

19th XBRL International Conference

"Reducing regulatory burden with XBRL: a catalyst for better reporting" June 22-25, 2009 Paris, France

Track4

Assurance on XBRL F/S filed by Listed Companies in Japan

KPMG(AZSA), Advisor, CPA, CISA Akira Matsuo

June 25,2009



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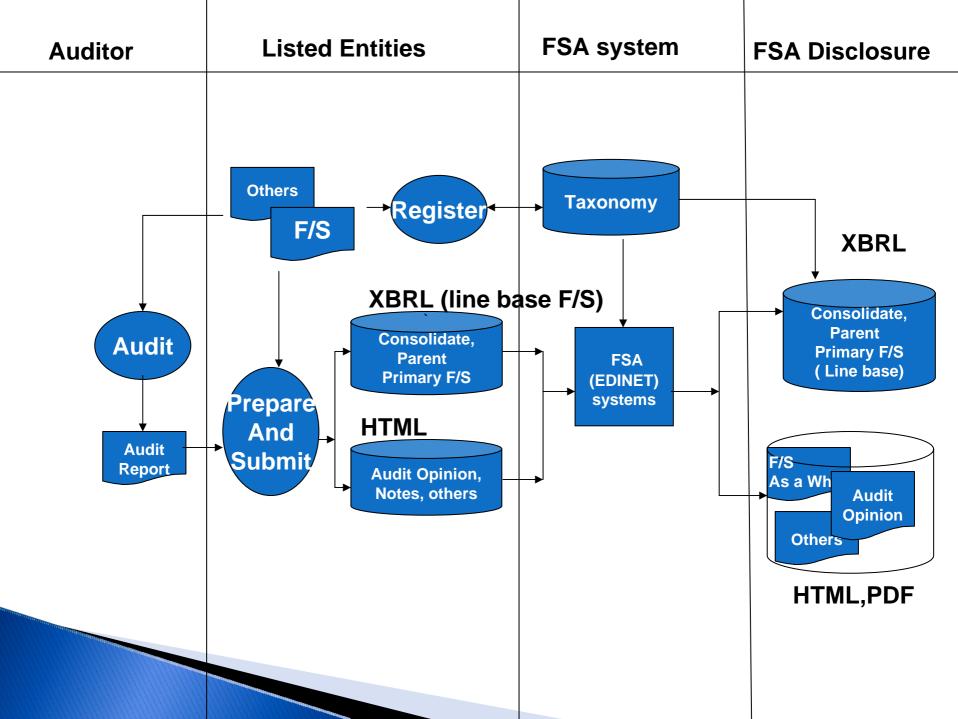
Assurance on XBRL F/S filed by Listed Companies in Japan

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Japanese Current status(1)

- XBRL Financial Disclosure Requirement
 - Started April 2008
 - Expecting about 5,000 listed entities at the end of Jun.2009) and about 3,000 funds
- Only primary F/S (Consolidated and parent, without note), HTML for other parts
- Only FSA systems generate public disclosed Primary F/S (PDF or HTML), no registration requirement for electronic paper primary F/S (HTML nor PDF)



Japanese current status(2)

- Only Audit opinion on paper based F/S
- No assurance opinion on XBRL data
- Most of the listed entities input their XBRL instance data through two F/S printing companies' systems
- The tight Edit/Validation check of the printing companies' systems contribute smooth transition of the disclosure
- Some number of extended taxonomies and instance documents contain some problems (very low percentage)

Issues for the FSA F/S disclosure

- the FSA system only generate public disclosed F/S (electronic) for listed companies
- Auditor only audits paper based F/S at an entity
- No assurance opinion on agreement of paper based F/S and the FSA system generated F/S
- English disclosure is not formally required

Practical Solution Discussion(1)

- ▶ EDIT/Validation program of the public disclosure system may improve the reliability of data, two printing companies' tight edit/validation procedure have contributed, though
- Integrity of input and output data of the FSA disclosure system shall be accounted for by an entity (as an assertion of management)?
- Should an auditor assures agreement of paper based audited F/S and output F/S from the FSA disclosure system? US requires electronic paper based F/S (PDF,HTML).
- Any international standard for English label usage as a taxonomy (IFRS taxonomy?)

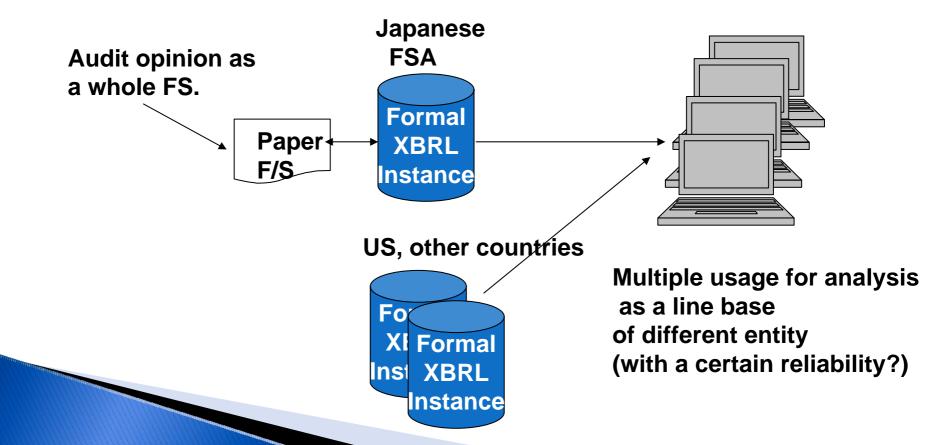
Users' expectation

- Timely comparability analysis by a line base
 - XBRL benefit dream?
 - Any direction for the dream?
 - Taxonomy,
 - Accounting method
 - Different jurisdiction?
 - Local requirements tax, others
 - On line disclosure?

Assurance/Audit and Expectation

Assurance / Audit

Expectation of Users



Issues for line data assurance

- Auditor's capability
 - XBRL technical capability
 - Internal control for a public disclosure system
 - Only disclosed through the public disclosure system
 - Who will account for the system?
 - Who will account for the data?
- User's Expectation
 - Reliability of financial data
 - Higher reliability assurance expectation?
 - Same level?
 - Do they understand current assurance level?
 - How assured data are identified?
 - Multiple entities in different countries?
 - Comparability
 - IFRS taxonomy?

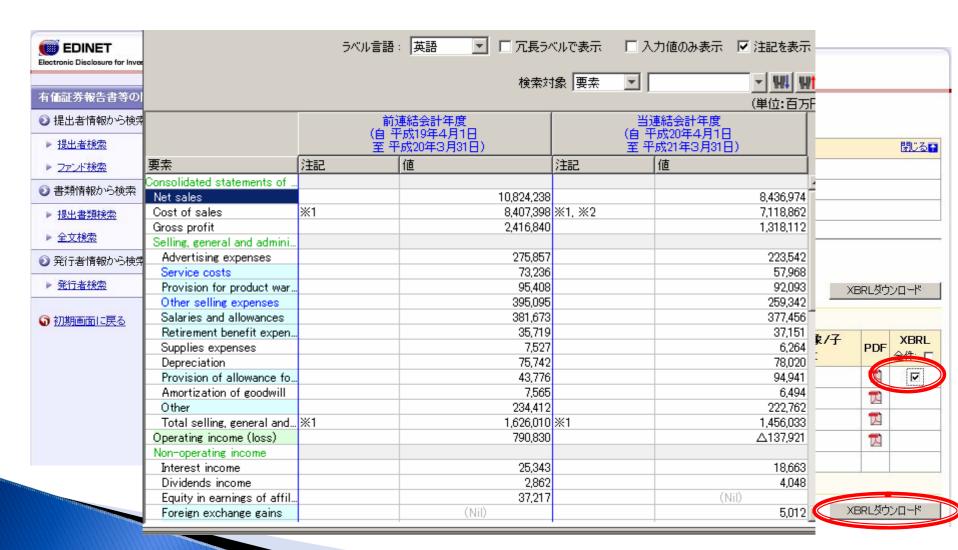
Practical Solution Discussion (2-1)

- Audit framework could not be modified within foreseeable future
- Current audit framework shall be maintained for issuing opinion on F/S as a whole
- A line item disclosure may require a certain level of assurance

Assured Mark? Comparability?

XBRL INSTANCE Assured what ? **XBRL TAXONOMY FSA** (FR.) **FSA** (FR.) Sales Analysis Report D(Gr.)C (US) Company 200,000 250,000 300,000 230,000 Sales 4,000 Tur<u>n</u> 40 83 50 57

Reality!



Ideal Dream?

- French FSA Systems
 - Validate and create
 - Sales (in English?)
 - Amount 200,000 (Currency?)
 - Company Name Renault?
 - Period 2009.1.1–2009.12.31
 - Issues
 - Language ?
 - Currency conversion?
 - Different period?
 - Accounting method?

Practical Solution Discussion(2-2)

- May use security technology to identify that the line item is a part of F/S disclosed on the public disclosure system
 (the system should be similar one with like a PKI assurance check procedure, readers should identify the agreement by themselves)
- Assured mark may attached to a line item of a F/S disclosed in other reports.
 - Who and how should be discussed?

Thank you!

- If you have any question
 - Please contact

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