



US GAAP versus IFRS Accounting Standards

The basics

January 2026



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Introduction

There are two global scale frameworks of financial reporting: US GAAP, as promulgated by the Financial Accounting Standards Board (FASB), and IFRS® Accounting Standards, as promulgated by the International Accounting Standards Board (IASB) (collectively, the Boards).

In this publication, we provide an overview, by accounting area, of the similarities and differences between US GAAP and IFRS Accounting Standards. We believe that any discussion of this topic should not lose sight of the fact that the two sets of standards generally have more similarities than differences for most common transactions, with IFRS Accounting Standards being largely grounded in the same basic principles as US GAAP. The general principles and conceptual framework are often the same or similar in both sets of standards and lead to similar accounting results. The existence of any differences – and their materiality to an entity's financial statements – depends on a variety of factors, including the nature of the entity, the details of the transactions, the interpretation of the more general principles of IFRS Accounting Standards, industry practices and accounting policy elections where US GAAP and IFRS Accounting Standards offer a choice. This publication focuses on accounting differences most commonly found in current practice and generally does not discuss disclosure-only differences.

Key updates

Our analysis generally reflects guidance effective in 2025 and finalized by the FASB and the IASB as of 30 June 2025. We also remove consideration of superseded standards when they are no longer applicable to most entities.

Our analysis generally does not include guidance related to IFRS for Small and Medium-Sized Entities (SMEs) or Private Company Council alternatives that are embedded within US GAAP. Further, this publication does not include discussion of any potential differences related to the IASB's issuance of IFRS 18 *Presentation and Disclosure in Financial Statements*, which supersedes International Accounting Standards (IAS) 1 *Presentation of Financial Statements*. An entity is not required to apply IFRS 18 until annual reporting periods beginning on or after 1 January 2027.

We will continue to update this publication periodically for new developments.

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Our US GAAP/IFRS Accounting Standards Differences Identifier Tool (DIT) publication provides a more in-depth review of accounting differences between US GAAP and IFRS Accounting Standards generally as of 30 June 2025. The DIT was developed as a resource for entities that need to identify some of the more common accounting differences between US GAAP and IFRS Accounting Standards that may affect an entity's financial statements when converting from US GAAP to IFRS Accounting Standards (or vice versa). To learn more about the DIT, please contact your local EY professional.

Ernst & Young LLP

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Financial statement presentation

Similarities

There are many similarities in US GAAP and IFRS Accounting Standards on financial statement presentation. Under both sets of standards, the components of a complete set of financial statements include a statement of financial position (balance sheet), a statement of profit or loss (income statement) and of other comprehensive income (OCI) (in either a single continuous statement of comprehensive income or two consecutive statements), a statement of cash flows and accompanying notes to the financial statements. Both US GAAP and IFRS Accounting Standards also require the changes in stockholders' or shareholders' equity to be presented. However, US GAAP allows the

changes in shareholders' equity to be presented in the notes to the financial statements, while IFRS Accounting Standards require the changes in shareholders' equity to be presented as a separate statement. Further, both require that the financial statements be prepared on the accrual basis of accounting, with the exception of the cash flow statement and rare circumstances (e.g., when the liquidation basis of accounting is appropriate). IFRS Accounting Standards and the conceptual framework in US GAAP have similar concepts regarding materiality and consistency that entities must consider in preparing their financial statements. Differences between the two sets of standards tend to arise due to the level of specific guidance provided.

Significant differences

	US GAAP	IFRS Accounting Standards
Financial periods required	Generally, comparative financial statements are presented although not required. Public entities must follow Securities and Exchange Commission (SEC) rules, which typically require balance sheets for the two most recent years, while all other statements must cover the three-year period ended on the balance sheet date.	Comparative information must be disclosed with respect to the previous period for all amounts reported in the current period's financial statements.
Layout of balance sheet and income statement	There is no general requirement within US GAAP to prepare the balance sheet and income statement in accordance with a specific layout. However, public entities must follow the detailed requirements in SEC Regulation S-X.	IFRS Accounting Standards do not prescribe a standard layout but includes a list of minimum line items. These minimum line items are less prescriptive than the requirements in SEC Regulation S-X.
Balance sheet – presentation of short-term loans (i.e., borrowings) refinanced with long-term loans after balance sheet date	Short-term loans are classified as noncurrent if the entity intends to refinance the loan on a long-term basis and, prior to issuing the financial statements, the entity can demonstrate an ability to refinance the loan by meeting specific criteria.	Short-term loans refinanced after the balance sheet date cannot be reclassified to long-term liabilities. However, short-term loans that the entity has the right to refinance for at least 12 months after the balance sheet date under an existing loan facility are classified as noncurrent.
Balance sheet – presentation of debt as current versus noncurrent	Debt for which there has been a covenant violation may be presented as noncurrent if a lender agreement to waive the right to demand repayment for more than one year exists before the financial statements are issued or available to be issued or it is probable that the covenant violation will be cured within the grace period specified in the lender agreement.	Debt associated with a covenant violation must be presented as current unless the lender agreement was reached prior to the balance sheet date.

	US GAAP	IFRS Accounting Standards
Income statement – classification of expenses	There is no general requirement within US GAAP to classify income statement items by function or nature. However, SEC registrants are required to present expenses in specific line items that are based on function (e.g., cost of sales).	Entities may present expenses based on either function or nature (e.g., salaries, depreciation). However, if function is selected, certain disclosures about the nature of expenses must be included in the notes.
Income statement – discontinued operations criteria	Discontinued operations classification is for components that are held for sale or disposed of and represent a strategic shift that has (or will have) a major effect on an entity's operations and financial results. An acquired business or nonprofit activity that, on acquisition or upon formation of a joint venture, is classified as held for sale also qualifies for reporting as a discontinued operation.	Discontinued operations classification is for components that have been disposed of or are classified as held for sale, and the component (1) represents a separate major line of business or geographical area of operations, (2) is part of a single coordinated plan to dispose of a separate major line of business or geographical area of operations or (3) is a subsidiary acquired exclusively with a view to resale.
Statement of cash flows – restricted cash	Changes in amounts generally described as restricted cash and restricted cash equivalents are shown in the statement of cash flows. In addition, when cash, cash equivalents, amounts generally described as restricted cash, and restricted cash equivalents are presented in more than one line item on the balance sheet, entities are required to reconcile the totals in the statement of cash flows to the related captions in the balance sheet. This reconciliation can be presented either on the face of the statement of cash flows or in the notes to the financial statements.	IFRS Accounting Standards do not address the presentation of changes in amounts generally described as restricted cash and restricted cash equivalents in the statement of cash flows. However, entities should make sure that only funds that meet the definition of cash or cash equivalents are presented as cash and cash equivalents in the statement of cash flows.
Disclosure of performance measures	There is no general requirement within US GAAP that addresses the presentation of specific performance measures. SEC regulations define certain key measures and require the presentation of certain headings and subtotals. Additionally, public entities are prohibited from disclosing non-GAAP measures in the financial statements and accompanying notes.	IFRS Accounting Standards require the presentation of additional line items, headings and subtotals in the statement of comprehensive income when such presentation is relevant to an understanding of the entity's financial performance. IFRS Accounting Standards have requirements on how the subtotals should be presented when they are provided.
Third balance sheet	Not required.	A third balance sheet is required as of the beginning of the earliest comparative period when there is a retrospective application of a new accounting policy or a retrospective restatement or reclassification that has a material effect on the balances of the third balance sheet. Related notes to the third balance sheet are not required. A third balance sheet is also required in the year an entity first applies IFRS Accounting Standards.

Standard setting activities

Primary financial statements

In November 2024, the FASB issued Accounting Standards Update (ASU) 2024-03, *Income Statement – Reporting Comprehensive Income – Expense Disaggregation Disclosures (Subtopic 220-40): Disaggregation of Income Statement Expenses*. The ASU does not change what a public business entity (PBE) presents on the face of its income statement, but requires a PBE to disclose, on an annual and interim basis, disaggregated information about certain income statement expense line items. A PBE is required to apply this guidance for fiscal years beginning after 15 December 2026, and interim periods within fiscal years beginning after 15 December 2027. Early adoption is permitted.

In April 2024, the IASB issued IFRS 18 *Presentation and Disclosure in Financial Statements*, which supersedes IAS 1 *Presentation of Financial Statements*. An entity is required to apply this standard for annual reporting periods beginning on or after 1 January 2027. Early adoption is permitted. The guidance in IFRS 18 contains a number of sections brought forward from IAS 1, with limited wording changes. However, IFRS 18 introduces new requirements on presentation within the statement of profit or loss, including specified totals and subtotals, disclosure of management-defined performance measures, and requirements for aggregation and disaggregation of financial information based on the identified 'roles' of the primary financial statements and the notes. It also includes narrow-scope consequential amendments to IAS 7 *Statement of Cash Flow*, IAS 33 *Earnings per Share* and IAS 34 *Interim Financial Reporting*.¹

Financial instruments with characteristics of equity

In November 2023, the IASB published an Exposure Draft, *Financial Instruments with Characteristics of Equity*, that would amend IAS 32 *Financial Instruments: Presentation*, IFRS 7 *Financial Instruments: Disclosures* and IAS 1 to address practice issues that arise when applying IAS 32 and to expand the disclosure requirements relating to financial instruments issued by an entity. The IASB expects to issue final amendments in 2026. Readers should monitor this project for developments.

¹ For further information on IFRS 18, please see Chapter 4 of International GAAP, *Presentation and Disclosures in Financial Statements – IFRS 18 and 19*.

Interim financial reporting

Similarities

Accounting Standards Codification (ASC) 270, *Interim Reporting* (including ASC 740-270, *Income Taxes – Interim Reporting*), and IAS 34 *Interim Financial Reporting* are substantially similar except for the treatment of certain costs described below. Both require an entity to apply the accounting policies that were in effect in the prior annual period, subject to the adoption of new policies that are disclosed. Both standards provide similar minimum

disclosure requirements when entities prepare condensed interim financial statements. Under both US GAAP and IFRS Accounting Standards, income taxes are accounted for based on an estimated average annual effective tax rates. Neither standard requires entities to present interim financial information. That is the purview of securities regulators such as the SEC, which requires US public entities to comply with Regulation S-X.

Significant differences

	US GAAP	IFRS Accounting Standards
Treatment of certain costs in interim periods	Each interim period is viewed as an integral part of an annual period. As a result, certain costs that benefit more than one interim period may be allocated among those periods, resulting in deferral or accrual of certain costs.	Each interim period is viewed as a discrete reporting period. A cost that does not meet the definition of an asset at the end of an interim period is not deferred, and a liability recognized at an interim reporting date must represent an existing obligation.

Standard setting activities

In December 2025, the FASB issued ASU 2025-11, *Interim Reporting (Topic 270): Narrow-Scope Improvements*, which clarifies the current interim disclosure requirements and the applicability of ASC 270. The ASU creates a comprehensive list of interim disclosures required under US GAAP and incorporates a disclosure principle that requires disclosures at interim periods when an event or change that has a material effect on an entity has occurred since the previous year end. The guidance is effective for all PBEs for interim periods within fiscal years beginning after 15 December 2027, and for all other entities for interim reporting periods within fiscal years beginning after 15 December 2028. Early adoption is permitted.

Consolidation, joint venture accounting and equity method investees/associates

Similarities

ASC 810, *Consolidation*, contains the main guidance for consolidation of financial statements, including variable interest entities (VIEs), under US GAAP. IFRS 10 *Consolidated Financial Statements* contains the IFRS Accounting Standards guidance.

Under both ASC 810 and IFRS 10, the determination of whether entities are consolidated by a reporting entity is based on control, although there are differences in how control is defined. Generally, all entities subject to the control of the reporting entity must be consolidated (although there are limited exceptions in certain specialized industries).

An equity investment that gives an investor significant influence over an investee (referred to as “an associate” in IFRS Accounting Standards) is considered an equity method investment under both US GAAP (ASC 323, *Investments – Equity Method and Joint Ventures*) and IFRS Accounting Standards (IAS 28 *Investments in Associates and Joint Ventures*). An investor is generally presumed to have significant influence when it holds 20% or more of the voting interest in an investee. Further, the equity method of accounting for such investments generally is consistent under ASC 323 and IAS 28.

The characteristics of a joint venture in ASC 323 and IFRS 11 *Joint Arrangements* are similar, but certain differences exist. Both US GAAP and IFRS Accounting Standards also generally require investors to apply the equity method when accounting for their interests in joint ventures.

Significant differences

	US GAAP	IFRS Accounting Standards
Consolidation model	<p>ASC 810 provides for primarily two consolidation models (i.e., Variable Interest Model and Voting Model). The Variable Interest Model evaluates control based on determining which party has power and benefits. The Voting Model evaluates control based on existing voting interests (or kick-out rights for limited partnerships and similar entities). All entities are first evaluated as potential VIEs. If an entity is not a VIE, it is evaluated for control pursuant to the Voting Model.</p> <p>Potential voting rights are generally not included in either evaluation. The notion of “de facto control” is not considered.</p>	<p>IFRS 10 provides a single control model for all entities, including structured entities (the definition of a structured entity under IFRS 12 <i>Disclosure of Interests in Other Entities</i> is similar to the definition of a VIE in US GAAP). An investor controls an investee when it is exposed or has rights to variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee.</p> <p>Potential voting rights are considered. The notion of “de facto control” is also considered.</p>
Preparation of consolidated financial statements – general	<p>Consolidated financial statements are required, although certain industry-specific exceptions exist (e.g., investment companies).</p>	<p>Consolidated financial statements are required, although certain industry-specific exceptions exist (e.g., investment entities), and there is a limited exemption from preparing consolidated financial statements for a parent entity that is itself a wholly-owned or partially-owned subsidiary, if certain conditions are met.</p>

	US GAAP	IFRS Accounting Standards
Preparation of consolidated financial statements – investment companies	<p>Investment companies generally do not consolidate entities that might otherwise require consolidation (e.g., majority-owned corporations). Instead, equity investments in these entities are reflected at fair value through profit or loss.</p> <p>A non-investment company parent of an investment company is required to retain the investment company subsidiary's fair value accounting in the parent's consolidated financial statements.</p> <p>US GAAP does not address whether an investment company parent should consolidate another investment company that it controls.</p>	<p>Investment entities generally do not consolidate entities that might otherwise require consolidation (e.g., majority-owned corporations). Instead, these investments are reflected at fair value through profit or loss.</p> <p>A parent of an investment entity consolidates all entities that it controls, including those controlled through an investment entity subsidiary (i.e., it does not retain the investment entity subsidiary's fair value accounting in its consolidated financial statements), unless the parent itself is an investment entity.</p>
Preparation of consolidated financial statements – different reporting dates of parent and subsidiaries	<p>The reporting entity and the consolidated entities are permitted to have differences in year ends of up to three months.</p> <p>The effects of significant events occurring between the reporting dates of the reporting entity and the controlled entities are disclosed in the financial statements.</p>	<p>The financial statements of a parent and its consolidated subsidiaries are prepared as of the same date. When the parent and the subsidiary have different reporting period-end dates, the subsidiary prepares (for consolidation purposes) additional financial information as of the same date as those of the parent, unless it is impracticable.</p> <p>If it is impracticable, when the difference in the reporting period-end dates of the parent and subsidiary is three months or less, the financial statements of the subsidiary are adjusted to reflect significant transactions and events.</p>
Uniform accounting policies	Uniform accounting policies between parent and subsidiaries are not required.	Uniform accounting policies between parent and subsidiaries are required.
Changes in ownership interest in a subsidiary without loss of control	<p>Transactions that result in decreases in the ownership interest of a subsidiary without a loss of control are accounted for as equity transactions in the consolidated entity (i.e., no gain or loss is recognized) when (1) the subsidiary is a business or nonprofit activity (except in a conveyance of oil and gas mineral rights or a transfer of a good or service in a contract with a customer in the scope of ASC 606, <i>Revenue from Contracts with Customers</i>) or (2) the subsidiary is not a business or nonprofit activity, but the substance of the transaction is not addressed directly by other ASC Topics.</p>	<p>Consistent with US GAAP, except that this guidance applies to all subsidiaries, including those that are not businesses or nonprofit activities and those that involve the conveyance of oil and gas mineral rights.</p>

	US GAAP	IFRS Accounting Standards
Loss of control of a subsidiary	<p>For certain transactions that result in a loss of control of a subsidiary, any retained noncontrolling investment in the former subsidiary is remeasured to fair value on the date the control is lost, with the gain or loss included in income along with any gain or loss on the ownership interest sold.</p> <p>This accounting applies to the following transactions: (1) loss of control of a subsidiary that is a business or nonprofit activity (except for a conveyance of oil and gas mineral rights or a transfer of a good or service in a contract with a customer in the scope of ASC 606) and (2) loss of control of a subsidiary that is not a business or nonprofit activity if the substance of the transaction is not addressed directly by other ASC Topics.</p>	<p>Consistent with US GAAP, except that this guidance applies to all subsidiaries, including those that are not businesses or nonprofit activities and those that involve conveyance of oil and gas mineral rights.</p> <p>Whether an entity needs to apply IFRS 10 or IFRS 15 <i>Revenue from Contracts with Customers</i> to the sale or transfer of interests in a separate entity (i.e., sale of a corporate wrapper) to a customer depends on facts and circumstances and may require significant judgment.</p> <p>In addition, recognition of a full or partial gain or loss resulting from the loss of control of a subsidiary in a transaction involving an associate or a joint venture that is accounted for using the equity method depends on whether the subsidiary constitutes a business and whether the entity has adopted <i>Sale or Contribution of Assets between an Investor and its Associate or Joint Venture (Amendments to IFRS 10 and IAS 28)</i>.²</p>
Loss of control of a group of assets that meet the definition of a business	<p>For certain transactions that result in a loss of control of a group of assets that meet the definition of a business or nonprofit activity, any retained noncontrolling investment in the former group of assets is remeasured to fair value on the date control is lost, with the gain or loss included in income along with any gain or loss on the ownership interest sold. There are two exceptions: a conveyance of oil and gas mineral rights and a transfer of a good or service in a contract with a customer within the scope of ASC 606.</p>	<p>IFRS 10 does not address the derecognition of a group of assets (i.e., not a legal entity) that constitute a business or nonprofit activities outside the loss of control of a subsidiary.</p>

² *Sale or Contribution of Assets between an Investor and its Associate or Joint Venture (Amendments to IFRS 10 and IAS 28)* was issued by the IASB in September 2014. In December 2015, the IASB indefinitely deferred the effective date of this amendment. However, early adoption of this amendment is still available.

	US GAAP	IFRS Accounting Standards
Equity method investments	<p>When determining significant influence, potential voting rights are generally not considered.</p> <p>When an investor in a limited partnership, limited liability company (LLC), trust or similar entity with specific ownership accounts has an interest greater than 3% to 5% in an investee, normally it accounts for its investment using the equity method.</p> <p>ASC 825-10, <i>Financial Instruments</i>, gives entities the option to account for certain equity method investments at fair value. If management does not elect to use the fair value option, the equity method of accounting is required.</p> <p>Conforming accounting policies between investor and investee is generally not required as long as the equity method investee's financial statements are prepared in accordance with US GAAP.</p>	<p>When determining significant influence, potential voting rights are considered if currently exercisable.</p> <p>When an investor has an investment in a limited partnership, LLC, trust or similar entity, the determination of significant influence is made using the same general principle of significant influence that is used for all other investments.</p> <p>Investments in associates held by venture capital organizations, mutual funds, unit trusts and similar entities are exempt from using the equity method, and the investor may elect to measure their investments in associates at fair value in accordance with IFRS 9 <i>Financial Instruments</i>.</p> <p>Uniform accounting policies between investor and investee are required.</p>
Joint ventures	<p>Joint ventures are defined as entities whose operations and activities are jointly controlled by their equity investors and have certain other characteristics. The purpose of the entity should be consistent with the definition of a joint venture.</p> <p>Joint control is not defined, but it is commonly interpreted to exist when all of the equity investors unanimously consent to each of the significant decisions of the entity.</p> <p>An entity can be a joint venture, regardless of the rights and obligations the parties sharing joint control have with respect to the entity's underlying assets and liabilities. The investors generally account for their interests in joint ventures using the equity method of accounting. They also can elect to account for their interests at fair value.</p> <p>Proportionate consolidation may be permitted to account for interests in unincorporated entities in certain limited industries (i.e., in the construction and extractive industries) and certain undivided interests.</p>	<p>Joint ventures are separate vehicles in which the parties that have joint control of the separate vehicle have rights to the net assets. In contrast with US GAAP, an entity can qualify as a joint venture if certain parties participate in decision-making through a means other than equity.</p> <p>Joint control is defined as existing when two or more parties must unanimously consent to each of the significant decisions of the entity.</p> <p>In a joint venture, the parties cannot have direct rights and obligations with respect to the underlying assets and liabilities of the entity. The investors generally account for their interests in joint ventures using the equity method of accounting. Investments in associates held by venture capital organizations, mutual funds, unit trusts and similar entities are exempt from using the equity method and the investor may elect to measure its investment at fair value.</p> <p>Proportionate consolidation is not permitted, regardless of industry. However, when a joint arrangement meets the definition of a joint operation instead of a joint venture under IFRS Accounting Standards, an investor would recognize its share of the entity's assets, liabilities, revenues and expenses and not apply the equity method.</p>

	US GAAP	IFRS Accounting Standards
Joint venture formations	ASC 805-60, <i>Business Combinations – Joint Venture Formations</i> , requires newly formed joint ventures to apply a new basis of accounting. Consequently, these joint ventures must initially measure their assets and liabilities at fair value, except for certain items that follow specific exceptions consistent with the guidance for business combinations. The fair value measurement includes expected synergies to be achieved upon consummation of the formation, including any synergies among the businesses contributed by the investors.	IFRS Accounting Standards do not address the accounting by a joint venture upon its formation.

Standard setting activities

In September 2024, the IASB issued an Exposure Draft, *Equity Method*, to address application questions in applying the equity method of accounting under IAS 28. The exposure draft also proposes new disclosure requirements to IFRS 12 and IAS 27 *Separate Financial Statements*. Readers should monitor this project for developments.

In August 2023, the FASB issued ASU 2023-05, *Business Combinations – Joint Venture Formations (Subtopic 805-60): Recognition and Initial Measurement*, which created ASC 805-60. This guidance requires certain joint ventures to apply a new basis of accounting upon formation by recognizing and initially measuring most of their assets and liabilities at fair value. The ASU applies to joint ventures that meet the definition in ASC 323, except those that may be proportionately consolidated by one or more investors and those that are not-for-profit entities or collaborative arrangements in the scope of ASC 808, *Collaborative Arrangements*. The ASU does not amend the definition of a joint venture or change the accounting by the investors in a joint venture. The ASU was effective for all joint ventures with a formation date on or after 1 January 2025.

In April 2022, the FASB chair added a project, *Consolidation for Business Entities*, to the FASB research agenda. This research project will explore whether a single consolidation model could be developed for business entities.

Business combinations

Similarities

The principal guidance for business combinations in US GAAP and IFRS Accounting Standards is largely converged. Under ASC 805, *Business Combinations*, and IFRS 3 *Business Combinations*, respectively, all business combinations are accounted for using the acquisition method. Under the acquisition method, upon obtaining control of another entity,

the underlying transaction should be measured at fair value, and this should be the basis on which the assets, liabilities and noncontrolling interests of the acquired entity are measured, with limited exceptions. Even though the standards are substantially converged, certain differences remain.

Significant differences

	US GAAP	IFRS Accounting Standards
Definition of a business	<p><i>Mandatory threshold test</i></p> <p>An entity must first evaluate whether substantially all of the fair value of the gross assets acquired is concentrated in a single identifiable asset or group of similar identifiable assets. If that threshold is met, the set is not a business and does not require further evaluation. Gross assets acquired should exclude cash and cash equivalents, deferred tax assets and any goodwill that would be created in a business combination from the recognition of deferred tax liabilities. If that threshold is not met, the entity must further evaluate whether it meets the definition of a business.</p>	<p><i>Optional threshold test</i></p> <p>An entity may elect to apply the threshold test on a transaction-by-transaction basis. If an entity elects to apply the threshold test, it first evaluates whether substantially all of the fair value of the gross assets acquired is concentrated in a single identifiable asset or group of similar identifiable assets. If that threshold is met, the set is not a business and does not require further evaluation. Gross assets acquired should exclude cash and cash equivalents, deferred tax assets and any goodwill that would be created in a business combination from the recognition of deferred tax liabilities. If that threshold is not met or if the entity elects to not apply the test, the entity must evaluate whether it meets the definition of a business.</p>
Assets and liabilities arising from pre-acquisition contingencies	<p><i>Initial recognition and measurement</i></p> <p>Assets and liabilities arising from pre-acquisition contingencies are recognized at fair value if the fair value can be determined during the measurement period. Otherwise, those assets or liabilities are recognized at the acquisition date in accordance with ASC 450, <i>Contingencies</i>, if those criteria for recognition are met.</p>	<p><i>Initial recognition and measurement</i></p> <p>Generally, liabilities subject to pre-acquisition contingencies are recognized as of the acquisition date if there is a present obligation that arises from past events and its fair value can be measured reliably, even if it is not probable that an outflow of resources will be required to settle the obligation. However, IFRS 3 has an exception to the recognition principle that requires an acquirer to apply IAS 37 <i>Provisions, Contingent Liabilities and Contingent Assets</i> and International Financial Reporting Interpretations Committee (IFRIC) 21 <i>Levies</i> to identify the contingent liabilities it has assumed in a business combination (if those contingent liabilities would be in the scope of IAS 37 or IFRIC 21 if incurred separately). If the fair value cannot be measured reliably, the contingent liability is not recognized. Contingent assets are not recognized.</p>

	US GAAP	IFRS Accounting Standards
	<p><i>Subsequent measurement</i></p> <p>If contingent assets and liabilities are initially recognized at fair value, an acquirer should develop a systematic and rational basis for subsequently measuring and accounting for those assets and liabilities depending on their nature.</p> <p>If amounts are initially recognized and measured in accordance with ASC 450, the subsequent accounting and measurement should be based on that guidance.</p>	<p><i>Subsequent measurement</i></p> <p>Liabilities subject to contingencies are subsequently measured at the higher of (1) the amount that would be recognized in accordance with IAS 37 or (2) the amount initially recognized less, if appropriate, the cumulative amount of income recognized in accordance with the principles of IFRS 15.</p>
Acquiree's operating leases as a lessor	An underlying asset subject to an operating lease is initially measured at its acquisition-date fair value. Separately, if the terms of an acquiree's operating lease are favorable or unfavorable relative to market terms, the acquirer recognizes an intangible asset or liability separately from the leased asset, respectively.	To avoid any inconsistency with the fair value model in IAS 40 <i>Investment Property</i> , which requires the fair value of investment property to take into account rental income from current leases, the terms of the operating lease are taken into account in estimating the acquisition-date fair value of the asset subject to the lease. Accordingly, an intangible asset or liability is not recognized separately from the leased asset if the terms of an operating lease are favorable or unfavorable compared to market terms. This would create an additional difference as an entity would be required to adjust the depreciation or amortization method of the leased asset to reflect the timing of the cash flows attributable to the underlying leases.
Initial recognition and measurement of contract assets and contract liabilities	Contract assets and contract liabilities from contracts with customers acquired or assumed in a business combination are recognized and measured in accordance with ASC 606. This also applies to other acquired contracts in which the provisions of ASC 606 apply.	Contract assets acquired and contract liabilities assumed are measured at fair value.
Measurement of noncontrolling interest	Noncontrolling interest is measured at fair value.	Noncontrolling interest components that are present ownership interests and entitle their holders to a proportionate share of the acquiree's net assets in the event of liquidation may be measured at (1) fair value or (2) the noncontrolling interest's proportionate share of the fair value of the acquiree's identifiable net assets. All other components of noncontrolling interest are measured at fair value unless another measurement basis is required by IFRS Accounting Standards. The choice is available on a transaction-by-transaction basis.

	US GAAP	IFRS Accounting Standards
Adjustments to provisional amounts within the measurement period	An acquirer recognizes measurement period adjustments during the period in which it determines the amounts, including the effect on earnings of any amounts it would have recorded in previous periods if the accounting had been completed at the acquisition date.	An acquirer recognizes measurement period adjustments on a retrospective basis. The acquirer revises comparative information for any prior periods presented, including revisions for any effects on the prior-period income statement.
Combination of entities under common control	The receiving entity records the net assets at their carrying amounts in the accounts of the transferor (historical cost).	The combination of entities under common control is outside the scope of IFRS 3. In practice, entities either follow an approach similar to US GAAP (historical cost) or apply the acquisition method (fair value) if there is substance to the transaction (policy election).
Pushdown accounting	An acquired entity can choose to apply pushdown accounting in its separate financial statements when an acquirer obtains control of it or later. However, an entity's election to apply pushdown accounting is irrevocable.	IFRS Accounting Standards do not address whether pushdown accounting is acceptable. However, the general view is that entities may not use the hierarchy in IAS 8 <i>Accounting Policies, Changes in Accounting Estimates and Errors</i> to refer to US GAAP and apply pushdown accounting in the separate financial statements of an acquired subsidiary because the application of pushdown accounting will result in the recognition and measurement of assets and liabilities in a manner that conflicts with certain IFRS Accounting Standards and interpretations. For example, the application of pushdown accounting generally will result in the recognition of internally generated goodwill and other internally generated intangible assets at the subsidiary level, which conflicts with the guidance in IAS 38 <i>Intangible Assets</i> .

Other differences may arise due to different accounting requirements of other existing US GAAP and IFRS Accounting Standards literature (e.g., replacement of share-based payment awards, initial classification of contingent consideration and subsequent measurement of contingent consideration).

Standard setting activities

In May 2025, the FASB issued ASU 2025-03, *Business Combinations (Topic 805) and Consolidation (Topic 810): Determining the Accounting Acquirer in the Acquisition of a Variable Interest Entity*. This ASU requires that an entity consider existing factors in ASC 805-10-55-12 through 55-15 when identifying the accounting acquirer in an acquisition achieved primarily through an exchange of equity interests in which the legal acquiree is a VIE that meets the definition

of a business. The ASU is effective for all entities for fiscal years beginning after 15 December 2026, and interim periods within those fiscal years. Entities are required to apply the guidance prospectively to all acquisitions that occur on or after the effective date. Early adoption is permitted.

Inventory

Similarities

ASC 330, *Inventory*, and IAS 2 *Inventories* are based on the principle that the primary basis of accounting for inventory is cost. Both standards define inventory as assets held for sale in the ordinary course of business, in the process of production for such sale or to be consumed in the production of goods or services. The permitted techniques

for cost measurement, such as the retail inventory method (RIM), are similar under both US GAAP and IFRS Accounting Standards. Further, under both sets of standards, the cost of inventory includes all direct expenditures to ready inventory for sale, including allocable overhead, while selling costs are excluded from the cost of inventories, as are most storage costs and general and administrative costs.

Significant differences

	US GAAP	IFRS Accounting Standards
Costing methods	Last-in, first-out (LIFO) is an acceptable method. A consistent cost formula for all inventories similar in nature or use is not explicitly required.	LIFO is prohibited. The same cost formula must be applied to all inventories similar in nature or use to the entity.
Measurement	<p>Inventory other than that accounted for under LIFO or RIM is carried at the lower of cost and net realizable value (NRV). NRV is the estimated selling price in the ordinary course of business less reasonably predictable costs of completion, disposal and transportation.</p> <p>LIFO and RIM are carried at the lower of cost or market. Market is defined as current replacement cost, but not greater than NRV (estimated selling price less reasonably predictable costs of completion, disposal and transportation) and not less than NRV reduced by an allowance for an approximately normal profit margin.</p>	Inventory is carried at the lower of cost and NRV under all permitted methods. NRV is defined as the estimated selling price in the ordinary course of business, less the estimated costs of completion and the estimated costs necessary to make the sale.
Reversal of inventory write-downs	Any write-downs of inventory below cost create a new cost basis that subsequently cannot be reversed, unless there is a recovery in value during the same fiscal year that the write-down occurred.	The amount of write-down is reversed (limited to the amount of the original write-down) when the reasons for the write-down no longer exist.
Permanent inventory markdowns under RIM	Permanent markdowns do not affect the gross margins used in applying RIM. Rather, such markdowns reduce the carrying cost of inventory to NRV, less an allowance for an approximately normal profit margin, which may be less than both original cost and NRV.	Permanent markdowns affect the average gross margin used in applying RIM. Reduction of the carrying amount of inventory should be to the lower of cost and NRV.

	US GAAP	IFRS Accounting Standards
Capitalization of pension costs	The service cost component of net periodic pension cost and net periodic postretirement benefit cost are the only components directly arising from employees' services provided in the current period. Therefore, when it is appropriate to capitalize employee compensation in connection with the construction or production of an asset, the service cost component applicable to the pertinent employees for the period are the relevant amounts to be considered for capitalization.	Any post-employment benefit costs included in the cost of inventory include the appropriate proportion of the components of defined benefit cost (i.e., service cost, net interest on the net defined benefit liability (asset) and remeasurements of the net defined benefit liability (asset)).

Standard setting activities

There is no significant standard setting activity in this area.

Long-lived assets

Similarities

ASC 360, *Property, Plant, and Equipment*, serves as the primary guidance for property, plant and equipment (PP&E) under US GAAP. The definition of PP&E under US GAAP is similar to that in IAS 16 *Property, Plant and Equipment*, which addresses tangible assets that are held for use in more than one reporting period. Other concepts that are similar include the following:

Recognition

Both accounting models have similar recognition criteria, requiring that costs be included in the cost of the asset if the future economic benefits are probable and can be reliably measured. Neither model allows the capitalization of startup costs, general administrative and overhead costs or regular maintenance. Both US GAAP and IFRS Accounting Standards require that the costs of dismantling an asset and restoring its site of use (i.e., the costs of asset retirement under ASC 410-20, *Asset Retirement and Environmental Obligations – Asset Retirement Obligations*, or IAS 37) be included in the cost of the asset when there is a legal obligation, but IFRS Accounting Standards require a provision in other circumstances as well.

Borrowing costs

ASC 835-20, *Interest – Capitalization of Interest*, and IAS 23 *Borrowing Costs*, require the capitalization of borrowing costs (e.g., interest costs) directly attributable to the

acquisition, construction or production of a qualifying asset. Qualifying assets are generally defined similarly under both accounting models. However, there are differences between US GAAP and IFRS Accounting Standards in the measurement of eligible borrowing costs for capitalization.

Depreciation

Depreciation of long-lived assets is required on a systematic basis under both accounting models. ASC 250, *Accounting Changes and Error Corrections*, and IAS 8 both treat changes in depreciation method, residual value and useful economic life as a change in accounting estimate requiring prospective treatment.

Assets held for sale

Assets held-for-sale criteria are similar in the *Impairment or Disposal of Long-Lived Assets* subsections of ASC 360-10 (and in ASC 205-20, *Presentation of Financial Statements – Discontinued Operations*) and IFRS 5 *Non-current Assets Held for Sale and Discontinued Operations*. Under both standards, the asset (or asset group) is measured at the lower of its carrying amount or fair value less costs to sell, the asset (or asset group) is not depreciated, and it is presented separately on the face of the balance sheet. Exchanges of nonmonetary similar productive assets are also treated similarly under ASC 845, *Nonmonetary Transactions*, and IAS 16, both of which allow gain or loss recognition if the exchange has commercial substance and the fair value of the exchange can be reliably measured.

Significant differences

	US GAAP	IFRS Accounting Standards
Revaluation of assets	Revaluation is not permitted.	Revaluation is a permitted accounting policy election for an entire class of assets, requiring revaluation to fair value on a regular basis.
Depreciation of asset components	Component depreciation is permitted, but it is not common.	Component depreciation is required if components of an asset have differing patterns of benefit.
Measurement of borrowing costs	Eligible borrowing costs do not include exchange rate differences. For borrowings associated with a specific qualifying asset, borrowing costs equal to the average accumulated expenditures times the borrowing rate are capitalized. Interest earned on the investment of borrowed funds generally cannot offset interest costs incurred during the period.	Eligible borrowing costs include exchange rate differences from foreign currency borrowings to the extent that they are regarded as an adjustment to interest costs. For borrowings associated with a specific qualifying asset, actual borrowing costs are capitalized and offset by investment income earned on those borrowings.

	US GAAP	IFRS Accounting Standards
Costs of a major overhaul	Although ASC 908, <i>Airlines</i> , provides guidance on airframe and engine overhauls for the airline industry, US GAAP does not provide guidance for other industries. As a result, repair and maintenance costs outside the scope of ASC 908 are generally expensed as incurred. ASC 908 permits the following accounting methods: (1) expensing overhaul costs as incurred, (2) capitalizing costs and amortizing through the date of the next overhaul or (3) following the built-in overhaul approach (i.e., an approach with certain similarities to composite depreciation).	Costs that represent a replacement of a previously identified component of an asset or costs of a major inspection are capitalized if the entity expects to use it during more than one period, future economic benefits are probable and the costs can be reliably measured. Otherwise, these costs are expensed as incurred. The carrying amount of the part that was replaced or any remaining carrying amount of the cost of a previous inspection should be written off.
Investment property	Investment property is not separately defined in US GAAP and, therefore, is accounted for as held and used or held for sale (like other PP&E).	Investment property is separately defined in IAS 40 <i>Investment Property</i> as property held to earn rent or for capital appreciation (or both) and may include property held by lessees as right-of-use assets. After initial recognition, investment property may be accounted for on a historical cost or fair value basis as an accounting policy election. IFRS 16 requires a lessee to measure right-of-use assets arising from leased property in accordance with the fair value model of IAS 40 if the leased property meets the definition of investment property and the lessee elects the fair value model in IAS 40 as an accounting policy. Investment property, if carried at fair value, is not depreciated, and changes in fair value are reflected in income.

Other differences include (1) hedging gains and losses related to the purchase of assets, (2) constructive obligations to retire assets and (3) the discount rate used to calculate asset retirement obligations.

Standard setting activities

There is no significant standard setting activity in this area.

Intangible assets

Similarities

Both US GAAP (ASC 805 and ASC 350, *Intangibles – Goodwill and Other*) and IFRS Accounting Standards (IFRS 3 and IAS 38) define intangible assets as nonmonetary assets without physical substance. The recognition criteria for both accounting models require that there be probable expected future economic benefits from costs that can be reliably measured, although some costs are never capitalized as intangible assets (e.g., startup costs). Goodwill is recognized only in a business combination. With the exception of development costs (addressed below), internally developed intangibles are not recognized as assets under either ASC 350 or IAS 38. Moreover, internal costs related to the research phase of research and development are expensed as incurred under both accounting models.

Amortization of finite-lived intangible assets over their estimated useful lives is required under both US GAAP and IFRS Accounting Standards, with one US GAAP minor exception in ASC 985-20, *Software – Costs of Software to Be Sold, Leased, or Marketed*, related to the amortization of computer software sold to others. In both sets of standards, if there is no foreseeable limit to the period over which an intangible asset is expected to generate net cash inflows to the entity, the useful life is considered to be indefinite and the asset is not amortized. Goodwill is not subject to amortization³ under either US GAAP or IFRS Accounting Standards.

Significant differences

	US GAAP	IFRS Accounting Standards
Development costs	<p>Development costs are expensed as incurred unless addressed by guidance in another ASC Topic. Development costs related to computer software developed for external use are capitalized once technological feasibility is established in accordance with specific criteria in ASC 985-20. In the case of software developed for internal use, only those costs incurred during the application development stage (as defined in ASC 350-40, <i>Intangibles – Goodwill and Other – Internal-Use Software</i>) may be capitalized.</p> <p>A customer in a hosting arrangement that is a service contract is required to apply ASC 350-40 to determine whether to capitalize implementation costs related to the arrangement or to expense them as incurred.</p>	<p>Development costs are capitalized when technical and economic feasibility of a project can be demonstrated in accordance with specific criteria, including demonstrating technical feasibility, intent to complete the asset and ability to sell the asset in the future. Although application of these principles may be largely consistent with ASC 985-20 and ASC 350-40, there is no separate guidance addressing computer software development costs.</p> <p>IFRS Accounting Standards do not address a customer's accounting for cloud computing arrangements or the costs to implement them. Therefore, an entity will need to apply judgment to account for these costs and may need to apply various IFRS Accounting Standards.</p>
Advertising costs	<p>Advertising and promotional costs are generally either expensed as incurred or expensed when the advertising takes place for the first time (policy choice), with limited exceptions.</p>	<p>Advertising and promotional costs are expensed as incurred. A prepayment may be recognized as an asset only when payment for the goods or services is made in advance of the entity having access to the goods or receiving the services.</p>

³ US GAAP includes an accounting alternative that allows private companies and not-for-profit entities to amortize goodwill acquired in a business combination or in an acquisition by a not-for-profit entity. IFRS Accounting Standards requires that apply IFRS Accounting Standards for SMEs are required to amortize goodwill.

	US GAAP	IFRS Accounting Standards
Revaluation	Revaluation is not permitted.	Revaluation to fair value of intangible assets other than goodwill is a permitted accounting policy election for a class of intangible assets. However, because revaluation requires reference to an active market for the specific type of intangible, this is relatively uncommon in practice.

Standard setting activities

In October 2025, the FASB issued ASU 2025-06, *Intangibles – Goodwill and Other – Internal-Use Software (Subtopic 350-40)*, which clarifies and modernizes the accounting for costs related to internal-use software. The guidance removes all references to project stages throughout ASC 350-40 and clarifies the threshold entities apply to begin capitalizing costs. The new guidance also specifies that the disclosures under ASC 360-10 are required for all software costs capitalized under ASC 350-40, regardless of how those costs are presented in the statement of financial position. All entities are required to apply this guidance for fiscal years beginning after 15 December 2027, and interim periods within those fiscal years. Early adoption is permitted.

In April 2024, the IASB added a project on intangible assets to its research agenda. This research project will seek to define the project’s scope and explore how best to stage work on this topic to produce timely improvements to IFRS Accounting Standards. Readers should monitor this project for developments.

Impairment of long-lived assets, goodwill and intangible assets

Similarities

Both US GAAP and IFRS Accounting Standards require a long-lived asset's recoverability to be tested if similarly defined indicators exist that it may be impaired. Both standards also require goodwill and intangible assets with indefinite useful lives to be tested at least annually for impairment and more frequently if impairment indicators are present. In addition, both US GAAP and IFRS Accounting

Standards require that an asset found to be impaired be written down and an impairment loss recognized. ASC 350, subsections of ASC 360-10 and IAS 36 *Impairment of Assets* apply to most long-lived and intangible assets, although some of the scope exceptions listed in the standards differ. Despite the similarity in overall objectives, differences exist in the way impairment is tested, recognized and measured.

Significant differences

	US GAAP	IFRS Accounting Standards
Method of determining impairment – long-lived assets	The two-step approach requires that a recoverability test be performed first (i.e., the carrying amount of the asset (asset group)) is compared with the sum of future undiscounted cash flows using entity-specific assumptions generated through use and eventual disposition). If it is determined that the asset is not recoverable, an impairment loss calculation is required.	The one-step approach requires that an impairment loss calculation be performed if impairment indicators exist.
Impairment loss calculation – long-lived assets	An impairment loss is the amount by which the carrying amount of the asset (asset group) exceeds its fair value using market participant assumptions, as calculated in accordance with ASC 820, <i>Fair Value Measurement</i> .	An impairment loss is the amount by which the carrying amount of the asset (or cash-generating unit (CGU)) exceeds its recoverable amount, which is the higher of (1) fair value less costs to sell and (2) value in use (the present value of future cash flows expected to be derived from the asset's use and eventual disposal at the end of its useful life).
Assignment of goodwill	Goodwill is assigned to a reporting unit, which is defined as an operating segment (as that term is used in ASC 280, <i>Segment Reporting</i>) or one level below an operating segment (component).	Goodwill is allocated to a CGU or group of CGUs that represents the lowest level within the entity at which the goodwill is monitored for internal management purposes and cannot be larger than an operating segment (before aggregation) as defined in IFRS 8 <i>Operating Segments</i> .
Method of determining impairment – goodwill	For the annual impairment test, an entity has the option to qualitatively assess whether it is more likely than not that the fair value of a reporting unit is less than its carrying amount before performing a quantitative impairment test. The entity performs a quantitative impairment test under the one-step approach at the reporting unit level by comparing the reporting unit's carrying amount with its fair value.	Qualitative assessment is not permitted. The one-step approach requires that an impairment test be done annually at the CGU level by comparing the CGU's carrying amount, including goodwill, with its recoverable amount.

	US GAAP	IFRS Accounting Standards
Impairment loss calculation – goodwill	The impairment loss is the amount by which the reporting unit's carrying amount exceeds the reporting unit's fair value. The impairment loss will be limited to the amount of goodwill allocated to that reporting unit.	The impairment loss on the CGU (the amount by which the CGU's carrying amount, including goodwill, exceeds its recoverable amount) is allocated first to reduce goodwill to zero, then, subject to certain limitations, the carrying amount of other assets in the CGU are reduced pro rata, based on the carrying amount of each asset.
Method of determining impairment – indefinite-lived intangibles	For the annual impairment test, entities have the option to qualitatively assess whether it is more likely than not that an indefinite-lived intangible asset is impaired. If a quantitative test is performed, the quantitative impairment test for an indefinite-lived intangible asset requires a comparison of the fair value of the asset with its carrying amount.	Qualitative assessment is not permitted for the annual impairment test. The one-step approach requires that an impairment test be done for each indefinite-lived intangible asset (or CGU to which it belongs) by comparing the asset's (or CGU's) carrying amount, including goodwill, with its recoverable amount.
Impairment loss calculation – indefinite-lived intangible assets	The amount by which the carrying amount of the asset exceeds its fair value.	The amount by which the carrying amount of the asset exceeds its recoverable amount if the impairment of the indefinite-lived intangible asset is tested for impairment separately. If the impairment test is performed at the CGU level, then the impairment loss is calculated as described in "Impairment loss calculation – goodwill" above.
Level of assessment – indefinite-lived intangible assets	Indefinite-lived intangible assets separately recognized should be assessed for impairment individually unless they operate in concert with other indefinite-lived intangible assets as a single asset (i.e., the indefinite-lived intangible assets are essentially inseparable). Indefinite-lived intangible assets may not be combined with other assets (e.g., finite-lived intangible assets or goodwill) for purposes of an impairment test.	If the indefinite-lived intangible asset does not generate cash inflows that are largely independent of those from other assets or groups of assets, then the indefinite-lived intangible asset should be tested for impairment as part of the CGU to which it belongs, unless certain conditions are met.
Reversal of loss	Reversal of impairment losses is not permitted (except for assets held for sale).	Prohibited for goodwill. Other assets must be reviewed at the end of each reporting period for reversal indicators. If appropriate, loss should be reversed up to the newly estimated recoverable amount, not to exceed the initial carrying amount adjusted for amortization or depreciation.

Standard setting activities

In March 2024, the IASB issued an Exposure Draft, *Business Combinations – Disclosures, Goodwill and Impairment*, which includes proposed targeted changes to the IAS 36 impairment test. Readers should monitor this project for developments.

Financial instruments

Similarities

The US GAAP guidance for financial instruments is located in numerous ASC Topics, including ASC 310, *Receivables*; ASC 320, *Investments – Debt Securities*; ASC 321, *Investments – Equity Securities*; ASC 325-40, *Investments – Other, Beneficial Interests in Securitized Financial Assets*; ASC 326, *Financial Instruments – Credit Losses*; ASC 470, *Debt*; ASC 480, *Distinguishing Liabilities from Equity*; ASC 505, *Equity*; ASC 815, *Derivatives and Hedging*; ASC 825, *Financial Instruments*; ASC 860, *Transfers and Servicing*; and ASC 948, *Financial Services – Mortgage Banking*.

The guidance in IFRS Accounting Standards for financial instruments is limited to IAS 32, IFRS 9 and IFRS 7.

Both US GAAP and IFRS Accounting Standards (1) require financial instruments to be classified into specific categories to determine the measurement of those instruments, (2) clarify when financial instruments should be recognized or derecognized in financial statements, (3) generally require the recognition of derivatives on the balance sheet at fair value and (4) require detailed disclosures in the notes to the financial statements for the financial instruments reported in the balance sheet. Both sets of standards also allow hedge accounting and the use of a fair value option.

Significant differences

	US GAAP	IFRS Accounting Standards
<i>Liabilities and equity</i>		
Classification	<p>US GAAP identifies certain instruments with characteristics of both debt and equity that must be classified as liabilities.</p> <p>Certain other contracts that are indexed to, and potentially settled in, an entity's own stock may be classified as equity if they either (1) require physical settlement or net-share settlement or (2) give the issuer a choice of net-cash settlement or settlement in its own shares.</p>	<p>Classification of certain instruments with characteristics of both debt and equity is largely based on the contractual obligation to deliver cash, assets or an entity's own shares.</p> <p>Contracts that are indexed to, and potentially settled in, an entity's own stock are classified as equity if settled only by delivering a fixed number of shares for a fixed amount of cash.</p>
Compound (hybrid) financial instruments	<p>Compound (hybrid) financial instruments (e.g., convertible bonds) are not split into debt and equity components unless certain requirements are met, but they may be bifurcated into debt and derivative components, with the derivative component accounted for using fair value accounting.</p>	<p>Compound (hybrid) financial instruments are required to be split into a debt and equity component or, if applicable, a derivative component. The derivative component is accounted for using fair value accounting.</p>

	US GAAP	IFRS Accounting Standards
<i>Recognition and measurement</i>		
Measurement – debt securities, loans and receivables	<p>Classification and measurement depend largely on the legal form of the instrument (i.e., whether the financial asset represents a security or a loan) and management's intent for the instrument.</p> <p>At acquisition, debt instruments that meet the definition of a security are classified in one of three categories and subsequently measured as follows:</p> <ul style="list-style-type: none"> ▶ Held-to-maturity (HTM) – amortized cost ▶ Trading – fair value, with changes in fair value recognized in net income (FV-NI) ▶ Available-for-sale (AFS) – fair value, with changes in fair value recognized in other comprehensive income (FV-OCI) <p>Unless the fair value option is elected, loans and receivables are classified as either (1) held-for-investment, and then measured at amortized cost, or (2) held for sale, and then measured at the lower of amortized cost basis or fair value.</p>	<p>Regardless of an instrument's legal form, its classification and measurement depend on its contractual cash flows (CCF) characteristics and the business model under which it is managed.</p> <p>The assessment of the CCF determines whether the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.</p> <p>Financial assets that pass the cash flow characteristics test are subsequently measured at amortized cost, FV-OCI or fair value, with changes in fair value recognized in profit or loss (FV-PL), based on the entity's business model for managing them, unless the fair value option is elected. Financial assets that fail the cash flow characteristics test are subsequently measured at FV-PL.</p>
Measurement – equity investments (except those accounted for under the equity method, those that result in consolidation of the investee or certain other investments)	<p>Equity investments are measured at FV-NI. A measurement alternative is available for equity investments that do not have readily determinable fair values and do not qualify for the net asset value (NAV) practical expedient under ASC 820. Under this alternative, investments may be measured at cost less any impairment. If an entity identifies observable price changes in orderly transactions for the identical or a similar investment of the same issuer, it must measure its equity investment at fair value in accordance with ASC 820 as of the date that the observable transaction occurred.</p>	<p>Equity investments are generally measured at FV-PL. An irrevocable FV-OCI election is available for non-derivative equity investments that are not held for trading. If the FV-OCI election is made, gains or losses recognized in OCI are not recycled (i.e., reclassified to profit or loss) upon derecognition of those investments. However, the entity may transfer the cumulative gain or loss within equity.</p>
Measurement – effective interest method	<p>The effective interest method is generally applied on the basis of CCF for financial assets. However, in some instances, estimated cash flows are used. US GAAP discusses three different approaches – catch-up, retrospective or prospective – to account for a change in estimated cash flows, depending on the type of instrument and the reason for the change.</p>	<p>The calculation of the effective interest rate is generally based on the estimated cash flows (without considering credit losses) over the expected life of the financial asset. IFRS Accounting Standards generally require the original effective interest rate to be used throughout the life of the financial instrument. When estimated cash flows change, an entity follows an approach that is analogous to the catch-up method under US GAAP.</p>

	US GAAP	IFRS Accounting Standards
Impairment		
Impairment recognition – debt instruments measured at FV-OCI	<p>For debt securities that are measured at FV-OCI, if the amortized cost of a debt security exceeds its fair value, the security is impaired.</p> <p>When an entity intends to sell an impaired debt security (or it is more likely than not that the entity will be required to sell the security before recovery of its amortized cost basis), the entire impairment (i.e., the difference between amortized cost and fair value) is recognized as a direct reduction in the security's amortized cost basis with the impairment loss reported in earnings.</p> <p>When an entity does not intend to sell an impaired debt security (and it is not more likely than not that the entity will be required to sell the security before recovery of its amortized cost basis), the entity must determine whether any impairment is attributable to credit-related factors. When evaluating an impairment, entities may not use the length of time a security has been in an unrealized loss position as a factor, either by itself or in combination with other factors, to conclude that a credit loss does not exist. This determination should be performed at the individual security level.</p> <p>The credit-related impairment is measured as the difference between the debt security's amortized cost basis and the present value of expected cash flows and it is recognized as an allowance on the balance sheet with a corresponding adjustment to earnings. The allowance should not exceed the amount by which the amortized cost basis exceeds fair value.</p> <p>Both the allowance and the adjustment to net income can be adjusted if conditions change. Impairment that isn't credit-related is recognized in OCI.</p>	<p>Under IFRS Accounting Standards, there is a single impairment model for all debt instruments not measured at FV-PL (i.e., measured at amortized cost or FV-OCI), including loans and debt securities. The guiding principle is to reflect the general pattern of deterioration or improvement in the credit quality of financial instruments.</p> <p>The amount of expected credit losses (ECLs) recognized as a loss allowance depends on the extent of credit deterioration since initial recognition. Generally, there are two measurement bases:</p> <ul style="list-style-type: none"> ▶ In Stage 1, 12-month ECLs, which applies to all items (on initial recognition and thereafter) as long as there is no significant deterioration in credit risk. ▶ In Stages 2 and 3, lifetime ECLs, which applies whenever there has been a significant increase in credit risk. In Stage 2, interest income is calculated on the asset's gross carrying amount. In Stage 3, a credit event has occurred, and interest income is calculated on the asset's amortized cost (i.e., net of the allowance). <p>For financial assets that are debt instruments measured at FV-OCI, impairment gains and losses are recognized in profit or loss. However, the ECLs do not reduce the carrying amount of the financial assets in the statement of financial position, which remains at fair value. Instead, impairment gains and losses are accounted for as an adjustment to the revaluation reserve accumulated in OCI (the "accumulated impairment amount"), with a corresponding charge to profit or loss.</p> <p>When a debt instrument measured at FV-OCI is derecognized, IFRS Accounting Standards require the cumulative gains and losses previously recognized in OCI to be reclassified to profit or loss.</p>

	US GAAP	IFRS Accounting Standards
Impairment recognition – equity instruments	<p>Equity investments are generally measured at FV-NI and therefore not reviewed for impairment. However, an equity investment without a readily determinable fair value for which the measurement alternative has been elected is qualitatively assessed for impairment at each reporting date.</p> <p>If a qualitative assessment indicates that the investment is impaired, the entity will have to estimate the investment's fair value in accordance with ASC 820 and, if the fair value is less than the investment's carrying value, recognize an impairment loss in net income equal to the difference between carrying value and fair value.</p>	<p>Equity instruments are measured at FV-PL or FV-OCI. That is, no measurement alternative is available. For equity instruments measured at FV-OCI, gains and losses recognized in OCI are never reclassified to profit or loss. Therefore, there is no impairment recognized for these instruments.</p>
Impairment recognition – financial assets measured at amortized cost	<p>Financial assets measured at amortized cost, including loans, receivables and HTM securities (including beneficial interests accounted for under ASC 325-40), follow the current expected credit loss (CECL) model.</p> <p>Under the CECL model, a lifetime expected credit loss is recorded upon initial recognition of assets in scope. The objective of the model is to recognize an allowance for credit losses that results in the financial statements reflecting the net amount expected to be collected. To determine the expected credit losses, entities must consider, among other things, available relevant information about the collectibility of cash flows (including information about past events, current conditions and reasonable and supportable forecasts). An expected credit loss estimate requires entities to reflect the risk of loss, even when that risk is remote. This is accomplished by pooling assets with similar risk characteristics. As a result of using pool-based assumptions, an estimate of zero credit loss may be appropriate only in limited circumstances.</p> <p>Write-downs (charge-offs) of a financial asset are recorded when the entity deems all or a portion of a financial asset to be uncollectible. Additionally, when measuring the allowance for credit losses, entities should incorporate an estimate of expected recoveries.</p>	<p>Under IFRS Accounting Standards, as discussed above, there is a single impairment model for debt instruments not measured at FV-PL (i.e., measured at amortized cost or FV-OCI), including loans and debt securities. Refer to "Impairment recognition – debt instruments measured at FV-OCI" above for a discussion of this model.</p> <p>Write-downs (charge-offs) of a financial asset are recorded when the entity has no reasonable expectation of recovering all or a portion of the CCF of the asset. IFRS Accounting Standards do not provide guidance on accounting for subsequent recoveries.</p>

	US GAAP	IFRS Accounting Standards
<i>Derivatives and hedging</i>		
Definition of a derivative and scope exceptions	To meet the definition of a derivative, an instrument must (1) have one or more underlyings and one or more notional amounts or payment provisions (or both), (2) require no initial net investment, as defined, and (3) be able to be settled net, as defined. Certain scope exceptions exist for instruments that would otherwise meet these criteria.	The IFRS Accounting Standards definition of a derivative does not include a requirement that a notional amount be indicated, nor is net settlement a requirement. Certain of the scope exceptions under IFRS Accounting Standards differ from those under US GAAP.
Hedging risk components	<p>Hedging of risk components of both financial and nonfinancial items is allowed, if certain criteria are met.</p> <p>Entities can separately hedge the foreign exchange risk, credit risk or interest rate risk associated with a financial instrument. However, interest rate components that may be hedged are defined by the literature as benchmark interest rates for fixed-rate financial instruments, and contractually specified interest rates for variable-rate financial instruments.</p> <p>If the hedged transaction is the forecasted purchase or sale of a nonfinancial asset, entities may separately hedge foreign exchange risk, the risk of changes for the entire purchase price or sales price, or any risk component that is contractually specified.</p>	Hedging of risk components of both financial and nonfinancial items is allowed, provided that the risk component is separately identifiable and reliably measurable.
Hedge effectiveness	<p>To qualify for hedge accounting the relationship must be "highly effective."</p> <p>Ongoing prospective and retrospective assessments of hedge effectiveness are required on a periodic basis (at least quarterly).</p> <p>There is no requirement to separately measure and recognize hedge ineffectiveness. For highly effective cash flow and net investment hedges, the entire change in the fair value of the hedging instrument included in the assessment of hedge effectiveness is recorded in OCI (for cash flow hedges) or the CTA section of OCI (for net investment hedges) and reclassified to earnings when the hedged item affects earnings (or when it becomes probable that the forecasted transaction being hedged in a cash flow hedge will not occur in the required time period).</p> <p>The shortcut method for interest rate swaps hedging recognized debt instruments is permitted.</p>	<p>To qualify for hedge accounting, there must be an economic relationship between the hedged item and the hedging instrument, the value changes resulting from that economic relationship cannot be dominated by credit risk, and the hedge ratio should generally be the same as the ratio management actually uses to hedge the quantity of the hedged item.</p> <p>Ongoing prospective assessments of effectiveness are required to be performed, at a minimum, at the time an entity prepares its annual or interim financial statements or upon a significant change in the circumstances affecting hedge effectiveness requirements, whichever occurs first.</p> <p>Ineffectiveness is measured and recognized through profit or loss each reporting period. For cash flow hedges and net investment hedges, the ineffectiveness recorded is limited to overhedges.</p> <p>The shortcut method for interest rate swaps hedging recognized debt instruments is not permitted.</p>

	US GAAP	IFRS Accounting Standards
Presentation of changes in the fair value of hedging instruments included in the effectiveness assessment	The entire change in fair value of the hedging instruments included in the assessment of hedge effectiveness is presented in the same income statement line item as the earnings effect of the hedged item.	IFRS Accounting Standards do not address where the change in fair value of the hedging instrument included in the assessment of hedge effectiveness should be presented in the income statement.
Excluded components	A hedging instrument's time value and the foreign currency basis spread can be excluded from the effectiveness assessment. The initial value of the excluded component is recognized in earnings using a systematic and rational method over the life of the hedging instrument. Any difference between the change in fair value of the excluded components and the amounts recognized in earnings under the systematic and rational approach is deferred in accumulated other comprehensive income (AOCI). Alternatively, an entity may make a policy election to record the changes in the fair value of components excluded from the assessment of hedge effectiveness immediately in earnings.	A hedging instrument's time value and foreign currency basis spread can be excluded from the effectiveness assessment. The change in fair value of any excluded components is deferred in AOCI and reclassified to profit and loss based on the nature of the hedged item (i.e., transaction-related or time period-related).
Derecognition		
Derecognition of financial assets	<p>Derecognition of financial assets (i.e., sales treatment) occurs when control over the financial asset has been surrendered. That is, when all of the following conditions are met:</p> <ul style="list-style-type: none"> ▶ The transferred financial assets are legally isolated from the transferor ▶ Each transferee (or, if the transferee is a securitization entity or an entity whose sole purpose is to facilitate an asset-backed financing, each holder of its beneficial interests), has the right to pledge or exchange the transferred financial assets (or beneficial interests) ▶ The transferor does not maintain effective control over the transferred financial assets or beneficial interests (e.g., through a call option or repurchase agreement) <p>The derecognition criteria may be applied to a portion of a financial asset only if it meets the definition of a participating interest.</p>	<p>Derecognition of financial assets is based on a mixed model that considers both transfer of risks and rewards and control. Transfer of control is considered only when the transfer of risks and rewards assessment is not conclusive. If the transferor has neither retained nor transferred substantially all of the risks and rewards, there is then an evaluation of the transfer of control. Control is considered to be surrendered if the transferee has the practical ability to unilaterally sell the transferred asset to a third party without restrictions. There is <i>no</i> legal isolation test.</p> <p>The derecognition criteria may be applied to a portion of a financial asset if the cash flows are specifically identified or represent a pro rata share of the financial asset, or a pro rata share of specifically identified cash flows.</p>

Other differences include (1) normal purchase and sale/own-use exception, (2) foreign exchange gain and/or losses on AFS debt securities and certain equity investments, (3) recognition of basis adjustments when hedging future transactions, (4) hedging net investments, (5) cash flow hedge of intercompany transactions, (6) hedging with internal derivatives, (7) impairment criteria for equity investments, (8) puttable minority interest, (9) netting and offsetting arrangements, (10) accounting for servicing assets and liabilities, and (11) measurement of credit losses on certain accounts receivable and contracts assets.

Standard setting activities

Liabilities and equity

In April 2025, the FASB issued a proposed ASU, *Debt – Modification and Extinguishments – Extinguishment of Liabilities (Subtopic 405-20): Accounting for Debt Exchanges*, which would require entities to account for certain exchanges of debt instruments as the issuance of a new debt obligation and the extinguishment of an existing debt obligation when certain conditions are met. The proposal would apply to transactions that involve the contemporaneous exchange of cash between the same debtor and creditor in connection with the issuance of a new debt obligation with multiple creditors and the satisfaction of an existing debt obligation. The FASB plans to issue a final ASU in 2026. Readers should monitor this project for developments.

In November 2024, the FASB issued ASU 2024-04, *Debt – Debt with Conversion and Other Options (Subtopic 470-20): Induced Conversions of Convertible Debt Instruments*, which clarifies the requirements for determining whether to account for certain early settlements of cash convertible debt instruments (i.e., debt instruments with conversion options that may be settled entirely or partially in cash) as induced conversions or extinguishments. The guidance requires an entity to account for a settlement as an induced conversion if the inducement offer includes the issuance of all consideration (in form and amount) issuable under the conversion privileges provided in the terms of the existing convertible debt instrument. The guidance is effective for all entities for fiscal years beginning after 15 December 2025, and interim periods within those fiscal years. Early adoption is permitted.

In May 2024, the IASB issued *Amendments to the Classification and Measurement of Financial Instruments (Amendments to IFRS 9 and IFRS 7)*. Among other things, the amendments clarify that a financial liability is derecognized on the settlement date (i.e., when the related obligation is discharged, canceled, expires or the liability otherwise qualifies for derecognition) and introduces an accounting policy option to

derecognize financial liabilities that are settled through an electronic payment system before settlement date if certain conditions are met. The amendments are effective for annual reporting periods beginning on or after 1 January 2026. Early adoption is permitted.

In November 2023, the IASB published an Exposure Draft, *Financial Instruments with Characteristics of Equity*, which proposes amendments to IAS 32, IFRS 7 and IAS 1 to address practice issues that arise when applying IAS 32 and to expand the disclosure requirements relating to financial instruments issued by an entity. The IASB is considering stakeholder feedback and redeliberating the proposals. The IASB expects to issue final amendments in 2026. Readers should monitor this project for developments.

Recognition and measurement

In May 2024, the IASB issued *Amendments to the Classification and Measurement of Financial Instruments (Amendments to IFRS 9 and IFRS 7)*. Among other things, the amendments clarify how to assess the CCF characteristics of financial assets that include environmental, social and governance (ESG)-linked features and other similar contingent features and clarify the treatment of non-recourse assets and contractually linked instruments. The amendments also require additional disclosures in IFRS 7 for financial assets and liabilities with contractual terms that reference a contingent event (including those that are ESG-linked) and equity instruments recorded at fair value through OCI. The amendments are effective for annual reporting periods beginning on or after 1 January 2026.

Derivatives and hedging

In December 2025, the IASB issued an Exposure Draft, *Risk Mitigation Accounting*, that proposes a new Risk Mitigation Accounting model to better reflect in financial statements how entities manage net repricing risk. The model addresses the limitations of existing hedge accounting requirements in IAS 39 *Financial Instruments: Recognition and Measurement* and IFRS 9. The comment period ends 31 July 2026. The IASB has also invited entities to perform fieldwork to test the model during the comment period, and it has also indicated that it will accept results until 30 November 2026.

In November 2025, the FASB issued ASU 2025-09, *Derivatives and Hedging (Topic 815): Hedge Accounting Improvements*, to amend certain aspects of its hedge accounting guidance to better reflect an entity's risk management activities in the financial statements. The guidance expands the hedged risks permitted to be aggregated in a group of individual forecasted transactions and increases the variable price components eligible to be designated as the hedged risk in the forecasted purchase

or sale of nonfinancial assets. It also eliminates the requirement to apply the net written option test when certain compound derivatives are used in interest rate hedges. In addition, the guidance simplifies the application of hedge accounting for entities hedging forecasted interest payments on choose-your-rate debt instruments and addresses application issues related to “dual hedges,” where a foreign-currency-denominated debt instrument is designated as a hedging instrument and a hedged item. The amendments are effective for PBEs for fiscal years beginning after 15 December 2026, and interim periods within those fiscal years. For all other entities, they are effective one year later. Early adoption is permitted.

In September 2025, the FASB issued ASU 2025-07, *Derivatives and Hedging (Topic 815) and Revenue from Contracts with Customers (Topic 606): Derivatives Scope Refinements and Scope Clarification for Share-Based Noncash Consideration from a Customer in a Revenue Contract*. The amendments exclude from the scope of ASC 815 certain contracts that are not traded on an exchange that include underlyings based on the operations or activities of one of the parties to the contract. This amendment is similar to a concept that currently exists in IFRS 9 whereby the definition of a derivative excludes contracts whose values change in response to changes in a nonfinancial variable that is specific to one of the parties to the contract. The amendments are effective for all entities for annual reporting periods (including interim reporting periods within those annual reporting periods) beginning after 15 December 2026. Early adoption is permitted.

Fair value measurements

Similarities

ASC 820 and IFRS 13 *Fair Value Measurement* both provide a framework for measuring fair value that is applicable under the various accounting topics that require (or permit) fair value measurements in US GAAP and IFRS Accounting Standards, respectively. The measurement of fair value across US GAAP and IFRS Accounting Standards is based on a single definition of fair value and a generally consistent framework for the application of that definition.

Like ASC 820, IFRS 13 defines fair value as an exit price. That is, the price to sell an asset or transfer a liability. Both ASC 820 and IFRS 13 acknowledge that the fair value of an asset or liability at initial recognition may not always be its transaction price, as exit and entry prices can differ. In addition, both ASC 820 and IFRS 13 indicate that when the transaction price differs from fair value, the reporting entity recognizes the resulting gain or loss in earnings unless the standard that requires or permits the fair value measurement specifies otherwise.

Significant differences

	US GAAP	IFRS Accounting Standards
"Day 1" gains and losses	The recognition of Day 1 gains and losses for assets and liabilities (including financial instruments) is required in instances in which the transaction price does not represent the fair value of an asset or liability at initial recognition, including when the fair value measurement is based on a valuation model with significant unobservable inputs (i.e., Level 3 measurements), unless the ASC Topic that requires or permits the fair value measurement specifies otherwise. However, in all instances, evidence is required to substantiate the amount by which fair value is assumed to differ from the transaction price.	The recognition of Day 1 gains and losses for assets and liabilities (including financial instruments) is required in instances in which the transaction price does not represent the fair value of an asset or liability at initial recognition, unless the standard that requires or permits the fair value measurement specifies otherwise. Day 1 gains and losses on financial instruments are recognized <i>only</i> when their fair value is evidenced by a quoted price in an active market for an identical asset or liability (i.e., a Level 1 input) or based on a valuation technique that uses only data from observable markets.
Practical expedient for alternative investments	Entities are provided a practical expedient to estimate the fair value of certain alternative investments (e.g., a limited partner interest in a private equity fund) using NAV or its equivalent.	There is no practical expedient for estimating fair value using NAV for alternative investments.
Contractual sale restrictions on equity securities	Entities should not consider a contractual restriction on the sale of an equity security as part of the unit of account of the equity security when measuring its fair value.	IFRS 13 does not require excluding a contractual restriction on the sale of an equity security from the unit of account of the equity security when measuring its fair value. Rather, IFRS 13 requires entities to determine whether the restriction is deemed to be a characteristic of the asset or the entity holding the asset.

Standard setting activities

There is no significant standard setting activity in this area.

Foreign currency matters

Similarities

ASC 830, *Foreign Currency Matters*, and IAS 21 *The Effects of Changes in Foreign Exchange Rates* are similar in their approach to foreign currency translation. Although the criteria to determine an entity's functional currency differ under US GAAP and IFRS Accounting Standards, both ASC 830 and IAS 21 generally result in the same determination (i.e., the currency of the entity's primary economic environment). Although there are significant differences in accounting for foreign currency translation in hyperinflationary economies under ASC 830 and IAS 29 *Financial Reporting in Hyperinflationary Economies*, both standards require the identification of hyperinflationary economies and generally consider the same economies to be hyperinflationary.

Both ASC 830 and IAS 21 require foreign currency transactions be *remeasured* into the entity's functional currency with amounts resulting from changes in exchange rates reported in income. Similarly, both standards allow financial statements to be presented in a currency other than the entity's functional currency (i.e., the reporting (US GAAP)

or presentation (IFRS Accounting Standards) currency), but this requires *translation* of an entity's financial statements from the functional currency to the reporting currency. Except for the translation of financial statements in hyperinflationary economies, the method used by both US GAAP and IFRS Accounting Standards to translate financial statements from the functional currency to the reporting currency generally is the same. In addition, both US GAAP and IFRS Accounting Standards require remeasurement into the functional currency before translation into the reporting currency. Assets and liabilities are translated at the period-end rate and income statement amounts generally are translated at the average rate, with the exchange differences reported in equity. Both standards require certain foreign exchange effects related to net investments in foreign operations to be accumulated in shareholders' equity (i.e., cumulative translation adjustment, or CTA). In general, these amounts are reclassified from equity into income when there is a sale (including the loss of a controlling financial interest) or complete liquidation or abandonment of the foreign operation.

Significant differences

	US GAAP	IFRS Accounting Standards
Translation/functional currency of foreign operations in a hyperinflationary economy	Local functional currency financial statements are remeasured as if the functional currency was the reporting currency (US dollar in the case of a US parent) with resulting exchange differences recognized in income.	The functional currency must be maintained. However, local functional currency financial statement amounts not already measured at the current rate at the end of the reporting period (current and prior period) are indexed using a general price index (i.e., restated in terms of the measuring unit current at the balance sheet date with the resultant effects recognized in income), and are then translated to the presentation currency at the current rate.
Consolidation of foreign operations	A "bottom-up" approach is required in order to reflect the appropriate foreign currency effects and hedges in place. An entity should be consolidated by the enterprise that controls the entity. The "step-by-step" method of consolidation is used, whereby each entity is consolidated into its immediate parent until the ultimate parent has consolidated the financial statements of all the entities below it.	The method of consolidation is not specified and, as a result, either the "direct" or the "step-by-step" method of consolidation is used. Under the "direct" method, each entity within the consolidated group is directly translated into the functional currency of the ultimate parent and then consolidated into the ultimate parent (i.e., the reporting entity) without regard to any intermediate parent. The choice of consolidation method used could affect the CTA deferred within equity at intermediate levels, and therefore the recycling of such exchange rate differences upon disposal of an intermediate foreign operation.

Standard setting activities

In August 2023, the IASB issued *Lack of Exchangeability (Amendments to IAS 21)* to specify how an entity should assess whether a currency is exchangeable and how it should determine a spot exchange rate when exchangeability is lacking. If a currency is not exchangeable into another currency, an entity is required to estimate the spot exchange rate at the measurement date. The entity is also required to disclose information that enables users of its financial statements to understand how the currency not being exchangeable into the other currency affects, or is expected to affect, the entity's financial performance, financial position and cash flows. The amendments are effective for annual reporting periods beginning on or after 1 January 2025.

Leases

Similarities

The overall accounting for leases under US GAAP (ASC 842, *Leases*) and IFRS Accounting Standards (IFRS 16 *Leases*) is similar. Both standards provide similar guidance for determining whether an arrangement is or contains a lease. In addition, both standards require lessees to identify and separately account for lease and non-lease components in

an arrangement unless they elect, by class of underlying asset, to account for a lease component and its associated non-lease components as a single lease component. Further, both require lessees to recognize right-of-use assets and lease liabilities on their balance sheets, unless certain recognition exemptions are elected, and both include specific classification and measurement models for lessors.

Significant differences

	US GAAP	IFRS Accounting Standards
<i>Scope and measurement exemptions</i>		
Low-value asset exemption	There is no recognition exemption for leases based on the value of the underlying asset.	Lessees may elect, on a lease-by-lease basis, not to recognize leases when the value of the underlying asset is low (e.g., US\$5,000 or less when new).
Scope exemption for intangible assets	All leases of intangible assets are excluded from the scope of ASC 842.	Lessees may apply IFRS 16 to leases of intangible assets other than rights held by a lessee under licensing agreements within the scope of IAS 38 for items such as motion picture films, video recordings, plays, manuscripts, patents and copyrights. Lessors are required to apply IFRS 16 to leases of intangible assets, except for licenses of intellectual property that are in the scope of IFRS 15.
<i>Key concepts</i>		
Lease liability – reassessment of variable lease payments	Changes in variable lease payments based on an index or rate result in a remeasurement of the lease liability when the lease liability is remeasured for another reason (e.g., a change in the lease term).	Changes in variable lease payments based on an index or rate result in a remeasurement of the lease liability whenever there is a change in the cash flows (i.e., when the adjustment to the lease payments takes effect).
Determination of the discount rate	Lessees and lessors determine the discount rate at the lease commencement date.	Lessees determine the discount rate at lease commencement, but lessors determine the rate implicit in the lease at the lease inception date. That is because a lessor determines lease classification at the lease inception date.
Determination of a lessee's incremental borrowing rate	A lessee may consider the effect of lease term options (e.g., purchase and renewal options) that are not included in the lease term. Entities that are not PBEs may elect to use a risk-free rate by class of underlying asset for initial and subsequent measurements of the lease liability. However, a lessee is required to use the rate implicit in the lease when it is readily determinable, even if they make the risk-free rate election.	IFRS 16 does not address whether a lessee may consider the effect of lease term options (e.g., purchase and renewal options) that are not included in the lease term. IFRS 16 does not provide accounting alternatives for private companies.

	US GAAP	IFRS Accounting Standards
Initial direct costs (IDCs)	IDCs are incremental costs that would not have been incurred if the lease had not been obtained. Lessors expense IDCs for sales-type leases if the fair value of the underlying asset is different from the carrying amount of the underlying asset at lease commencement.	IDCs are incremental costs of obtaining a lease that would not have been incurred if the lease had not been obtained. However, costs incurred by a manufacturer or dealer lessor in connection with a finance lease are expensed as incurred.
Classification		
Lessee lease classification	Recognized leases are classified as either finance or operating. Lessees classify leases at the lease commencement date.	All recognized leases are accounted for similarly to finance leases under ASC 842.
Lessor lease classification	Leases are classified as operating, direct financing or sales-type leases at the lease commencement date.	Leases are classified as operating or finance leases at the inception date of the lease.
Lessor – lease classification criteria	Each classification criterion is determinative. Lessors are also required to classify a lease as an operating lease if the lease has variable lease payments that do not depend on an index or rate and would result in a selling loss if the lease were to be classified as a sales-type or direct financing lease otherwise.	All classification criteria can be considered individually or in combination. IFRS 16 provides examples and indicators of situations that can be considered individually, or in combination, and would result in a lease being classified as a finance lease. Meeting a single criterion does not automatically result in the lease being classified as a finance lease. IFRS 16 does not include additional guidance for a lessor's classification of a lease that results in a selling loss.
Lessor – reassessment of lease classification	Lessors are required to reassess lease classification if lessees exercise an existing option to renew the lease (i.e., change in assessment of lease term) or to purchase the underlying asset when it was previously determined it was not reasonably certain to do so.	Lessors do not reassess lease classification if lessees exercise an existing option to renew the lease (i.e., change in assessment of lease term) or to purchase the underlying asset when it was previously determined it was not reasonably certain to do so. Lease classification is determined at lease inception and reassessed only if there is a lease modification that is not accounted for as a separate contract.
Lessor – collectibility	Collectibility of the lease payments is considered when determining whether a lease is classified as a direct financing or an operating lease.	IFRS 16 does not address considering collectibility of lease payments.
Subleases	When classifying a sublease, the sublessor classifies the sublease based on the underlying asset rather than the right-of-use asset on the head lease.	When classifying a sublease, a sublessor classifies the sublease based on the right-of-use asset recognized as part of the head lease rather than the underlying asset subject to the sublease.

	US GAAP	IFRS Accounting Standards
<i>Lessee accounting</i>		
Short-term leases – existence of a purchase option	A lease does not qualify as a short-term lease if it includes a purchase option that is reasonably certain to be exercised.	A lease does not qualify as a short-term lease if it includes a purchase option, regardless of whether the lessee is reasonably certain to exercise the option.
Short-term leases – change in lease term	<p>A lease no longer qualifies as a short-term lease when there is a change in a lessee's assessment of either of the following:</p> <ul style="list-style-type: none"> ▸ The lease term so that, after the change, the remaining lease term extends more than 12 months from the end of the previously determined lease term ▸ Whether the lessee is reasonably certain to exercise an option to purchase the underlying asset 	A change in the terms of a short-term lease creates a new lease. If that new lease has a lease term greater than 12 months, it cannot qualify as a short-term lease.
Allocating variable consideration not dependent on an index or rate between lease and non-lease components of a contract	Lessees allocate variable consideration not dependent on an index or rate to the lease and non-lease components of a contract on a relative standalone price basis.	Lessees may allocate variable consideration not dependent on an index or rate entirely to a non-lease component of a contract.
Lease modifications that do not result in a separate contract and shorten the contractual lease term	Lease modifications that do not result in a separate contract and shorten the contractual lease term do not result in the recognition of a gain or loss. A lessee recognizes the amount of the remeasurement of the lease liability as an adjustment to the corresponding right-of-use asset without affecting profit or loss. However, if the right-of-use asset is reduced to zero, a lessee would generally recognize any remaining amount in profit or loss.	Lease modifications that do not result in a separate contract and shorten the contractual lease term result in the recognition of a gain or loss for the difference between the decrease in the lease liability and the proportionate decrease in the right-of-use asset.
Reallocation of consideration in the contract upon a change in the lease term, the assessment of whether a purchase option is reasonably certain to be exercised, or the amounts probable of being owed under a residual value guarantee	The consideration in the contract is reallocated when a lease is modified or a lease liability is remeasured. Therefore, the revised lease payments are generally allocated based on the standalone price of the lease and non-lease components at the date of remeasurement (or effective date of the modification). However, standalone prices are not required to be updated under US GAAP when the remeasurement is due to (1) a change in the amount that is probable the lessee will owe under a residual value guarantee or (2) a resolution of a contingency that results in some or all of the payments allocated to the lease component that were previously determined to be variable meeting the definition of lease payments, unless these events are combined with one of the other remeasurement and reallocation events (e.g., change in lease term).	The consideration in the contract is reallocated only when a lease is modified. Therefore, when a lease liability is remeasured for other reasons (e.g., a change in lease term), the revised lease payments are allocated based on the standalone price of the lease and non-lease components at lease commencement.

	US GAAP	IFRS Accounting Standards
Componentization	Component depreciation is permitted, but not common.	A lessee applies the depreciation requirements in IAS 16 in depreciating right-of-use assets, which requires that each item of PP&E with a cost that is significant in relation to the total cost of the item be separately depreciated (i.e., a component approach).
Capitalization of lease costs during the construction of a lessee asset	ASC 842-10-55-21 prohibits an entity from capitalizing lease costs during the construction of a lessee asset unless an entity is able to capitalize those costs under ASC 970, <i>Real Estate</i> , on real estate projects for sale or rental.	IFRS 16 does not provide similar guidance on the capitalization of lease costs during the construction of a lessee asset.
Amortization of leasehold improvements associated with a lease between entities under common control	A lessee is required to amortize leasehold improvements associated with common control leases over their useful life to the common control group, as long as the lessee controls the use of the underlying asset through a lease.	IFRS 16 does not provide similar guidance on amortization of leasehold improvements associated with a lease between entities under common control.
Lessor accounting		
Practical expedient to not separate lease and non-lease components	A lessor can elect, by class of underlying asset, not to separate lease and related non-lease components if certain criteria are met. Additionally, if the non-lease component is the predominant component of the combined component, the combined component is accounted for in accordance with ASC 606.	IFRS 16 does not include a similar practical expedient for lessors.
Recognition of selling profit for direct financing leases	Selling profit on direct financing leases is deferred at lease commencement and amortized into income over the lease term.	IFRS 16 does not distinguish between sales-type and direct financing leases. Selling profit on finance leases is recognized at lease commencement.
Collectibility – sales-type leases and operating leases	Collectibility of the lease payments is assessed for purposes of initial recognition and measurement of sales-type leases. It is also evaluated to determine the income recognition pattern of operating leases.	IFRS 16 does not address considering collectibility of lease payments.
Modification of a sales-type or direct financing lease (under US GAAP) or a finance lease (under IFRS Accounting Standards) that does not result in a separate contract	If the modification of a sales-type or direct financing lease is not accounted for as a separate contract, the entity reassesses the classification of the lease as of the effective date of the modification based on the modified terms and conditions, and the facts and circumstances as of that date. ASC 842 then specifies how to account for the modified lease based on the classification of the modified lease.	If the modification of a finance lease is not accounted for as a separate contract, the accounting for the modification depends on whether the finance lease would have been classified as an operating lease had the modification been in effect at lease inception. IFRS 16 then specifies how to account for the modified lease based on that classification.

	US GAAP	IFRS Accounting Standards
Allocating variable consideration not dependent on an index or rate between lease and non-lease components of a contract	If the terms of a variable payment that is not dependent on an index or rate relate, even partially, to the lease component, the lessor will recognize those payments (allocated to the lease component) as income in profit or loss in the period when the changes in facts and circumstances on which the variable payment is based occur (e.g., when the lessee's sales on which the amount of the variable payment depends occur). When the changes in facts and circumstances on which the variable payment is based occur, the lessor will allocate those payments to the lease and non-lease components of the contract. The allocation is on the same basis as the initial allocation of the consideration in the contract or the most recent modification not accounted for as a separate contract unless the variable payment meets the criteria in ASC 606-10-32-40 to be allocated only to the lease component(s).	IFRS 16 does not include similar guidance for variable consideration related to the lease component. Lessors would allocate the consideration in the contract based on the guidance in IFRS 15.73 through 90, which is to allocate the transaction price to each performance obligation (or distinct good or service) in an amount that depicts the amount of consideration to which the entity expects to be entitled in exchange for transferring the promised goods or services to the customer.
Sale of lease receivables when the lessor retains an interest in the unguaranteed residual asset	If a lessor sells substantially all of the lease receivable associated with a sales-type lease or a direct financing lease and retains an interest in the unguaranteed residual asset, the lessor no longer accretes the unguaranteed residual asset to its estimated value over the remaining lease term under ASC 842. Instead, the lessor reports any remaining unguaranteed residual asset at its carrying amount at the date of the sale of the lease receivable and applies ASC 360 to determine whether the unguaranteed residual asset is impaired.	IFRS 16 does not include similar guidance. The lessor's net investment in the lease, which includes any unguaranteed residual value, is subject to the derecognition and impairment requirements in IFRS 9.

	US GAAP	IFRS Accounting Standards
<i>Sale and leaseback transactions</i>		
Assessing whether a transfer of an asset is a sale and purchase in a sale and leaseback transaction	<p>To determine whether an asset transfer is a sale and purchase, a seller-lessee and a buyer-lessor consider the following:</p> <ul style="list-style-type: none"> ▶ Whether the transfer meets the sale criteria under ASC 606 (however, certain fair value repurchase options would not result in a failed sale) ▶ Whether the leaseback would be classified as a sales-type lease by the buyer-lessor or a finance lease by the seller-lessee (i.e., a sale and purchase does not occur when the leaseback is classified as a sales-type lease by the buyer-lessor or as a finance lease by the seller-lessee) 	<p>To determine whether the transfer of an asset is accounted for as a sale and purchase, a seller-lessee and a buyer-lessor apply the requirements in IFRS 15 (including those for repurchase agreements) to assess whether the buyer-lessor has obtained control of the asset.</p> <p>IFRS 16 does not contain the same lease classification criteria included in US GAAP, which precludes sale accounting if the leaseback would be classified as a sales-type lease by the buyer-lessor or a finance lease by the seller-lessee. However, entities should carefully consider the requirements in IFRS 15 (i.e., whether the buyer-lessor obtains control of the asset) to determine whether the transfer of an asset is accounted for as a sale and purchase. Entities may often reach similar conclusions on whether a sale and purchase have occurred under both standards.</p>
Gain or loss recognition in sale and leaseback transactions	The seller-lessee recognizes any gain or loss, adjusted for off-market terms, immediately.	The seller-lessee recognizes only the amount of any gain or loss, adjusted for off-market terms, that relates to the rights transferred to the buyer-lessor.
Failed sales – seller/lessee	Asset transfers that do not qualify as sales should be accounted for as financings by the lessor and lessee. ASC 842 provides additional guidance on adjusting the interest rate in certain circumstances (e.g., to ensure there is not a built-in loss).	Asset transfers that do not qualify as sales should be accounted for as financings in accordance with IFRS 9 by the lessor and lessee. IFRS 16 does not provide additional guidance on interest rate adjustments.
Reassessment of a failed sale when a repurchase option expires	If a repurchase option is the only reason the transfer of an asset in a sale and leaseback transaction is not accounted for as a sale, a seller would recognize the sale of the asset and a leaseback upon expiration of the repurchase option.	IFRS 16 does not include similar guidance for the reassessment of a failed sale when a repurchase option expires in a sale and leaseback transaction.
<i>Other considerations</i>		
Related party transactions	Entities classify and account for related party leases (including sale and leaseback transactions) based on the legally enforceable terms and conditions of the lease. Disclosure of related party transactions is required.	IFRS 16 does not address related party lease transactions, including leases between entities under common control. IAS 24 <i>Related Party Disclosures</i> contains guidance on related party disclosures.

	US GAAP	IFRS Accounting Standards
Practical expedient to use the written terms and conditions of common control arrangement	Private companies and certain not-for-profit entities can elect a practical expedient to use the written terms and conditions (rather than the legally enforceable terms) of a common control arrangement to determine whether a lease exists and to classify and account for the lease. If the election is not made, the private company would use the legally enforceable terms and conditions.	IFRS 16 does not include a similar practical expedient for common control arrangements.
Lessee involvement in asset construction (“build-to-suit” transactions)	ASC 842 includes guidance for evaluating whether a lessee controls an underlying asset being constructed before the commencement date. When a lessee controls the underlying asset during construction, it recognizes the asset on its balance sheet and accounts for the transaction using the sale and leaseback guidance in ASC 842-40 at the end of the construction period to determine whether it has sold the asset. When a lessee controls the underlying asset during construction, the lessor accounts for its costs to construct the asset as a loan to the lessee to construct the lessee’s asset. At the end of the construction period, the lessor applies the sale and leaseback guidance to determine whether it has purchased the asset.	IFRS 16 does not include guidance for lessee involvement in asset construction.
Leveraged leases	Leveraged lease accounting is grandfathered for unmodified leases that commenced before the adoption of ASC 842. If an existing leveraged lease is modified on or after the effective date, the lease would no longer be accounted for as a leveraged lease but would instead be accounted for under ASC 842.	Leveraged lease accounting is not permitted under IFRS 16.

Standard setting activities

In November 2025, the FASB completed its post-implementation review of ASC 842 and did not identify any matters that warranted immediate standard-setting action. The IASB began its post-implementation review of IFRS 16 in June 2024 and is currently conducting outreach with various groups and stakeholders. As part of its efforts, the IASB issued a Request for Information on IFRS 16 with a comment period that ended in October 2025.

Income taxes

Similarities

ASC 740, *Income Taxes*, and IAS 12 *Income Taxes* require entities to account for both current and expected future tax effects of events that have been recognized, either for financial or tax reporting (i.e., deferred taxes), using an asset and liability approach. Deferred tax liabilities for temporary differences arising at the acquisition date from

nondeductible goodwill or the excess of financial reporting goodwill over tax goodwill for tax-deductible goodwill are not recorded under either US GAAP or IFRS Accounting Standards. In addition, the tax effects of items accounted for directly in equity during the current year are allocated directly to equity. Neither ASC 740 nor IAS 12 permits the discounting of deferred taxes.

Significant differences

	US GAAP	IFRS Accounting Standards
Tax basis	<p>Tax basis is a question of fact under the tax law. For most assets and liabilities, there is no dispute on the amount; however, when uncertainty exists, the amount is determined in accordance with ASC 740-10-25. Management's intent is not a factor.</p>	<p>Tax basis is referred to as "tax base." Tax base is generally the amount deductible or taxable for tax purposes. The manner in which management intends to settle or recover the carrying amount affects the determination of the tax base.</p> <p>When an uncertain tax treatment exists, it is determined in accordance with IFRIC 23 <i>Uncertainty Over Income Tax Treatments</i>.</p>
Uncertain tax positions	<p>ASC 740-10-25 requires a two-step process, separating recognition from measurement. First, a benefit is recognized when it is "more likely than not" (i.e., greater than 50% likelihood) to be sustained based on the technical merits of the position. Second, the amount of benefit to be recognized is based on the largest amount of tax benefit that is greater than 50% likely of being realized upon ultimate settlement.</p> <p>The unit of account for uncertain tax positions is based on the level at which an entity prepares and supports the amounts claimed in the tax return and considers the approach the entity anticipates the taxation authority will take in an examination. Detection risk is not considered in the analysis.</p>	<p>IFRIC 23 clarifies that when it is probable (similar to "more likely than not" under US GAAP) that the taxation authority will accept an uncertain tax treatment, taxable profit or loss is determined consistent with the tax treatment used or planned to be used in the income tax filings.</p> <p>When it is not probable that a taxation authority will accept an uncertain tax treatment, an entity will reflect the effect of the uncertainty for each uncertain tax treatment by using either the expected value or the most likely amount, whichever method better predicts the resolution of the uncertainty.</p> <p>Uncertain tax treatments may be considered separately or together based on which approach better predicts the resolution of the uncertainty. Detection risk is not considered in the analysis.</p>

	US GAAP	IFRS Accounting Standards
Taxes on intercompany transfers of assets that remain within a consolidated group	<p>Income tax expense paid by the transfer or on intercompany profits from the transfer or sale of inventory within a consolidated group are deferred in consolidation, resulting in the recognition of a prepaid asset for the taxes paid. ASC 740 also prohibits the recognition of deferred taxes for increases in the tax bases due to an intercompany sale or transfer of inventory. The income tax effects of the intercompany sale or transfer of inventory are recognized when the inventory is sold to a party outside of the consolidated group.</p> <p>Entities are required to recognize both the current and deferred income tax effects of intercompany sales and transfers of assets other than inventory in the income statement as income tax expense (benefit) in the period in which the sale or transfer occurs.</p>	<p>IAS 12 requires taxes paid on intercompany profits to be recognized as tax expense as incurred and requires the recognition of deferred taxes on temporary differences between the tax bases of assets transferred between entities/tax jurisdictions that remain within the consolidated group.</p>
Initial recognition exemption	<p>The initial recognition exemption that exists under IAS 12 is generally not provided under ASC 740. Deferred taxes are recognized for temporary differences arising on the initial recognition of an acquired asset or liability. If the amount paid when acquiring a single-asset differs from its tax basis in a transaction that is not a business combination, the consideration paid is allocated between the asset and deferred tax effect. In this case, a simultaneous equation is used to determine the amount of the deferred tax and the value of the asset acquired.</p>	<p>Deferred tax effects arising from the initial recognition of an asset or liability are not recognized when (1) the amounts did not arise from a business combination, (2) upon occurrence, the transaction affects neither accounting nor taxable profit (e.g., acquisition of nondeductible assets) and (3) at the time of the transaction, it does not give rise to equal taxable and deductible temporary differences. This is referred to as the initial recognition exemption.</p>
Recognition of deferred tax assets	<p>Deferred tax assets are recognized in full, but a separately recognized valuation allowance reduces the asset to the amount that is more likely than not to be realized.</p>	<p>Amounts are recognized only to the extent they are probable (i.e., more likely than not) that they will be realized. A separate valuation allowance is not recognized.</p>
Calculation of deferred tax asset or liability	<p>Enacted tax rates as of the balance sheet date must be used.</p>	<p>Enacted or “substantively enacted” tax rates as of the balance sheet date must be used.</p>
Recognition of deferred tax liabilities from investments in subsidiaries or joint ventures (often referred to as outside-basis differences)	<p>Recognition is not required for an investment in a foreign subsidiary or foreign corporate joint venture that is essentially permanent in duration, unless it becomes apparent that the difference will reverse in the foreseeable future. A deferred tax liability is recognized for investment in a domestic subsidiary unless an entity can recover the investment in a tax-free manner and expects to use that means.</p>	<p>Recognition is not required if the reporting entity has control over the timing of the reversal of the temporary difference and it is probable (i.e., more likely than not) that the difference will not reverse in the foreseeable future.</p>

Other differences include (1) the allocation of subsequent changes to deferred taxes to components of income or equity (i.e., backward tracing), (2) the calculation of deferred taxes on foreign nonmonetary assets and liabilities when the local currency of an entity is different from its functional currency, (3) the measurement of deferred taxes when different tax rates apply to distributed or undistributed profits and (4) the recognition of deferred tax assets on basis differences in domestic subsidiaries and domestic joint ventures that are permanent in duration.

Standard setting activities

In March 2023, the FASB issued ASU 2023-02, *Investments – Equity Method and Joint Ventures (Topic 323): Accounting for Investments in Tax Credit Structures Using the Proportional Amortization Method*, which allows entities to apply the proportional amortization method to all tax equity investments that meet certain conditions. The guidance was effective for PBEs for fiscal years beginning after 15 December 2023, and interim periods therein, and for all other entities for fiscal years beginning after 15 December 2024, and interim periods therein.

In January 2021, the IASB published an Exposure Draft, *Regulatory Assets and Regulatory Liabilities*, which sets out the proposals for a model to account for regulatory assets and regulatory liabilities. The IASB expects to publish a new IFRS Accounting Standard for rate-regulated activities in the first half of 2026, which will replace the interim standard, IFRS 14 *Regulatory Deferral Accounts*. Readers should monitor this project for developments.

Provisions and contingencies

Similarities

IAS 37 provides the overall guidance for recognition and measurement criteria of provisions and contingencies. While there is no equivalent single standard under US GAAP, ASC 450 and a number of other standards deal with specific types of provisions and contingencies (e.g., ASC 410, *Asset Retirement and Environmental Obligations*; ASC 420, *Exit or Disposal Cost Obligations*). In addition, the guidance in non-authoritative FASB Concepts Statement 8, *Conceptual Framework for Financial Reporting – Chapter 4, Elements of Financial Statements* (CON 8 Chapter 4) is similar to the specific recognition

criteria provided in IAS 37. Both US GAAP and IFRS Accounting Standards require recognition of a loss contingency (provision) based on the probability of occurrence when a reliable estimate can be made, although the definition of “probable” is different. Both US GAAP and IFRS Accounting Standards prohibit the recognition of provisions for costs associated with future operating activities. Further, both US GAAP and IFRS Accounting Standards require disclosures about a contingent liability whose occurrence is more than remote but does not meet the recognition criteria.

Significant differences

	US GAAP	IFRS Accounting Standards
Recognition threshold	A loss must be “probable” to be recognized. US GAAP defines “probable” as “the future event or events are likely to occur.”	A loss must be “probable” to be recognized. IFRS Accounting Standards describe “probable” for the purposes of IAS 37 as “more likely than not to occur.” That is a lower threshold than under US GAAP.
Discounting provisions	Provisions may be discounted when the amount of the liability and the timing of the payments are fixed or reliably determinable (i.e., by considering the guidance on environmental liabilities under ASC 410-30) or when the obligation is a fair value obligation (e.g., an asset retirement obligation under ASC 410-20). The discount rate to be used is dependent upon the nature of the provision. However, when a provision is measured at fair value, the time value of money and the risks specific to the liability should be considered.	Provisions should be recorded at the estimated amount to settle or transfer the obligation taking into consideration the time value of money, if material. The discount rate used should be a pretax discount rate that reflects current market assessments of the time value of money and risks specific to the liability that have not been reflected in the best estimate of the expenditure. The increase in the provision due to the passage of time is recognized as an interest expense.
Measurement of provisions – range of possible outcomes	If some amount within a range of loss appears at the time to be a better estimate than any other amount within the range, that amount should be accrued. When no amount within the range is a better estimate than any other amount, the minimum amount in the range should be accrued.	The best estimate of the amount to settle or transfer an obligation at the end of the reporting period should be accrued. For a large population of items being measured, such as warranty costs, the best estimate is typically the expected value, although the midpoint in the range is used when any point in a continuous range is as likely as another. The best estimate for a single obligation may be the most likely outcome, although other possible outcomes also should be considered.

	US GAAP	IFRS Accounting Standards
Exit or disposal cost obligations	Under ASC 420, once management has committed to an exit plan, each type of cost is examined to determine when it should be recognized. Involuntary employee termination costs under a one-time benefit arrangement are recognized over the future service period, or immediately if there is no future service required at the communication date. Costs to terminate a contract before the end of its term (excluding leases within the scope of ASC 842) and costs that will continue to be incurred under the contract for its remaining term without economic benefit to the entity are to be recognized and measured at fair value in the period in which the liability is incurred (generally when the entity terminates the contract pursuant to the contractual terms or ceases to use the rights conveyed under the contract). Other costs associated with exit or disposal activities should be recognized and measured at fair value in the period in which the liability is incurred.	Once management has a legal or constructive obligation for a detailed exit plan, the general provisions of IAS 37 apply. Costs typically are recognized earlier than under US GAAP because IAS 37 focuses on the exit plan as a whole, rather than the plan's individual cost components.
Onerous contracts	Recording losses on executory contracts is generally not permitted under US GAAP, unless required by a specific accounting standard. The circumstances in which such a provision can be recorded generally are limited to a restructuring (or other exit activity), a business combination, and certain other specified transactions under US GAAP.	IAS 37 requires that a provision be recorded when a contract is considered onerous. An onerous contract is a contract in which the unavoidable costs of meeting its obligations exceed the economic benefits expected to be received under the contract. The unavoidable costs under a contract reflect the least net cost of exiting from the contract, which is the lower of the cost of fulfilling it and any compensation or penalties arising from failure to fulfill it.

Standard setting activities

In November 2025, the IFRS Foundation published final examples demonstrating how entities can improve the reporting of uncertainties in their financial statements using climate-related examples as practical illustrations. The IFRS Foundation's announcement of the final examples indicated, "The examples use climate-related scenarios as practical illustrations, but the underlying principles apply more broadly to all uncertainties." Specifically, example 5 illustrates how the disclosure requirements of IAS 37 might apply to decommissioning and restoration provisions. Entities should consider these examples when applying IFRS Accounting Standards.

In November 2024, the IASB published an Exposure Draft, *Provisions – Targeted Improvements*, that proposed targeted improvements to IAS 37 to (1) clarify the requirements for the present obligation criterion and change the timing of the recognition of some provisions (in particular, levies), (2) align the liability definition and requirements for identifying liabilities in IAS 37 with the IASB's Conceptual Framework, (3) clarify the requirements for restructuring provisions, (4) clarify which costs to include in the measurement of a provision, and (5) specify that the rate used to discount a provision does not include non-performance risk and should reflect (i) the time value of money as represented by a risk-free rate and (ii) the risks in expenditure required to settle the obligation, if not already reflected in expected cash flows. Readers should monitor this project for developments.

Revenue recognition

Similarities

The revenue recognition standards issued by the FASB and the IASB are broadly applicable to all revenue transactions with customers (with some limited scope exceptions, for example, for insurance contracts, financial instruments and leases).

The standards also specify the accounting for costs an entity incurs to obtain and fulfill a contract to provide goods and services to customers and provide a model for the measurement and recognition of gains and losses on the sale of certain nonfinancial assets, such as PP&E, including real estate.

The core principle of both standards is that an entity recognizes revenue to depict the transfer of promised goods or services to customers at an amount that reflects the consideration the entity expects to be entitled in exchange for those goods or services. The standards also require entities to provide comprehensive disclosures and change the way they communicate information in the notes to the financial statements in both interim and annual periods.

The principles in the standards are applied using the following five steps:

1. Identify the contract(s) with a customer
2. Identify the performance obligation(s) in the contract
3. Determine the transaction price
4. Allocate the transaction price to the performance obligation(s) in the contract
5. Recognize revenue when (or as) the entity satisfies a performance obligation

Below, we discuss the significant differences in the standards for which entities applying US GAAP and IFRS Accounting Standards, respectively, may reach different accounting conclusions.

Significant differences

	US GAAP	IFRS Accounting Standards
Collectibility threshold	An entity must assess whether it is <i>probable</i> that the entity will collect <i>substantially all</i> of the consideration to which it will be entitled in exchange for the goods or services that will be transferred to the customer. For purposes of this analysis, the term “probable” is defined as “the future event or events are likely to occur,” consistent with its definition elsewhere in US GAAP.	An entity must assess whether it is <i>probable</i> that the entity will collect the consideration to which it will be entitled in exchange for the goods or services that will be transferred to the customer. For purposes of this analysis, the term “probable” is defined as “more likely than not,” consistent with its definition elsewhere in IFRS Accounting Standards.
Shipping and handling activities	An entity can elect to account for shipping and handling activities performed <i>after</i> the control of a good has been transferred to the customer as a fulfillment cost (i.e., not as a promised good or service).	IFRS 15 does not include a similar policy election.
Presentation of sales (and other similar) taxes	An entity can elect to exclude sales (and other similar) taxes from the measurement of the transaction price.	IFRS 15 does not include a similar policy election.
Noncash consideration – measurement date	An entity is required to measure the estimated fair value of noncash consideration at contract inception.	IFRS 15 does not specify the measurement date for noncash consideration.

	US GAAP	IFRS Accounting Standards
Noncash consideration – types of variability	When the variability of noncash consideration is due to both the form (e.g., changes in share price) of the consideration and for other reasons (e.g., a change in the exercise price of a share option because of the entity's performance), the constraint on variable consideration applies only to the variability for reasons other than its form.	IFRS 15 does not address how the constraint is applied when the noncash consideration is variable due to both its form and other reasons. The IASB noted that, in practice, it might be difficult to distinguish between variability in the fair value due to the form of the consideration and other reasons, in which case applying the variable consideration constraint to the whole estimate of the noncash consideration might be more practical.
Consideration paid or payable to a customer – equity instruments	<p>Equity instruments granted to a customer in conjunction with selling goods or services are a form of consideration paid or payable to a customer.</p> <p>Entities are required to measure such equity awards in accordance with ASC 718, <i>Compensation – Stock Compensation</i>. That is, an entity must measure the equity instrument using the grant-date fair value for both equity- and liability-classified share-based payment awards. ASC 606 also includes guidance on how to measure variability of share-based payment awards granted to a customer in conjunction with selling goods or services.</p> <p>After the adoption of ASU 2025-04, <i>Stock Compensation (Topic 718) and Revenue from Contracts with Customers (Topic 606): Clarifications to Share-Based Consideration Payable to a Customer</i>, the guidance on constraining estimates of variable consideration does not apply to share-based consideration payable to a customer that is measured and classified under ASC 718. Rather, the grantor assesses whether an award will vest using only the guidance in ASC 718.</p>	<p>IFRS 15 does not address whether equity instruments issued by an entity to a customer are a type of consideration paid or payable to a customer nor does the standard address the accounting for the initial and subsequent measurement of equity instruments granted to customers in a revenue arrangement. IFRS 2 <i>Share-based Payment</i> also does not address such transactions.</p> <p>Depending on the facts and circumstances, several IFRS Accounting Standards (or a combination of standards) may be applicable (e.g., IFRS 2, IFRS 15, IAS 32).</p>
Licenses of intellectual property (IP) – determining the nature of an entity's promise	An entity must classify the IP underlying all licenses as either functional or symbolic to determine whether to recognize the revenue related to the license at a point in time or over time, respectively.	IFRS 15 does not require an entity to classify licenses as either functional or symbolic. IFRS 15 requires three criteria to be met to recognize the revenue related to the license over time. If the license does not meet those criteria, the related revenue is recorded at a point in time.

	US GAAP	IFRS Accounting Standards
Licenses of IP – applying the guidance to bundled performance obligations	If an entity is required to bundle a license of IP with other promised goods or services in a contract, it is required to consider the licenses guidance to determine the nature of its promise to the customer.	IFRS 15 does not state that an entity needs to consider the licenses guidance to help determine the nature of its promise to the customer when a license is bundled with other goods or services. However, the IASB clarified in the Basis for Conclusions that an entity should consider the nature of its promise in granting the license if the license is the primary or dominant component (i.e., the predominant item) of a single performance obligation.
Licenses of IP – renewals	Revenue related to the renewal of a license of IP may not be recognized before the beginning of a renewal period.	IFRS 15 does not include similar requirements as ASC 606 for renewals. When an entity and a customer enter into a contract to renew (or extend the period of) an existing license, the entity needs to evaluate whether the renewal or extension should be treated as a new contract or as a modification of the existing contract.
Reversal of impairment losses	Reversal of impairment losses is prohibited for all costs to obtain and/or fulfill a contract.	IFRS 15 permits the reversal of some or all of previous impairment losses when impairment conditions no longer exist or have improved. However, the increased carrying value of the asset must not exceed the amount that would have been determined (net of amortization) if no impairment had been recognized previously.
Sale or transfer of nonfinancial assets to noncustomers	<p>ASC 610-20, <i>Other Income – Gains and Losses from the Derecognition of Nonfinancial Assets</i>, provides guidance on how to account for any gain or loss resulting from the sale or transfer of nonfinancial assets or in substance nonfinancial assets to noncustomers that are not an output of an entity's ordinary activities and are not a business. This includes the sale of intangible assets and PP&E, including real estate, as well as materials and supplies. ASC 610-20 also includes guidance for a "partial sale" of nonfinancial assets and in substance nonfinancial assets held in a legal entity.</p> <p>ASC 610-20 requires entities to apply certain recognition and measurement principles of ASC 606. Thus, under US GAAP, the accounting for a contract that includes the sale of a nonfinancial asset to a noncustomer is generally consistent with that of a contract to sell a nonfinancial asset to a customer, except for financial statement presentation and disclosure.</p>	IAS 16, IAS 38 and IAS 40 require entities to use certain of the requirements of IFRS 15 when recognizing and measuring gains or losses arising from the sale or disposal of nonfinancial assets to noncustomers when it is not in the ordinary course of business. IFRS 15 does not address the sale of in substance nonfinancial assets to noncustomers that are not a business. The applicable guidance for such disposals would depend on facts and circumstances (e.g., the sale or disposal of a subsidiary (i.e., loss of control) is generally accounted for under IFRS 10).

	US GAAP	IFRS Accounting Standards
	Sales or transfers of businesses to noncustomers are accounted for using the deconsolidation guidance in ASC 810. Further, sales or transfers of subsidiaries that do not contain solely nonfinancial assets and in substance nonfinancial assets to noncustomers are accounted for using the deconsolidation guidance in ASC 810, unless other US GAAP applies.	
Sale or transfer of interests in a separate entity (i.e., sale of a corporate wrapper) to a customer	The sale of a corporate wrapper to a customer generally will be in the scope of ASC 606.	Whether an entity needs to apply IFRS 10 or IFRS 15 to the sale of a corporate wrapper to a customer depends on facts and circumstances and may require significant judgment.

Standard setting activities

In November 2024, the FASB completed its post-implementation review of ASC 606. In July 2024, the IASB finalized its decisions on its post-implementation review of IFRS 15. Through these reviews, the Boards determined that their respective revenue recognition standard is working as intended and did not identify any matters that warranted immediate standard-setting action.

In September 2025, the FASB issued ASU 2025-07, which clarifies that an entity receiving share-based noncash consideration from a customer for the transfer of goods or services in a revenue contract would apply the noncash consideration guidance in ASC 606. Further, an entity would not apply the guidance in other ASC Topics (e.g., ASC 815, ASC 321) to such consideration until it has an unconditional right to receive or retain the share-based noncash consideration, other than by passage of time or by conditions that are unrelated to the entity’s performance obligations (or a specific outcome of the entity’s performance) under ASC 606. The amendments are effective for all entities for annual reporting periods (including interim reporting periods within those annual reporting periods) beginning after 15 December 2026. Early adoption is permitted.

In May 2025, the FASB issued ASU 2025-04 to clarify the guidance for share-based consideration granted to a customer in conjunction with selling goods or services. The guidance applies to all reporting entities that issue share-based consideration to a customer in the scope of ASC 606 and, among other things, clarifies that the variable consideration constraint would not apply to share-based consideration payable to customer. ASU 2025-04 is effective for fiscal years beginning after 15 December 2026, and interim periods within those fiscal years. Early adoption is permitted.

Share-based payments

Similarities

The US GAAP guidance for share-based payments, ASC 718, is largely converged with the guidance in IFRS 2. Both require a fair value-based approach for accounting for share-based payment arrangements whereby an entity (1) acquires goods or services in exchange for issuing share options or other equity instruments (collectively referred to as “shares” in this publication), or (2) incurs liabilities that are based, at least in part, on the price of its shares or that may require settlement in its shares. ASC 718 and IFRS 2 apply to transactions with both employees and nonemployees and are applicable to all entities. They both also define the fair value of the transaction as the amount at which the asset or liability

could be bought or sold in a current transaction between willing parties. Further, they require the fair value of the shares to be measured based on a market price (if available) or estimated using an option-pricing model. In the rare cases in which fair value cannot be determined, both sets of guidance allow the use of intrinsic value, which is remeasured until settlement of the shares. In addition, the treatment of modifications and settlements of share-based payments is similar in many respects. Finally, both sets of guidance require similar disclosures in the financial statements to provide investors with sufficient information to understand the types and extent to which the entity is entering into share-based payment transactions.

Significant differences

	US GAAP	IFRS Accounting Standards
Forfeitures (awards granted to employees)	<p>Entities may elect to account for forfeitures related to service conditions by (1) recognizing forfeitures of awards as they occur (e.g., when an award does not vest because the employee leaves the entity) or (2) estimating the number of awards expected to be forfeited and adjusting the estimate when subsequent information indicates that the estimate is likely to change.</p> <p>For awards with performance conditions, entities follow ASC 718-10-25-20 and assess the probability that a performance condition will be achieved at each reporting period to determine whether and when to recognize compensation cost, regardless of its accounting policy election for forfeitures.</p>	<p>There is no accounting policy election under IFRS 2. Entities should base initial accruals of compensation cost on the estimated number of instruments for which the requisite service is expected to be rendered. That estimate should be revised if subsequent information indicates that the actual number of instruments expected to vest is likely to differ from previous estimates.</p>
Performance period different from service period (awards granted to employees)	<p>A performance condition where the performance target affects vesting can be achieved after the employee’s requisite service period. Therefore, the period of time to achieve a performance target can extend beyond the end of the service period.</p>	<p>A performance condition is a vesting condition that must be met while the employee is rendering service. The commencement date may start (but not substantially) before the grantee begins providing service. If a performance target can be achieved after the employee’s requisite service period, it would be accounted for as a nonvesting condition that affects the grant date fair value of the award.</p>

	US GAAP	IFRS Accounting Standards
Transactions with nonemployees	<p>The US GAAP definition of an employee focuses primarily on the common law definition of an employee.</p> <p>Awards to nonemployees are measured based on the fair value of the equity instruments to be issued in exchange for goods or services received.</p> <p>The measurement date of equity-classified awards is generally the grant date.</p>	<p>IFRS Accounting Standards have a more general definition of an employee that includes individuals who provide services similar to those rendered by employees.</p> <p>Fair value of the transaction should be based on the fair value of the goods or services received, and only on the fair value of the equity instruments granted in the rare circumstance that the fair value of the goods and services cannot be reliably estimated.</p> <p>The measurement date is the date the entity obtains the goods or the counterparty renders the services.</p>
Measurement and recognition of expense – employee awards with graded vesting features	<p>Entities make an accounting policy election to recognize compensation cost for employee awards with a graded vesting schedule and containing only service conditions on a straight-line basis over either (1) the requisite service period for each separately vesting portion of the award (i.e., accelerated method) or (2) the requisite service period for the entire award.</p> <p>US GAAP permits the total fair value of the award (regardless of the entity's expense attribution policy above) to be determined by estimating the value of the award subject to graded vesting as a single award using an average expected life or by estimating the value of each vesting tranche separately using a separate expected life.</p>	<p>Entities must recognize compensation cost using the accelerated method and each individual tranche must be measured separately.</p>
Equity repurchase features at grantee's election	<p>Liability classification is not required if the grantee bears the risks and rewards of equity ownership (i.e., the repurchase feature is exercisable at fair value and after at least six months from the date the shares are issued or vest).</p>	<p>Liability classification is required (i.e., no six-month consideration exists).</p>
Deferred taxes	<p>Deferred tax assets for awards that will result in a tax deduction are calculated based on the cumulative US GAAP expense recognized.</p> <p>Entities recognize all excess tax benefits and tax deficiencies by recording them as income tax expense or benefit in the income statement.</p>	<p>Deferred tax assets are calculated based on the estimated tax deduction determined at each reporting date (e.g., intrinsic value).</p> <p>If the tax deduction exceeds cumulative compensation cost for an individual award, the deferred tax effect on the excess is credited to shareholders' equity. If the tax deduction is less than or equal to cumulative compensation cost for an individual award, the deferred tax effect is recorded in income.</p>

	US GAAP	IFRS Accounting Standards
Modification of vesting terms that were improbable of achievement	If an award is modified such that the service or performance condition, which was previously improbable of achievement, is probable of achievement as a result of the modification, the compensation cost is based on the fair value of the modified award at the modification date. Grant date fair value of the original award is not recognized.	Compensation cost is based on the grant date fair value of the award, together with any incremental fair value at the modification date. The determination of whether the original grant date fair value affects the accounting is based on the ultimate outcome (i.e., whether the original or modified conditions are met) rather than the probability of vesting as of the modification date.

Standard setting activities

There is no significant standard setting activity in this area.

Employee benefits other than share-based payments

Similarities

ASC 715, *Compensation – Retirement Benefits*; ASC 710, *Compensation – General*; ASC 712, *Compensation – Nonretirement Postemployment Benefits*; and IAS 19 *Employee Benefits* are the principal sources of guidance in accounting for employee benefits other than share-based payments under US GAAP and IFRS Accounting Standards, respectively. Under both US GAAP and IFRS Accounting Standards, the cost recognized for defined contribution plans is based on the contribution due from the employer in each period. The accounting for defined benefit plans has

many similarities as well, most notably that the defined benefit obligation is the present value of benefits that have accrued to employees for services rendered through that date based on actuarial methods of calculation. Both US GAAP and IFRS Accounting Standards require the funded status of the defined benefit plan to be recognized on the balance sheet as the difference between the present value of the benefit obligation and the fair value of plan assets, although IAS 19 limits the net asset recognized for overfunded plans.

Significant differences

	US GAAP	IFRS Accounting Standards
Actuarial method used for defined benefit plans	The use of either the projected unit credit method or the traditional unit credit method is required depending on the characteristics of the plan's benefit formula.	Projected unit credit method is required in all cases.
Calculation of the expected return on plan assets	Calculated using the expected long-term rate of return on invested assets and the market-related value of the assets (based on either the fair value of plan assets at the measurement date or a "calculated" value that smooths changes in fair value over a period not to exceed five years, at the employer's election).	The concept of an expected return on plan assets does not exist. A "net interest" expense (income) on the net defined benefit liability (asset) is recognized as a component of defined benefit cost based on the discount rate used to determine the obligation.
Treatment of actuarial gains and losses	Actuarial gains and losses may be recognized immediately in net income or deferred in AOCI and subsequently amortized to net income through a "corridor approach," at the employer's election.	Actuarial gains and losses must be recognized immediately in OCI and are not subsequently recognized in net income.
Recognition of prior (past) service costs or credits from plan amendments	Prior service costs or credits from plan amendments are initially deferred in AOCI and are subsequently generally recognized in net income on a prospective basis, typically over the average remaining service period of active employees or, when all or almost all participants are inactive, over the average remaining life expectancy of those participants.	Past service costs or credits from plan amendments are recognized immediately in net income.

	US GAAP	IFRS Accounting Standards
Settlements and curtailments	A settlement gain or loss is recognized in net income in the period in which a settlement occurs. A curtailment loss is recognized in net income when the curtailment is probable of occurring and the loss is estimable, while a curtailment gain is recognized in net income when the curtailment occurs.	A settlement gain or loss is recognized in net income when the settlement occurs. Fewer events qualify as settlements under IFRS Accounting Standards as compared to US GAAP. A change in the defined benefit obligation from a curtailment is recognized in net income at the earlier of when the curtailment occurs or when related restructuring costs or termination benefits are recognized.
Multiemployer postretirement plans	A multiemployer postretirement plan is accounted for similar to a defined contribution plan.	A multiemployer postretirement plan is accounted for as either a defined contribution plan or a defined benefit plan based on the terms (contractual and constructive) of the plan. If it is accounted for as a defined benefit plan, an entity must account for the proportionate share of the plan similar to any other defined benefit plan, unless sufficient information is not available.

Standard setting activities

There is no significant standard setting activity in this area.

Earnings per share

Similarities

Entities whose common shares are publicly traded, or that are in the process of issuing such shares in the public markets, must disclose substantially the same earnings per share (EPS) information under ASC 260, *Earnings Per Share*, and IAS 33 *Earnings per Share*. Both standards require the presentation of basic and diluted EPS on the face of the income statement, and both use the same

methods for calculating diluted EPS. These include the “treasury stock method” for determining the dilutive effects of stock options, nonvested shares (restricted stock) and warrants, and the “if-converted method” for determining the dilutive effects of convertible instruments. Note that only ASC 260 includes these defined method terms. Although both ASC 260 and IAS 33 use similar methods of calculating EPS, there are some specific, narrow application differences.

Significant differences

	US GAAP	IFRS Accounting Standards
Contracts that may be settled in shares or cash at the issuer's option	An entity will generally be required to presume share settlement. That is, the presumption that the contract will be settled in shares may not be overcome by past experience or a stated policy of cash settlement (except for liability-classified share-based payment awards).	Such contracts are <i>always</i> assumed to be settled in shares. That is, the presumption of share settlement may not be overcome.
Computation of year-to-date and annual diluted EPS using the treasury stock method and for contingently issuable shares	Under the treasury stock method for computing diluted EPS, for year-to-date and annual computations when each period is profitable, the number of incremental shares added to the denominator is the weighted average of the incremental shares that were added to the denominator in each of the quarterly computations. For year-to-date and annual computations of diluted EPS, contingently issuable shares are included on a weighted-average basis (e.g., assuming each of the quarters was profitable, weighted for the interim periods in which they were included in the computation of diluted EPS).	All dilutive potential ordinary shares, including contingently issuable shares, are determined independently for each period presented, including year-to-date periods. Regardless of whether the period has income or loss, the number of dilutive potential ordinary shares included in the year-to-date period is not a weighted average of the dilutive potential ordinary shares included in each interim computation.
Treasury stock method for share-based payments	Assumed proceeds under the treasury stock method exclude the income tax effects of share-based payment awards because such effects are already required to be recorded as income tax expense or benefit in the income statement when the awards vest or are settled.	For options, warrants and their equivalents, IAS 33 does not explicitly require assumed proceeds to include the income tax effects recorded in additional paid-in capital.

	US GAAP	IFRS Accounting Standards
Treatment of contingently convertible instruments	<p>Potentially issuable shares from a contingently convertible instrument with a market price trigger are included in diluted EPS using the if-converted method from the issuance date, even if the market price trigger is not satisfied at the end of the reporting period.</p> <p>If the number of shares contingently convertible depends on both market price and non-market price triggers, an entity would include the dilutive effect of the instrument from the date that all of the required non-market price triggers are met using an assumption that the end of the reporting period is the end of the contingency period (i.e., ignore the market price contingency).</p>	<p>There is no guidance for contingently convertible instruments; entities will follow the contingently issuable share guidance, as follows. Potentially issuable shares from a contingently convertible instrument with a share price trigger are included in diluted EPS using the if-converted method only if the contingencies are satisfied at the end of the reporting period, assuming the end of the reporting period is the end of the contingency period.</p> <p>If the number of shares contingently issuable depends on both share price and non-share price triggers, contingently issuable shares are not included in the diluted EPS calculation unless both conditions are met.</p>

Standard setting activities

In December 2025, the FASB issued ASU 2015-12, *Codification Improvements*, which included amendments to ASC 260 that clarify how to calculate diluted EPS when an entity has a loss from continuing operations and a contract that may be settled in stock or cash that is reported as an asset or liability for accounting purposes. These types of contracts may require an adjustment to the numerator in the diluted EPS calculation for any changes in income or loss that would result if the contract had been reported as an equity instrument. The amendments specify that an entity should consider whether including the potential common shares would have a dilutive effect on the diluted EPS computation by evaluating the combined effect of any numerator and denominator adjustment, even if a loss from continuing operations exists. The guidance is effective for all entities for annual reporting periods beginning after 15 December 2026, and interim periods within those annual periods. Early adoption is permitted.

Segment reporting

Similarities

The requirements for segment reporting under both ASC 280 and IFRS 8 apply to entities with public reporting requirements and are based on a “management approach” in identifying the reportable segments. The two standards are largely converged, and only limited differences exist.

Significant differences

	US GAAP	IFRS Accounting Standards
Determination of segments under a “matrix” form of organization	A “matrix” form of organization is a structure in which different components are managed in more than one way, and the chief operating decision maker (CODM) reviews all of the information provided. For example, in some public entities, certain managers are responsible for different product and service lines worldwide, while other managers are responsible for specific geographic areas. The CODM regularly reviews the operating results of both sets of components, and financial information is available for both. In this situation, ASC 280 requires that the components that are based on products and services be considered the operating segments.	All entities determine segments based on the management approach, regardless of form of organization.
Disclosure of segment liabilities	Entities are not required to disclose segment liabilities even if reported to the CODM.	If regularly reported to the CODM, segment liabilities are a required disclosure.
Disclosure of long-lived assets	For the purposes of entity-wide geographic area disclosures, the definition of long-lived assets implies hard assets that cannot be readily removed, which would exclude intangible assets, including goodwill.	Disclosure of geographical information for noncurrent assets is required. In a balance sheet that is classified according to liquidity, noncurrent assets are assets that include amounts expected to be recovered more than 12 months after the balance sheet date. These noncurrent assets often include intangible assets.
Disclosure of aggregation	Entities must disclose whether operating segments have been aggregated.	Entities must disclose whether operating segments have been aggregated and the judgments made in applying the aggregation criteria, including a brief description of the operating segments that have been aggregated and the economic indicators that have been assessed in determining economic similarity.

	US GAAP	IFRS Accounting Standards
Disclosure of expense categories	All public entities, including those with a single reportable segment, are required to disclose, on an interim and annual basis, significant expense categories and amounts that are regularly provided to the CODM and included in reported measure of profit or loss. Additionally, an entity is required to disclose, for each reportable segment, an amount for other segment items and a qualitative description of the composition of those other segment items.	IFRS 8 requires annual disclosure of material items of expense, which may overlap with the US GAAP requirements to disclose significant expense categories. However, IFRS 8 does not have comparable requirements to disclose other segment items for each reportable segment.

Standard setting activities

There is no significant standard setting activity in this area.

Subsequent events and going concern

Similarities

Despite some differences in terminology, the accounting for subsequent events under ASC 855, *Subsequent Events*, and IAS 10 *Events after the Reporting Period* is largely similar. An event that occurs during the subsequent events period that provides additional evidence about conditions existing at the balance sheet date usually results in an adjustment to the financial statements. If the event occurring after the balance sheet date relates to conditions that arose after the balance sheet date, the financial statements are generally not adjusted, but disclosure may be necessary to keep the financial statements from being misleading.

The going concern assumption is a fundamental principle in the preparation of financial statements under both ASC 205-40, *Presentation of Financial Statements – Going Concern*, and IAS 1. Under the going concern assumption, an entity is ordinarily viewed as continuing in business for

the foreseeable future with neither the intention nor the necessity of liquidation, ceasing operations or seeking protection from creditors pursuant to laws or regulations. An entity that is a going concern is one that has the ability to realize its assets and discharge its liabilities in the normal course of operations.

Both US GAAP and IFRS Accounting Standards also require management to assess an entity's ability to continue as a going concern. When events and conditions that raise substantial doubt about (US GAAP), or when material uncertainties related to events or conditions cast significant doubt upon (IFRS Accounting Standards), an entity's ability to continue as a going concern, certain disclosures are required under both US GAAP and IFRS Accounting Standards.

Even with these similarities, some application differences exist that are discussed below.

Significant differences

	US GAAP	IFRS Accounting Standards
Date through which subsequent events must be evaluated	<p>Subsequent events are evaluated through the date the financial statements are issued (SEC registrants and conduit bond obligors for conduit debt securities that are traded in a public market) or available to be issued (all entities other than SEC registrants or conduit bond obligors). Financial statements are considered issued when they are widely distributed to shareholders or other users in a form that complies with US GAAP. Financial statements are considered available to be issued when they are in a form that complies with US GAAP and all necessary approvals have been obtained.</p> <p>Unless the entity is an SEC filer, it is required to disclose the dates through which it evaluated subsequent events, and whether that date is the date the financial statements were issued or the date the financial statements were available to be issued.</p> <p>Disclosure in the financial statements of the date through which subsequent events were evaluated is not required for SEC filers.</p>	<p>Subsequent events are evaluated through the date that the financial statements are "authorized for issue." Depending on an entity's corporate governance structure and statutory requirements, authorization procedures may vary.</p> <p>Entities are required to disclose the date when the financial statements were authorized for issue (i.e., the date through which subsequent events were evaluated), who gave that authorization and if the owners of the entity or others have the power to amend them after issue.</p>

	US GAAP	IFRS Accounting Standards
Reissuance of financial statements	<p>If the financial statements are reissued, events or transactions may have occurred that require disclosure in the reissued financial statements to keep them from being misleading. However, an entity should not recognize events occurring between the time the financial statements were issued or available to be issued and the time the financial statements were reissued unless the adjustment is required by US GAAP or regulatory requirements (e.g., stock splits, discontinued operations or the effect of adopting a new accounting standard retrospectively).</p> <p>Unless the entity is an SEC filer, it is required to disclose in the revised financial statements the dates through which it evaluated subsequent events in both the issued or available-to-be-issued financial statements and the revised financial statements (i.e., financial statements revised only for correction of an error or retrospective application of US GAAP).</p> <p>Disclosure in the revised financial statements of the date through which subsequent events were evaluated is not required for SEC filers.</p>	<p>IAS 10 does not address the reissuance of financial statements and recognizes only one date through which subsequent events are evaluated (i.e., the date that the financial statements are authorized for issue, even if they are being reissued). If an entity reissues financial statements, such as to correct an error or to include subsequent events that occurred after the financial statements were originally authorized for issue, there is a new date of authorization to issue the financial statements. This date is disclosed in the financial statements with respect to the evaluation of subsequent events, and an entity could have adjusting subsequent events in reissued financial statements.</p> <p>IAS 10 does not address the presentation of reissued financial statements in an offering document when the originally issued financial statements have not been withdrawn, but the reissued financial statements are provided either as supplementary information or as a representation of the originally issued financial statements in an offering document in accordance with regulatory requirements.</p>
Going concern assessment	<p>Management must evaluate whether there are conditions and events, considered in the aggregate, that raise substantial doubt about an entity's ability to continue as a going concern within one year after the date the financial statements are issued (or within one year after the date the financial statements are available to be issued, when applicable).</p> <p>Management's evaluation is based on relevant conditions and events known and reasonably knowable at the date the financial statements are issued.</p> <p>Furthermore, if, after considering management's plans, substantial doubt about an entity's ability to continue as a going concern is alleviated as a result of consideration of management's plans, incremental disclosures are required.</p>	<p>In assessing whether the going concern assumption is appropriate, management considers all available information about the future, which is at least, but is not limited to, 12 months from the end of the reporting period (i.e., balance sheet date).</p> <p>While there are no specific disclosure requirements under IAS 1 when substantial doubt about an entity's ability to continue as a going concern is alleviated as a result of consideration of management's plans, an entity should consider the disclosure requirements in IAS 1.25.</p>

Standard setting activities

There is no significant standard setting activity in this area.

IFRS Accounting Standards resources

The EY organization offers a variety of online resources that provide more detail about IFRS Accounting Standards as well as things to consider as you research the potential impact of IFRS Accounting Standards on your company.

www.ey.com/ifrs

The EY organization's global website contains a variety of free resources, including:

- ▶ International GAAP® – written by EY professionals and updated annually, this is a comprehensive guide to interpreting and implementing IFRS Accounting Standards and provides insights into how complex practical issues should be resolved in the real world of global financial reporting.
- ▶ IFRS Developments – announces significant decisions on technical topics that have a broad audience, application or appeal.
- ▶ *Applying IFRS* – provides more detailed analyses of proposals, standards or interpretations and discussion of how to apply them.
- ▶ Other technical publications – including a variety of publications focused on specific standards and industries.
- ▶ Good Group Illustrative IFRS Financial Statements – a set of illustrative interim and annual financial statements that incorporates applicable presentation and disclosure requirements. Also provided is a range of industry-specific illustrative financial statements.
- ▶ International GAAP® Disclosure checklists – checklists designed to assist in the preparation of financial statements in accordance with IFRS Accounting Standards, as issued by the IASB, and in compliance with the disclosure requirements of IFRS Accounting Standards.
- ▶ From here you can also locate information about free web-based training on IFRS Accounting Standards and our Thought center webcast series.

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