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XBRL Japan

Standardize to Enhance: Process &
Controls, Analytical Insights,
Economics

October 1, 2013

Discussion Topics

Trends

- Around the World
- Implications
- Analytical Insights
- Lessons Learned

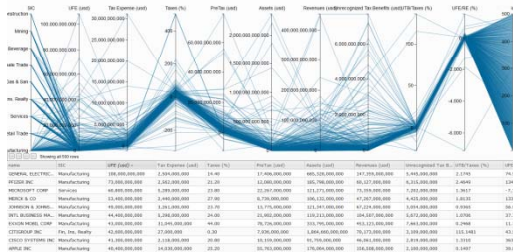
Standardize to Empower Reporting Professionals:

- Enhancing Reporting Process & Controls Agility, Effectiveness, Economics

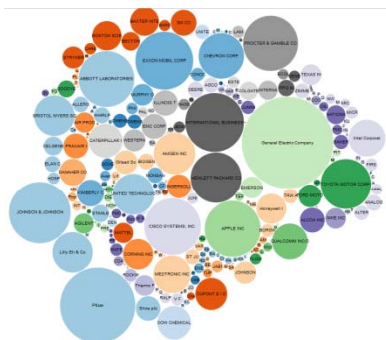
Next Steps

Trends

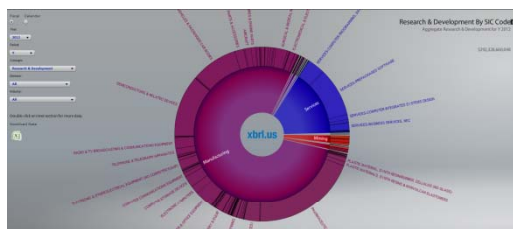
Examples of More Granular Transparency / Insights



“A comparison of Income, Revenue, and Taxes of various companies”



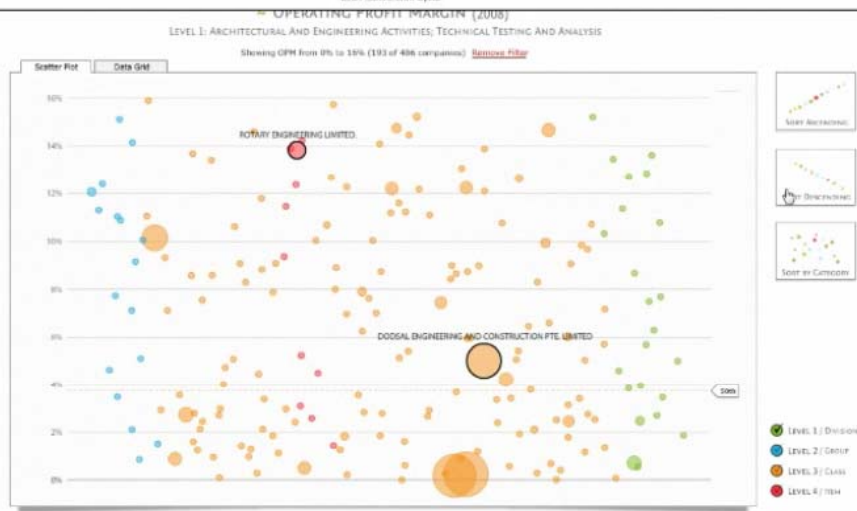
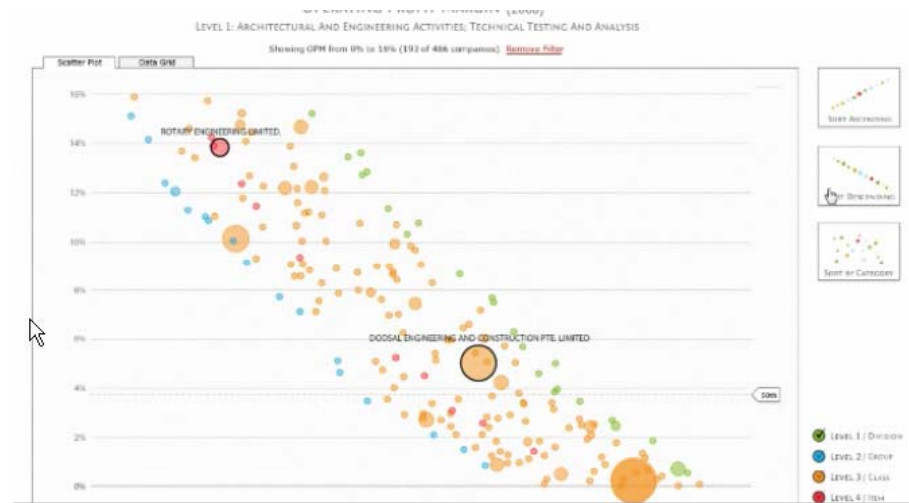
“Visual template representation - a comparison of unremitted taxes based on earnings made overseas”



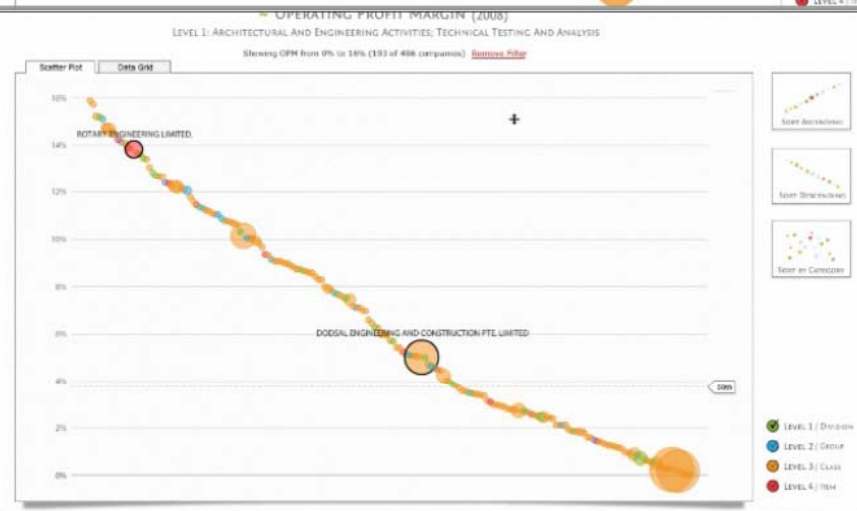
“XBRL Data in Use - Accumulated values of key items”

Open Analytics at ACRA in Singapore

Enhancing Analysis of Business Reports



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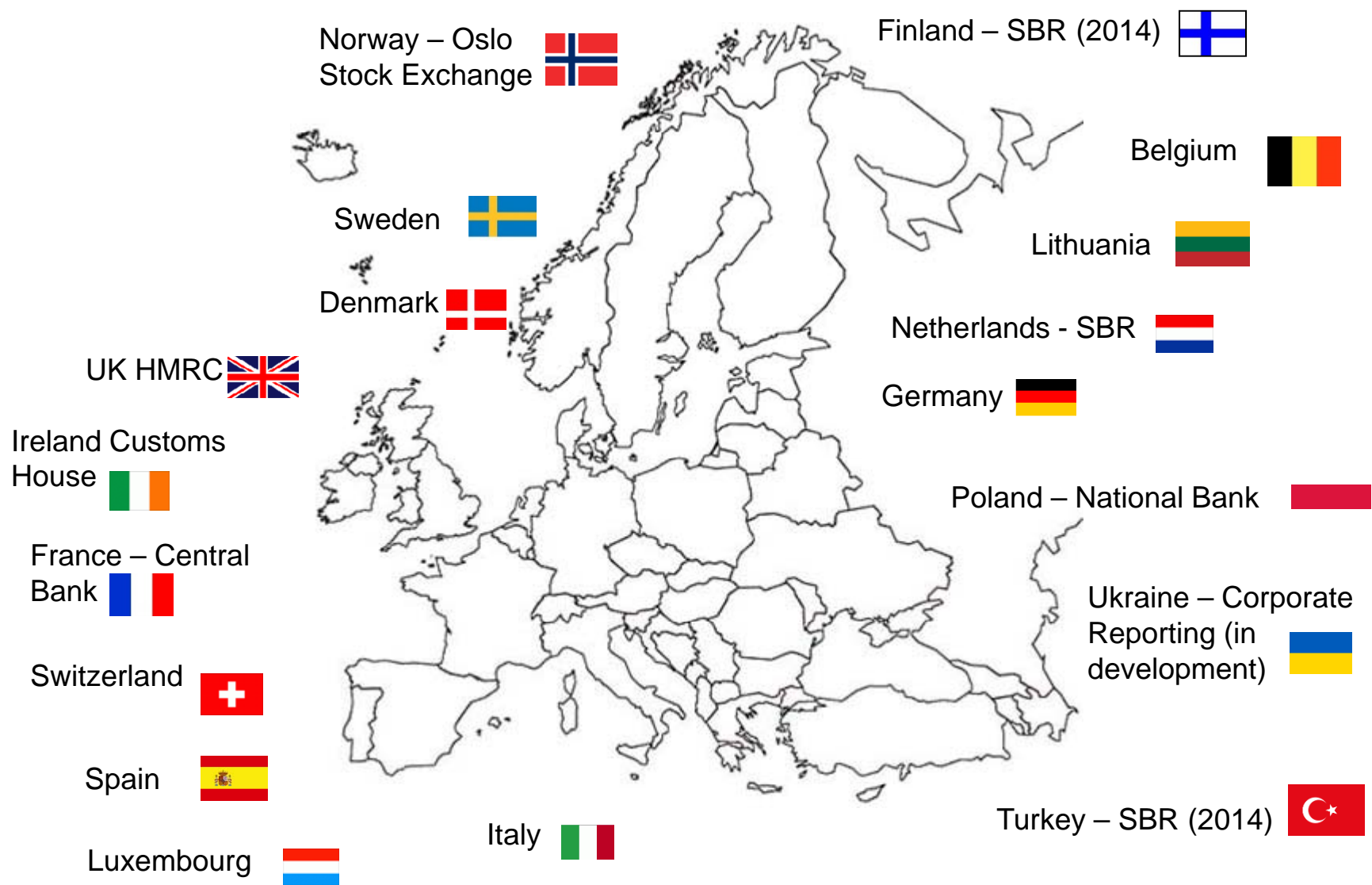
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XBRL Around the World: Latin America



XBRL Around the World: Europe



XBRL Around the World: EU



Solvency II

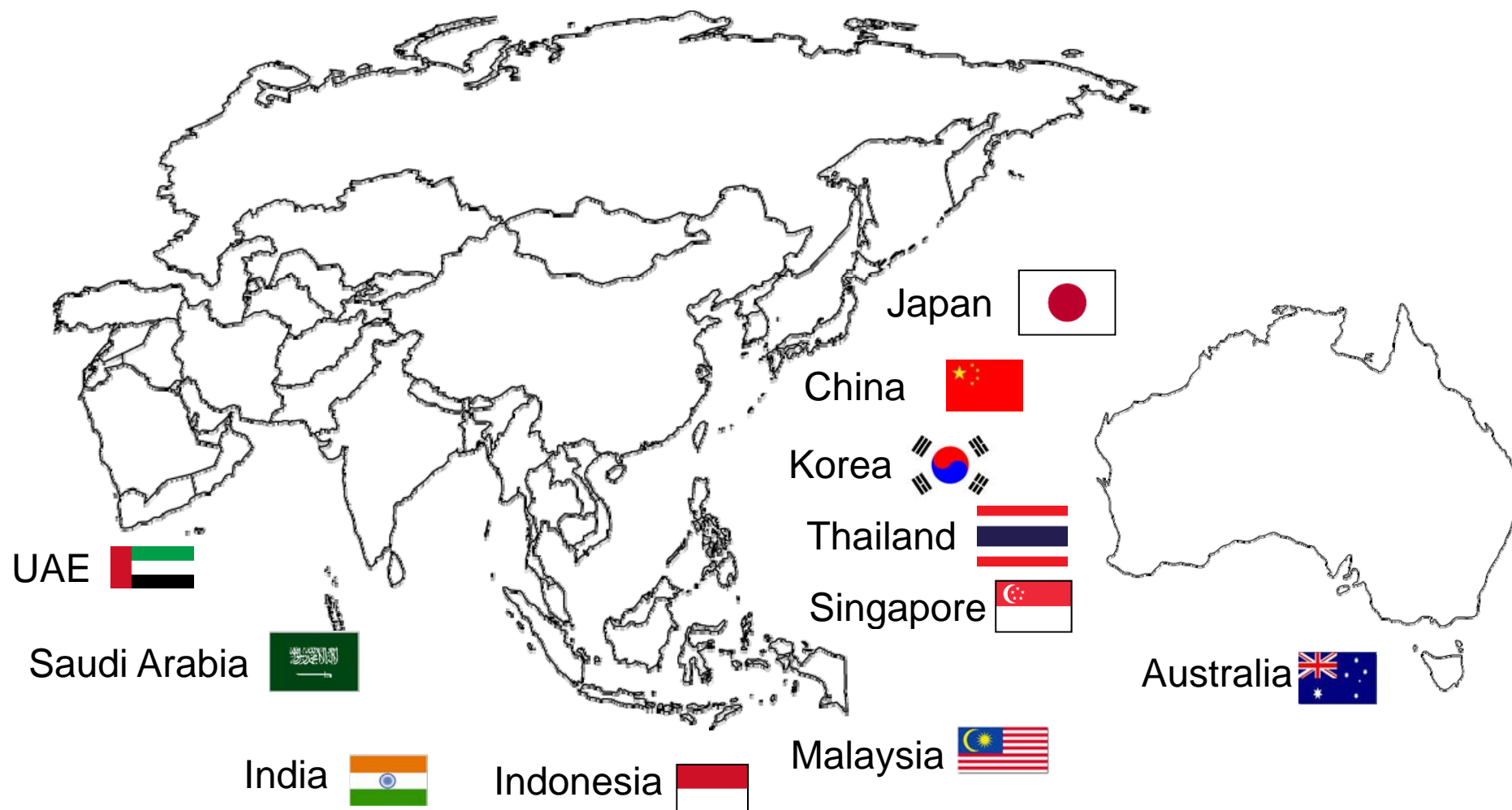
Basel II

Business
Registers

CRD IV



XBRL Around the World: Asia and Oceania



Trends

‘Big Data’

Migration from unstructured to structured information accelerating; driven largely by economics and transparency demand

Expansion of existing programs (e.g. Australia, Japan, Singapore, etc.)

New regulatory territory adoption (e.g. Brazil, Malaysia, Russia, Saudi Arabia, etc.)

New disclosure areas (e.g. Solvency II, CDR, WICI, CSR/GRI, Corp Actions, etc.)

Assurance mandates on XBRL reports increasing (e.g. Netherlands, India, etc.)

Alignment with other relevant standards (e.g. LEI, RIXML, ISO, etc.)

Internal applications at GL and sub-ledgers (e.g. Data Act, Brazil, companies, etc.)

Emergence of new enabling software

Production / Disclosure Management / Mapping

Consumption / analytical applications

Standardized analytics enable collaboration among analysts / persistent analysis

And then there is the next thing.

Corp Actions – closing gap between Issuer & Investor

LAWYERS, ADVISORS, LEAD MANAGERS, REGISTRARS,
TRANSFER/FILING/INFORMATION/PUBLICATION AGENTS

REGULATORS, SHARE REGISTER, ANALYTICS
COMPANY

ISSUER

INVESTOR



Standardization enhances Analytics (Social Analytics)

Standardized Data, Formulas/Models, Relationships, Presentations

Deeper levels of analysis and insights as more data is immediately 'reusable'

Enables collaboration by analysts on models ('YouTube' for modeling)

Shift in Time / Resources applied to:

Accessing data

Inputting data into analytical applications

Correcting validation and input errors

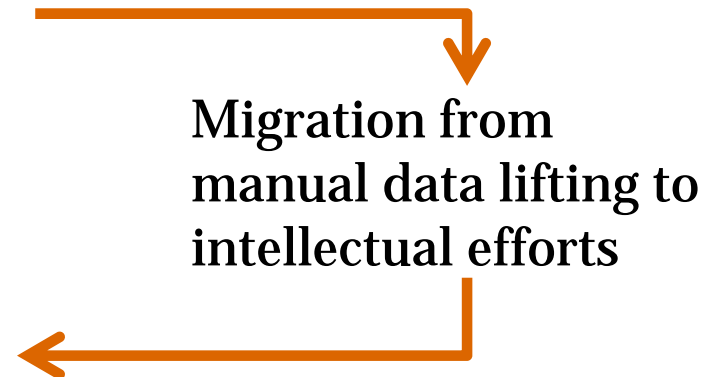
Performing analytics

Analyzing analytical results

Asking follow-up questions

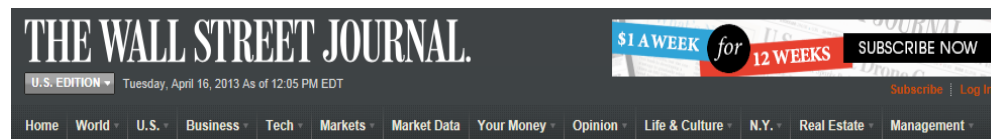
Analyzing answers to questions

Making decisions



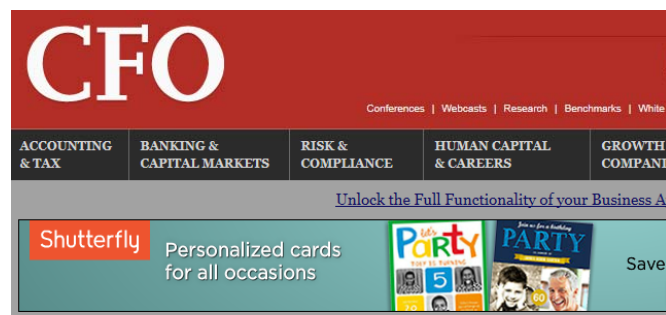
US SEC's Analytics have been Standardized & Improved

Here are examples of how the SEC has used standardized data and standardized analytics to enhance their risk assessment capabilities.



PRESS RELEASE | April 16, 2013, 12:05 p.m. ET

SEC Chief Economist Offers Insight Into XBRL Data Tools Designed to Discover Accounting Anomalies and Improve Financial Disclosures



Fraud | July 16, 2013 | CFO.com | US

SEC Eyes Data Mining to Boost Fraud Detection

The "drastically reduced cost" and increased power of analytics are driving efforts to track down companies that seem to be doing a whole lot better than everyone else.

LEGAL/REGULATORY | WHITE COLLAR WATCH | JUNE 3, 2013, 11:38 AM | 11 Comments

The S.E.C. Is 'Bringin' Sexy Back' to Accounting Investigations

BY PETER J. HENNING

In April 2003, a [New York Times](#) article discussed the push by federal prosecutors to crack down on accounting fraud in which one expert said, "These have become the hot, sexy cases."

What followed were the convictions of chief executives including [Jeffrey K. Skilling](#) of Enron, [Bernard J. Ebbers](#) of WorldCom and [John J. Rigas](#) of Adelphia Communications.

The attraction seems to have worn off. The number of corporate accounting cases at the Securities and



F. Carter Smith/Polaris
Jeffrey K. Skilling, Enron's former chief, in 2008. The number of corporate accounting cases at the S.E.C. has declined in recent years.



4

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Janet Novack, Forbes Staff

I write from D.C. about tax and retirement policy and planning.

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PERSONAL FINANCE | 8/09/2013 @ 1:26PM | 391 views

How SEC's New RoboCop Profiles Companies For Accounting Fraud

Explicit Demand from Investors



U.S. Securities and Exchange Commission

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Company Filings | More Search Options

ABOUT DIVISIONS ENFORCEMENT REGULATION EDUCATION FILINGS NEWS

SPOTLIGHT

- Credit Ratings Roundtable
- Decimalization
- Dodd-Frank Act Implementation
- Enforcement Cooperation Initiative
- Financial Crisis Enforcement Actions
- Fixed Income Markets
- Foreign Corrupt Practices Act
- Insider Trading
- Interactive Data and XBRL Initiatives
- Investor Advisory Committee
- Jumpstart Our Business Startups (JOBS) Act

Investor Advisory Committee

Section 911 of the Dodd-Frank Act established the new Investor Advisory Committee to advise the Commission on regulatory priorities, the regulation of securities products, trading strategies, fee structures, the effectiveness of disclosure, and on initiatives to protect investor interests and to promote investor confidence and the integrity of the securities marketplace. The Dodd-Frank Act authorizes the committee to submit findings and recommendations for review and consideration by the Commission.

"The Investor Advisory Committee, formed to help advise the Commission as it seeks to protect investors, maintain fair, orderly and efficient markets, and facilitate capital formation, is comprised of individuals with diverse expertise representing a wide variety of investor interests. I thank the members for their service, and look forward to working with the Committee as it continues its important work on behalf of investors."

- Mary Jo White, Chair, SEC

Recommendations of the Investor Advisory Committee

- Universal Proxy
- Data Tagging

News

[SEC Announces Members of New Investor Advisory Committee](#)

By-Laws and Operating Procedures

- Charter
- By-Laws

Meetings

[Submit comments to the Committee](#)

Comments received by the Committee are available

July 25, 2013

- Recommendations of the Investor Advisory Committee — Data Tagging
- Recommendations of the Investor Advisory Committee



October 26, 2009

Meredith Cross, Esq.
Director
Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Effective Processing of Corporate Actions

Dear Ms. Cross:

The Asset Managers Forum ("AMF") Corporate Actions Committee is writing this letter to support the "Issuer to Investor: Corporate Actions" initiative which promotes the use of XBRL for corporate actions announcements. The Asset Managers Forum is the operations affiliate of the Securities Industry and Financial Markets Association's ("SIFMA") Asset Management Group ("AMG"), the voice for the buy side within the securities industry and the broader financial markets. The clients of AMF member firms include state and local pension funds, universities, and individuals saving for retirement.

The Asset Managers Forum formed the Corporate Actions Committee in response to the on-going risk exposure confronting market participants in the current corporate actions processing environment. The goal of the Committee is to identify solutions to reduce financial, operational and reputation risk for AMF members (asset managers, custodians and vendors). The Committee encourages the industry to implement best practices and standards to effectively manage the processing of corporate actions.

SIFMA Members

CFA Institute

"The Irreversible Trend toward Greater Connectivity and Data in Financial Reporting"

Recommendation: "The SEC should move forward with its 21st Century Disclosure Project"

FINANCIAL REPORTING DISCLOSURES

Investor Perspectives on
Transparency, Trust, and Volume

Examples of Poor Report Quality

Examples of Report Quality Issues in Company Reports (2012 10ks):

"Quality means doing it right when no one is looking." – Henry Ford.

Type	XBRL Report	Correct
Fact Problem	UFE \$4.3B	UFE \$17.2B
Fact Problem	Settlements -77910000 (dr)	Settlements 77910000 (dr)
Fact Problem	Public Float \$6.3 Quintillion (17 zeros)	Public Float \$6.3B
Fact Problem	Accumulated Amortization - \$28.5B (cr)	Accumulated Amortization \$28.5B (cr)
Extension Problem	xxx.Cash and Cash Equivalents	US GAAP Term: Cash and Cash Equivalents
Report Problem	Net Cash Provided by Ops of \$1.3B	Net Cash Provided by Ops of \$1.0B

Learning's

Few like change / uncertainty

Perceptions drive reality – “No one is going to buy anything over the Internet”

Regulatory Mandate (Bad) OR Supply Chain Standard (Good)

Implementation approach dictates initial cost/benefit – perception

Bolt-on adds cost/time.....ORBuild-in reduces cost/time

Review procedures need to address structures (not just presentation)

Process changes (and related benefits) follow the “Bell Curve”

Investor demand for

Structured disclosures is strong

Report quality is high; however, actual report quality is poor

Enabling software

Critical to benefit realization; most still early stage but maturing

Development based upon customer demand/request

There are many more supply chain applications (e.g. Corporate Actions, WICI, etc.)
that are now emerging

Empowering Reporting Professionals

Perspective Question: What software application is most commonly used by companies for reporting?

1. SAP
2. Oracle
3. Hyperion
4. Fujitsu
5. BAAN
6. IBM Cognos
7. JD Edwards
8. Microsoft Dynamics
9. Office

Common Report Assembly Manual Processes

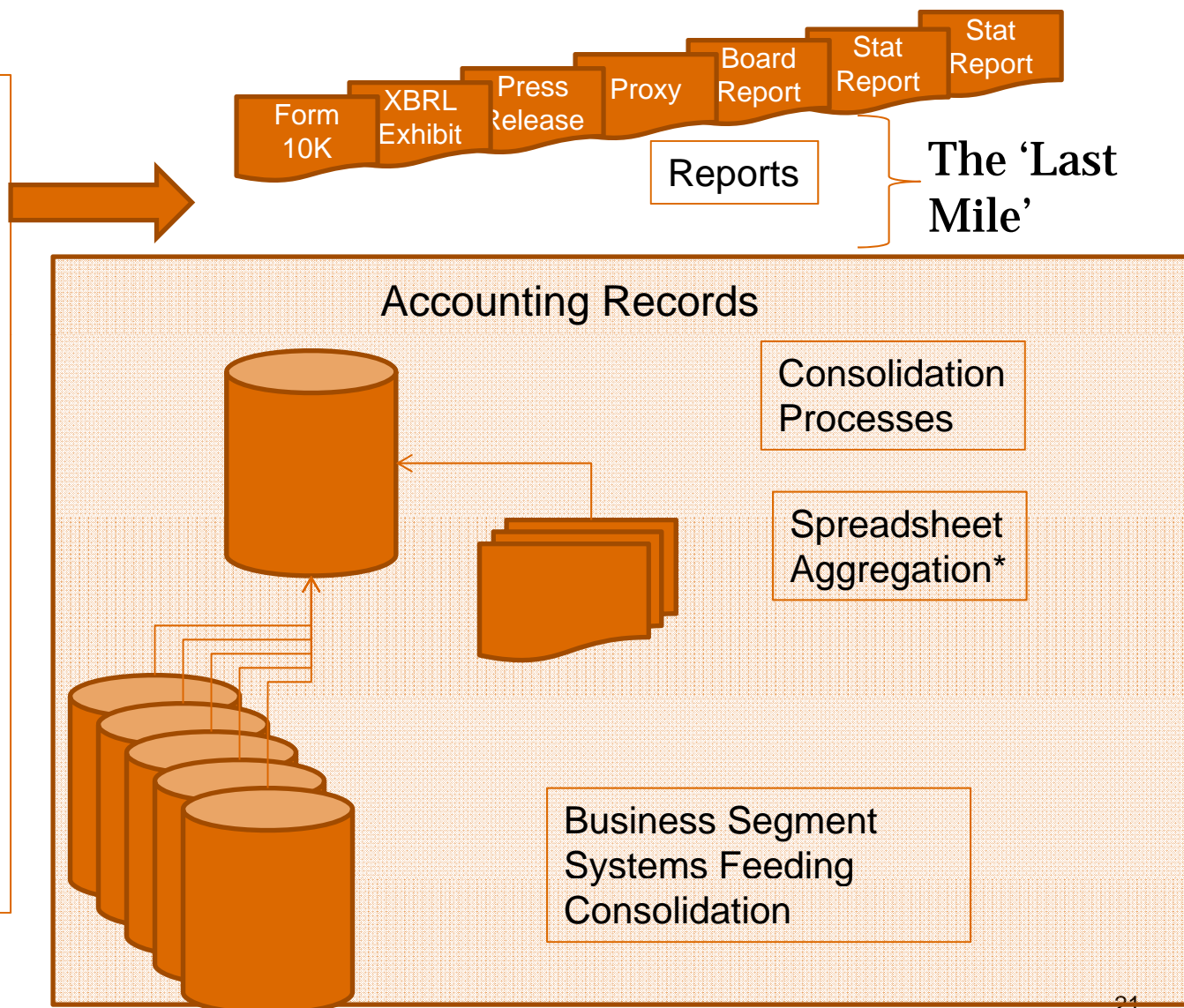
While companies have significant investments in ERP and consolidation application, the 'last mile' of report assembly and review processes and controls are highly manual. 'Last Mile' process steps that are commonly manual include:

- Spreadsheet Aggregation
- Report Assembly from disparate sources
- Report Validation
- Narrative Text Generation
- Review Processes via emailing of Office docs
- Benchmarking / Peer & Best Practice Assessments
- References from disclosures to relevant standards, regulations, key accounting policies & memos
- Tagging of completed reports with XBRL taxonomy elements

Typical Report Assembly Process Last Mile (Manual)

Reports are created via a series of access and rekeying efforts manually replicating information contained in the company accounting records.

In a typical company process, there are 'no' to 'very limited' explicit connections between reported disclosures and company accounting records. As a result, report assembly and validation is largely a manual effort.



Typical Report Assembly Process (Manual)

Reports are assembled from a series of source documents, often requiring manual rekeying of data from source documents into the computer records.

In a typical process, the data is 'very little' connected to the reported company records. The report validation is a very manual effort.

スライド 22

RMW2

this is the same as the prior slide; just with the excel worksheets expanded for effect.

R M Willis, 2013/09/27

Outsourcing may be common: But control is important

Google Earnings, Revenue Miss Wall Street Forecasts



By CNBC | CNBC – 8 hours ago

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Google reported its quarterly earnings much earlier than expected Thursday, and the results missed analysts' expectations significantly.



An employee rides her bike past a logo next to a Google building.

After the earnings announcement, the company's shares (GOOG) fell sharply, and its market cap shed about \$19 billion. (Click here to get the latest quotes for Google.) The company offered no explanation as to why it released earnings early. Trading was halted shortly after the announcement at the company's request pending news.

Following the earnings release surprise, the company issued a

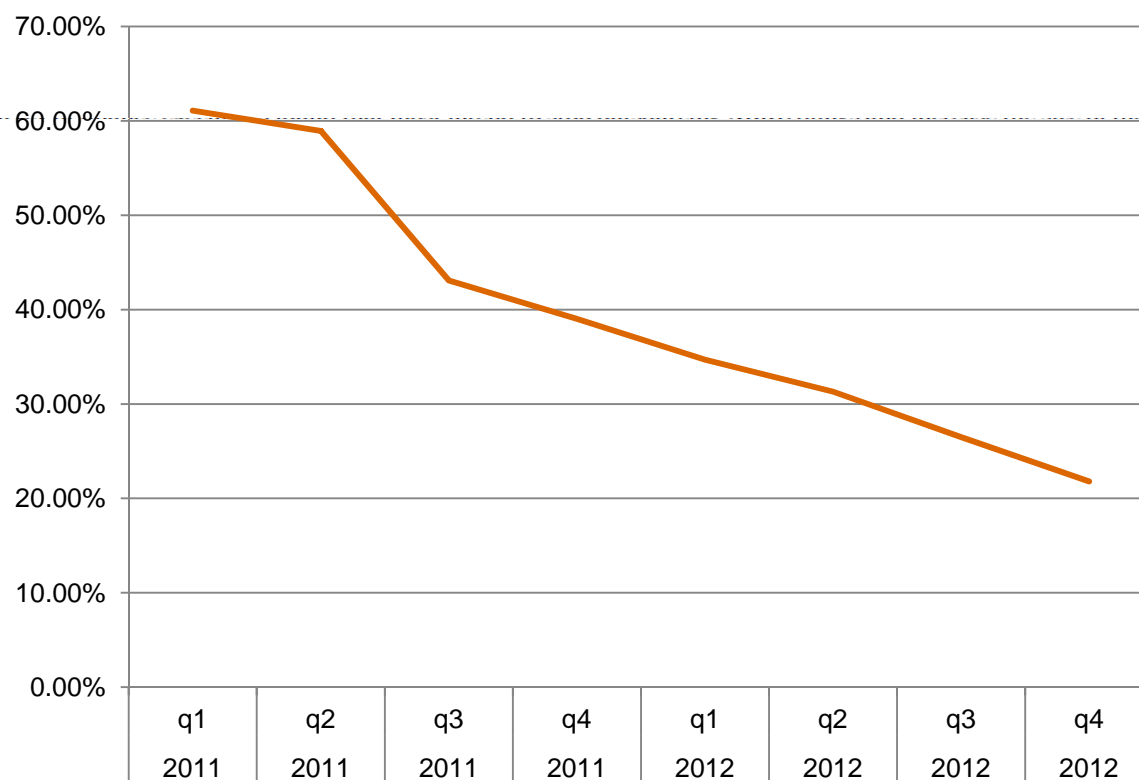
"Earlier this morning RR Donnelley, the financial printer, informed us that they had filed our draft 8K earnings statement without authorization. We have ceased trading on NASDAQ while we work to finalize the document. Once it's finalized we will release our earnings, resume trading on NASDAQ and hold our earnings call as normal at 1:30 PM PT," the company said.

(More From CNBC: [The Top 10 US States for Technology](#))

Net income was \$3.01 billion, down from \$3.18 billion in the year-ago quarter.

Many CFO's Moving to Build – in XBRL

Bowne / RR DONNELLEY



And the market share decline over the past 2 years for the major outsourcing vendor reflects this transition.

RR DONNELLEY

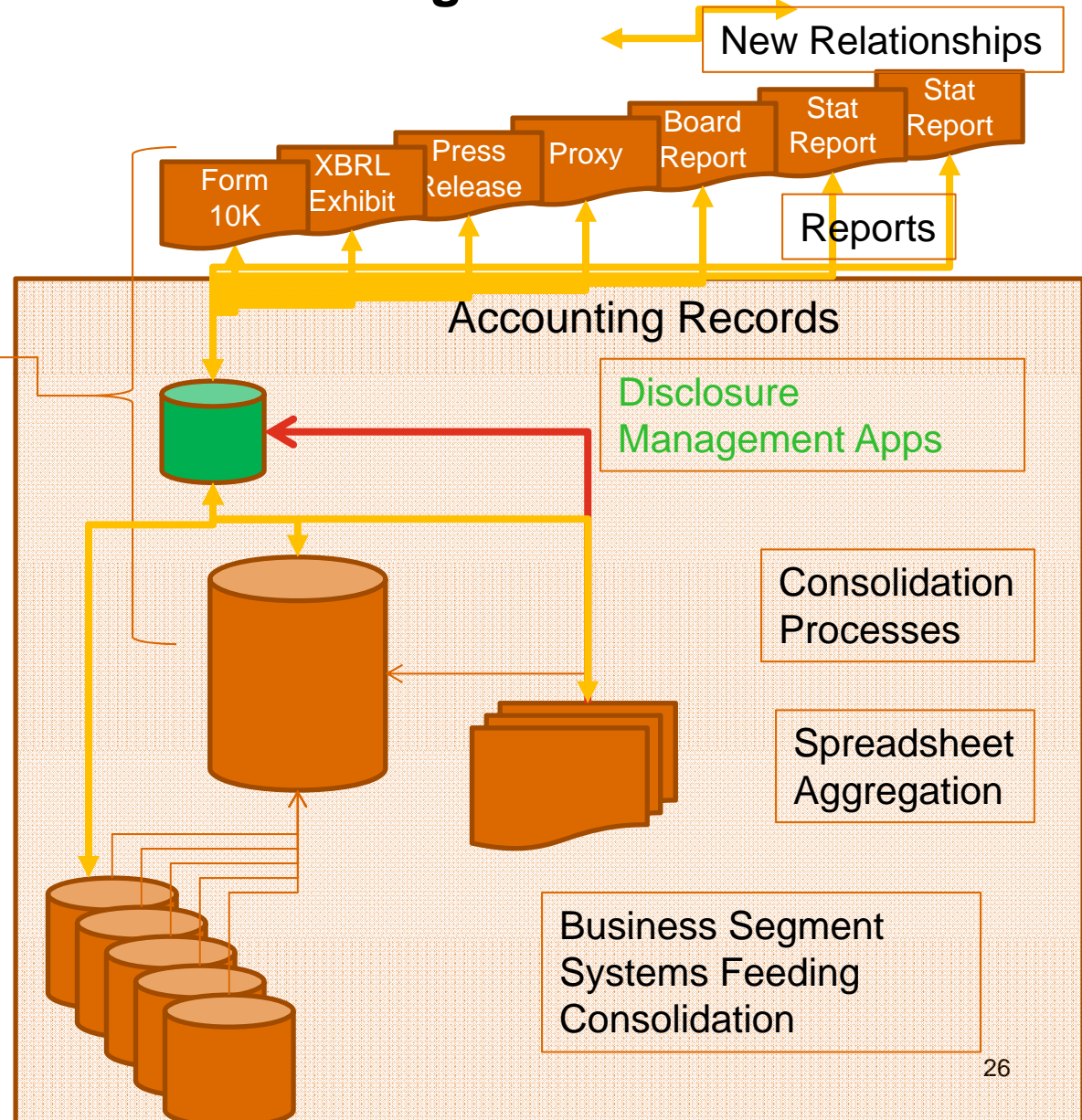
Transition to 'built-in' approach
Lowers Cost/time while enhancing control



Disclosure Management – Streamlining the Last Mile

Mapping relationships between company report writer systems and the company report are explicit and access, reuse and some validation processes are automated within the built-in application. These explicit relationships now can exist between source system accounting records and company reports.

Disclosure Management process controls are critical and may include: application access controls; control over mappings (both incoming and outgoing); log of changes; report versioning controls and audit trail; and others.



Disclosure Management Process Enhancements

‘Last Mile’ process steps that are automated and streamlined via effective Disclosure Management application implementation include:

- Spreadsheet Assembly is automated ‘pulling’ data from disparate source systems
- Report Assembly (& updating) is automated pulling data from disparate systems
- Report Validation is built into the DM application
- Some Narrative Text Generation is automated
- Review Processes are collaborative and provide a ‘topical’ view
- Benchmarking / Peer & Best Practice Assessments are automatically loaded in context of the company disclosures (e.g. Income taxes)
- References explicitly link from reporting concepts to standards, regulations, key accounting memos, and company policies
- Virtual Reporting Service Center useful across all reporting types
- XBRL Reports are a by-product of report assembly and review

25% to 50% cost and time enhancements

Disclosure Management Articles



“Disclosure Management: Streamlining the Last Mile” - Outlines general process enhancements enabled



“How to Differentiate Disclosure Management Features”



“Grocery Store Managers & Financial Executives: Bolt-on or Built-in to Realize Process Benefits?”

Next Steps

Next Steps for Producers

Enhance review of report structures to ensure report quality

Use Disclosure Management to Standardize Reporting Processes & Controls

- Apply the standardized reporting processes & controls across all content silos (e.g. Company reports, Corp Actions, IR, Internal, etc.)
- Migrate reporting content silos towards a Virtual Service Center
- Use Disclosure Management to enable process effectiveness and

Prioritize internal ERP instances for Standardization to enhance internal transparency

‘Robocop’ for your internal GRC, IA, BI, WICI, etc.

Next Steps for Consumers

Communicate demand for high quality structured disclosures

Use freely available granular disclosures to enhance:

- Timeliness / persistence of analysis
- Insights from more granular analysis
- Number of companies analyzed
- Cost of analysis

Standardize formulas / models to enhance:

- Institutional management of analytical intellectual property
- Institutional transparency of how, where and when analytics are applied

Thank you

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