Groupe Mapping ESEF

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Réunion 26-5

2 JUILLET 2026

Fil rouge de la réunion

1/ Préparation IFRS 18 (objectif : remontée des questions / commentaires vers ESMA pour alimenter le manuel de reporting)

2/ Autres sujets à discuter

- Libellés
- Balisage des dividendes (montant total vs solde, dividendes en action, dividende sur actions de préférence, dividendes ordinaires vs majorés…)

Notes en réunion

La réunion s’est concentrée sur les points à suggérer à l’ESMA pour le Reporting Manual
Elle a été prolongée en sous-groupe le 09/07
Le courrier transmis à l’ESMA par XBRL France résume les positions du GT suite aux discussions illustrées dans la suite du support → Se référer à ce courrier.

Points à anticiper IFRS 18

- Points d’entrée
- Sélection des tags au P&L
- Hierarchie
- Autres ? Comparaisons N-1 ?
- Balisage volontaire MPMs et charges par nature ?
- Proposition de balisage de la contribution ANC

Notes en réunion

Ces points ont été intégrés aux réflexions sur l'évolution du Reporting Manual
Le courrier transmis à l'ESMA par XBRL France résume les positions du GT suite aux discussions illustrées dans la suite du support → Se référer à ce courrier.

Questions sur le balisage du P&L (1/2)

	Profit or loss before financing and income tax	**X**
Financing	Interest expense on borrowings and lease liabilities	(X)
Financing	Interest expense on pension liabilities	(X)
	Profit before tax	**X**
	Income tax	(X)
	Profit for the year	**X**

How to tag that element?

Not part of European RTS

	Concept	Label	Implementation label	Extract of ref
P&L	InterestExpenseFinancing	Interest expense, financing		IFRS 18.61
P&L	InterestExpenseOnLeaseLiabilities	Interest expense on lease liabilities, financing		IFRS 16.53 b
No P&L	InterestExpenseForFinancialLiabilitiesNotAtFairValueThroughProfitOrLoss	Interest expense for financial liabilities not at fair value through profit or loss	Do not use this line-item element for the statement of profit or loss. This element is used only to tag information in the notes. If no suitable element is included in the IFRS Accounting Taxonomy, an extension element needs to be created. The label of that extension element should reflect the category of the element in its label.	IFRS 7.20 b
No P&L	InterestExpenseOnBorrowings	Interest expense on borrowings		IFRS 18.113 c common practice

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Questions sur le balisage du P&L (2/2)

Financing		
	Profit or loss before financing and income tax	**X**
Financing	Interest expense on borrowings and lease liabilities	(X)
Financing	Interest expense on pension liabilities	(X)
	Profit before tax	**X**
	Income tax	(X)
	Profit for the year	**X**

1 Select the line item element

No P&L ESEF RTS: select the element with the closest accounting meaning => *InterestExpenseForFinancialLiabilitiesNotAtFairValueThroughProfitOrLoss?*

According to the implementation label in the IFRS taxonomy, this tag should not be used for the statement of profit or loss

⇒ Use an extension? *ext:InterestExpenseOnBorrowingsAndLeaseLiabilitiesFinancing*

2 If an extension is used => determine the wider anchor

P&L *InterestExpenseFinancing*, i.e. the element with the closest wider accounting meaning/scope within the financing category

No P&L *InterestExpenseForFinancialLiabilitiesNotAtFairValueThroughProfitOrLoss*, i.e. the element with the closest wider accounting meaning/scope

3 If an extension is used => determine the narrow anchor(s)

P&L *InterestExpenseOnLeaseLiabilities* would be a narrow anchor.

No P&L Should *InterestExpenseOnBorrowings* also be used as a narrow anchor?

Can a P&L element of the financing category combine core taxonomy elements that are not categorised as financing?

Notes en réunion

La position, détaillée dans le courrier à l’ESMA relatif au Reporting Manual 2026 est de favoriser une extension, avec un libellé

- Basé sur les libellés standards de concepts standards similaires
- Catégorisé, donc Qualifié Op/Fi/Inv

La question du wider est posée à l’ESMA

Le narrower est a priori dans la catégorie de l’extension

Block tagging des notes

- Minimal changes to the list of mandatory block tags in the RTS (only for impacts of changes in the IFRS taxonomy)

- There are new block tags in the 2025 IFRS taxonomy that would be very beneficial for users of financial statements, that are not part of the mandatory list but could be used voluntarily

Note explaining transition from IAS 1 to IFRS 18	DisclosureOfReconciliationBetweenRestatedAmountsPresentedApplyingIFRS18AndAmountsPreviouslyPresentedApplyingIAS1Explanatory
Note for specified nature of expenses	DisclosureOfSpecifiedExpensesByNatureExplanatory
Note for MPMs	DisclosureOfManagementdefinedPerformanceMeasuresExplanatory

Notes en réunion

La position, détaillée dans le courrier à l’ESMA relatif au Reporting Manual 2026 est de favoriser l’utilisation de ces tags

Modifications de la liste obligatoire RTS

RTS 2024 : 245 blocktags

\+ **Disclosure of operating profit (loss)**

− Disclosure of profit (loss) from operating activities

− Disclosure of expenses by nature

− Disclosure of finance cost

Disclosure of finance income

Disclosure of finance income (cost)

Description of accounting policy for finance costs

Description of accounting policy for finance income and costs

− *Concept DisclosureOfBasisOfPreparationOfFinancialStatementsExplanatory*

The tag **DisclosureOfChangesInAccountingPoliciesAccountingEstimatesAndErrorsExplanatory** is maintained and its label is changed to **Disclosure of basis of preparation of financial statements**
Expected content: all IAS 8 disclosures

= RTS 2025 (IFRS 18) : 238 blocktags

Modifications de la hiérarchie ?

[811000] Notes - Basis of preparation of financial statements and statement of IFRS compliance
Disclosure of basis of preparation of financial statements [text block]
Statement of IFRS compliance [text block]
Financial statements comply with IFRSs
Management conclusion on fair presentation as consequence of departure
Explanation of departure from IFRS
Explanation of financial effect of departure from IFRS
Explanation of nature of requirement in IFRS and conclusion why requirement is in conflict with objective of financial statements set out in Framework
Explanation of adjustments that would be necessary to achieve fair presentation
Disclosure of uncertainties of entity's ability to continue as going concern [text block]
Explanation of fact and basis for preparation of financial statements when not going concern basis
Entity has not prepared financial statements on going concern basis
Explanation of why entity not regarded as going concern
Disclosure of material accounting policy information [text block]
Explanation of management judgements in applying entity's accounting policies with significant effect on recognised amounts
Explanation of sources of estimation uncertainty with significant risk of causing material adjustment
Disclosure of assets and liabilities with significant risk of material adjustment [text block]
Disclosure of assets and liabilities with significant risk of material adjustment [abstract]
Disclosure of assets and liabilities with significant risk of material adjustment [table]

- En particulier, **Disclosure of basis of preparation of financial statements [text block]** (désormais DisclosureOfChangesInAccountingPoliciesAccountingEstimatesAndErrorsExplanatory), dans la version IFRS 18 de la taxonomie *uniquement*, est parent de tags précédemment orphelins dont le contenu fera explicitement partie d'IAS 8.

- Proposition: éditer une version taxonomie 2025 IFRS 18 qui s'adapte à cette hiérarchie dans la taxonomie ? (ou une colonne 'Expected Parent IFRS 18')

- Par exemple pour **Statement of IFRS compliance [text block]**, pour lequel un rattachement dans la hiérarchie semble raisonnable

- Par exemple pour **Disclosure of material accounting policy information [text block]**, qui créerait un nouveau « monster tag » si rattaché dans la hiérarchie, une exception semble raisonnable

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Notes en réunion

Un point d’attention est fait sur le changement de sens de DisclosureOfChangesInAccountingPoliciesAccountingEstimatesAndErrorsExplanatory désormais à comprendre comme « **Disclosure of basis of preparation of financial statements [text block]** »

Points campagne 2026 - Libellés

Débat à rouvrir sur les libellés :

- **Est-il possible / souhaitable d'avoir un libellé XBRL qui dévie du libellé « humain » de l'extension ?**

  Premiers débats CNCC en 2025 => plutôt non, mais

  - on voit bien qu'il y a parfois une compréhension « implicite » du libellé papier (du fait de la position de la ligne, des éléments au-dessus et en-dessous) qui n'est pas transposée dans la version électronique
  - il y a des règles RTS sur le libellé XBRL qui ne s'appliquent pas au libellé « papier »

- **Est-ce qu'IFRS 18 tue le débat ?**
- **Décision provisoire IFRS IC de juin 2026 => à commenter ?**

Points campagne 2026 - Libellés

Extrait RTS sur les libellés (annex IV)

4. If the closest core taxonomy element would misrepresent the accounting meaning of the disclosure being marked up as required by point 3, issuers shall create an extension taxonomy element and use that to mark up the disclosure concerned. All extension taxonomy elements created shall:

   (a) not duplicate the meaning and scope of any core taxonomy element;

   (b) identify the creator of the element;

   (c) be assigned with an appropriate balance attribute;

   (d) have standard labels in the language corresponding to the language of the annual financial report. Labels in additional languages are recommended to be added. All labels shall correspond to the accounting meaning and scope of the described underlying business concepts.

ESMA
European Securities and Markets Authority

7 May 2026
ESMA32-2064178921-9413

Report on
2025 Corporate reporting enforcement and regulatory activities

Other areas addressed by enforcement actions in 2025 and noted in the chart above related primarily to label quality and language mismatch, naming convention concerns for extension taxonomy elements, as well as the inappropriate use of label roles for mark-ups in the primary financial statements. For mark-ups in the notes to the financial statements, enforcement actions frequently concerned the improper use of the escape attribute, which can distort rendering and impair the human readability of text block mark-ups (particularly in tables). Issuers are encouraged to review these areas carefully to ensure that labels, naming conventions, language declarations and technical attributes are applied correctly. Improving attention to these details will support higher-quality filings and help prevent avoidable follow-up from enforcers.

Points campagne 2026 – Libellés

BPTF – Extrait « Comments and recommendations on ESEF guidance » – 25 janvier 2022

Our recommendations:

1. Labelling of the base ESEF taxonomy elements: the standard label should not be overridden. This means that in cases where the standard labels of the core taxonomy are used, no standard label for the core elements used should be present in the extended label linkbases (as these labels would have a higher priority than the base taxonomy standard labels).
2. Labelling of the extension elements: we would recommend that the extension elements standard labels are defined in English, in accordance with the ESEF/IFRS style guide to provide the accounting meaning of the extension (the name of the extension will therefore be created in English). A verbose label may reproduce the human readable label in the language of the report.

Guidance XBRL International

4 What makes a good standard label

Good standard labels will have the following properties:

Standalone and unique

Standard labels should be sufficient to identify a concept without reference to its position within a hierarchy such as the presentation tree. Standard labels should also be unique within the taxonomy. For example, a concept such as "Other deductible expenses" should not have a standard label of "Other" as this on its own is not sufficient to convey the meaning of the concept, and is unlikely to be unique ("Other" may be appropriate as a terse label).

Useful

Labels should describe a concept in such a way that it accurately describes the meaning of the concept. Avoiding acronyms not familiar to the users of the taxonomy can be applied as one of the rules to create useful standard labels. For concepts that can take both positive and negative values, standard labels should describe the meaning of a negative number in parentheses. For example, a negative value reported for a concept with the standard label "Other Income (expense)" would indicate that value represents an expense. Handling positive and negative values in XBRL is described in more detail in a separate guidance document

Role independent

Standard labels should not reflect a particular usage of a concept. For example, XBRL best practice requires that the same concept is used to represent both opening and closing balances; these are the same concept, but reported at different points in time. As such, "Opening Balance, Cash and cash equivalents" should not be used as a standard label. Instead, the standard label should be "Cash and cash equivalents", and separate labels should be used to reflect opening and closing balances. The use of label roles to differentiate different types of label is discussed in more detail in a separate guidance document.

Concise

Labels should be as concise as possible whilst still meeting the other criteria for good standard labels.

Consistent

Labels should be defined using a consistent construction pattern, allowing users to understand the label better across concepts in the taxonomy. For example, if the term "Non-current" needs to be included in labels it should be consistently used either as a suffix or prefix throughout the taxonomy.

Points campagne 2026 – Libellés (post IFRS 18)

IFRS 18

43 An entity shall label and describe items presented in the primary financial statements (that is, totals, subtotals and line items) or items disclosed in the notes in a way that faithfully represents the characteristics of the item (see paragraphs B24–B26). To faithfully represent an item, an entity shall

Description of items

B24 Paragraph 43 requires an entity to label and describe items presented or disclosed in a way that faithfully represents the characteristics of the item. Such items will often be aggregations of items arising from individual transactions or other events and could vary in whether they are aggregations of items for which information is material and items for which information is immaterial. Specifically, in either the primary financial statements or in the notes:

(a) an item for which information is material could be aggregated with other items for which information is also material—an entity might provide such an aggregation to summarise information but would also be required to disclose information about each item;

(b) an item for which information is material could be aggregated with items for which information is not material—an entity would be required to provide information about disaggregated items only if immaterial information obscured the material information; or

(c) an item for which information is not material could be aggregated with other items for which information is not material—an entity might provide such an aggregation to complete a list of items and would not be required to disclose information about disaggregated items, subject to paragraph B26(b).

B25 An entity shall label items presented or disclosed as 'other' only if it cannot find a more informative label. Examples of how an entity might find a more informative label are:

(a) if an item for which information is material is aggregated with items for which information is not material, finding a label that describes the item for which information is material; and

(b) if items for which information is not material are aggregated:

(i) aggregating items that share similar characteristics and describing them in a way that faithfully represents the similar characteristics; or

(ii) aggregating items with other items that do not share similar characteristics and describing them in a way that faithfully represents the dissimilar characteristics of the items.

ESMA European Securities and Markets Authority

Public statement on implementation of IFRS 18 – février 2026

Labelling

ESMA notes that IFRS 18 requires the use of **informative labels** for line items presented in the financial statements or items disclosed in the notes. For example, IFRS 18 restricts issuers' ability to label items as 'other' to only those situations where no other more informative label can be found[40]. ESMA urges issuers to avoid using the term 'other' as much as possible.

ESMA expects that the **labels** for **additional line items and subtotals** in the statement of profit or loss are **sufficiently clear** and specific to enable users of the financial statements to understand what those line items or subtotals include and/or exclude, without having to search for this information in the notes. Furthermore, these line items or subtotals **should comply with the aggregation and disaggregation** requirements set out in IFRS 18.

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Décision provisoire IFRS IC juin 2026 (1/2)

Labels of Subtotals (IFRS 18 Presentation and Disclosure in Financial Statements)—Agenda Paper 7A

Open for comment until 9 September 2026

The Committee received a request about the labelling of a subtotal in an entity's statement of profit or loss, when that subtotal is also a management-defined performance measure (referred to as 'the measure'). In particular, the request asked whether the label of the measure is required to explicitly list all the elements excluded from (or included in) the measure.

The measure described in the request:

a. complies with the requirements in paragraph 24 of IFRS 18 for additional subtotals in a primary financial statement; and
b. meets the definition of a management-defined performance measure in paragraph 117 of IFRS 18.

Applicable requirements

Paragraph 43 of IFRS 18, and related application guidance in paragraphs B24–B26, set out requirements for labelling and describing subtotals presented in an entity's primary financial statements. Specifically, paragraph 43 requires an entity to 'label and describe items presented in the primary financial statements (that is, totals, subtotals and line items) or items disclosed in the notes in a way that faithfully represents the characteristics of the item…'.

Paragraph 123 of IFRS 18, and related application guidance in paragraphs B134–B135, set out requirements for labelling and describing management-defined performance measures. Specifically, paragraph B134(a) requires an entity to 'label and describe [a management-defined performance measure] in a way that faithfully represents its characteristics in accordance with paragraph 43 [of IFRS 18]'.

Applying the requirements in IFRS 18

The Committee observed that determining how to appropriately label and describe the measure requires judgement based on an entity's specific facts and circumstances.

The Committee noted that the requirements in IFRS 18 set out principles that an entity applies when labelling items, including subtotals and management-defined performance measures. For example:

a. paragraph 43 requires the label for a subtotal to faithfully represent the characteristics of the subtotal and, similarly, paragraph B134 requires the label for a management-defined performance measure to faithfully represent the characteristics of the management-defined performance measure; and
b. paragraph 123 requires an entity to label a management-defined performance measure in a clear and understandable manner that does not mislead users of financial statements.

Décision provisoire IFRS IC juin 2026 (2/2)

The Committee observed that it is possible to meet the applicable requirements for labelling without listing in the measure's label all the elements excluded from (or included in) the measure. For example, paragraph B135(a) includes an example of a management-defined performance measure with a label of 'operating profit before non-recurring expenses'. Paragraph B135(b) requires an entity to 'explain the meaning of terms it uses in its descriptions…(for example, explaining how the entity defines 'non-recurring expenses')', and paragraph 43 states '[i]n some cases, an entity might need to include in the descriptions and explanations the meaning of the terms the entity uses'. The Committee observed that all necessary descriptions and explanations need not be included in the label itself and may be disclosed in the notes.

The Committee therefore concluded that the label of a subtotal that is a management-defined performance measure is not required to explicitly list all the elements excluded from (or included in) the measure, as long as that label, and any related descriptions in the notes, complies with the applicable requirements in IFRS 18 on how to label and describe subtotals and management-defined performance measures.

Conclusion

The Committee concluded that the principles and requirements in IFRS 18 provide an adequate basis for an entity to determine whether the label of a subtotal that is a management-defined performance measure is required to explicitly list all the elements excluded from (or included in) the measure. Consequently, the Committee [decided] that a standard-setting project is not needed to address the request.