Amendments to HKAS 21
Issued September 2023

Effective for annual reporting periods
beginning on or after 1 January 2025

Amendments to HKAS 21

Lack of Exchangeability

Hong Kong Institute of
Certified Public Accountants
香港會計師公會

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Amendments to HKAS 21 *The Effects of Changes in Foreign Exchange Rates*

Paragraphs 8 and 26 are amended. Paragraphs 8A–8B, 19A and their related headings, paragraphs 57A–57B, 60L–60M and Appendix A are added. New text is underlined and deleted text is struck through. For ease of reading, text in Appendix A has not been underlined.

Definitions

8 The following terms are used in this Standard with the meanings specified:

...

A currency is *exchangeable* into another currency when an entity is able to obtain the other currency within a time frame that allows for a normal administrative delay and through a market or exchange mechanism in which an exchange transaction would create enforceable rights and obligations.

...

Elaboration on the definitions

Exchangeable (paragraphs A2–A10)

8A An entity assesses whether a currency is exchangeable into another currency:

(a) at a measurement date; and

(b) for a specified purpose.

8B If an entity is able to obtain no more than an insignificant amount of the other currency at the measurement date for the specified purpose, the currency is not exchangeable into the other currency.

...

Estimating the spot exchange rate when a currency is not exchangeable (paragraphs A11–A17)

19A An entity shall estimate the spot exchange rate at a measurement date when a currency is not exchangeable into another currency (as described in paragraphs 8, 8A–8B and A2–A10) at that date. An entity's objective in estimating the spot exchange rate is to reflect the rate at which an orderly exchange transaction would take place at the measurement date between market participants under prevailing economic conditions.

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Reporting foreign currency transactions in the functional currency

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Reporting at the ends of subsequent reporting periods

...

26 When several exchange rates are available, the rate used is that at which the future cash flows represented by the transaction or balance could have been settled if those cash flows had occurred at the measurement date. ~~If exchangeability between two currencies is temporarily lacking, the rate used is the first subsequent rate at which exchanges could be made.~~

...

Disclosure

...

57A When an entity estimates a spot exchange rate because a currency is not exchangeable into another currency (see paragraph 19A), the entity shall 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. To achieve this objective, an entity shall disclose information about:

(a) the nature and financial effects of the currency not being exchangeable into the other currency;

(b) the spot exchange rate(s) used;

(c) the estimation process; and

(d) the risks to which the entity is exposed because of the currency not being exchangeable into the other currency.

57B Paragraphs A18–A20 specify how an entity applies paragraph 57A.

Effective date and transition

...

60L *Lack of Exchangeability*, issued in September 2023, amended paragraphs 8 and 26, and added paragraphs 8A–8B, 19A, 57A–57B and Appendix A. An entity shall apply those amendments for annual reporting periods beginning on or after 1 January 2025. Earlier application is permitted. If an entity applies the amendments for an earlier period, it shall disclose that fact. The date of initial application is the beginning of the annual reporting period in which an entity first applies those amendments.

60M In applying *Lack of Exchangeability*, an entity shall not restate comparative information. Instead:

(a) when the entity reports foreign currency transactions in its functional currency, and, at the date of initial application, concludes that its functional currency is not exchangeable into the foreign currency or, if applicable, concludes that the foreign currency is not exchangeable into its functional currency, the entity shall, at the date of initial application:

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(i) translate affected foreign currency monetary items, and non-monetary items measured at fair value in a foreign currency, using the estimated spot exchange rate at that date; and

(ii) recognise any effect of initially applying the amendments as an adjustment to the opening balance of retained earnings.

(b) when the entity uses a presentation currency other than its functional currency, or translates the results and financial position of a foreign operation, and, at the date of initial application, concludes that its functional currency (or the foreign operation's functional currency) is not exchangeable into its presentation currency or, if applicable, concludes that its presentation currency is not exchangeable into its functional currency (or the foreign operation's functional currency), the entity shall, at the date of initial application:

(i) translate affected assets and liabilities using the estimated spot exchange rate at that date;

(ii) translate affected equity items using the estimated spot exchange rate at that date if the entity's functional currency is hyperinflationary; and

(iii) recognise any effect of initially applying the amendments as an adjustment to the cumulative amount of translation differences—accumulated in a separate component of equity.

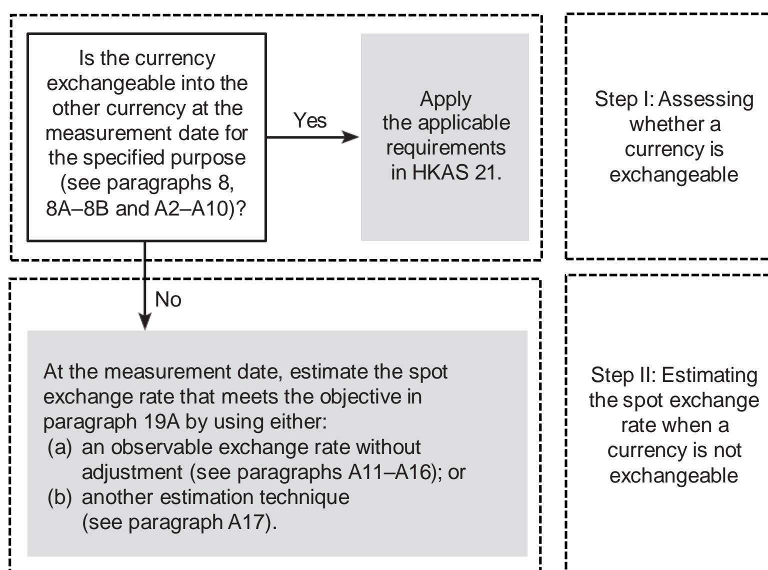
...

Appendix A
Application guidance

This appendix is an integral part of the Standard.

Exchangeability

A1 The purpose of the following diagram is to help entities assess whether a currency is exchangeable and estimate the spot exchange rate when a currency is not exchangeable.



Step I: Assessing whether a currency is exchangeable (paragraphs 8 and 8A–8B)

A2 Paragraphs A3–A10 set out application guidance to help an entity assess whether a currency is exchangeable into another currency. An entity might determine that a currency is not exchangeable into another currency, even though that other currency might be exchangeable in the other direction. For example, an entity might determine that currency PC is not exchangeable into currency LC, even though currency LC is exchangeable into currency PC.

Time frame

A3 Paragraph 8 defines a spot exchange rate as the exchange rate for immediate delivery. However, an exchange transaction might not always complete instantaneously because of legal or regulatory requirements, or for practical reasons such as public holidays. A normal administrative delay in obtaining the other currency does not preclude a currency from being exchangeable into that other currency. What constitutes a normal administrative delay depends on facts and circumstances.

Ability to obtain the other currency

A4 In assessing whether a currency is exchangeable into another currency, an entity shall consider its ability to obtain the other currency, rather than its intention or decision to do so. Subject to the other requirements in paragraphs A2–A10, a currency is exchangeable into another currency if an entity is able to obtain the other currency—either directly or indirectly—even if it intends or decides not to do so. For example, subject to the other requirements in paragraphs A2–A10, regardless of whether the entity intends or decides to obtain PC, currency LC is exchangeable into currency PC if an entity is able to either exchange LC for PC, or exchange LC for another currency (FC) and then exchange FC for PC.

Markets or exchange mechanisms

A5 In assessing whether a currency is exchangeable into another currency, an entity shall consider only markets or exchange mechanisms in which a transaction to exchange the currency for the other currency would create enforceable rights and obligations. Enforceability is a matter of law. Whether an exchange transaction in a market or exchange mechanism would create enforceable rights and obligations depends on facts and circumstances.

Purpose of obtaining the other currency

A6 Different exchange rates might be available for different uses of a currency. For example, a jurisdiction facing pressure on its balance of payments might wish to deter capital remittances (such as dividend payments) to other jurisdictions but encourage imports of specific goods from those jurisdictions. In such circumstances, the relevant authorities might:

(a) set a preferential exchange rate for imports of those goods and a ‘penalty’ exchange rate for capital remittances to other jurisdictions, thus resulting in different exchange rates applying to different exchange transactions; or

(b) make the other currency available only to pay for imports of those goods and not for capital remittances to other jurisdictions.

A7 Accordingly, whether a currency is exchangeable into another currency could depend on the purpose for which the entity obtains (or hypothetically might need to obtain) the other currency. In assessing exchangeability:

(a) when an entity reports foreign currency transactions in its functional currency (see paragraphs 20–37), the entity shall assume its purpose in obtaining the other currency is to realise or settle individual foreign currency transactions, assets or liabilities.

(b) when an entity uses a presentation currency other than its functional currency (see paragraphs 38–43), the entity shall assume its purpose in obtaining the other currency is to realise or settle its net assets or net liabilities.

(c) when an entity translates the results and financial position of a foreign operation into the presentation currency (see paragraphs 44–47), the entity shall assume its purpose in obtaining the other currency is to realise or settle its net investment in the foreign operation.

A8 An entity's net assets or net investment in a foreign operation might be realised by, for example:

(a) the distribution of a financial return to the entity's owners;

(b) the receipt of a financial return from the entity's foreign operation; or

(c) the recovery of the investment by the entity or the entity's owners, such as through disposal of the investment.

A9 An entity shall assess whether a currency is exchangeable into another currency separately for each purpose specified in paragraph A7. For example, an entity shall assess exchangeability for the purpose of reporting foreign currency transactions in its functional currency (see paragraph A7(a)) separately from exchangeability for the purpose of translating the results and financial position of a foreign operation (see paragraph A7(c)).

Ability to obtain only limited amounts of the other currency

A10 A currency is not exchangeable into another currency if, for a purpose specified in paragraph A7, an entity is able to obtain no more than an insignificant amount of the other currency. An entity shall assess the significance of the amount of the other currency it is able to obtain for a specified purpose by comparing that amount with the total amount of the other currency required for that purpose. For example, an entity with a functional currency of LC has liabilities denominated in currency FC. The entity assesses whether the total amount of FC it can obtain for the purpose of settling those liabilities is no more than an insignificant amount compared with the aggregated amount (the sum) of its liability balances denominated in FC.

Step II: Estimating the spot exchange rate when a currency is not exchangeable (paragraph 19A)

A11 This Standard does not specify how an entity estimates the spot exchange rate to meet the objective in paragraph 19A. An entity can use an observable exchange rate without adjustment (see paragraphs A12–A16) or another estimation technique (see paragraph A17).

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Using an observable exchange rate without adjustment

A12 In estimating the spot exchange rate as required by paragraph 19A, an entity may use an observable exchange rate without adjustment if that observable exchange rate meets the objective in paragraph 19A. Examples of an observable exchange rate include:

(a) a spot exchange rate for a purpose other than that for which an entity assesses exchangeability (see paragraphs A13–A14); and

(b) the first exchange rate at which an entity is able to obtain the other currency for the specified purpose after exchangeability of the currency is restored (first subsequent exchange rate) (see paragraphs A15–A16).

Using an observable exchange rate for another purpose

A13 A currency that is not exchangeable into another currency for one purpose might be exchangeable into that currency for another purpose. For example, an entity might be able to obtain a currency to import specific goods but not to pay dividends. In such situations, the entity might conclude that an observable exchange rate for another purpose meets the objective in paragraph 19A. If the rate meets the objective in paragraph 19A, an entity may use that rate as the estimated spot exchange rate.

A14 In assessing whether such an observable exchange rate meets the objective in paragraph 19A, an entity shall consider, among other factors:

(a) *whether several observable exchange rates exist*—the existence of more than one observable exchange rate might indicate that exchange rates are set to encourage, or deter, entities from obtaining the other currency for particular purposes. These observable exchange rates might include an 'incentive' or 'penalty' and therefore might not reflect the prevailing economic conditions.

(b) *the purpose for which the currency is exchangeable*—if an entity is able to obtain the other currency only for limited purposes (such as to import emergency supplies), the observable exchange rate might not reflect the prevailing economic conditions.

(c) *the nature of the exchange rate*—a free-floating observable exchange rate is more likely to reflect the prevailing economic conditions than an exchange rate set through regular interventions by the relevant authorities.

(d) *the frequency with which exchange rates are updated*—an observable exchange rate unchanged over time is less likely to reflect the prevailing economic conditions than an observable exchange rate that is updated on a daily basis (or even more frequently).

Using the first subsequent exchange rate

A15 A currency that is not exchangeable into another currency at the measurement date for a specified purpose might subsequently become exchangeable into that currency for that purpose. In such situations, an entity might conclude that the first subsequent exchange rate meets the objective in paragraph 19A. If the rate meets the objective in paragraph 19A, an entity may use that rate as the estimated spot exchange rate.

A16 In assessing whether the first subsequent exchange rate meets the objective in paragraph 19A, an entity shall consider, among other factors:

(a) *the time between the measurement date and the date at which exchangeability is restored*—the shorter this period, the more likely the first subsequent exchange rate will reflect the prevailing economic conditions.

(b) *inflation rates*—when an economy is subject to high inflation, including when an economy is hyperinflationary (as specified in HKAS 29 *Financial Reporting in Hyperinflationary Economies*), prices often change quickly, perhaps several times a day. Accordingly, the first subsequent exchange rate for a currency of such an economy might not reflect the prevailing economic conditions.

Using another estimation technique

A17 An entity using another estimation technique may use any observable exchange rate—including rates from exchange transactions in markets or exchange mechanisms that do not create enforceable rights and obligations—and adjust that rate, as necessary, to meet the objective in paragraph 19A.

Disclosure when a currency is not exchangeable

A18 An entity shall consider how much detail is necessary to satisfy the disclosure objective in paragraph 57A. An entity shall disclose the information specified in paragraphs A19–A20 and any additional information necessary to meet the disclosure objective in paragraph 57A.

A19 In applying paragraph 57A, an entity shall disclose:

(a) the currency and a description of the restrictions that result in that currency not being exchangeable into the other currency;

(b) a description of affected transactions;

(c) the carrying amount of affected assets and liabilities;

(d) the spot exchange rates used and whether those rates are:

(i) observable exchange rates without adjustment (see paragraphs A12–A16); or

(ii) spot exchange rates estimated using another estimation technique (see paragraph A17);

(e) a description of any estimation technique the entity has used, and qualitative and quantitative information about the inputs and assumptions used in that estimation technique; and

(f) qualitative information about each type of risk to which the entity is exposed because the currency is not exchangeable into the other currency, and the nature and carrying amount of assets and liabilities exposed to each type of risk.

A20 When a foreign operation's functional currency is not exchangeable into the presentation currency or, if applicable, the presentation currency is not exchangeable into a foreign operation's functional currency, an entity shall also disclose:

(a) the name of the foreign operation; whether the foreign operation is a subsidiary, joint operation, joint venture, associate or branch; and its principal place of business;

(b) summarised financial information about the foreign operation; and

(c) the nature and terms of any contractual arrangements that could require the entity to provide financial support to the foreign operation, including events or circumstances that could expose the entity to a loss.

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A heading is amended. New text is underlined.

Appendix B
Amendments to other pronouncements

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Amendments to HKFRS 1 *First-time Adoption of Hong Kong Financial Reporting Standards*

Paragraphs 31C and D27 are amended and paragraph 39AI is added. New text is underlined and deleted text is struck through.

Presentation and disclosure

...

Explanation of transition to HKFRSs

...

Use of deemed cost after severe hyperinflation

31C If an entity elects to measure assets and liabilities at fair value and to use that fair value as the deemed cost in its opening HKFRS statement of financial position because of severe hyperinflation (see paragraphs D26–D30), the entity's first HKFRS financial statements shall disclose an explanation of how, and why, the entity had, and then ceased to have, a functional currency that is subject to severe hyperinflation. ~~has both of the following characteristics:~~

~~(a) a reliable general price index is not available to all entities with transactions and balances in the currency.~~

~~(b) exchangeability between the currency and a relatively stable foreign currency does not exist.~~

...

Effective date

...

39AI *Lack of Exchangeability* (Amendments to HKAS 21), issued in September 2023, amended paragraphs 31C and D27. An entity shall apply those amendments when it applies HKAS 21 (as amended in September 2023).

...

Appendix D
Exemptions from other HKFRSs

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Severe hyperinflation

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D27 The currency of a hyperinflationary economy is subject to severe hyperinflation if it has both of the following characteristics:

(a) a reliable general price index is not available to all entities with transactions and balances in the currency.

(b) ~~exchangeability between~~ the currency is not exchangeable into ~~and~~ a relatively stable foreign currency ~~does not exist~~. Exchangeability is assessed in accordance with HKAS 21.

Illustrative Examples accompanying IAS 21 *The Effects of Changes in Foreign Exchange Rates*

Illustrative Examples accompanying IAS 21 have been added. For ease of reading, new text is not underlined.

These examples accompany, but are not part of, IAS 21. They illustrate aspects of IAS 21 but are not intended to provide interpretative guidance.

Introduction

IE1 These examples illustrate how an entity might apply some of the requirements in IAS 21 in hypothetical situations based on the limited facts presented. Although some aspects of the examples might be present in actual fact patterns, fact patterns in the examples are simplified, and an entity would need to evaluate all relevant facts and circumstances when applying IAS 21. The examples do not illustrate all the requirements in IAS 21, nor do they create additional requirements.

Exchangeability

IE2 Examples 1–3 illustrate how an entity assesses whether a currency is exchangeable (Step I as set out in paragraphs 8, 8A–8B and A2–A10). Examples 4–5 illustrate how an entity estimates the spot exchange rate when a currency is not exchangeable (Step II as set out in paragraphs 19A and A11–A17). In all five examples:

(a) Entity X's functional and presentation currency is PC. Entity X prepares consolidated financial statements.

(b) Entity X has a subsidiary, Entity Y, that is a foreign operation. Entity Y's functional currency is LC, the currency of the jurisdiction in which Entity Y operates. The relevant authority administers the exchangeability of LC for other currencies.

Step I: Assessing whether a currency is exchangeable (paragraphs 8, 8A–8B and A2–A10)

Example 1—Time frame

IE3 The relevant authority in Entity Y's jurisdiction makes PC available to entities in exchange for LC only after completion of an administrative process. The authority requires entities wishing to obtain PC to explain how they intend to use PC when submitting a request for PC. In usual circumstances, an entity obtains PC after N days—that is, N days is the time the authority needs, under its administrative process, to perform checks and provide PC.

IE4 Entity X considers N days to be a normal administrative delay applying to a transaction to exchange LC for PC through this exchange mechanism. Subject to the other requirements in paragraphs A2–A10, Entity X considers LC to be exchangeable into PC if Entity X is able to obtain PC within N days of requesting it.

Example 2—Markets or exchange mechanisms

IE5 The relevant authority in Entity Y's jurisdiction is unable to meet demand for PC and temporarily stops making PC available through the exchange mechanism it administers. In the absence of this exchange mechanism, individual resellers settle transactions to exchange LC for PC at an exchange rate that is not set by the authority. These exchange transactions do not create enforceable rights and obligations, and no other markets or exchange mechanisms exist in which a transaction to exchange LC for PC would create such rights and obligations.

IE6 In assessing whether LC is exchangeable into PC, Entity X considers only markets or exchange mechanisms in which a transaction to exchange LC for PC would create enforceable rights and obligations. Entity X concludes that LC is not exchangeable into PC because the exchange transactions with individual resellers do not create enforceable rights and obligations, and no other markets or exchange mechanisms exist in which a transaction to exchange LC for PC would create such rights and obligations.

Example 3—Purpose of obtaining the other currency

IE7 The relevant authority in Entity Y's jurisdiction prevents entities from obtaining PC for purposes other than importing food and medicine.

IE8 In translating the results and financial position of Entity Y, Entity X assesses whether it is able to obtain PC for the purpose of realising its net investment in Entity Y. Because Entity X is prevented from obtaining PC for this purpose, Entity X concludes that LC is not exchangeable into PC. Entity X's ability to obtain PC for the purpose of importing food and medicine is irrelevant to the assessment.

Step II: Estimating the spot exchange rate when a currency is not exchangeable (paragraphs 19A and A11–A16)

Example 4—Using an observable exchange rate for another purpose (paragraphs A11–A14)

Fact pattern

IE9 At 31 December 20X1 the relevant authority in Entity Y's jurisdiction prevents entities from obtaining PC for the purpose of realising a net investment in an entity operating in that jurisdiction. Other than that restriction, entities are able to obtain PC and the LC:PC exchange rate is free-floating. Only one exchange rate applies to transactions for exchanges of LC for PC; it is updated several times a day.

IE10 At the measurement date of 31 December 20X1 Entity X is unable to obtain PC to realise its net investment in Entity Y. Therefore, Entity X concludes that LC is not exchangeable into PC.

Estimating the spot exchange rate

IE11 Because Entity X concludes that LC is not exchangeable into PC, Entity X is required to estimate the spot exchange rate that meets the objective in paragraph 19A.

IE12 Applying paragraphs A11–A14, Entity X considers whether it might use the observable LC:PC exchange rate for the purpose of realising a net investment in an entity. To do so, it assesses whether that observable exchange rate meets the objective in paragraph 19A and considers:

(a) *whether several exchange rates exist*—only one observable exchange rate exists between LC and PC.

(b) *the purpose for which the currency is exchangeable*—Entity X is able to obtain PC for any transaction other than a transaction that would result in the realisation of its net investment in Entity Y.

(c) *the nature of the exchange rate*—the observable exchange rate is free-floating.

(d) *the frequency with which exchange rates are updated*—the observable exchange rate is updated several times a day.

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IE13 Considering these factors, Entity X determines that the observable LC:PC exchange rate meets the objective in paragraph 19A. Therefore, Entity X may use that observable exchange rate as the estimated spot exchange rate when it translates the results and financial position of Entity Y.

Example 5—Using the first subsequent exchange rate (paragraphs A11–A12 and A15–A16)

Fact pattern

IE14 At 31 December 20X1 the jurisdiction in which Entity Y operates is subject to hyperinflation. The relevant authority in Entity Y's jurisdiction prevents entities from obtaining PC for the purpose of realising a net investment in an entity operating in that jurisdiction. However, from 30 April 20X2, the authority allows entities to obtain PC for that purpose.

IE15 At the measurement date of 31 December 20X1 Entity X is unable to obtain PC to realise its net investment in Entity Y. Therefore, Entity X concludes that LC is not exchangeable into PC.

Estimating the spot exchange rate

IE16 Because Entity X concludes that LC is not exchangeable into PC, Entity X is required to estimate the spot exchange rate that meets the objective in paragraph 19A.

IE17 Applying paragraphs A11–A12 and A15–A16, Entity X considers whether it might use the first exchange rate at which it is able to obtain the other currency after exchangeability of the currency is restored (first subsequent exchange rate). To do so, it assesses whether that first subsequent exchange rate meets the objective in paragraph 19A and considers:

(a) *the time between the measurement date and the date at which exchangeability is restored*—exchangeability is restored four months after the measurement date.

(b) *inflation rate*—the jurisdiction in which Entity Y operates is subject to hyperinflation.

IE18 Considering these factors, Entity X determines that the first subsequent exchange rate does not reflect the prevailing economic conditions at the measurement date. Therefore, the first subsequent exchange rate does not meet the objective in paragraph 19A for the purpose of realising Entity X's net investment in Entity Y. However, Entity X could adjust that rate, as necessary, to estimate a rate that meets the objective in paragraph 19A for realising its net investment in Entity Y.

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Amendments to the Basis for Conclusions on IAS 21 *The Effects of Changes in Foreign Exchange Rates*

This Basis for Conclusions accompanies, but is not part of, IAS 21.

Paragraphs BC41–BC65 and their heading and subheadings are added. For ease of reading, these paragraphs and their headings have not been underlined.

Lack of Exchangeability

Background to the August 2023 amendments

BC41 In August 2023 the IASB issued *Lack of Exchangeability* and amended the Standard to improve the usefulness of information provided to users of financial statements. The amendments require entities to apply a consistent approach to determining whether a currency is exchangeable into another currency and the spot exchange rate to use when it is not. The IASB had been informed of diverse views among stakeholders on how to determine whether a currency is exchangeable into another currency and the exchange rate to use when it is not. Although circumstances in which a currency is not exchangeable into another currency might arise relatively infrequently, when they do arise, economic conditions can deteriorate rapidly. In those circumstances, the diverse views on the application of the Standard could have led to material differences in affected entities' financial statements. In developing the amendments, the IASB considered input from the IFRS Interpretations Committee and feedback from stakeholders on the IASB's April 2021 Exposure Draft *Lack of Exchangeability*.

Assessing whether a currency is exchangeable

BC42 Many factors influence the exchangeability of one currency into another currency. To make the definition of 'exchangeable' operational and to help entities apply that definition consistently, the Standard specifies when an entity is able to exchange a currency for another currency. In developing the definition and related application guidance, the IASB discussed the following questions:

(a) what time frame for obtaining the other currency does an entity consider (see paragraphs BC43–BC44)?

(b) what if an entity is able to obtain the other currency, but does not intend to do so (see paragraph BC45)?

(c) which markets or exchange mechanisms for obtaining the other currency does an entity consider (see paragraph BC46)?

(d) what is the purpose for which an entity obtains the other currency (see paragraphs BC47–BC50)?

(e) what if an entity is able to obtain only limited amounts of the other currency (see paragraphs BC51–BC52)?

Time frame

BC43 The IASB concluded that a normal administrative delay in obtaining the other currency:

(a) does not contradict the notion of 'immediate delivery' in the definition of a spot exchange rate in paragraph 8 of the Standard. In the IASB's view, the notion of 'immediate delivery' incorporates a short period of time to meet administrative, legal or regulatory requirements in exchanging currencies.

(b) does not preclude a currency from being exchangeable into that other currency. In the IASB's view, acknowledging the existence of normal administrative delays in currency exchanges improves the operability of the requirements. If an entity cannot consider a normal administrative delay in its assessment of the time frame to exchange one currency for another, the entity might inappropriately conclude that a currency is not exchangeable into another currency.

BC44 The IASB decided not to develop application guidance on what constitutes a 'normal administrative delay'—this assessment would depend on facts and circumstances.

Ability to obtain the other currency

BC45 The IASB decided that assessing whether a currency is exchangeable into another currency depends on an entity's ability to obtain the other currency and not on its intention or decision to do so. For example, a currency can be exchangeable into another currency for the purpose of realising an entity's net investment in a foreign operation even if the entity has no intention of entering into a transaction that would result in realising that net investment. This requirement is consistent with other requirements in the Standard—for example, the requirement to use a spot exchange rate when translating amounts into another currency, regardless of an entity's intention or decision to enter into a transaction at that spot exchange rate.

Markets or exchange mechanisms

BC46 The IASB observed that the nature and type of markets or exchange mechanisms can vary between jurisdictions. The IASB discussed whether to require an entity to consider specified markets or exchange mechanisms (for example, government-administered exchange mechanisms) when assessing exchangeability. The IASB decided that, when assessing whether a currency is exchangeable into another currency, entities consider only markets or exchange mechanisms in which a transaction to exchange that currency into the other currency would create enforceable rights and obligations.

Purpose of obtaining the other currency

BC47 In many jurisdictions (particularly those in which exchange rates are free-floating), only one exchange rate exists between two currencies. In such jurisdictions, the purpose for which an entity intends to use the other currency would neither change the exchange rate nor affect the entity's ability to obtain that other currency. However, for some currencies, different exchange rates might apply for different uses, which could affect an entity's ability to obtain those currencies. The IASB therefore concluded that it is important for an entity to consider the purpose for which it obtains the other currency.

BC48 The IASB considered, separately, situations in which an entity:

(a) reports foreign currency transactions in its functional currency (see paragraph BC49); and

(b) uses a presentation currency other than its functional currency or translates the results and financial position of a foreign operation (see paragraph BC50).

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BC49 Paragraphs 20–37 of the Standard specify requirements for reporting foreign currency transactions in the functional currency. These requirements apply to individual foreign currency transactions, and monetary and non-monetary items relating to such transactions. The IASB decided that, when reporting foreign currency transactions, an entity assesses a currency's exchangeability separately for each individual transaction, asset or liability—that is, an entity would assume the purpose of obtaining foreign currency is to realise or settle the individual foreign currency transaction, or an asset or liability related to that transaction. An entity would therefore assess whether it is able to obtain the other currency to realise or settle the transaction, or the asset or liability related to that transaction. Requiring entities to assess each individual transaction, asset or liability does not create a new assessment, because paragraph 26 of the Standard requires an entity to do so when several exchange rates are available.

BC50 Paragraphs 38–49 of the Standard specify requirements for the use of a presentation currency other than the functional currency and for translating the results and financial position of a foreign operation. These requirements apply to all assets and liabilities (that is, the net assets or net liabilities)—and not to individual assets or liabilities—of an entity or its foreign operation. The IASB therefore decided that, in these situations, an entity assesses exchangeability from the perspective of a transaction that would result in realising or settling its net assets or net liabilities (or net investment in the foreign operation). The IASB observed that:

(a) entities in some jurisdictions might experience a delay in remitting dividends, and such a delay would not necessarily result in an entity concluding that a currency is not exchangeable into the other currency; such a delay might reflect a normal administrative delay. Also, an entity concluding that a currency is not exchangeable into another currency does not automatically require the entity to use a complex estimation technique (see paragraph BC55).

(b) an entity considers its ability to realise its net assets (or net investment in a foreign operation) in a single transaction—and not over time—even though an entity might often be unable to realise its net assets in a single transaction. This consideration is consistent with other requirements in the Standard (see paragraph BC49). In accordance with paragraph A10 of the Standard, a currency would be exchangeable into another currency even if an entity is unable to obtain the entire amount—but is able to obtain more than an insignificant amount—of the other currency required to realise its net assets or net investment in a foreign operation (see paragraphs BC51–BC52).

Ability to obtain only limited amounts of the other currency

BC51 An entity might be able to obtain only limited amounts of the other currency. The IASB decided to specify that, in such circumstances, a currency is exchangeable into another currency when an entity is able to obtain more than an insignificant amount of that other currency. This approach is similar to the approach in IFRS 13 *Fair Value Measurement* when the volume or level of activity for an asset or liability has significantly decreased (see paragraphs B37–B42 of IFRS 13), in which case an entity may depart from using unadjusted observable prices. Similarly, when the activity in the market in which an entity obtains the other currency is so low that the entity is able to obtain no more than an insignificant amount of that other currency, the entity estimates the spot exchange rate applying paragraph 19A of the Standard—in which case the entity may depart from using the observable exchange rate.

BC52 In developing the requirements, the IASB considered the level at which an entity assesses the significance of the amount of the other currency it is able to obtain—for example, whether an entity performs this assessment for each transaction and balance separately, or on an aggregated basis. The IASB decided that an entity assesses the significance of the amount of the other currency it is able to obtain for a specified purpose using the aggregate method described in paragraph A10 of the Standard. Instead of requiring an entity to consider each transaction or balance separately, the aggregate method requires an entity to compare the amount of the other currency it is able to obtain with the aggregated amount (the sum) of the transactions or balances it needs to recover or settle.

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Estimating the spot exchange rate when a currency is not exchangeable

BC53 The IASB decided that when one currency is not exchangeable into another currency at a measurement date, an entity estimates the spot exchange rate at that date. The objective in paragraph 19A of the Standard is for an entity to estimate the rate at which an orderly exchange transaction hypothetically would take place at the measurement date between market participants under prevailing economic conditions. This approach is similar to (although not the same as) an entity measuring an asset or liability at fair value by estimating the price at which an orderly transaction to sell the asset or transfer the liability hypothetically would take place at the measurement date.

BC54 The IASB decided not to provide any detailed requirements on how an entity estimates a spot exchange rate because:

(a) estimating a spot exchange rate can be complicated and depends on entity-specific and jurisdiction-specific facts and circumstances.

(b) the economic models an entity might use to estimate a spot exchange rate are varied. These models vary in complexity and in the economic factors they use as inputs (for example, inflation, interest rates, the balance of payments or a jurisdiction's productivity). The IASB decided not to prescribe one particular estimation technique or approach because that technique or approach would be unlikely to capture all relevant factors for all possible situations without being overly burdensome.

(c) the requirements for assessing exchangeability are expected to result in an entity estimating the spot exchange rate only in a narrow set of circumstances.

(d) the uncertainties inherent in estimating a spot exchange rate are similar to those that relate to other financial information based on estimates. An entity is required to disclose relevant information about the estimated spot exchange rate and the estimation technique (see paragraphs BC58–BC62).

(e) such an approach is consistent with the measurement requirements in other IFRS Accounting Standards. For example, IFRS 9 *Financial Instruments* does not specify a particular technique for the measurement of expected credit losses, but instead sets out an objective.

BC55 The IASB noted that when a currency is not exchangeable into another currency, an entity would not necessarily need to use a complex estimation technique. To reduce complexity, the IASB decided to:

(a) specify that an entity may use an observable exchange rate without adjustment as the estimated spot exchange rate, if that observable exchange rate meets the objective in paragraph 19A of the Standard (see paragraph A12 of the Standard).

(b) include two examples of observable exchange rates that an entity could consider and set out a non-exhaustive list of factors to help entities assess whether those observable exchange rates would meet the objective in paragraph 19A of the Standard (see paragraphs A13–A16 of the Standard).

(c) specify that an entity using another estimation technique could, for example, start with an observable exchange rate—including a rate from an exchange transaction in a market or exchange mechanism that does not create enforceable rights and obligations—and adjust that rate, as necessary, to estimate the spot exchange rate as required by paragraph 19A of the Standard (see paragraph A17 of the Standard).

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Other considerations

BC56 The IASB decided not to specify a hierarchy of observable exchange rates to use in estimating a spot exchange rate because doing so might impose costs without providing more useful information. For example, a hierarchy of observable exchange rates would require an entity to look for, and successively consider, each exchange rate in the hierarchy, when it might be more cost-effective for the entity to use another estimation technique.

BC57 When an entity is able to obtain only limited amounts of the other currency, the IASB considered whether to permit or require the entity to use a blended exchange rate (that is, a weighted average exchange rate reflecting both the rate at which the entity could obtain the other currency for a portion of the transaction or balance and an estimated exchange rate for the remaining portion). The IASB decided not to permit or require the use of such a rate because:

(a) determining a blended exchange rate could be difficult for an entity, thereby increasing costs for preparers without providing significant additional benefits.

(b) in determining a blended exchange rate, an entity would use the observable spot exchange rate only for an insignificant portion of the transaction or balance, and the estimated spot exchange rate for the remaining portion. The entity would do so because, applying the requirements in paragraph A10 of the Standard, the entity would conclude that a currency is not exchangeable into the other currency only when the entity is able to obtain no more than an insignificant amount of the other currency. Therefore, in most cases, the IASB expected that a blended exchange rate will not differ significantly from the estimated spot exchange rate.

Disclosure

BC58 An entity's estimation of a spot exchange rate when a currency is not exchangeable into another currency could materially affect its financial statements. That estimation would also require the entity to make judgements and assumptions. In developing the requirements, the IASB was informed that users of financial statements are interested not only in the effect on an entity's financial statements of estimating the spot exchange rate, but also in understanding an entity's exposure to a currency that is not exchangeable into another currency. Users said information about the nature and financial effects of a currency not being exchangeable into another currency, the spot exchange rate used, the estimation process and the risks to which the entity is exposed would help their analyses. Accordingly, the applicable disclosure requirements in the Standard are designed to provide users with such information.

BC59 The IASB observed that some of the requirements in paragraphs A19–A20 of the Standard are similar to those in other IFRS Accounting Standards. An entity might already provide some of the information those paragraphs require when applying other Standards. For example, an entity might already provide:

(a) summarised financial information about a foreign operation, in accordance with paragraphs B10 or B12–B13 of IFRS 12 *Disclosure of Interests in Other Entities*;

(b) information about the methodology used to estimate the spot exchange rate, in accordance with paragraphs 125–133 of IAS 1 *Presentation of Financial Statements*; and

(c) some (or all) of the qualitative and quantitative information about the nature and extent of risks arising from a currency that is not exchangeable into another currency, in accordance with the disclosure requirements in IFRS 7 *Financial Instruments: Disclosures* and IFRS 12.

BC60 Nonetheless, the IASB concluded it would be helpful to include the requirements in paragraphs A19–A20 of the Standard. The IASB observed that an entity need not duplicate information required by the Standard if it has provided the information in its financial statements by applying other disclosure requirements.

BC61 The IASB concluded that it was unnecessary to include specific disclosure requirements regarding significant judgements made in assessing exchangeability. Paragraph 122 of IAS 1 already requires disclosure of such judgements to the extent they are part of the judgements an entity's management has made that have the most significant effect on the amounts recognised in the financial statements.

BC62 The IASB noted that, for an entity applying paragraph 57A of the Standard, disclosures are required when a currency is not exchangeable into another currency at the end of the reporting period and also when a currency is not exchangeable into another currency during part of the reporting period—even if that is no longer the case at the end of the reporting period.

Transition

Entities already applying IFRS Accounting Standards

BC63 The IASB developed the transition requirements in paragraphs 60L–60M of the Standard because it concluded that the expected benefits of requiring entities to apply the amendments retrospectively, in accordance with IAS 8 *Accounting Policies, Changes in Accounting Estimates and Errors*, would not outweigh the costs. In particular:

(a) applying the amendments retrospectively would require an entity to assess exchangeability in prior periods and then estimate spot exchange rates for those prior periods. In many cases, retrospective application would be likely to require the use of hindsight and, even if possible without hindsight, would be costly.

(b) a currency not being exchangeable into another currency is generally accompanied by high inflation and other economic events that make trend information less useful for investors than in other situations. The IASB was informed that, when a currency is not exchangeable into another currency, users of financial statements are interested in understanding an entity's exposure at the reporting date to that currency. The IASB therefore concluded that an entity applies the amendments from the date of initial application without restating comparative information.

BC64 The IASB decided:

(a) to require an entity to translate items using the estimated spot exchange rate at the date of initial application if the related requirement in the Standard requires an entity to translate that item using the closing rate.

(b) not to permit an entity to retranslate other items, even though they might have been translated using a spot exchange rate that is not aligned with the amendments. The expected benefits of requiring an entity to identify those items and then estimate an appropriate exchange rate would not outweigh the costs.

(c) to require an entity to recognise any effect of initially applying the amendments as an adjustment to:

(i) the opening balance of retained earnings when the entity reports foreign currency transactions. For these transactions, an entity generally recognises exchange differences in profit or loss. Requiring entities to track separately any exchange differences recognised in other comprehensive income would introduce unnecessary complexity.

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(ii) the cumulative amount of translation differences in equity when the entity uses a presentation currency other than its functional currency, or translates the results and financial position of a foreign operation. In these situations, an entity generally recognises exchange differences in other comprehensive income and accumulates those differences in a separate component of equity.

First-time adopters

BC65 The IASB concluded that a specific exemption from retrospective application of the amendments would be unnecessary for a first-time adopter because:

(a) IFRS 1 does not provide any exemption for a first-time adopter that reports foreign currency transactions in its financial statements. The entity therefore applies all the applicable requirements in IAS 21 retrospectively when reporting foreign currency transactions.

(b) paragraph D13 of IFRS 1 already allows a first-time adopter to deem the cumulative translation differences for all foreign operations to be zero at its date of transition to IFRS Accounting Standards.

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Amendments to the Basis for Conclusions on IFRS 1 *First-Time Adoption of International Financial Reporting Standards*

This Basis for Conclusions accompanies, but is not part of, IFRS 1.

Paragraph BC95A is added. For ease of reading, this paragraph has not been underlined.

Presentation and disclosure

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Explanation of transition to IFRSs

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BC95A In August 2023 the IASB amended IAS 21 to define when a currency is exchangeable into another currency. The IASB made conforming amendments to paragraphs 31C and D27 of IFRS 1 which previously referred to, but did not define, exchangeability.

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