

**Exposure Draft 01/23: Proposed Revisions to APES 110 Code of Ethics for Professional Accountants (including Independence Standards) Relating to the Definition of Engagement Team and Group Audits**

Review of Submissions - General Comments  
 Exposure Draft 01/23: Proposed Revisions to APES 110 Code of Ethics for Professional Accountants (including Independence Standards) Relating to the Definition of Engagement Team and Group Audits

*Note: Specific comments relating to Exposure Draft 01/23 are addressed in separate tables. This table excludes minor editorial changes.*

Item No.	Paragraph No. in ED	Respondent	Respondents' Comments	Change made to standard?
1	N/A	CA ANZ	<p><b>Submission: Proposed Revisions to APES 110 Code of Ethics for Professional Accountants (including Independence Standards) Relating to the Definition of Engagement Team and Group Audits</b></p> <p>Chartered Accountants Australia and New Zealand (“CA ANZ”) appreciates the opportunity to submit comments on the proposals outlined in the above Exposure Draft (“ED”) to revise APES 110 <i>Code of Ethics for Professional Accountants (including Independence Standards)</i> (“the Code”). We acknowledge that the proposals contained in the ED reflect adoption of the recent changes made to the International Ethics Standards Board for Accountants (“IESBA”) Code.</p>	No
2	N/A	CPAA	<p><b>Proposed Revisions to APES 110 Code of Ethics for Professional Accountants (including Independence Standards) Relating to the Definition of Engagement Team and Group Audits ED 01/23</b></p> <p>CPA Australia represents the diverse interests of more than 170,000 members working in over a 100 jurisdictions and regions. We make this submission on behalf of our members and in the broader public interest.</p>	No
3	N/A	Deloitte	<p><b>Exposure Draft 01/23 - Proposed Revisions to APES 110 Code of Ethics for Professional Accountants (including Independence Standards) Relating to the Definition of Engagement Team and Group Audits</b></p> <p>We appreciate the opportunity to comment on Exposure Draft 01/23 Proposed Revisions to the Definition Engagement Team and Group Audits in APES 110 Code of Ethics for Professional Accountants (including Independence Standards) (“the Australian Code”) issued by the Accounting Professional &amp; Ethical Standards Board (APESB) in March 2023 (the ED).</p>	No
4	N/A	EY	<p><b>Exposure Draft 01/23 – Proposed Revisions to APES 110 Code of Ethics for Professional Accountants (including Independence Standards) Relating to the Definition of Engagement Team and Group Audits</b></p>	No

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			EY welcomes the opportunity to comment on ED 01/23 as we are supportive of the Accounting Professional & Ethical Standards Board's (APESB) efforts to enhance APES 110 <i>Code of Ethics for Professional Accountants (including Independence Standards)</i> in Australia.	
5	N/A	IPA	<b>Re: Exposure Draft 01/23 Proposed Revisions to APES 110 Code of Ethics for Professional Accountants (including Independence Standards)</b>  Thank you for the opportunity to comment on Exposure Draft 01/23.	No
6	N/A	KPMG	<b>Proposed Revisions to APES 110 Code of Ethics for Professional Accountants (including Independence Standards) Relating to the Definition of Engagement Team and Group Audits</b>  KPMG Australia (KPMG) welcomes the opportunity to comment on the proposed revisions to the definition of 'Engagement Team' and 'Group Audits' in APES 110 Code of Ethics for Professional Accountings (including Independence Standards) ("APES 110") ("the ED").	No
7	N/A	CPAA	Overall, CPA Australia supports the APESB's proposed amendments to APES 110 Code of Ethics for Professional Accountants (including Independence Standards) to incorporate changes made by the International Ethics Standards Board for Accountants (IESBA), set out in Exposure Draft 01/23 issued March 2023. CPA Australia provided a <a href="#">submission</a> to IESBA in May 2022 concerning the proposed revisions to the International Code of Ethics for Professional Accountants set out in their Exposure Draft released February 2022. As the proposed changes to APES 110 are in line with the final IESBA pronouncement CPA Australia is supportive of the changes outlined in the exposure draft.	No
8	N/A	Deloitte	We are supportive overall of the amendments proposed by the APESB in this ED to incorporate changes made by the International Ethics Standards Board for Accountants (IESBA) to the International Code of Ethics for Professional Accountants (including International Independence Standards) (the International Code).	No
9	N/A	EY	We broadly agree that APESB's proposed changes will reinforce and strengthen auditor independence in Australia, and in turn promote increased confidence in the audit function.  We have no specific comments regarding the proposed revisions.	No
10	N/A	IPA	IPA is supportive of the range of proposed amendments to incorporate changes made by the International Ethics Standards Board for Accountants that act to strengthen and clarify the independence principles that apply to individuals and Firms for the audit of Group Financial Statements.	No

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11	N/A	KPMG	KPMG is supportive of the APES Board's intent of amending APES 110 to incorporate changes made by the International Ethics Standards Board for Accountants (IESBA) to the International Code of Ethics Standards Board for Accountants (including International Independence Standards) ("the International Code").	No
12	N/A	CA ANZ	It will be critical for the APESB to make resources available such as Staff Q&As and other technical guidance to assist the professional bodies in providing education and guidance to members, particularly with respect to who is captured by definitions and who can directly influence the outcome of the group audit.	No
13	N/A	CPAA	To assist professional bodies in providing member support and implementation training we also request that the APESB produces a "Staff Q&A" and other relevant guidance material.	No
14	N/A	CA ANZ	Should you have any questions about the matters raised in this submission or wish to discuss them further, please contact Josephine Haste CA <a href="mailto:josephine.haste@charteredaccountantsanz.com">mailto:josephine.haste@charteredaccountantsanz.com</a>	No
15	N/A	CPAA	If you have any queries about this submission, please don't hesitate to contact Ms. Melissa Read, Senior Manager, Professional Standards, Professional Standards and Business Support on <a href="mailto:melissa.read@cpaaustralia.com.au">mailto:melissa.read@cpaaustralia.com.au</a> or +61 (0) 481 476 275.	No
16	N/A	Deloitte	Please feel free to contact me at (02) 9322 5258. Yours sincerely	No
17	N/A	EY	We would be pleased to discuss our comments with the Board and with technical staff. Should you wish to do so, please contact me at leigh.walker@au.ey.com or on 03 9288 8454.	No
18	N/A	IPA	If you have any queries with respect to our comments or require further information, please don't hesitate to contact Erik Hopp at erik.hopp@publicaccountants.org.au or on 03 8665 3144.	No
19	N/A	KPMG	If you would like to discuss this letter further, please don't hesitate to reach out.	No

## RESPONDENTS

1	CA ANZ	Chartered Accountants Australia and New Zealand
2	CPAA	CPA Australia
3	Deloitte	Deloitte Touche Tohmatsu
4	EY	Ernst & Young
5	IPA	Institute of Public Accountants
6	KPMG	KPMG Australia