

Q1

How many funds do you expect to have significant numbers of instruments that are valued using unobservable inputs?

We currently have 4 property funds which either invest directly in property or via special purpose vehicles.

We do not expect there to be a significant number of other instruments that are valued using unobservable inputs.

Q2

Do you have systems or processes in place to support the IFRS reporting levels?

Our 3rd party administrator has confirmed that there are systems/processes already in place to support the IFRS reporting levels.

Q3

Do you agree that the SORP's emphasis justifies the additional disclosure category for unobservable inputs? If not, please explain why.

Agreed. This will highlight to what extent the valuation of the assets is subjective although the fact that the valuation of the properties is a matter of opinion rather than fact is already disclosed in the report and accounts.

Q4

Do you agree with the generic approach for all authorised funds or should it be more focussed on UCITs with non-UCITS funds being dealt with by exception in Appendix III?

It makes sense to be consistent across UCITS and non-UCITS

Q5

Do you agree with the integrated approach of using a single set of disclosures to satisfy the regulatory and accounting requirements?

Again, it makes sense for there to be a single set of disclosures which satisfies both requirements.

Q6

Do you think the SORP should define realised and unrealised gains/losses for non-UCITS funds?

Yes – this will ensure consistency and avoid any differences of treatment and auditor opinion

Q7

If so, should it use definition A, B or something else?

Definition A is the most straightforward and least subjective but we understand the merit of definition B, showing the amount of return that is subject to significant judgement by the manager.

Q8

Do you think the proposals will help investors better understand the performance and costs? If not, please suggest how it might be improved.

We believe that this additional disclosure will help the investors better understand the performance and costs, however, not all investors will actually see this information (as very few request the long form report and accounts) and those that do, might not fully understand what is being disclosed. We would prefer that this information is required by COLL to be included in the short report as well

Q9

Are there any aspects of the proposal that you think will be particularly troublesome to produce?

The layout of the information will need to be carefully considered and will involve some additional typesetting time and expense. However the collation of the information should be reasonably straightforward, although this will need to be discussed further with the 3rd party administrator

Q10

Do you agree with the simplification of the principles for recognising revenue from debt securities?

Yes, although it is likely that the current process will be maintained for the foreseeable future.

Q11

Do you agree with the removal of the aggregation?

Yes – it is of very little value to the investors and adds an additional unnecessary level of complexity when consolidated accounts are prepared.

Q12

What do you think would be the earliest feasible effective date?

Agree with current proposed dates

Q13

Which requirements need an earlier effective date?

Agree with current proposed dates

Q14

Which requirements should be deferred?

Agree with current proposed dates

Q15

Do you think the proposed SORP satisfies the requirements of FRS102

Yes, we believe so.

Q16

Do you have any other comments on the proposed SORP?

No further comments