



Fédération Française des
Experts en Evaluation

IVSC
IVSC Financial Instruments Board
20 St Dunstan's Hill
LONDON
EC3R 8HL
United Kingdom

Paris,
19 April 2021

Response to the IVSC Exposure Draft: Financial Instruments

The Fédération Française des Experts en Evaluation (FFEE) welcomes the opportunity provided by the IVSC Financial Instruments Board to comment on the IVSC Exposure Draft Consultation: IVS 500 - Financial Instruments.

The Fédération Française des Experts en Evaluation (FFEE) is a Professional Body Organisation that brings together the most representatives French professional organisations in the three areas of activity of the IVSC - Real estate, Business valuation, Financial instrument. Our Federation consists of 12 national organisations that are all representatives of at least one of the three areas of activity.

If the IVSC Financial Instruments Board would find it useful, we remain available for any further questions.

Yours sincerely,

Gilles de Courcel
Chairman

A handwritten signature in blue ink, appearing to read 'G. de Courcel'.

Amaury Catrice
Executive Director

A handwritten signature in black ink, appearing to read 'A. Catrice'.



INTERNATIONAL VALUATION STANDARDS COUNCIL

IVS 500 *Financial Instruments*

Exposure Draft

Issued: 11 December 2020
Comments Due: 19 April 2021



IVS 500 *Financial Instruments* Feedback Form

Questions for Respondents

IVS 500 <i>Financial Instruments</i> Exposure Draft: Objective	
The objective of IVS 500 <i>Financial Instruments</i> is to establish principles that will enable entities to derive fit-for-purpose valuations of financial instruments in all market conditions and circumstances, and for whatever purpose it is required, including for financial, tax and regulatory reporting.	
Question 1: Do you agree with the proposed objective? Why or why not? If you agree with only parts of the proposed objectives, please specify what you agree and disagree with. If you disagree with the proposal, please explain what you propose instead and why.	We do agree with the proposed objective to establish principles that will enable entities to derive fit-for-purpose valuations of financial instruments in all market conditions and circumstances, and for whatever purpose it is required, including for financial, tax and regulatory reporting.
Question 2: The Exposure Draft is focused on the requirements that have to be met for two elements, Governance and Data, of the proposed standard in order for an entity to arrive at a fit-for-purpose valuation of financial instruments. Do you agree that the requirements are clear, complete and provide adequate guidance to ensure compliance? Why or why not? If you agree with only parts of the requirements, please specify what you agree and disagree with. If you disagree with the requirements, please explain what you propose instead and why. If you think the requirements are incomplete, please explain what you propose should be included and why.	We do agree that the requirements exposed are clear, complete and provide adequate guidance to ensure compliance.



IVS 500 *Financial Instruments* Exposure Draft: Scope

Para 20.1 outlines the scope of application of IVS 500 *Financial Instruments*. In arriving at the proposed scope the FI Board focused on limiting the application of IVS 500 to only those instruments intended by the Board and on ensuring, as far as possible, that all definitions are clear to avoid ambiguity in practice.

In addition, in order to avoid overlaps with extant IVS requirements and the inclusion of instruments that could potentially meet the definition of a financial instrument but are not valued as such within the scope of IVS 500, the FI Board has proposed a number of exceptions to the scope requirements in IVS 500 as outlined in para 20.1 of this Exposure Draft.

Question 3: Do you agree with these proposals? Why or why not? If you agree with only parts of the proposals, please specify what you agree and disagree with. If you disagree with the proposals, please explain what you propose instead and why.

At this stage, we do agree this standard will be applied by all entities to valuations of financial instruments as defined, except for:

- the impairment of financial assets under relevant GAAP,
- pension liabilities,
- insurance contracts,
- equity instruments if the measurement undertaken for the purpose of valuing a business or a business interest,
- lease contracts.



IVS 500 *Financial Instruments* Exposure Draft: Definitions

Paras 30.1 to 30.5 provide definitions for the purpose of applying IVS 500 *Financial Instruments*. More specifically they define:

- fit-for-purpose valuations
- financial assets
- financial liabilities; and
- equity instruments

Question 4: Do you agree with these proposals? Why or why not? If you agree with only parts of the proposals, please specify what you agree and disagree with. If you disagree with the proposals, please explain what you propose instead and why.

We do agree with the paras 30.1 to 30.5 provide definitions for the purpose of applying IVS 500 Financial Instruments.

In paras 30.6 to 30.8, valuation uncertainty and valuation risk are defined for the purposes of IVS 500 *Financial Instruments*. This Exposure Draft uses valuation risk to set proportionality parameters (para 30.9) that determine the level of effort and the nature and extent of processes and controls needed in order to arrive at a fit-for-purpose valuation of a financial instrument. The objective of the FI Board in outlining the above concept is to enable constituents to evaluate in a consistent manner the extent and rigour of the processes necessary to ensure a fit-for-purpose valuation of financial instruments given the requirement for which it is needed, market conditions and other circumstances prevailing at the valuation date.

Question 5: Do you agree with these proposals? Why or why not? If you agree with only parts of the proposals, please specify what you agree and disagree with. If you disagree with the proposals, please explain what you propose instead and why.

We do agree with de paras 30.6 to 30.8 definitions for the purpose of applying IVS financial instruments.



IVS 500 *Financial Instruments* Exposure Draft: Governance

The Exposure Draft provides guidance on the processes that entities should follow to ensure proper governance around financial instrument valuations. The guidance requires that a valuation process should be:

- systematic
- consistently applied
- economically sound; and
- controlled

In order for the valuation process to meet the above objectives it should require:

- ownership
- accountability
- transparency
- consistency
- review and challenge
- diversity; and
- documentation

Question 6: Do you agree with these proposals? Why or why not? If you agree with only parts of the proposals, please specify what you agree and disagree with. If you disagree with the proposals, please explain what you propose instead and why.

We to agree with the valuation process described in paras 50.1 and 50.2.



IVS 500 Financial Instruments Exposure Draft: Data

For the purposes of this Exposure Draft, data is considered to be any input to a process undertaken to arrive at a fit-for-purpose valuation. Firstly, the section on data outlines the principles for creating a data taxonomy or dictionary to categorise, assess and control all data that is used in valuations.

Secondly, the specific requirements that need to be met for the following data types are outlined:

- internally sourced data
- market data
- transaction data
- model-based/indicative market data
- judgement-based data;
- historical data; and
- performance data

The section further describes the controls necessary for aggregating and managing data in an organisation and how the concept of proportionality applies in determining the requirements concerning the use of data.

Question 7: Do you agree with the principles outlined in paras 60.5.1 to 60.5.3 regarding the development of a data taxonomy? Why or why not? If you agree with only parts of the proposals, please specify what you agree and disagree with. If you disagree with the proposals, please explain what you propose instead and why.

At this stage, we do agree with the principles outlined in paras 60.5.1 to 60.5.3.



<p>Question 8: Paras 60.6.2 to 60.6.8 outline the specific requirements for the data-types listed above. Do you agree with these proposals? Why or why not? If you agree with only parts of the proposals, please specify what you agree and disagree with. If you disagree with the proposals, please explain what you propose instead and why.</p>	<p>At this stage, we do agree with the specific requirements for the data-types listed in paras 60.6.2 to 60.6.8.</p>
<p>Question 9: Paragraphs 60.7.1 to 60.7.6 outline the principles for controlling and aggregating data across an organisation. Do you agree with these proposals? Why or why not? If you agree with only parts of the proposals, please specify what you agree and disagree with. If you disagree with the proposals, please explain what you propose instead and why.</p>	<p>At this stage, we do agree with the principles for controlling and aggregating data across an organisation described in paras 60.7.1 to 60.7.6.</p>

PLEASE PROVIDE THE FOLLOWING INFORMATION:

Your Details:

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Company or organisation: FFEE

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Please see the following privacy notice which explains how we use the personal information we collect through your use of our website at www.ivsc.org ("this website"): [IVSC privacy notice](#)