Dear Neil,

Many thanks for the Discussion paper on Basel III disclosure requirements: composition of capital and remuneration of April 2013.

Upon my review of the April 2013 Draft Prudential Standard APS 330 Public Disclosure and more particularly in reference to APS 330; Attachment E, Table 18; paragraph (a) to (f) on ‘Qualitative’ disclosures (pages 46 and 47) and Discussion Paper (page 7), it is not very clear whether a local unlisted AD which is a subsidiary of a publicly listed company which is not an ADI could be exempt from providing “Qualitative” disclosures and only make reference to the report on the ‘Qualitative’ disclosures.

does not have its own remuneration policies as it is a subsidiary of and relies and follows the remuneration policies also from a business and operational perspective forms part of and is included in the segment of the business. Also does not have a separate People and Remuneration Committee.

I do not see any benefit in duplicating the same information on ‘Qualitative disclosures’ on the website (as part of APS 330 disclosures) which is already available and disclosed in the Remuneration report and also that does not have its own remuneration policies. I acknowledge and see benefit in disclosing the ‘Quantitative disclosures’ as required under Table 18 and Table 18A of APS 330 in relation to the new definition of ‘senior managers and material risk takers’ of the ADI which will be different to the ‘key management personnel’ definition in the Remuneration Report and Australian Accounting Standard AASB 124 Related Party Disclosures which is presently disclosed in the annual financial statements.

Also the Discussion paper (page 7) mentions on locally incorporated ADIs which may meet the APS 330 Public Disclosure requirement and may not need to present the remuneration information separately on its website (as part of APS 330) if it has already disclosed this in its Remuneration Report in accordance with the Corporations Act 2001.

In summary, I note more clarification is sought and would appreciate if you could please consider the above in your final Prudential Standard APS 330 Public Disclosure, where a local unlisted AD; such as, which is a subsidiary of a publicly listed company (which is not an ADI) could be exempt from disclosing ‘Qualitative’ information on its website (as part of APS 330) as long as it makes reference in its APS 330 disclosures (on the website) and links to the Remuneration report pursuant to Corporations Act 2001. The locally unlisted ADI will provide ‘Quantitative disclosures’ in accordance with APS 330 as this information will not be readily available in the Remuneration report and under Related Party Disclosures in the annual financial statements.