

31 July 2020

Mr Channa Wijesinghe  
Chief Executive Officer  
Accounting and Ethical Standards Board Limited (APESB)  
Level 11  
99 William Street  
Melbourne Victoria 3000

**CPA Australia Ltd**

Level 20, 28 Freshwater Place  
Southbank VIC 3006  
Australia

GPO Box 2820  
Melbourne VIC 3001  
Australia

**Phone** 1300 737 373

**Outside Aust** +613 9606 9677

**Website** cpaaustralia.com.au

By Email: [channa.wijesignhe@apesb.com.au](mailto:channa.wijesignhe@apesb.com.au)

Dear Channa,

**Exposure Draft: *Proposed Amendments to Part 4B of APES 110 Code of Ethics for Professional Accountants (including Independence Standards)*.**

CPA Australia represents the diverse interests of more than 166,000 members working in over 100 countries and regions around the world. We make this submission on behalf of our members and in the broader public interest.

CPA Australia supports clear and well-structured professional, accounting, audit and ethics standards which apply consistent terminology and phrasing both within and between issued standards. It is important that the standard setting process follows a logical, sequential, practical and consistent structure to enable professional accountants to easily digest, comprehend and implement the requirements. This is particularly relevant for the application of Independence Standards in assurance engagements where multiple parties are stakeholders to the engagement and it may be unclear when the standards apply and to whom.

CPA Australia supports alignment between the standards issued by the International Ethics Standards Board for Accountants (IESBA) and the International Auditing and Assurance Standards Board (IAASB). We further support the alignment of domestic standards issued by the APESB with international standards. The proposed amendments to the Code of Ethics for Professional Accountants (APES 110) appropriately reflect updates to the International Code resulting from changes to ISAE 3000 *Assurance Engagements other than Audits or Reviews of Historical Financial Information* (revised). Consistent definitions, glossary, phrasing and referencing remove ambiguity when applying the Code to assurance engagements, which improves understanding, usability and implementation of the requirements by professional accountants.

CPA Australia welcomes the inclusion of application material to clarify the roles of all parties to an assurance engagement and the amendments to clearly articulate the independence requirements for attestation engagements. The removal of duplicated requirements and application material by updating the definitions serves to simplify the Code and improve its usability.

Should you have any questions regarding this submission, please do not hesitate to contact Josephine Haste CPA, Policy Adviser – Ethics and Professional Standards on +613 9606 9693 or [josephine.haste@cpaaustralia.com.au](mailto:josephine.haste@cpaaustralia.com.au).

Yours sincerely



**Dr Gary Pflugrath**  
**Executive General Manager, Policy and Advocacy**