

Australian Securities and Investments Commission

via email: rri.consultation@asic.gov.au

26 August 2026

KPMG submission: Proposed remake of ASIC Corporations (Wholly-owned Companies) Instrument 2016/785

KPMG Australia (KPMG) welcomes the opportunity to comment on the proposed remake of ASIC Corporations (Wholly-owned Companies) Instrument 2016/785 and supports initiatives that enhance the efficiency and effectiveness of Australia's financial reporting framework.

KPMG supports the proposed extension of the relief pending Australian Government law reform on simplified reporting relief for group entities announced in the 2026–27 Budget.

We have no comments on the specific questions raised by ASIC. However, to improve the clarity and application of the financial information disclosure conditions we recommend that ASIC consider the following additions in the definition in paragraph 6 of "*additional consolidation information*":

- *AASB 18 Presentation and Disclosure in Financial Statements* supersedes *AASB 101 Presentation of Financial Statements* for annual reporting periods beginning on or after 1 January 2027. Given the proposed instrument will apply to financial years ending on or after 1 January 2027, for the avoidance of doubt, relevant references for AASB 18 should also be included alongside those of AASB 101.
- Entities that do not have public accountability prepare Tier 2 general purpose financial statements applying *AASB 1060 General Purpose Financial Statements – Simplified Disclosures for For-Profit and Not-for-Profit Tier 2 Entities*. The equivalent AASB 1060 paragraph references to those of AASB 101/ AASB 18 should be included for circumstances where the holding entity prepares consolidated financial statements in accordance with AASB 1060.

Should you wish to discuss the contents of this submission further, please do not hesitate to contact us.

Yours sincerely,



Partner, Audit & Assurance
KPMG Australia