

## Exposure Draft 04/24: Revisions of APESB pronouncements

Review of Submissions – General Comments  
Exposure Draft 04/24: Revisions of APESB pronouncements

*Note: Specific comments relating to Exposure Draft 04/24 are addressed in a separate table. This table excludes minor editorial changes.*

Item No.	Paragraph No. in ED	Respondent	Respondents' Comments	Change made to standard?
1	N/A	Deloitte	We appreciate the opportunity to comment on Exposure Draft 04/24 Revision of APESB pronouncements, related to Transaction Advisory Services, issued by the Accounting Professional & Ethical Standards Board (APESB) in September 2024 (the ED).	No
2	N/A	EY	Ernst & Young welcomes the opportunity to offer its views on the proposed revisions to the pronouncements identified in the Exposure Draft comprising APES 350 <i>Participation by Members in Public Practice in Due Diligence Committees in connection with a Public Document</i> , APES 345 <i>Reporting on Prospective Financial Information Prepared in connection with a Public Document</i> and APES GN 31 <i>Professional and Ethical Considerations relating to Low Doc Offering Sign-offs</i> ("Transaction Advisory Services Related Pronouncements").	No
3	N/A	CA ANZ	Chartered Accountants Australia and New Zealand ('CA ANZ') appreciates the opportunity to provide comment on the above mentioned Exposure Draft ('ED') issued by the Accounting Professional and Ethical Standards Board ('APESB'). The ED proposes changes to the following standards:  APES 345 Reporting on Prospective Financial Information Prepared in connection with a Public Document.  APES 350 Participation by Members in Public Practice in Due Diligence Committees in connection with a Public Document  APES GN 31 Professional and Ethical Considerations relating to Low Doc Offering Signoffs.	No
4	N/A	Deloitte	We are supportive overall of the amendments proposed by APESB in this ED.	No
5	N/A	EY	We support, as a whole, the revisions to each pronouncement in the Exposure Draft which aim to ensure overall consistency with the amendments to APES 110 Code of Ethics for Professional Accountants (including Independence Standards) (the "Code") in November 2023. We believe that these proposed revisions appropriately address the key revisions required to ensure consistency across the Transaction Advisory Services Related Pronouncements and to the Code.	No

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6	N/A	CA ANZ	<p>The proposed changes include:</p> <ul style="list-style-type: none"> <li>a) Revisions to reflect recent amendments to the Code</li> <li>b) The inclusion of references to reflect Technology-related revisions to the Code</li> <li>c) Minor editorials</li> <li>d) The intention to retain the term “listed entity” for transaction advisory service-related pronouncements.</li> </ul> <p>CA ANZ supports the proposed amendments listed at a) to c) in this submission.</p>	No
7	N/A	Deloitte	Please feel free to contact me at (02) 9322 5258.	No
8	N/A	EY	We welcome the opportunity to contribute to the improvement of accounting, professional and ethical standards that will continue to drive the quality and consistency of such services in Australia. We would be pleased to discuss our comments with members of the Accounting Professional & Ethical Standards Board and its staff. If you wish to do so, please contact either Preethy Jagannathan (02 9248 4133) or myself on (03 8650 7234).	No
9	N/A	CA ANZ	<b>Appendix 1</b> provides more information about CA ANZ. Should you have any questions about the matters raised in this submission or wish to discuss them further, please contact Josephine Haste FCA, <a href="mailto:josephine.haste@charteredaccountantsanz.com">josephine.haste@charteredaccountantsanz.com</a>	No
10	N/A	CA ANZ	<p><b>About Chartered Accountants Australia and New Zealand</b></p> <p>Chartered Accountants Australia and New Zealand (CA ANZ) represents 139,000 financial professionals, supporting them to make a difference to the businesses, organisations and communities in which they work and live. Chartered Accountants are known as Difference Makers. The depth and breadth of their expertise helps them to see the big picture and chart the best course of action.</p> <p>CA ANZ promotes the Chartered Accountant (CA) designation and high ethical standards, delivers world-class services and life-long education to members and advocates for the public good. We protect the reputation of the designation by ensuring members continue to comply with a code of ethics, backed by a robust discipline process. We also monitor Chartered Accountants who offer services directly to the public.</p>	No

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			<p>Our flagship CA Program, the pathway to becoming a Chartered Accountant, combines rigorous education with mentored practical experience. Ongoing professional development helps members shape business decisions and remain relevant in a changing world.</p> <p>We actively engage with governments, regulators and standard-setters on behalf of members and the profession to advocate boldly in the public good. Our thought leadership promotes prosperity in Australia and New Zealand.</p> <p>Our support of the profession extends to affiliations with international accounting organisations.</p> <p>We are a member of the International Federation of Accountants and are connected globally through Chartered Accountants Worldwide and the Global Accounting Alliance. Chartered Accountants Worldwide brings together members of 15 chartered accounting institutes to create a community of more than 1.8 million Chartered Accountants and students in more than 190 countries. CA ANZ is a founding member of the Global Accounting Alliance which is made up of 10 leading accounting bodies that together promote quality services, share information and collaborate on important international issues.</p> <p>We have a strategic alliance with the Association of Chartered Certified Accountants. The alliance represents more than 870,000 current and next generation accounting professionals across 179 countries and is one of the largest accounting alliances in the world providing the full range of accounting qualifications.</p> <p>We employ more than 500 talented people across Australia, New Zealand, Singapore, Malaysia, Hong Kong and the United Kingdom.</p>	

## RESPONDENTS

1	Deloitte	Deloitte Touche Tohmatsu
2	EY	Ernst & Young
3	CA ANZ	Chartered Accountants Australia and New Zealand