

Rådet för finansiell rapportering

The Swedish Financial Reporting Board

RFR-rs 2009:16

International Accounting Standards Board
30 Cannon Street
London EC4M 6XH
United Kingdom

Dear Sirs,

Re: Exposure Draft – ED/2009/9 – Classification of Rights of Issues – Proposed Amendments to IAS 32

This is the Swedish Financial Reporting Board's response to your invitation to comment on the Exposure Draft (ED) regarding Classification of Rights of Issues.

We support the amendments proposed in the ED regarding instruments (rights) to be offered pro rata to all existing owners of the same class of equity instruments and the exercise price to be a fixed amount of cash in any currency. However, we do not support the idea to restrict the amendment only to those instruments. We believe that instruments with similar features also should be classified as equity instruments, ie equity conversion options and stand-alone options issued with a fixed exercise price in any currency. Such a classification should not be restricted to instruments offered pro rata to existing owners of the same class of equity instruments. Instead, the classification as equity instruments should also encompass instruments offered to other parties.

We support the proposed transition rules.

If you have any questions concerning our comments please address our Executive member Carl-Eric Bohlin by e-mail to: carl-eric.bohlin@radetforfinansiellrapportering.se

Stockholm, September 14, 2009

Kind regards,



Anders Ullberg
Chairman