

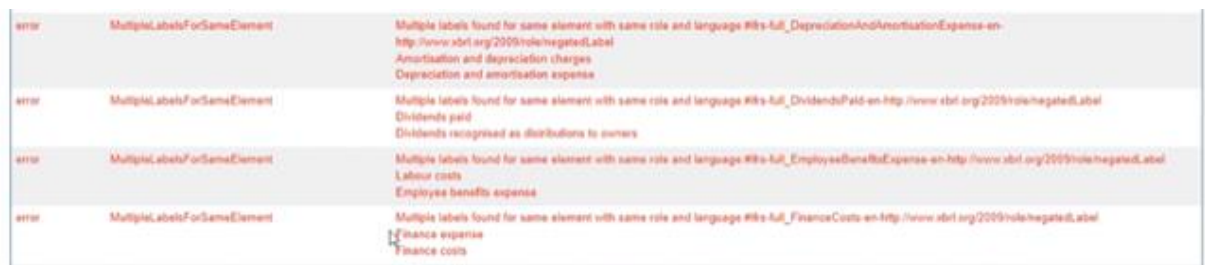
November 9, 2021

Points discussed :

- Contribution of BPTF to Karl-Magnus presentation to the XBRL Europe days (November 22) and review of OAMs survey.
- Clarifications on questions raised by Vergil on labels:

I would like to get your opinion on two errors shown by few ESEF validation tools.

1. **Use of Multiple labels:** This happens when we change the label predefined in the taxonomy for label roles such as period start, period end, negated, total etc. For example, please refer to the below screenshot where we have changed the label for the negated label role and the validation engine throws this as error.



error	MultipleLabelsForSameElement	Multiple labels found for same element with same role and language #18-full_DepreciationAndAmortisationExpense-en- http://www.xbrl.org/2009/role/negatedLabel Amortisation and depreciation charges Depreciation and amortisation expense
error	MultipleLabelsForSameElement	Multiple labels found for same element with same role and language #18-full_DividendsPaid-en- http://www.xbrl.org/2009/role/negatedLabel Dividends paid Dividends recognised as distributions to owners
error	MultipleLabelsForSameElement	Multiple labels found for same element with same role and language #18-full_EmployeeBenefitExpense-en- http://www.xbrl.org/2009/role/negatedLabel Labour costs Employee benefit expense
error	MultipleLabelsForSameElement	Multiple labels found for same element with same role and language #18-full_FinanceCosts-en- http://www.xbrl.org/2009/role/negatedLabel Finance expense Finance costs

2. Declaring the labels: Some tools throws error even when we declare the labels as is without changing the same for available ESEF elements. For example, the label predefined in the taxonomy for **DepreciationAndAmortisationExpense** is **Depreciation and amortisation expense**. Even when we declare this label as is in label XML, we still get the error.

When we looked at the ESEF filing rules, the only rule that is relevant to use of labels is provided under RTS Annex IV Par 8 that says **“Labels and references of the core taxonomy elements in extension taxonomies of issuer shall not be replaced”**. With this rule, we can interpret that ‘Labels’ referred in the rule might include all label roles not just standard label role. First point will be addressed if we do not change the label in label XML file (again additional labels are provided only for English version of taxonomy. Other languages have only standard and documentation label roles, hence we might have to add these conditions only for English document). However, the rule does not say that we should never export the labels in the XML file unless its extended elements. Could you please provide your views on this as you would have dealt with this already. Are we missing any other rule under ESEF filing manual? Would it be helpful if you could point us to respective contacts for clarification.

- We discussed the possible publication of guidance by our working group. We decided to review the proposed subjects in our next meeting on Dec 7, 2021.