# Disclosure Regulation around the World: Data and Descriptive Analysis

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#### **Abstract**

The goal of this project is to understand how disclosure regulation is set across countries and over time. To this end, we are in the process of collecting a comprehensive dataset on disclosure regulation around the world. This describes the data we have collected thus far and provides preliminary descriptive evidence.

We appreciate the helpful comments of participants at the 2020 TRR 266 Annual Conference on Accounting for Transparency as well as workshop participants at Humboldt-Universität zu Berlin and Charles University in Prague. We thank David Joos, Elizaveta Lomako, Stefan Miels, Nicholas Mues, Hans Pyrlik, Alejandro Sotelo Figueira, Judith Schrader and Justus Steinkühler for excellent research assistance. We acknowledge financial support from Deutsche Forschungsgemeinschaft (Project-ID 403041268-TRR 266).

#### Introduction

The goal of this project is to understand how accounting regulation is set. The focus of the project is on accounting regulation that mandates the disclosure of financial statement information by firms as agent-senders to a host of external stakeholders (i.e., shareholders, debtholders, government, society) as agent-receivers. The disclosure of financial statement information enhances the transparency of firms by making this information available, accessible and visible to their external stakeholders.

Prior literature as well as anecdotal evidence suggest that accounting regulators offer firms menus of disclosure regimes and that these menus differ considerably across countries. For example, while listed firms in the United States are subject to strict disclosure regulation, private firms in the United States are largely unregulated in this regard and consequently do not have to make their financial statements publicly available. In contrast, regulatory menus tend to be less diverse in many European countries where most firms with limited liability have to publish their financial statements on electronic filing platforms regardless of their listing status. Prior literature has little to say about why we observe these cross-country differences in regulatory menus. In this project, we will address this void by collecting and analyzing a comprehensive dataset on disclosure regulation around the world.

We currently have three main datasets containing (1) country level information on the business demography and other economic indicators for all UN constituents, (2) details on disclosure regulation by legal form in OECD countries and the European Union and (3) information on IFRS adoption around the globe.

In the following, we will describe each of these datasets in detail and provide preliminary descriptive evidence. All datasets as well as the codes used for the analyses are available on GitHub.<sup>1</sup> Please note that we continuously extend the datasets and update the analyses.

#### Data

#### Dataset 1

The first dataset comprises country level information on the business demography and other economic indicators for all UN constituents. We provide this information through the following files:

https://github.com/trr266/disclosure\_regulation\_around\_the\_world

The file *ctry\_profiles.csv* contains information on the 193 member states of the United Nations as of August 2022 (see variables iso2, iso3, ctry\_name and capital). We retrieved this information from the website of the U.S. Department of State.<sup>2</sup> The file also contains details on when and how the respective country was formed (see variables formation\_year, formation\_comment and formation source).

The files *number\_firms\_orbis.csv* and *number\_firms\_stat\_office.csv* comprise information on the total of number of registered firms by country-year (country identifier: iso2). We retrieved this information from national statistical agencies, supranational statistical agencies (Eurostat) as well as from the commercial data vendor ORBIS. The file *number\_firms\_eurostat.csv* comprises information on the number of firms by legal form and year. We retrieved this information from the website of Eurostat.<sup>3</sup>

The file *worldbank\_data.csv* contains information on the gross domestic product (in current US\$) and the population by country year (country identifier: iso2), respectively. We retrieved this information from the website of the World Bank.<sup>4</sup>

#### Dataset 2

The second dataset comprises files on accounting regulation for firms in 43 countries that are either members of the OECD or the European Union. The data is structured in a flexible and extendable way that allows for the inclusion of further regulations, countries and years. The current dataset focusses on regulations regarding balance sheet and income statement disclosures as well as audit requirements and size thresholds. Regulators tend to impose lighter requirements on firms qualifying as small or medium sized. The size thresholds in our dataset summarize those size categories.

The unit of observation is country-year-legal form. Hence, the dataset summarizes the regulations (e.g., balance sheet disclosures) for each legal form (e.g., limited liability enterprises) in a given country-year. We are currently planning to have our data checked by national experts to ensure high data quality.

The *norms.csv* is at the heart of dataset 2. This file displays the applicable paragraphs from national laws mandating firms to disclose a balance sheets or an income statements as well as

We used the following the website of the U.S. Department of State: <a href="https://www.state.gov/dependencies-and-areas-of-special-sovereignty/">https://www.state.gov/dependencies-and-areas-of-special-sovereignty/</a>

We used the following website of Eurostat:

<a href="https://ec.europa.eu/eurostat/databrowser/view/BD\_9AC\_L\_FORM\_R2\_custom\_3992779/default/table?lang=en">https://ec.europa.eu/eurostat/databrowser/view/BD\_9AC\_L\_FORM\_R2\_custom\_3992779/default/table?lang=en</a>

We used the following websites of the World Bank: <a href="https://data.worldbank.org/indicator/">https://data.worldbank.org/indicator/</a> NY.GDP.MKTP.CD and <a href="https://data.worldbank.org/indicator/SP.POP.TOTL">https://data.worldbank.org/indicator/SP.POP.TOTL</a>

paragraphs defining size categories and audit requirements. The source\_link column provides a direct link to the complete legal texts. All legal texts that are available in PDF format are stored in the legal\_texts folder on GitHub.

In the file *regulation.csv* the content of each regulation is summarized. We define a regulation as a set of laws mandating a group of companies to behave in a certain way (e.g., disclose balance sheets). The data currently contains information on regulations mandating firms to disclose a balance sheet or an income statement as well as size thresholds and audit requirements. Each regulation can be merged with the applicable paragraphs from national laws using the *norms\_regulation.csv*.

All size thresholds are summarized in the *size\_threshold.csv*. In almost all cases size thresholds are defined by three limits based on total assets, sales and the number of employees. Usually a firm is considered to exceed a threshold if it surpasses two of the three limits. All size thresholds can be merged with the other files using the regulation\_id.

The file *affected\_legal\_forms.csv* assigns the applicable regulations to each legal form. We classify national legal forms into four groups: (i) listed limited liability enterprises, (ii) private limited liability enterprises, (iii) partnerships and (iv) sole proprietorships.

The file *affected\_firms.csv* provides estimates for the share of firms disclosing a balance sheet or an income statement for each country-year-legal form. The number of total firms by legal form is retrieved from Eurostat, the World Bank, and from the commercial data vendor ORBIS. The number of available balance sheets and income statements is estimated based on available datapoints in ORBIS.

#### Dataset 3

The last dataset (*data\_ifrs\_adoption.xlsx*) comprises regulatory details on accounting standards that firms have to apply in their financial statements. This dataset shows which firms have to apply IFRS, IFRS for SMEs or other accounting standards for which types of financial statements. We collected this information from secondary sources only (e.g., country profiles published by the IASB or the World Bank). The sample comprises 185 countries and captures regulatory details as of today. Appendix B illustrates the structure of this dataset.

# Analysis 1

The first analysis is based on four data files:

• Country profiles for 193 member states of the UN as of 2022 (ctry profiles.csv)

- Data from ORBIS on the number of registered firms by country-year (number\_firms\_orbis.csv)
- Data from statistical offices on the number of registered firms by country-year (number\_firms\_stat\_office.csv)
- Data from the World Bank on the population and the gross domestic product in current US\$ by country-year (worldbank\_data.csv)

The raw dataset from ORBIS comprises information on the number of registered firms for 2,268 country-years over the period 2010 to 2021. The coverage of our dataset collected from statistical offices is much smaller and currently covers 532 country-years for the period 2010 to 2021. There are several reasons for the smaller coverage of the second dataset:

- (i) There is no statistical office in the respective country.
- (ii) There is a national office in the respective country, but this office does not provide publicly accessible information on the number of registered firms.
- (iii) There is a national office in the respective country that may provide information on the number of registered firms, but we are not able to collect this information due to language barriers.

Some statistics on the number of registered firms seem implausibly low, especially those provided by ORBIS. For example, the number of registered firms is lower than 100 for 426 country-years covered by ORBIS. In contrast, the minimum number of firms provided by statistical offices is 2,508. We therefore clean the data based on the ratio of the number of registered firms relative to the population in the respective country-year. Specifically, we set statistics on the number of registered firms to missing where this ratio is lower than 0.2%. This threshold is based on a visual inspection of histograms but inevitably arbitrary.

After this data-cleaning step, we have information on the number of registered firms from ORBIS for 1,296 country-years over the period 2010 to 2021. The clean dataset from statistical offices comprises information on the number of registered firms for 502 country-years over the same period.

ORBIS provides information on the number of registered firms for 56.0% of all country-years in the dataset (1,296 divided by 2,316 = 193 member states over twelve years from 2010 to 2021). This coverage is constant over time (see sheet "year" in output file *analysis\_1.xlsx*). Statistical offices provide information on the number of registered firms for 21.7% of all

country-years in the dataset (502 divided by 2,316 country-years). This coverage varies over time and is particularly low towards the end of the sample period.

The "gdp" sheet in the file *analysis\_1.xlsx* shows that country-years covered by ORBIS (statistical offices) generate 91% (49%) of the gross domestic product of the total 2,316 country-years in the dataset. Hence, coverage in both sources tends to focus on economically rich countries.

The "continent" sheet in the file *analysis\_1.xlsx* shows that coverage ratios vary substantially across continents. Coverage is highest (by far) for countries that are either members of the OECD or the European Union (100% for ORBIS and 75% for statistical offices).

For our second analysis, detailed country level information on the business demography is crucial. We will therefore focus this analysis on OECD countries and the European Union given that data availability is relatively high in this setting.

#### Analysis 2

The second analysis is based on the datasets concerning accounting regulation in OECD countries and the European Union:

- Share of firms with available balance sheets and income statements in ORBIS (affected\_firms.csv)
- Data on disclosure regulation (norms.csv) and the respective regulation's effect (regulation.csv)
- Data on the group of firms affected by each regulation (affected\_legal\_forms.csv)
- Data on the applicable national laws (*norms\_regulation.csv*)

The data collection is mainly based on local laws provided in the file *norms.csv* as well as on information provided by the European Commission.<sup>5</sup> Interactive visualizations of the data are accessible online.<sup>6</sup>

We proceed our second analysis in two steps. In the first step, we present aggregate statistics across all countries in the OECD and the European Union. In the second step, we present statistics for each individual country in the European Union. In several countries in the

We used the following report implemented by CNA Interpreta for the European Commission: https://op.europa.eu/en/publication-detail/-/publication/f5778349-894c-4260-a5ad-9a69e4d2a3a2

Interactive visualizations of balance sheet and income statement availability: https://jmaterna.shinyapps.io/a01\_b05\_shiny/

European Union we document substantial changes in the share of disclosing firms over time following two EU Directives (Directive 2012/6/EU & Directive 2013/34/EU).

As to the aggregate statistics: In 2018, 65 % of sample firms were limited liability firms. Partnerships account for 5 % of the business demography and 30 % of firms are sole proprietorships. Figure 1 displays the share of available balance sheets in ORBIS for the year 2018. The plot illustrates substantial variation in disclosure requirements across countries. Especially the European Union is characterized by a comparably high share of disclosing firms.

Figure 2 displays the share of available balance sheets and income statements in ORBIS for all three groups of firms for the years 2010 to 2020 in the European Union. The plot displays strong variation in disclosure requirements across legal forms and over time. In most countries in the European Union, almost all limited liability firms have to disclose at least a balance sheet. The share of disclosing firms declines slightly after 2012. This is mainly driven by two EU Directives (Directive 2012/6/EU & Directive 2013/34/EU) that exempt micro companies from the obligation to disclose balance sheets in several countries (e.g., Germany and France). The share of limited liability firms with available income statement information is considerably lower. This is mainly driven by four large countries exempting small limited liability firms from disclosing an income statement (Austria, Germany, Ireland, Netherlands). The thresholds for income statement disclosures are based on turnover, total assets and the number of employees.

The share of partnerships with available balance sheet and income statement information is much lower. In 10 of the 27 countries in the European Union, the obligation for partnerships to disclose financial statements is dependent on the type of partners. Usually partnerships have to disclose financial information if all liable partners are limited liability companies. In eight countries, cooperatives are required to disclose financial statements. In most countries, sole proprietorships never have to disclose financial information. An exception to this rule is Slovenia. Slovenian sole proprietorships generally have to disclose a balance sheet and an income statement. In some other countries, sole proprietorships have to disclose a balance sheet if a size threshold is met.

While Figure 2 indicates substantial variation in disclosure requirements across legal forms, its aggregate nature masks variation across countries. In the following second step of our second analysis, we therefore compute and describe statistics for each individual country in the European Union. These statistics are presented in Appendix A.

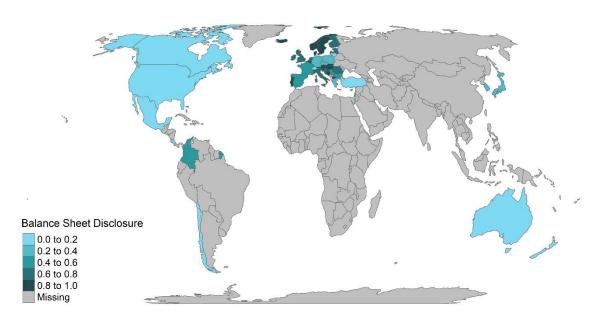


Figure 1: Plotted is the share of firms in OECD countries and the European Union with available balance sheet information for the year 2018.

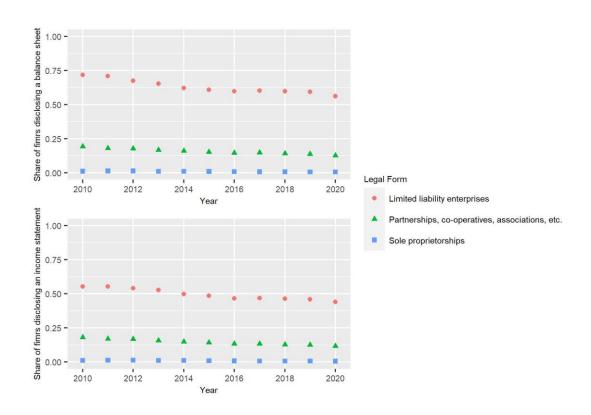


Figure 2: Plotted is the share of firms in the European Union with available balance sheet and income statement information by legal form.

## Appendix A: Disclosure requirements by country

#### Austria

In 2020 48% of registered Austrian firms were limited liability companies. The share of firms disclosing a balance sheet remains relatively high over the full sample period. Generally, all limited liability firms have to disclose a balance sheet. However, it is possible for smaller entities to file an abbreviated version of a balance sheet. The share of limited liability firms disclosing an income statement is much lower. Small limited liability companies do not have to disclose an income statement. Apart from a minor adjustment in 2015 the size threshold for income statement disclosures remains constant over the sample period. (UGB §§ 189 -283)

17 % of registered Austrian firms are partnerships. Certain types of partnerships ('Genossenschaften') have to disclose a balance sheet. Also, partnerships in which all liable partners are limited liability companies have to disclose a balance sheet. The thresholds for income statement disclosures are equivalent to those of limited liability firms. (§ 22 GenG, § 278 UGB)

Sole proprietorships make up 35 % of Austrian firms. They do not have to disclose a balance sheet or an income statement.

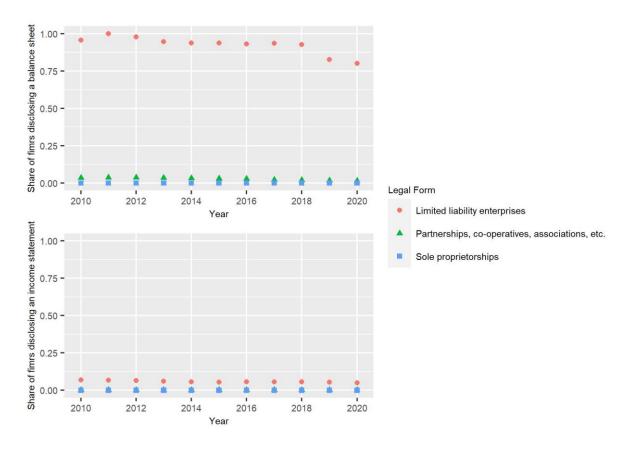


Figure 3: Plotted is the share of Austrian firms with available balance sheet and income statement information by legal form.

## **Belgium**

In 2020 38% of registered Belgian firms were limited liability companies. Generally, all limited liability firms in Belgium have to disclose a balance sheet. The disclosure requirements for small companies are somewhat lighter. However, all limited liability firms also have to disclose an income statement. (Article 92 Company Code, Article 15 § 1 Company Code, Article 93 Company Code).

8 % of Belgian firms are partnerships. Only certain types of partnerships ('Société Cooperative') are required to keep books and disclose a balance sheet and an income statement (Article 15 § 1 Company Code, Article 93 Company Code).

Sole proprietorships make up 54 % of Belgian firms. They do not have to disclose a balance sheet or an income statement.

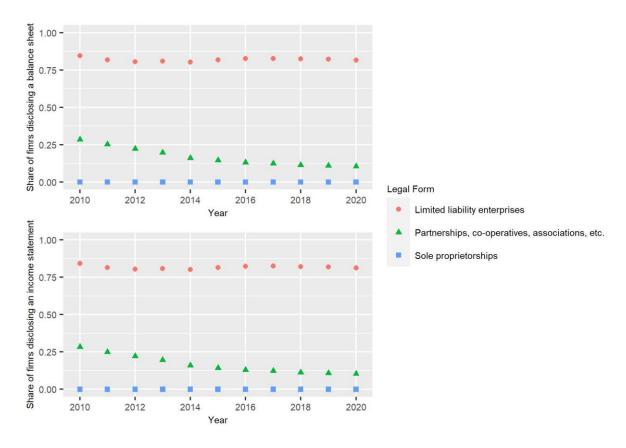


Figure 4: Plotted is the share of Belgian firms with available balance sheet and income statement information by legal form.

## Bulgaria

83 % of Bulgarian firms are limited liability firms, 2 % of firms are partnerships. Both types of legal forms generally have to disclose a balance sheet and an income statement. (ЗАКОН ЗА СЧЕТОВОДСТВОТО (§ 38))

15 % of firms are sole proprietorships. They generally do not have to disclose a balance sheet or an income statement.

It is noteworthy that the data availability for limited liability firms and partnerships sharply increases in 2011. This observation requires further investigation.

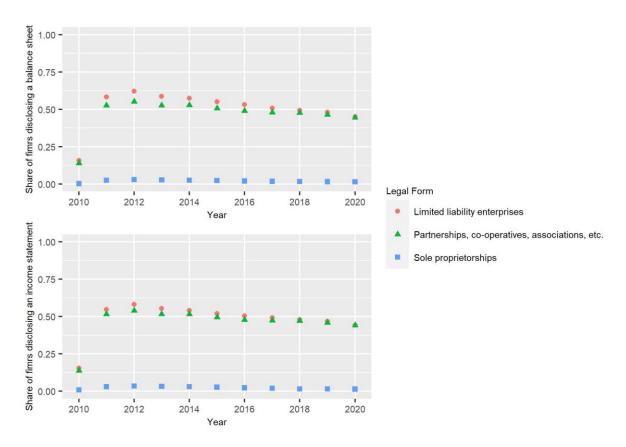


Figure 5: Plotted is the share of Bulgarian firms with available balance sheet and income statement information by legal form.

## Croatia

60 % of Croatian firms are limited liability firms, 1 % of firms are partnerships. Both types of legal forms generally have to disclose a balance sheet and an income statement. (Croatian Company Code)

40 % of firms are sole proprietorships. They generally do not have to disclose a balance sheet or an income statement.

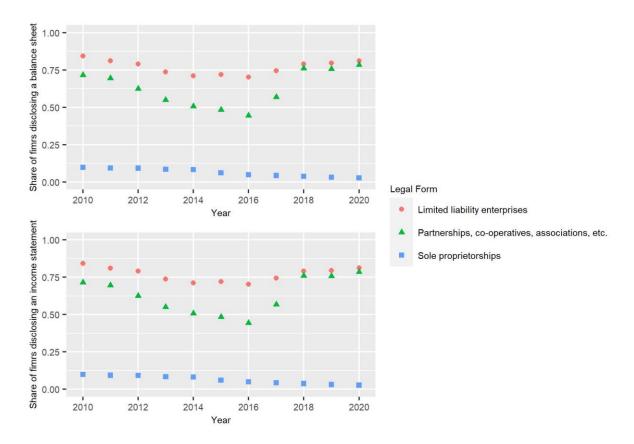


Figure 6: Plotted is the share of Croatian firms with available balance sheet and income statement information by legal form.

## **Cyprus**

62 % of firms in Cyprus are limited liability firms. They generally have to disclose a balance sheet and an income statement. (Ο περί Εταιρειών Νόμος, § 118 – 122)

0,5 % of firms are partnerships. In Cyprus partnerships have the same disclosure requirements as limited liability firms if all liable partners are limited liability firms. (Ο περί Εταιρειών Νόμος,  $\S 118 - 122$ )

Sole proprietorships make up 37 % of the business demography. They are not required to disclose a balance sheet or an income statement.

Despite the relatively extensive disclosure requirements the availability of financial information for firms in Cyprus is extremely low.

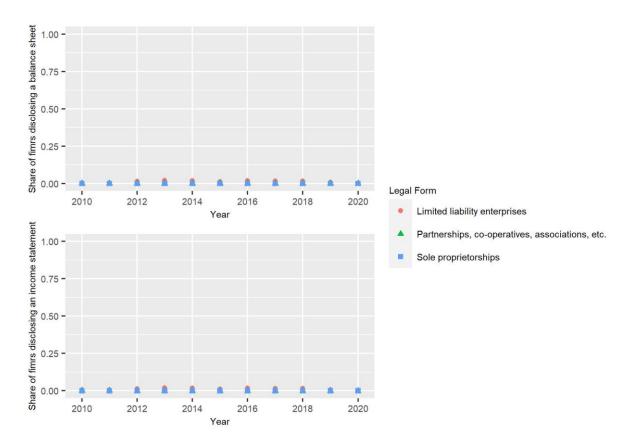


Figure 7: Plotted is the share of Cypriotic firms with available balance sheet and income statement information by legal form.

#### **Czech Republic**

32 % of Czech firms are limited liability firms. They generally have to disclose both a balance sheet and an income statement. However, the share of available balance sheets lies well below 100 % in the whole sample period.

Partnerships make up less than 1 % of the Czech business demography. They generally have to disclose a balance sheet and an income statement.

Sole proprietorships constitute the largest share of firms (67 %). Sole proprietorships are mandated to disclose balance sheets and income statements if their turnover is above 25 Mio. CZK.

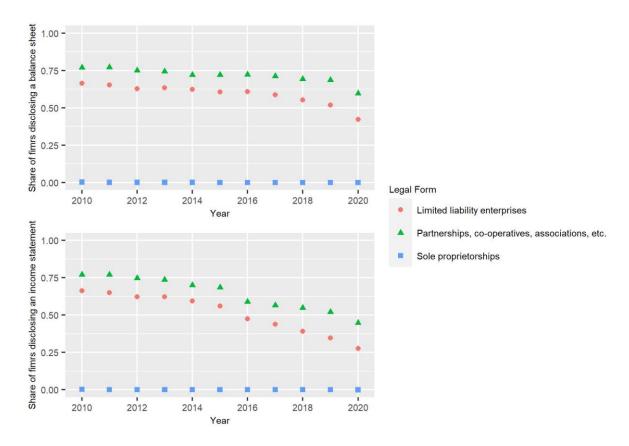


Figure 8: Plotted is the share of Czech firms with available balance sheet and income statement information by legal form.

#### **Denmark**

Limited liability enterprises make up 48 % of the business demography in Denmark. Generally, all limited liability firms in Denmark have to disclose a balance sheet and an income statement. (§ 3 (1) Danish Bookkeeping Law).

4 % of Danish firms are partnerships. Partnerships have to disclose a balance sheet and an income statement if all liable partners are limited liability companies (§ 3 (2) Danish Bookkeeping Law). Certain partnerships ('Andelsselskaber') have to disclose a balance sheet if they meet a certain size threshold (§ 3 (4) & § 4 Danish Bookkeeping Law).

48 % of firms in Denmark are sole proprietorships. They do not need to disclose a balance sheet or an income statement.

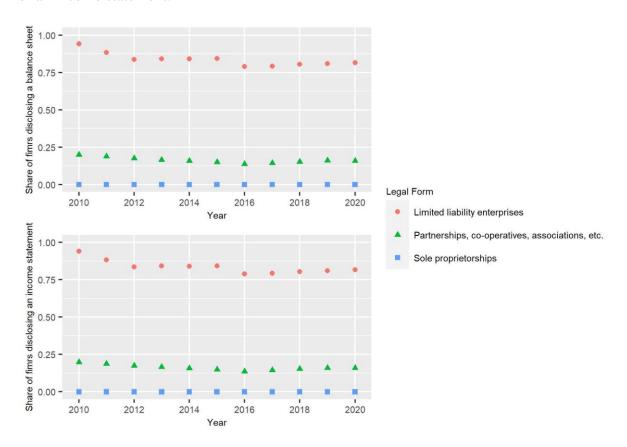


Figure 9: Plotted is the share of Danish firms with available balance sheet and income statement information by legal form.

#### **Estonia**

7 % of Estonian firms are limited liability firms. Generally, all limited liability firms in Estonia have to disclose a balance sheet and an income statement. However, there are simplifications in the structure of the balance sheet for smaller entities. (CNA Interpreta (2011))

4 % of firms are partnerships. Only certain types of partnerships have to disclose a balance sheet and an income statement ('Tulundusühistu'). Also, partnerships in which all liable partners are limited liability firms are obligated to disclose a balance sheet and an income statement. (CNA Interpreta (2011))

89 % of firms in Estonia are sole proprietorships. While they do have to disclose some financial information, balance sheets and income statements are typically not available in ORBIS. (CNA Interpeta (2011))

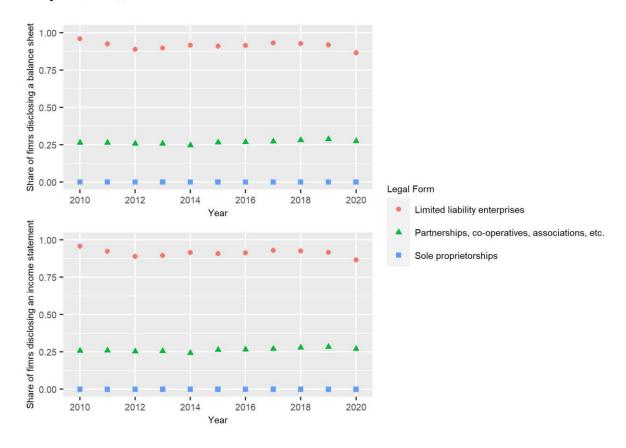


Figure 10: Plotted is the share of Estonian firms with available balance sheet and income statement information by legal form.

#### **France**

54 % of firms in France are limited liability firms. Before 2013 generally all limited liability firms had to disclose a balance sheet and an income statement. Following Directive 2013/34/EU micro companies have been exempted from disclosing a balance sheet and an income statement. This legal change led to a noticeable decrease in the number of available data points in ORBIS. (Code de commerce Book I, Title II, Chapter III, Section 2 & Book II, Title III, Chapter III, Section 5)

1 % of firms in France are partnerships. Partnerships have to disclose a balance sheet if all liable partners are limited liability companies and if a size threshold is met. However, following Directive 2013/34/EU micro partnerships are exempted from disclosing a balance sheet and an income statement to the public. (Code de commerce Book I, Title II, Chapter III, Section 2 & Book II, Title III, Chapter III, Section 5)

Sole proprietorships make up 45 % of French firms. Sole proprietorships generally do not have to disclose a balance sheet and an income statement. The high share of disclosing firms in the plot is likely driven by measurement issues.

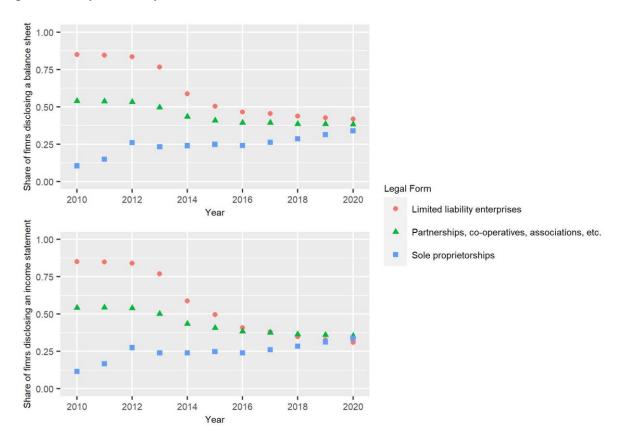


Figure 11: Plotted is the share of French firms with available balance sheet and income statement information by legal form.

# **Finland**

58 % of Finish firms are limited liability firms. Generally, they do have to disclose both a balance sheet and an income statement.

7 % of Finish firms are partnerships and 34 % of firms are sole proprietorships. Both types of firms have to disclose a balance sheet if they meet a certain size threshold.

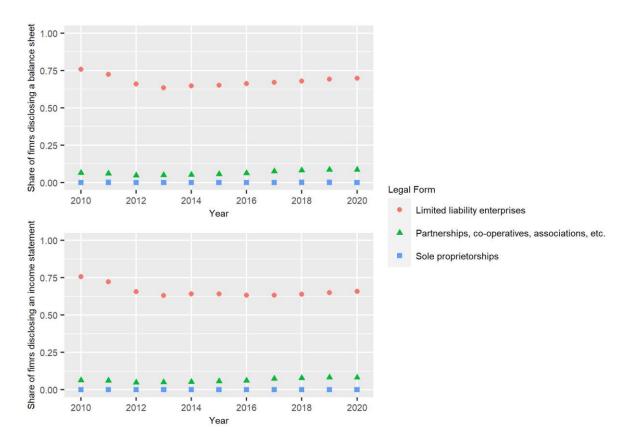


Figure 12: Plotted is the share of Finish firms with available balance sheet and income statement information by legal form.

## Germany

Limited liability firms account for 24 % of German firms. Until 2012 all German limited liability firms had to disclose a balance sheet. Following Directive 2012/6/EU micro companies have been exempted from disclosing a balance sheet and an income statement. This legal change led to a noticeable decrease in the number of available data points in ORBIS. The size threshold for mandatory income statement disclosures is much higher than the threshold for balance sheet disclosure. This leads to a low availability of income statement information. (§ 267, § 325 HGB)

15 % of German firms are partnerships. The disclosure requirements for limited liability firms apply to partnerships if all liable partners are limited liability firms. Otherwise partnerships do not have to disclose a balance or an income statement. (§ 267, § 325 HGB)

Sole proprietorships make up 61 % of German firms. They do not have to disclose a balance sheet or an income statement.

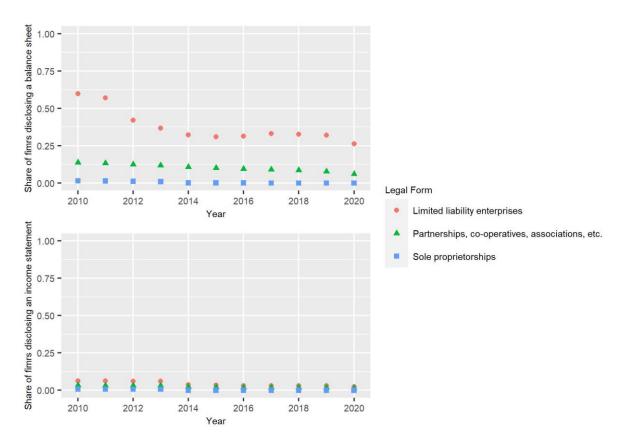


Figure 13: Plotted is the share of German firms with available balance sheet and income statement information by legal form.

# Greece

11 % of Greece firms are limited liability enterprises. Generally, all limited liability firms in Greece have to disclose both a balance sheet and an income statement. (Article 43b Commercial Code)

Partnerships make up 15 % of enterprises in Greece. Partnerships only have to disclose a balance sheet and an income statement if all liable partners are limited liability firms. (Article 43b (Nr. 3) Commercial Code)

Sole proprietorships do not have to publicly disclose financial information. They account for 74 % of Greece firms.

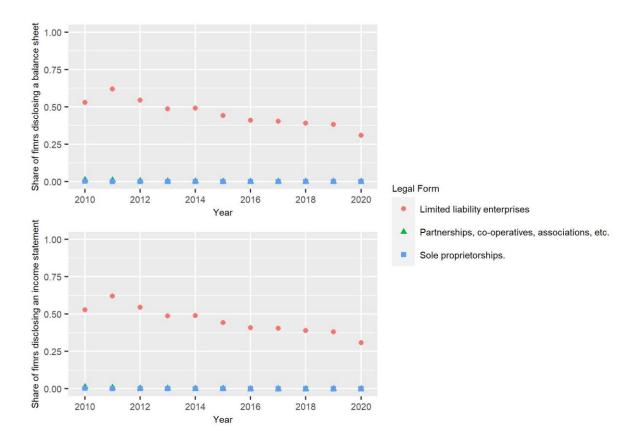


Figure 14: Plotted is the share of Greece firms with available balance sheet and income statement information by legal form.

## Hungary

35 % of Hungarian firms are limited liability firms. They generally do have to disclose both a balance sheet and an income statement. (a számvitelről, § 2)

Partnerships account for 12 % of Hungarian firms. Certain types of Hungarian partnerships ('Polgári jogi társaság') have the same disclosure requirements as limited liability firms. (a számvitelről, § 2)

Sole proprietorships generally do not have to disclose financial information. They constitute for 52 % of Hungarian firms.

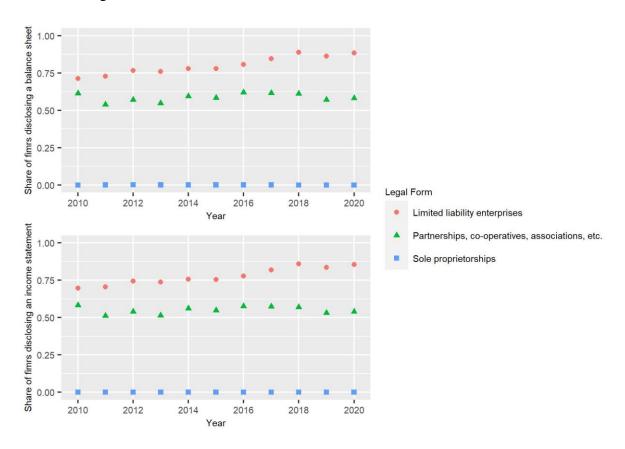


Figure 15: Plotted is the share of Hungarian firms with available balance sheet and income statement information by legal form.

# Italy

24 % of Italian firms are limited liability enterprises. Generally, all limited liability firms in Italy have to disclose both a balance sheet and an income statement. (Code Civil Capo III)

The regulations for limited liability firms also apply to certain types of partnerships ('Cooperativa'). Partnerships account for 15 % of Italian firms. (Code Civil Capo III, Artikel 2519)

Sole proprietorships do not have to publicly disclose financial information. They account for 6 % of Italian firms.

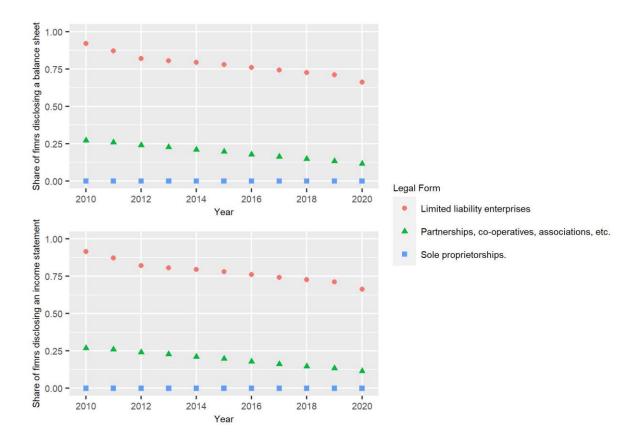


Figure 16: Plotted is the share of Italian firms with available balance sheet and income statement information by legal form.

## **Ireland**

48 % of Irish firms are limited liability firms. Limited liability firms generally have to disclose a balance sheet. However, the disclosure of income statements is only mandatory if a certain size threshold is met. The same rules generally apply to partnerships which make up 2 % of Irish businesses. (Companies Act 2014)

50 % of firms are sole proprietorships. They generally do not have to disclose a balance sheet or an income statement.

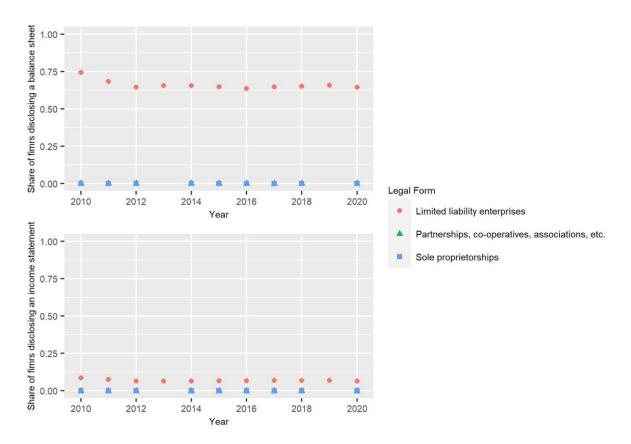


Figure 17: Plotted is the share of Irish firms with available balance sheet and income statement information by legal form.

## Latvia

72 % of Latvian firms are limited liability firms, 2 % of firms are partnerships. Both types of legal forms generally have to disclose a balance sheet and an income statement. (Komerclikums)

26 % of firms are sole proprietorships. They generally do not have to disclose a balance sheet or an income statement.

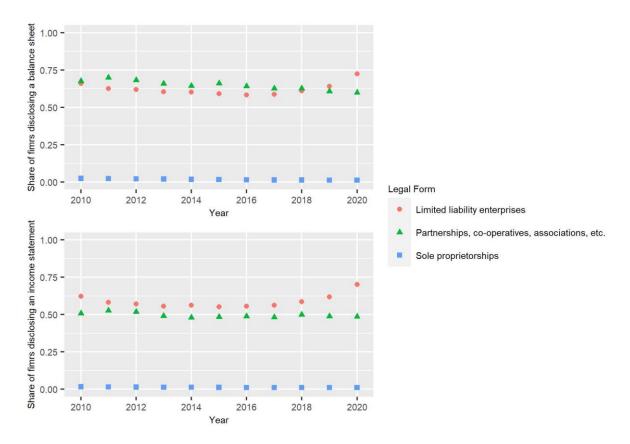


Figure 18: Plotted is the share of Latvian firms with available balance sheet and income statement information by legal form.

#### Lithuania

34 % of Lithuanian firms are limited liability enterprises. Generally, all limited liability firms in Lithuania have to disclose both a balance sheet and an income statement. (CNA Interpreta (2011))

Roughly the same disclosure regulations apply to partnerships. Partnerships make up 0,4 % of Lithuanian firms. (CNA Interpreta (2011))

66 % of firms in Lithuania are sole proprietorships. They generally do not have to disclose financial statements. (CNA Interpreta (2011))

It is noteworthy that the data availability for limited liability firms and partnerships sharply increases in 2019. This observation requires further investigation.

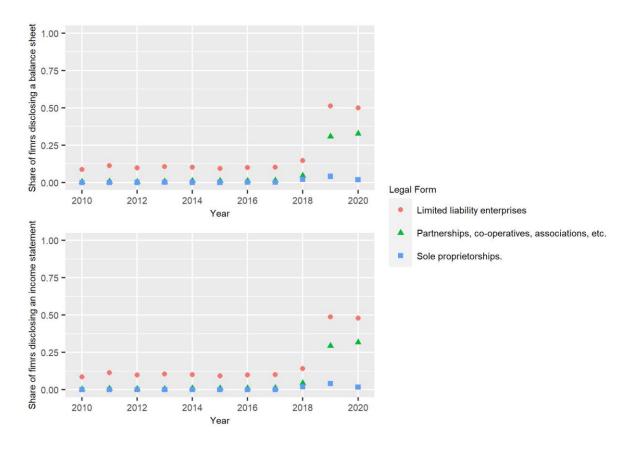


Figure 19: Plotted is the share of Lithuanian firms with available balance sheet and income statement information by legal form.

# Luxembourg

85 % of firms in Luxembourg are limited liability firms. They generally have to disclose a balance sheet and an income statement. (Code de commerce)

Partnerships and sole proprietorships constitute for 3 % and 12 % of firms, respectively. Both legal forms generally do not have to disclose financial information.

It is noteworthy that the data availability for limited liability firms sharply increases in 2015/16. This observation requires further investigation.

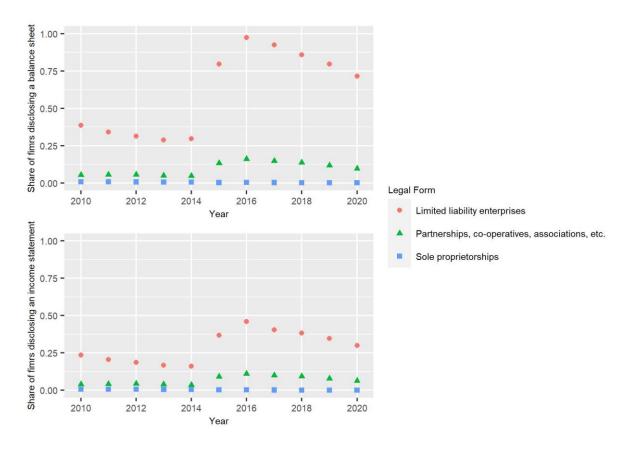


Figure 20: Plotted is the share of Louxembourgish firms with available balance sheet and income statement information by legal form.

# Malta

33 % of Maltese firms are limited liability firms, 4 % of firms are partnerships. Both types of legal forms generally have to disclose a balance sheet and an income statement. (Companies Act (§167))

62 % of firms are sole proprietorships. They generally do not have to disclose a balance sheet or an income statement.

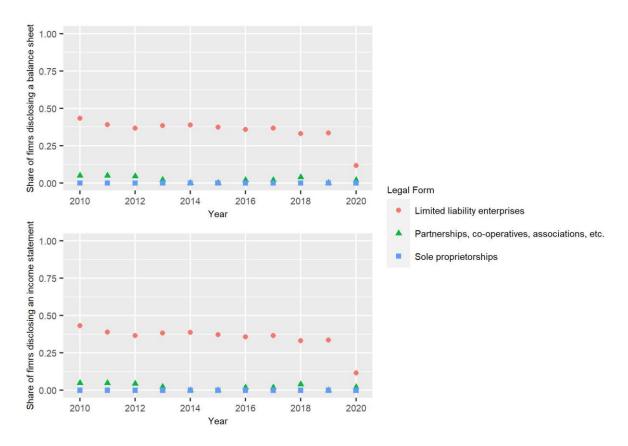


Figure 21: Plotted is the share of Maltese firms with available balance sheet and income statement information by legal form.

#### **Netherlands**

22 % of Dutch firms are limited liability firms. They usually have to disclose a balance sheet regardless of size. Income statements only have to be disclosed to the public if a certain size threshold based on total assets, turnover and the number of employees is met. The size threshold for income statement disclosure leads to a low availability of income statement information in ORBIS. (Burgerlijk Wetboek Boek 2)

12 % of firms in the Netherlands are partnerships. The disclosure requirements for limited liability firms apply to certain partnerships ('Cooperatie') and to partnerships in which all liable partners are limited liability firms. (Burgerlijk Wetboek Boek 2)

66 % for Dutch firms are sole proprietorships. They usually do not have to disclose financial statements.

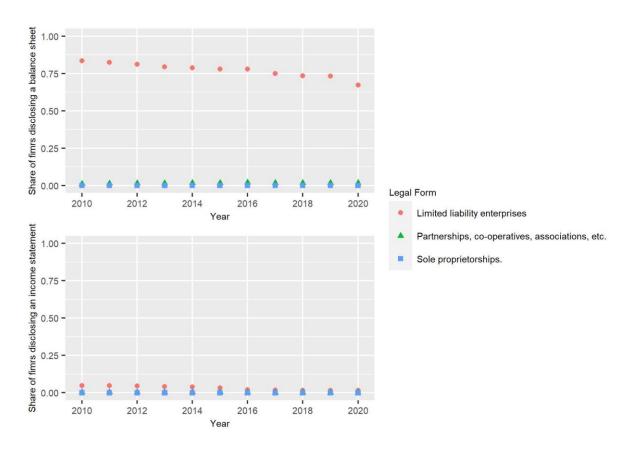


Figure 22: Plotted is the share of Dutch firms with available balance sheet and income statement information by legal form.

#### **Poland**

9 % of firms in Poland are limited liability firms. All limited liability firms are obligated to disclose a balance sheet and an income statement. (CNA Interpreta (2011))

Partnerships account for 3 % of enterprises in Poland. Some partnerships ('Spoldzielnia', 'Spolka komandytowa') always have to disclose a balance sheet and an income statement. Other forms of partnerships ('Spolka jawna') only have to disclose those documents if they meet a certain threshold based on turnover. (CNA Interpreta (2011))

The largest share of firms in Poland (88 %) is sole proprietorships. They do not have to disclose financial information. (CNA Interpreta (2011))

It is noteworthy that the data availability for limited liability firms sharply increases in 2017. This observation requires further investigation.

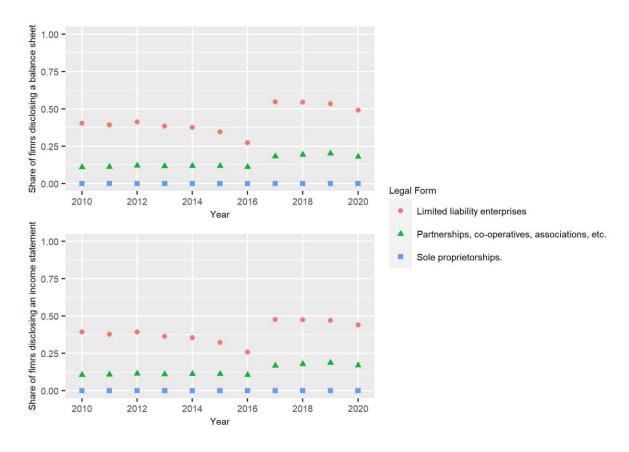


Figure 23: Plotted is the share of Polish firms with available balance sheet and income statement information by legal form.

#### **Portugal**

41 % of Portuguese firms are limited liability firms. Limited liability firms in Portugal generally have to disclose a balance sheet and an income statement. (CNA Interpreta (2011))

Partnerships account for 1 % of firms in Portugal. They only have to disclose a balance sheet if a certain size threshold is met and if all liable partners are limited liability firms. The size threshold is based on turnover, total assets and the average number of employees. (CNA Interpreta (2011))

58 % of firms in Portugal are sole proprietorships. They usually do not have to disclose a balance sheet or an income statement. ORBIS data on sole proprietorships in Portugal is very limited. (CNA Interpreta (2011))

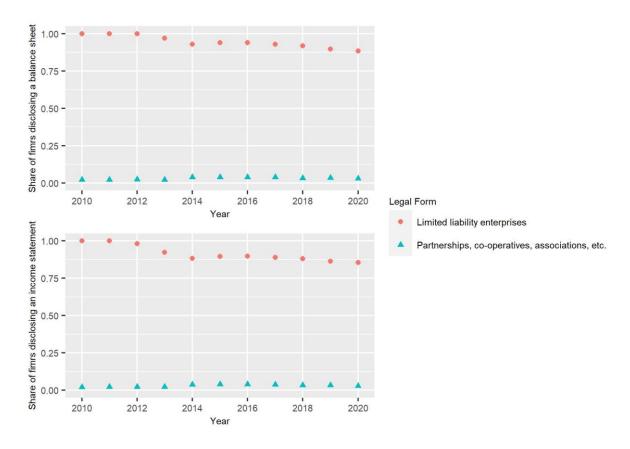


Figure 24: Plotted is the share of Portugese firms with available balance sheet and income statement information by legal form.

## Romania

69 % of Romanian firms are limited liability firms. They usually have to disclose a balance sheet and an income statement. This also applies to partnerships. Partnerships make up 0,3 % of the Romanian business population. (CNA Interpreta (2011))

Sole proprietorships account for 31 % of businesses. They usually do not have to disclose financial information. (CNA Interpreta (2011))

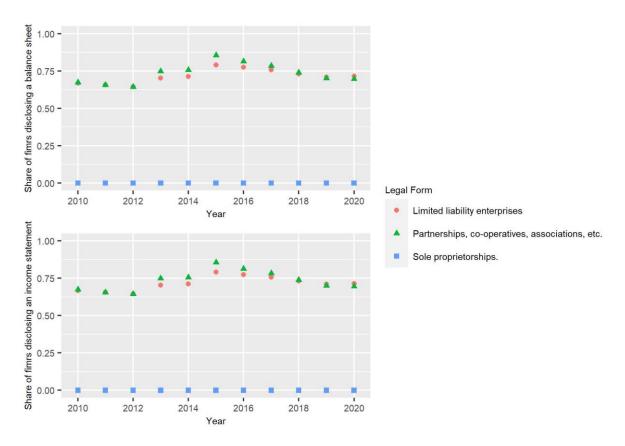


Figure 25: Plotted is the share of Romnian firms with available balance sheet and income statement information by legal form.

## Slovakia

39 % of Slovakian firms are limited liability firms. They usually have to disclose a balance sheet and an income statement. This also applies to partnerships. Partnerships make up less than 1 % of the Slovakian business population. (CNA Interpreta (2011))

60 % of Slovakian firms are sole proprietorships. Sole proprietorships usually do not have to disclose financial information to the public. (CNA Interpreta (2011))

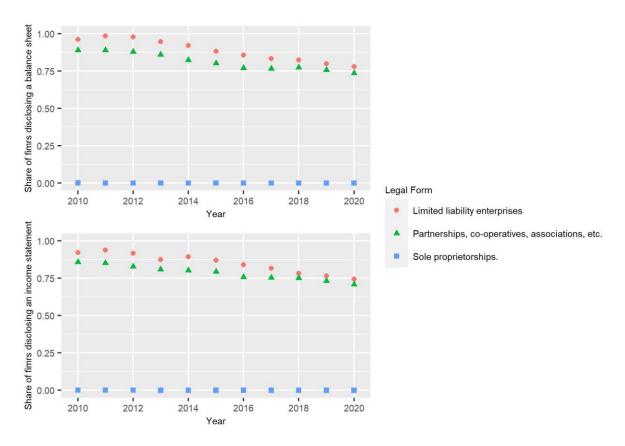


Figure 26: Plotted is the share of Slovakian firms with available balance sheet and income statement information by legal form.

## Slovenia

The Slovenian business demography consists of 38 % limited liability firms, 1 % partnerships and 60 % sole proprietorships. Generally, all three groups have to disclose a balance sheet and an income statement. (CNA Interpreta (2011))

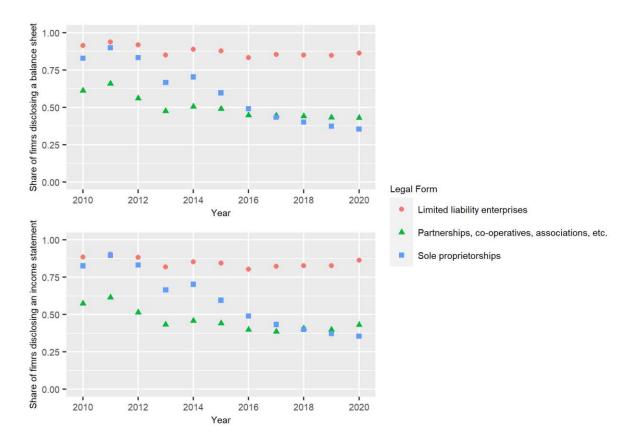


Figure 27: Plotted is the share of Slovenian firms with available balance sheet and income statement information by legal form.

# **Spain**

The Spanish business demography consists of 38 % limited liability firms, 7 % partnerships and 55 % sole proprietorships. Generally, all three groups have to disclose a balance sheet and an income statement. However, the data availability in ORBIS is much lower, especially for partnerships and sole proprietorships. (CNA Interpreta (2011))

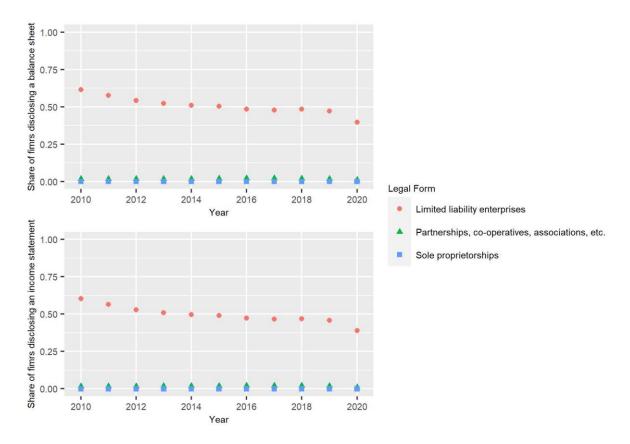


Figure 28: Plotted is the share of Spanish firms with available balance sheet and income statement information by legal form.

## Sweden

Limited liability firms constitute the largest share (59 %) of Swedish firms. They usually have to disclose both a balance sheet and an income statement. (Annual Accounts Act (SFS 1995:1554), Chapter 8)

7 % of Swedish firms are partnerships. They only have to disclose a balance sheet if one or more partners are legal persons. (Annual Accounts Act (SFS 1995:1554), Chapter 8)

Sole proprietorships generally do not have to disclose financial information. They make up 35 % of the Swedish business population

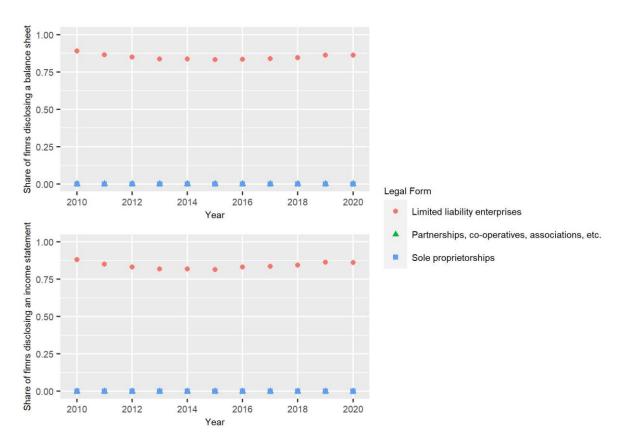


Figure 29: Plotted is the share of Swedish firms with available balance sheet and income statement information by legal form.

Appendix B: Structure of third dataset on IFRS adoption around the globe

