



UA NvD Platform

Dear Sir / Madam

We are grateful for the opportunity to express our opinion on the Exposure Draft International Tax Reform—Pillar Two Model Rules.

Our team members are pleased that the proposed changes will yield excellent results. These changes will not affect the integrity of the financial statements. On the contrary, we believe that it is this approach that will bring clarity to the accounting of income tax.

We also urge the IASB to start considering the issue of conceptual simplifying income tax accounting for micro-undertakings and for small undertakings. Such a simplification can be based on exactly the principle that is set out in the Exposure Draft International Tax Reform. Definitions of micro-undertakings and small undertakings can be taken from the Directive 2013/34/EU of the European Parliament and of the Council.

Yours faithfully,

Oksana Kononenko, Team Lead of SME UA NvD Platform, Ukraine