

9 September 2026

International Accounting Standards Board
7 West Ferry Circus
Canary Wharf
London E14 4HD
United Kingdom
Email: commentletters@ifrs.org

Dear Sir/Madam

SAICA SUBMISSION ON TENTATIVE AGENDA DECISION: MANAGEMENT-DEFINED PERFORMANCE MEASURES—PUBLIC COMMUNICATIONS (IFRS 18)

In response to your request for comments on Tentative Agenda Decision: Management-defined Performance Measures—Public Communications (IFRS 18), attached is the comment letter prepared by the South African Institute of Chartered Accountants (SAICA). This comment letter results from deliberations of SAICA's Accounting Practices Committee (APC), which comprises members from reporting organisations, preparers, regulators, auditors, IFRS specialists, investment analysts and academics.

We thank you for the opportunity to provide comments on this Tentative Agenda Decision.

Please do not hesitate to contact us should you wish to discuss any of our comments.

Blaise Colyvas
Chairperson: APC

Mulala Ratshitanga
Lead: Financial Reporting

Cc: Kedibone Sono
Head: Financial Reporting

Milton Segal
Executive: Standards





The Committee received a request asking whether presentations provided on a confidential basis to a small number of identifiable shareholders or potential investors are public communications for the purpose of identifying a management-defined performance measure applying IFRS 18.

Fact pattern

The request described a fact pattern in which:

- a. a private entity prepares and shares presentations (including pitch materials) with a small number of identifiable shareholders or potential investors. The presentations contain performance measures that could otherwise meet the definition of a management-defined performance measure;
- b. the presentations are shared under agreements that require confidentiality and prevent redistribution of the presentations to other parties; and
- c. the presentations are not published online, included in press releases, distributed to analysts, or otherwise made accessible to a broader or undefined external audience.

Applying the requirements in IFRS 18

Paragraph 117 of IFRS 18 contains the definition of a management-defined performance measure. Part (a) of the definition states that to be a management-defined performance measure, a subtotal of income and expenses must be used 'in public communications outside financial statements'.

To help entities assess whether a communication is a public communication, paragraph B119 of IFRS 18 lists particular communications that 'public communications' include and exclude. The Committee observed that the reference to 'investor presentations' in paragraph B119 of IFRS 18 should not be read to mean that all presentations provided to investors are public communications.

The Committee noted that an entity applies judgement in assessing whether a particular communication is a public communication. In paragraph BC335 of the Basis for Conclusions accompanying IFRS 18, the IASB observed that 'an entity actively decides how it communicates publicly and the performance measures it includes in those communications. An entity usually has systems and processes in place to monitor and control its communications to comply with laws and regulations restricting the type and timing of information permitted to be provided to the market...'.

The Committee concluded that the presentations described in the fact pattern are not public communications for the purposes of identifying a management-defined performance measure applying IFRS 18.

Conclusion

The Committee concluded that the principles and requirements in IFRS 18 provide an adequate basis for the entity to assess whether the presentations described in the fact pattern are public communications for the purpose of identifying a management-defined performance measure applying



IFRS 18. Consequently, the Committee [decided] that a standard-setting project is not needed to address the request.

SPECIFIC COMMENTS

We do not have specific comments on this agenda decision. We agree with the conclusion reached by the IASB staff and there is sufficient guidance available on this matter.