



7 March 2023

International Accounting Standards Board
Email: commentletters@ifrs.org

Cc: EFRAG

Dear Sir/Madam

IAS 12 Exposure Draft International Tax Reform—Pillar Two Model Rules

We refer to the invitation to comment the *IAS 12 Exposure Draft International Tax Reform—Pillar Two Model Rules* published January 2023.

The Norsk Regnskapsstiftelse (the Norwegian Accounting Standards Board, NASB) is supportive of the proposals in the Exposure Draft.

We question whether the exception implicitly scopes all top-up taxes within IAS 12, for all entities, and whether this needs to be made clearer.

Lastly, we would like to express a concern that the subject matter in this exposure draft illustrates that there may be more fundamental issues of concern related to IAS 12 in general. New and sophisticated tax schemes, like the Pillar Two Model Rules and the EU's measures for high energy prices (revenue caps and windfall tax) illustrates that IAS 12 is lacking in its objectives, definitions and scope. Had this issue surfaced a year ago, we question whether it would have given the IAS 12 standard more attention in the Boards Agenda process.

Yours faithfully,

Bjørn Einar Strandberg
Chair of the Technical Committee on IFRS