



30 March 2017

The Chairman
Accounting Professional & Ethical Standards Board
Level 7, 600 Bourke Street
MELBOURNE VIC 3000
AUSTRALIA

CPA Australia Ltd
ABN 64 008 392 452
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.wijesinghe@apesb.org.au

Dear Nicola

Exposure Draft 02/16 – Proposed amendments to APES 110 *Code of Ethics for Professional Accountants* due to the revisions to IESBA’s *Code of Ethics for Professional Accountants*

CPA Australia welcomes the opportunity to respond to the above Exposure Draft. CPA Australia represents the diverse interests of more than 160,000 members in 118 countries. Our vision is to make CPA Australia the global accountancy designation for strategic business leaders. We make this submission on behalf of our members and in the broader public interest.

CPA Australia supports the proposed amendments to APES 110 *Code of Ethics for Professional Accountants* to incorporate the changes made by the International Ethics Standards Board for Accountants (IESBA) to the *International Code of Ethics for Professional Accountants*. We have provided our comments to the IESBA exposure drafts on:

- Responding to Non-Compliance with Laws and Regulations (NOCLAR)
- Non-Assurance Services

A fundamental issue in relation to NOCLAR is an effective regulatory framework that enables the disclosure of suspected illegal acts and affords appropriate protection to members who disclose a suspected wrongdoing to an appropriate authority. Australia’s legal framework on whistleblowing is in need of development particularly in the private sector. We have provided our comments to the recent consultation on the Government’s *Review of tax and corporate whistleblower protections in Australia*, seeking a comprehensive legal framework to enable effective whistleblowing so that wrongdoing is addressed and whistleblowers are protected. Further, CPA Australia is a partner organisation of the research project ‘[Whistling While They Work 2: Improving Managerial Responses to Whistleblowing in Public & Private Sector Organisations](#)’ and is represented in its research team.

We do not support the proposed effective date of 15 July 2017. We note IESBA’s effective date is one year after issue and APESB’s own practice has generally been to allow at least one year before major changes to the Code, as those proposed in this Exposure Draft, become effective. Given the magnitude and importance of the new requirements imposed by NOCLAR that necessitate education and training, as well as the development of policies and procedures for members in business and practice, we support an effective date of at least one year after the issue of the proposed amendments. We are of the view that the availability of early adoption of the NOCLAR provisions will allow their earlier application, where necessary.

If you require further information on our views expressed in this submission, please contact Dr Eva Tsahuridu, CPA Australia by email at eva.tsahuridu@cpaaustralia.com.au or on +61 3 9606 5159.

Yours sincerely

A handwritten signature in grey ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Stuart Dignam
General Manager - Policy & Corporate Affairs