

22 September 2008

The Chairman
IASCF Trustees
30 Cannon Street
London EC 4M 6XH
UNITED KINGDOM

Dear Sir

Constitutional Review

The Group of 100 (G100) is an organisation of chief financial officers from Australia's largest business enterprises with a purpose with a purpose of advancing Australia's financial competitiveness. The G100 is pleased to provide comments on the proposals in the constitution review.

Monitoring Group: The G100 supports the creation of a monitoring group and the responsibilities assigned to it as a means of establishing public accountability and transparency in its operations and in making appointments. The G100 considers that the members of the group should be drawn from relevant international organisations and bodies and as such should not include members drawn from purely national bodies such as the US Securities and Exchange Commission and the Japan Financial Services Agency. We believe that these national organisations would have an involvement through the relevant IOSCO bodies.

IASB Size and Composition: The G100 believes that increasing the size of the IASB carries with it the risk that it will result in a slowing of its activity and a diminution in the overall quality of the Board. The G100 has previously indicated that the size of the Board should be reduced to ten members. The proposals do not convince us to shift from this view. In addition, the G100 strongly believes that limiting the terms of members to two terms and for not more than seven years in total is a further means of ensuring that the Board remains focussed on implementation issues as well as high technical quality.

However, if the proposal to increase the size of the Board is adopted, the G100 believes that the composition should be changed to ensure that there are more members from a preparer background.

The proposals in respect of the geographical split of the IASB are also a concern. The requirements for membership are a high degree of technical expertise and practical experience. While geographical location bears consideration in choosing between equally credentialed candidates it should not drive the appointment. Members are appointed as experts in their own right and any implication that they are representatives of a particular region must be vigorously opposed.

However, the G100 believes that, in making appointments to the IASB, balance is important in order to avoid the impression that the IASB is weighted towards North America and Europe. In this regard the proposed geographical split seems appropriate. However, this split should not result in the appointment of a member for the sake of achieving the geographical split.

Yours sincerely

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

Tony Reeves
National President