Sent via email to: commentletters@ivsc.org

Milan, 5.7.2016


Dear Sirs/Madams,

Studio Ghitti & Associati (“SGEA”) is pleased to submit its comments with reference to the abovementioned Exposure Draft (“ED”) to the International Valuation Standards Council (“IVSC”).

SGEA welcomes the opportunity offered by the IVSC to all its stakeholders to comment and give their feedback on valuation standards being developed and/or updated.

SGEA, in particular, thinks that the due process each International Valuation Standards (“IVSs”) undergoes greatly contributes to enhance confidence and public trust in the valuation process as well as in the valuation profession.

SGEA, finally, strongly supports IVSC’s specific objectives provided that valuations and valuation-related issues are at the heart of our financial markets and systems. Consequently, it is our belief that only by raising the quality of valuation standards, the valuation process as a whole can help achieve higher market efficiency thus becoming a useful tool for the entire society.

Our letter of comments is organised as follows: (i) our general comments on the mentioned ED are outlined in Part 1 (“General Comments”), whereas (ii) our detailed responses to the ED questions are outlined in Part 2 (“Questions for Respondents”).
Part 1 – “General Comments”

Para. 20.1, rows 7-11, Assets and Liabilities. Although assets and liabilities are referenced throughout the IVSs, SGEA fails to see a clear-cut definition of an asset and a liability in the IVSs ED issued for public consultation. Moreover, as already pointed out in an earlier IVSC Discussion Paper¹, we fail to see any specific standard relating to the valuation of liabilities expect for those arising from financial instrument.

We understand that there have been specific projects going on to tackle this issue; upon the findings of those projects, in our opinion, incorporating into the IVS Framework a straightforward definition of an asset and a liability would bring additional clarity and disclosure to the valuation process.

Para. 30.1, rows 13-15, Valuer. SGEA finds the definition of Valuer, provided by the proposed Framework, does not fully reflect the professional requirements that a Valuer should have².

Moreover, it should be noted that, on March 31st 2016, IVSC Professional Board drafted the ED of the International Professional Standards (“IPSs”), whose proposed Framework provides a thorough definition of Professional Valuer³.

Consequently, as of now the IVSC has issued two separate and independent documents providing, each, a different definition of Valuer (or Professional Valuer).

SGEA reckons it to be advisable to align the definition of Valuer provided by IVS 2017 Framework ED to the more stringent definition of Professional Valuer provided by IPS Framework ED. Better yet it would be to completely integrate the two sets of standards (IVSs and IPSs), making direct reference to IPS Framework for the definition of (Professional) Valuer provided into IVS 2017 Framework.

² See IVS 2017: Introduction & Framework (ED), para 30.1, rows 13-15: “The definition of valuer is “one who possesses the necessary qualifications, ability, and experience to execute a valuation. In some States, licensing is required before one can act as a Valuer”.”
³ See Framework for International Professional Standards (ED), para 22, rows 160-164: “A professional valuer is a person who has expertise in the field of valuation, achieved through formal education and practical experience and maintained through continuous learning and development, is held to high professional standards equivalent to the IVSC’s IPSs and Code of Ethical Principles and whose compliance with such standards is subject to enforcement by a VPO (Valuation Professional Organisations) that is a member of the IVSC2”.
It is SGEA opinion that, in so doing, (i) confusion will be cleared about the professional figure of the Valuer (having only one, rather stringent, definition of it) and (ii) it will be possible to develop a well-respected and trusted global valuation profession, having all the Valuers to meet the stringent requirements set forth into the IPSs which are aimed, inter alia, to: “strengthen the ability of the valuation profession to provide more competent valuation services (...)” and to strengthen public trust “by increasing the competence of the global valuation profession”\textsuperscript{4}.

**Para. 50.2, rows 38-40, Competence.** SGEA agrees with the statement: “it is acceptable for the valuer to seek assistance from specialists (...), providing this is disclosed in the scope of work (...).” Nonetheless, we also think it would be worthwhile to specify that, in such cases, the Valuer has to somehow critically analyse and question the results of the specialists exercising professional scepticism. Unquestioned acceptance of a third party work within a valuation process could indeed be detrimental to the credibility of the overall valuation.

If the Valuer is unable to judge the reasonableness of a third party work, that should be clearly stated into her/his final valuation report.

**Para. 60.3, rows 55-56, Exceptions and Departures.** SGEA agrees that, in case of departures from the mandatory application of IVSs: “(...) the nature of any departures shall be identified (...).” Nonetheless, we also think it would be worthwhile to specify that, in such cases, the Valuer has to clearly point out the material consequences of such departures on the final valuation result, if any and whether possible.

We believe that, in so doing – whoever the user of the final valuation – she/he will have a deeper insight and a fuller understanding of the valuation itself. Furthermore, the valuation will be more easily comparable with past or future valuations of the same entity, as might be or become available with no departure from IVSs.

\textsuperscript{4} *Ivi*, para 8, rows 44-45 and 50-51.
Part 2 – “Questions for Respondents”

Question (a) page 5

“In IVS 2013, all substantive portions of the standards were labelled as “commentary” (except for scope and effective date). This label seems to have created some confusion amongst stakeholders as to whether the standards were mandatory. The Board’s position is that all aspects of IVS 2017 should be mandatory and this exposure draft has removed the “commentary” label for clarity. Do you agree with the removal of the commentary label?”

SGEA agrees with the removal of the “commentary” label from certain parts of the revised IVSs, considering all aspects of IVS 2017 as mandatory.

That being said, we acknowledge the new structure helps identify those parts of the IVSs that should be regarded as mandatory and those that should not, however we believe that – if clearly identified as such – a (non-mandatory) “commentary” section to IVS 2017 (mandatory) provisions could highly contribute to a more thorough disclosure and to explain the Board’s view upon certain parts of the IVSs 2017 that could potentially foster doubts upon application.

On this subject, we would like to point out that the new Italian Valuation Standards (“Principi Italiani di Valutazione” or “PIV”) issued on July 2015 by the Italian Valuation Standards Setter (“Organismo Italiano di Valutazione” or “OIV”) are organised as we suggested above. In particular, PIV – though consisting of valuation principles, premises, comments, illustrative examples, appendixes and a glossary – clearly states that only boldfaced, consecutively numbered valuation principles, are mandatory, while all other parts (premises, comments and so forth) are not, but only help better illustrate the contents of the (mandatory) valuation principles and their underlying rationale.

Question (b) page 5

“Do you agree with the Board’s decision to remove the section on Bases of Value from the IVS Framework and produce a single chapter on Bases of Value in order to clarify the mandatory nature of this section and to avoid repeating certain guidance throughout the IVS? If not, why?”
SGEA, recognising (i) the crucial role played by bases of value throughout the valuation process and (ii) the possibility that the choice of two different bases of value can lead to two completely different (potentially conflicting) valuation results, agrees with the removal of this section from the IVS Framework and the choice to envisage a dedicated standard to bases of value.

Moreover, we believe that stakeholders will also benefit from this Board’s decision thanks to the avoidance of repetition of certain guidance and key concepts throughout IVSs.

**Question (c) page 5**

"Do you agree with the Board’s decision to remove the section on Valuation Approaches from the IVS Framework and produce a single chapter on valuation approaches and methodologies in order to clarify the mandatory nature of this section and to avoid repeating certain guidance throughout the IVS? If not, why?"

SGEA agrees with the removal of this section from the IVS Framework and the choice to envisage a dedicated standard to valuation approaches and methodologies.

Moreover, we believe that stakeholders will also benefit from this Board’s decision thanks to the avoidance of repetition of certain guidance and key concepts throughout IVSs.

**Question (d) page 5**

"Do you agree with the IVS definition of Exceptions and Departures? If not, why?"

SGEA agrees with the proposed definition of “exceptions” and “departures”.

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We hope that our comments will be helpful, providing useful feedbacks to the IVSC in order to enhance the overall quality and depth of IVSs and bringing them ever closer to best practices defined both by practitioners and academics.
Should you have any questions whatsoever regarding our comments as outlined above, please do not hesitate to either contact Mr. Marco Ghitti (studio@sgca.eu) or Mr. Ronny Zappella (ronny.zappella@unibg.it).

Best regards,

[Signatures]

Marco Ghitti

Ronny Zappella
INTERNATIONAL VALUATION STANDARDS COUNCIL  
1 King Street  
London  
EC2V 8AU  
United Kingdom (UK)

Sent via email to: commentletters@ivsc.org

Milan, 5.7.2016

RE: Comments on IVS 104: Bases of Value - Exposure Draft

Dear Sirs/Madams,

Studio Ghitti & Associati ("SGEA") is pleased to submit its comments with reference to the abovementioned Exposure Draft ("ED") to the International Valuation Standards Council ("IVSC").

SGEA welcomes the opportunity offered by the IVSC to all its stakeholders to comment and give their feedback on valuation standards being developed and/or updated.

SGEA, in particular, thinks that the due process each International Valuation Standards ("IVSs") undergoes greatly contributes to enhance confidence and public trust in the valuation process as well as in the valuation profession.

SGEA, finally, strongly supports IVSC’s specific objectives provided that valuations and valuation-related issues are at the heart of our financial markets and systems. Consequently, it is our belief that only by raising the quality of valuation standards, the valuation process as a whole can help achieve higher market efficiency thus becoming a useful tool for the entire society.

Our letter of comments is organised as follows: (i) our general comments on the mentioned ED are outlined in Part 1 ("General Comments"), whereas (ii) our detailed responses to the ED questions are outlined in Part 2 ("Questions for Respondents").
Part 1 – “General Comments”

Para 20.2, rows 60-61, Bases of Value. SGEA finds the statement: “[i]t is the valuer’s sole responsibility to choose the relevant basis (or bases) of value according to the terms and purpose of the valuation assignment” not necessarily true.

In fact, there could be cases where the Valuer has to perform a valuation adopting the relevant basis (or bases) of value as “required” by some contractual provisions, Regulations, Laws or directly by the final Client and so forth.

Furthermore, this circumstance is clearly envisaged by para. 10.2, rows 12-14 (Introduction): “[a] valuer may be required to use bases of value that are defined by statute, regulation, private contract or other document. Such bases have to be interpreted and applied accordingly”.

Consequently, we believe that – while it is certainly true that the Valuer has to be held accountable for the choice of the relevant basis (or bases) of value when it is indeed her/his choice – the Valuer cannot be held accountable for such choice where she/he is required to perform a valuation on a particular and already decided-upon basis (or bases) of value. In these latter circumstances, the Valuer should only be held accountable for the correct interpretation and application of the basis (or bases) of value she/he has been asked to use in her/his valuation.

Para 20.3, rows 65-66, Bases of Value. While discussing the generality of bases of value, it is stated that: “[s]ome common valuation bases are defined and discussed in the IVS Framework”. Actually, the current IVS Framework ED, among other things, no longer includes a section on bases of value (which has been moved to a new and separate IVS). Thus, we suggest modifying the abovementioned quote according to the changes introduced to the IVS Framework structure and contents.

Para 70.1, rows 202-210, Synergistic Value. Synergistic value is defined as: “the result of a combination of two or more assets or interest where the combined value is more than the sum of the separate values”. Likewise, investment value – which is an entity-specific basis of value – is: “the
value of an asset to a particular owner or prospective owner for individual investment or operational objectives” and: “reflects the benefits received by an entity from holding the asset”.

That said, we believe that it could be helpful to further clarify the distinction between synergistic and investment value, provided that both bases of value: (i) take into account specific synergies deriving from the asset(s) being valued and (ii) are, in a sense, entity-specific.

Para 200.1, rows 378-381, Synergies. Although the definition of synergies as: “financial benefits associated with combining assets and liabilities” is technically correct, we believe that the reader, according to that definition, might develop the (wrong) impression only one kind of synergy exists, i.e. the “financial” one (“financial synergies”); whereas, in valuation, both practitioners and academics recognise two broad categories of synergies: (i) “operating” and (ii) “financial” synergies1.

Thus, we believe that the provided definition of synergy could be adjusted accordingly, in order to clear any doubts as to what kind of synergy should be taken into account while doing valuations.

Para 210, rows 397-430, Assumptions and Special Assumptions. SGEA agrees with the two identified general categories of assumptions. Notwithstanding, paragraph 210 and IVS 104 do not seem to require the Valuer to set out her/his assumptions in her/his final valuation report. SGEA strongly recommends adding the abovementioned specification (at least, for the so-called “special assumptions”) as, we believe, this would increase the quality, transparency and disclosure of the final valuation as a whole.

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1 For a comprehensive review of this subject, see Damodaran A., October 2005, The Value of Synergy, Stern School of Business.
Part 2 – “Questions for Respondents”

Question (a) page 5

“Do you agree that valuers should be responsible for choosing the appropriate basis (or bases) of value according to the terms and purpose of the valuation assignment, and that the basis of value may not be one defined by the IVSC? If not, why?”

Please see our Part 1 – “General Comments”, comment to para 20.2, rows 60-61, Bases of Value.

Question (b) page 5

“Prior versions of international valuation standards included Special Value as a separate and distinct basis of value. The Board generally believes that valuers seldom perform valuations using Special Value as a distinct basis of value. Rather, valuations are typically performed using another basis of value predicated on certain hypothetical assumptions (“special assumptions”) or a specific purchaser (resulting in synergistic value). Do you agree with the removal of Special Value as a separate and distinct basis of value? If not, please describe the circumstances in which you use Special Value as a distinct basis of value?”

SGEA agrees with the removal of Special Value as a separate and distinct basis of value.

That being said, as we pointed out earlier in Part 1 – “General Comments”, comment to para 210, rows 397-430, Assumptions and Special Assumptions, we also believe that the valuation’s overall transparency and disclosure would be enhanced were the Valuer required to specify, in her/his final valuation report, all the assumptions (or, at the very least, all special assumptions) used in her/his valuation process, as well as all material consequences of such assumptions upon the final valuation result.

Question (c) page 5

“The IVSC has retitled the previously defined Fair Value as Equitable Value in order to avoid confusion with other definitions of Fair Value. Do you agree with this change, if not, why not?”

SGEA agrees with the retitling of the previously defined Fair Value as Equitable Value.
Furthermore, we believe that far too many definitions of *Fair Value* have been developed over time (Equitable Value under IVS 104, Fair Value under IFRS 13, Fair Market Value under Regulation §20.2031-1, OECD’s Fair Market Value, MBCA’s Fair Value, and so forth). Overlapping of apparently similar terms can be misleading to the general public, all the more so because, differences (if any) among these terms are often subtle and difficult to grasp. As a direct consequence, the general public’s trust in valuation could be undermined by all these different definitions of what should theoretically be an unambiguous concept.

**Question (d) page 5**

“*Liquidation Value has been added as an additional basis of value. Do you agree with its inclusion within IVS 2017 and are you in accordance with the definition used? If not, why not?*”

SGEA agrees with both the inclusion of the so-called *Liquidation Value* within IVS 2017 and the definition therein provided.

**Question (e) page 5**

“*Replacement Value has been added as an additional basis of value. Do you agree with its inclusion within IVS 2017 and are you in accordance with the definition used? If not, why not?*”

Please see – *mutatis mutandis* – our answer to the previously Question (d).

Furthermore, we believe that, due to the choice of words, the reader could have the (wrong) impression that the Replacement Value (being the “*total cost of replacing an asset*”) is necessarily estimated according to the Replacement Cost Method as defined into IVS 105 – Valuation Approaches and Methods. Contrariwise, the Replacement Value, depending on the information available to the Valuer, can be best estimated by one, or more, of the following three valuation approaches: (i) Market Approach, (ii) Income Approach (iii) Cost Approach.

Thus, in para. 90, row 219, *Defined Basis of Value – Replacement Value* we suggest to replace “*cost of*” with “*amount to be paid for*”.

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Question (f) page 5

"Are there other bases of value defined by other entities/organisations that should be mentioned in IVS 104? Which ones? Why?"

SGEA thinks that the bases of value identified by IVS 104 suitably account for the vast majority of valuations currently being performed. Moreover, should no bases of value, as identified by IVS 104, be found to apply, the Valuer can still introduce any special assumptions as needed to modify one of the bases of value provided into IVS 104, according to the value she/he needs to estimate.

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We hope that our comments will be helpful, providing useful feedbacks to the IVSC in order to enhance the overall quality and depth of IVSs and bringing them ever closer to best practices defined both by practitioners and academics.

Should you have any questions whatsoever regarding our comments as outlined above, please do not hesitate to contact either Mr. Marco Ghitti (studio@sgea.eu) or Mr. Ronny Zappella (ronny.zappella@unibg.it).

Best regards,

Marco Ghitti

Ronny Zappella
INTERNATIONAL VALUATION STANDARDS COUNCIL
1 King Street
London
EC2V 8AU
United Kingdom (UK)

Sent via email to: commentletters@ivsc.org

Milan, 7.7.2016

RE: Comments on IVS 105: Valuation Approaches and Methods - Exposure Draft

Dear Sirs/Madams,

Studio Ghitti & Associati ("SGEA") is pleased to submit its comments with reference to the abovementioned Exposure Draft ("ED") to the International Valuation Standards Council ("IVSC").

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Our letter of comments is organised as follows: (i) our general comments on the mentioned ED are outlined in Part 1 ("General Comments"), whereas (ii) our detailed responses to the ED questions are outlined in Part 2 ("Questions for Respondents").
Part 1 – “General Comments”

Para 10.5, rows 35-36, Introduction. SGEA finds the statement: “[i]t is the valuer’s sole responsibility to choose the appropriate method(s) for each valuation engagement” not necessarily true.

In fact, there could be cases where the Valuer has to perform a valuation where the valuation approaches and methods may be required to her/him by some contractual provisions, Regulations, Laws or directly by the final Client and so forth.

Consequently, we believe that – while it is certainly true that the Valuer has to be held accountable for the choice of the appropriate valuation approaches and methods when it is indeed her/his choice. On the other hand, the Valuer cannot be held accountable for such choice when she/he is required to perform a valuation using one or more particular and already decided-upon valuation approaches and methods. Should the latter be the case, the Valuer should only be held accountable for the correct interpretation and application of the valuation approaches and methods which she/he has been asked to use into her/his valuation.

Para 10.8, rows 48-53, Introduction. SGEA agrees that: “price information from an active market is generally considered to be the strongest evidence of value”. Nonetheless, we also think it could be worthwhile to clarify that, when markets are “distressed” or “irrational”, price information might not be the strongest or best evidence of value. Indeed, in cases of “fly-to-quality” or “fly-to-safety” scenarios, quotations of certain goods or financial instruments can lose part of their relevance thus becoming less material to the Valuer.

For instance, when formulating cash flow forecasts for a gold mining company, a Valuer should carefully assess whether gold quotations on financial markets are “fair” and sustainable over the long period, or – contrariwise – merely the result of a “fly-to-quality” or “fly-to-safety” scenario, making it not sustainable over the long period.

In the latter case, in fact, it would not be advisable to estimate terminal values referring to the current market prices since: (i) markets are “distressed” and/or “irrational” and (ii) prices are neither “fair” nor sustainable.
In such cases, as discussed above, we believe that "the strongest evidence of value" may not necessarily be reflected into price information, but should be sought into the so-called "intrinsic value".

In this regard, we also believe that, if our comment were to be accepted, it may be helpful to somehow define the concept of "intrinsic value" into the IVS 104 Bases of Value.

Para 50.5, rows 336-338, Type of Cash Flow. Although obvious, while indicating that cash flows can either be pre-tax or post-tax, we believe that it could be useful to specify that the discount factor has to be chosen accordingly (i.e., on a pre or post tax basis).

By the way, this "accordance" – required by the so-called consistency principle – between cash flows and discount factors is clearly required later on by the IVS 105 when indicating that cash flows can be estimated either in nominal terms or in real terms and so can, accordingly, the pertinent discount factors.

Therefore, we believe advocating the consistency principle only while discussing nominal or real cash flows might result confusing to the reader; thus, our suggestion is to make direct reference to the consistency principle also while discussing pre or post tax cash flows.

Para 60.3, rows 440-445, Terminal Value. SGEA agrees with the three mentioned methods for calculating a terminal value, i.e.: (i) Gordon growth model/constant growth model, (ii) market approach/exit value and (iii) salvage value/disposal cost.

However, we would like to point out that – with regard to the latest method (salvage value/disposal cost) which, in our view, substantially coincides with the so-called liquidation value – (i) for a greater internal consistency with the overall IVSs corpus and (ii) for a greater external consistency with the specialist literature, it may be more efficient to make reference to the so-called "liquidation

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3 See para 50.5, rows 339-342, Type of Cash Flow.

4 See IVS 104: Bases of Value (ED), para 80.1, rows 212-217.
value approach"\(^5\) rather than the "salvage value/disposal cost" method. The former approach, in fact, estimates the terminal value recognising that: "[i]n some valuations, (...) the firm will cease operations at a point in time in the future and sell the assets it has accumulated to the highest bidders. The estimate that emerges is called a liquidation value"\(^6\).

Consequently, we believe that adding a direct reference to this method (liquidation value approach) rather than the "salvage value/disposal cost" method would not only be consistent with best practices and literature, but would also with the proposed liquidation value as a new basis of value under IVS 104 – *Bases of Value*. In fact, when a Valuer has to perform the valuation of an asset\(^7\) using the liquidation value as basis of value in estimating the asset’s terminal value, the only valid approach she/he could use would be the liquidation value approach because the valuation is performed assuming the asset liquidation (no going-concern assumption).

Para 60.6, rows 453-454, *Market Approach/Exit Value*. SGEA agrees that the terminal value under the market approach/exit value can be calculated by the: "application of a (...) market multiple".

However, we would like to point out that the terminal value should generally be calculated assuming a steady state for the asset being valued, meaning – among other things – a mature asset, traded into a mature market environment with "low-to-no" growth expectation, in order the growth expected after the explicit forecast period to be sustainable.

According to this steady state assumption, it should be noted that not every market multiple, however chosen, is suitable for calculating the terminal value of an asset. In fact, market multiples tend to incorporate, into their prices, expectations on future growth and market opportunities, whereas the steady state assumption requires a no growth scenario. Hence, the market multiple to be used should be chosen among: (i) assets that are already into a steady state or (ii) assets that are not

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\(^{5}\) See Damodaran A., *op. cit.*, pp. 304-305: "[y]ou can find the terminal value in one of three ways. One is to assume a liquidation of the firm’s assets in the terminal year and estimate what others would pay for the assets that the firm has accumulated at that point."

\(^{6}\) *Ibid.*

\(^{7}\) The word “asset” is deemed to include the following words or groups of words: “liability”, “liabilities”, “groups of assets, liabilities, or assets and liabilities".
into a steady state, adjusting their market multiples suitably to sterilise growth expectations incorporated into their prices, making them, de facto, “steady state market multiples”

Part 2 – “Questions for Respondents”

Question (a) page 5

“Do you agree that when selecting an appropriate valuation approaches and methods a valuer should consider the following?

a) the appropriate bases of value, determined by the terms and purpose of the valuation assignment,

b) the respective strengths and weaknesses of the possible valuation approaches and methods,

c) the appropriateness of each method in view of the nature of the asset, and the approaches or methods used by participants in the relevant market,

d) the availability of reliable information needed to apply the method(s), and

e) if not, why? What considerations would you add to or remove from this list?”

SGEA agrees with the suggested (minimum) considerations a Valuer should take into account when selecting one or more appropriate valuation approaches and methods. We also agree with the preference given to the market approach when: “reliable, verifiable and relevant market information is available”.

Question (b) page 5

“Under each valuation approach, this exposure draft includes criteria for when the approach should be used. Do you agree with the criteria presented under each approach? If no, what changes would you make? Why?”

8 For a more comprehensive review of this adjustment to market multiple, see Organismo Italiano di Valutazione (OIV), Luglio 2015, PIV. Principi Italiani di Valutazione 2015, Milano, Egea, pp. 149-151.
SGEA agrees with the provided *criteria* for when each valuation approach should be used. We find these *criteria* reasonable and straightforward.

**Question (c) page 5**

"Are there areas of this chapter that you feel should be expanded upon in future board projects (eg. discount rates, discounts/premiums, etc)?"

SGEA feels that two areas of the current IVS 105 deserve more in-depth study in future Board interventions, namely:

- **terminal value.** We think that one of the major and most critical aspects strictly related to the calculation of a terminal value is the estimate of a proper growth rate (the so-called Growth Factor) to be applied to the projected cash flow. Whereas Growth Factor is not covered by the current IVS 105, we believe that would be extremely useful, given the significance of this valuation parameter;

- **discount factor.** We think that one of the major and most critical aspects while performing a Discounted Cash Flow valuation is the estimate of one or more proper discount factors to be applied to the projected cash flow. In our opinion, the current section of IVS 105 dedicated to the discount factor does not seem to fully cover this aspect. Though we understand that IVSs are high-level standards, we also think that given the utmost relevance of this valuation parameter, this would deserve a more in-depth and thorough analysis.

Since terminal value and discount factor, as discussed above, are critical aspects while performing a valuation, we feel that it may be appropriate to dedicate two separate standards or technical guides to these aspects rather than to develop a more in depth analysis of them into the current proposed IVS 105 *Valuation Approaches and Methods.*

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We hope that our comments will be helpful, providing useful feedbacks to the IVSC in order to enhance the overall quality and depth of IVSs and bringing them ever closer to best practices defined both by practitioners and academics.

Should you have any questions whatsoever regarding our comments as outlined above, please do not hesitate to either contact Mr. Marco Ghitti (studio@sgea.eu) or Mr. Ronny Zappella (ronny.zappella@unibg.it).

Best regards,

[Signatures]

Marco Ghitti

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