

**Project Proposal—Structure of the Code****Appendix****Comments by IFAC Technical Managers**

The comments of IFAC Technical Manager from each technical area are required before this Project Proposal is considered by the board or committee proposing to undertake the project.

**Technical Manager to the Compliance Advisory Panel and Professional Accountancy Organization Development Committee**

We fully support the key objective of this project and would be happy to be consulted as the project progresses. In particular, the reorganization of the Code to include a short and concise section of requirements accompanied by more extensive guidance would, in our opinion, enhance the understanding of the Code and make it easier to adopt or converge to in the varied regulatory environments around the world.

Signed: Szymon Radziszewicz

Date: March 20, 2014

**Technical Manager to the International Accounting Education Standards Board (IAESB)**

Thank you for the opportunity to comment on the IESBA project, Structure of the IESBA Code. I offer the following suggestions as a result of the IAESB clarity project of its Standards: (1) Ensure that terminology and their definitions are consistent with other Standard-setting Boards (e.g., IAESB's IES 4, *Initial Professional Development – Professional Values, Ethics, and Attitudes*); (2) Enhance the Scope section to provide a clear understanding of the work involved so as to avoid “scope creep” and unforeseen delays; (3) Identify your drafting conventions at the beginning of the project and ensure that they are consistent with other Standard-setting Boards (e.g., Appendix of *Framework for International Education Standards for Professional Accountants*) and accepted at an international level; (4) differentiate between what is mandatory application guidance and what is non-mandatory application guidance; and (5) communicate on a regular basis the progress status of the project so as to update your stakeholders.

Signed: David McPeak

Date March 20, 2014

**Technical Manager to International Auditing and Assurance Standards Board (IAASB)**

Staff of the IAASB supports the request to the IESBA to consider this proposal. While the proposal itself concisely covers key points in principal, we found the Report and Recommendations of the Working Group (Agenda Item 4-A) integral to understanding some of the considerations that will be involved in the project.

In the IESBA's consideration of the proposal:

In relation to distinguishing requirements from guidance, we believe it important that the Board continue to emphasize (irrespective of structure or manner of ‘separation’) that the guidance material is an integral part of the Code and that the entire text of the Code is relevant to the proper application of the requirements.

In relation to clarification of responsibilities, we encourage IESBA staff to be alert to changes that may be relevant or have implication to other standards, including those of the IAASB, and to proactively raise such issues with IAASB staff.

In relation to clarification of terms used, we encourage IESBA staff to consider how similar terms are used in other standards, including those of the IAASB, and to consider usage in a way that is consistent between standards, to the extent appropriate.”

Signed: James Gunn

Date: March 27, 2014

**Technical Manager to the Professional Accountants in Business (PAIB) Committee**

PAIBC has nothing further to add.

Signed: Stathis Gould

Date: March 14, 2014

**Technical Manager to the International Public Sector Accounting Standards Board**

No comment.



Signed: Stephenie Fox

Date: March 20 2014

**Technical Manager to the Small and Medium Practices Committee**

The SMP Committee supports the project proposal and the objective to improve the clarity and usability of the Code by restructuring it. We have had the opportunity to comment on the preliminary report and recommendations and agree with many of the proposals presented to date. In particular, we welcomed the recommendation to clearly distinguish the requirements of the Code from the guidance, to further consider the length and complexity of some of the sentences and to clearly differentiate between requirements for PIEs and entities that are not PIEs by moving independence (Sections 290 and 291) into a separate area.

The SMP Committee would welcome more opportunities to provide further input and looks forward to working closely with the IESBA on this project.

Signed: Christopher Arnold

Date: March 20 2014

**Technical Manager to the Transnational Auditors Committee (TAC)**

No comments to add. This will be of interest to the Forum of Firms and it would be good to be updated on developments on a regular basis. Please let me know how the Forum of Firms might assist going forward.

Signed: Barry Naik

Date March 20, 2014