

30 July 2020

The Ms Nancy Milne  
Chair  
Accounting Professional & Ethical Standards Board Limited  
Level 11, 99 William Street  
Melbourne VIC 3000

Dear Ms Milne

**Re: Exposure Draft ED 01/2020 *Proposed Amendments to Part 4B of APES 110 Code of Ethics for Professional Accountants (including Independence Standards)***

On behalf of the Institute of Public Accountants, I submit our review of Exposure Draft ED 1/20 *Proposed Amendments to Part 4B of APES 110 Code of Ethics for Professional Accountants (including Independence Standards)*.

The IPA supports the proposed amendments to APES 110 Part 4B to align with amendments to ASAE 3000 *Assurance Engagements Other than Audits of Historical Financial Information* and the addition of the material relating to independence requirements where there is a relationship or interest with parties responsible for the 'Underlying Subject Matter or Subject Matter Information'.

If you would like to discuss our comments, please contact me or our technical advisers Mr Stephen La Greca ([stephenlagreca@aol.com](mailto:stephenlagreca@aol.com)) or Mr Colin Parker ([colin@gaap.com.au](mailto:colin@gaap.com.au)) GAAP Consulting.

Yours sincerely



Vicki Stylianou  
Executive General Manager, Advocacy & Policy  
Institute of Public Accountants

**About the IPA**

The IPA is a professional organisation for accountants recognised for their practical, hands-on skills and a broad understanding of the total business environment. Representing more than 35,000 members in Australia and in over 65 countries, the IPA represents members and students working in industry, commerce, government, academia and private practice. Through representation on special interest groups, the IPA ensures the views of its members are voiced with government and key industry sectors and makes representations to Government including the Australian Tax Office (ATO), Australian Securities and Investments Commission (ASIC) and the Australian Prudential Regulation Authority (APRA) on issues affecting our members, the profession and the public interest.

The IPA recently merged with the Institute of Financial Accountants of the UK, making the new IPA Group the largest accounting body in the SMP/SME sector in the world.