20 October 2026

CPA Australia Ltd
ABN 64 008 392 452

Level 20, 28 Freshwater Place
Southbank VIC 3006 Australia

GPO Box 2820 Melbourne
VIC 3001 Australia

P 1300 737 373
Outside Aust +613 9606 9677

cpaaustralia.com.au

Mr. Channa Wijesinghe
Chief Executive Officer
Accounting Professional and Ethical
Standards Board Limited (APESB)
Level 3, 99 Queen Street
Melbourne Victoria 3000
sub@apesb.org.au

By website:
https://apesb.org.au/current-projects/

Dear Channa,

Exposure Draft 02/26, Proposed Guidance Note APES GN 40 *Ethical Conflicts in the Workplace – Considerations for Members in Business*

CPA Australia represents the diverse interests of more than 176,000 members working in over 100 jurisdictions and regions. We make this submission on behalf of our members and in the broader public interest.

We support APESB's review of *APES GN 40 Ethical Conflicts in the Workplace - Considerations for Members in Business* (GN 40) set out in Exposure Draft 02/26 (Exposure Draft) in response to feedback on the extant GN 40 and to include amendments to address recent revisions to APES 110. Below are general comments with respect to the Exposure Draft.

Many of the existing and proposed case studies focus on Members in senior roles. We recommend including examples that reflect ethical challenges faced at different levels of seniority and across different career stages, as the appropriate response may vary depending on a Member's position. For instance, a junior accounts-payable assistant may face intimidation from their manager for resisting an unethical request, while a CFO may face a similar threat from the CEO. Although the nature of the threat may be comparable, the practical options available to each Member are likely to differ. In a large organisation, a junior employee may have little or no access to senior leadership or those charged with governance, unlike a CFO in the same circumstances.

Most of the existing and proposed case studies involve Members working in large organisations. However, many Members in business work in small to medium-sized entities, which may lack formal conflict resolution policies and procedures and often have very flat structures. We recommend that several case studies be revised to reflect the structure of smaller businesses, or that they outline possible courses of action for Members working in both larger and smaller organisations, as illustrated in Case Study 3.

If you have any queries please contact Belinda Zohrab, Lead - Regulation and Standards, at belinda.zohrab@cpaaustralia.com.au.

Yours sincerely,

Elinor Kasapidis
Chief of Policy, Standards and External Affairs
CPA Australia