



**The Group of 100 Incorporated**

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8 February 2010

Ms Kate Spargo  
Chairperson  
Accounting Professional & Ethical Standards Board  
600 Bourke Street (Level 7)  
MELBOURNE VIC 3000

Dear Ms Spargo

**Consultation Paper: Proposed Revision of APES 110  
Code of Ethics for Professional Accountants**

The Group of 100 (G100) is an organisation of chief financial officers from Australia's largest business enterprises with the purpose of advancing Australia's financial competitiveness. The G100 is pleased to provide comments on the Consultation Paper.

**Question 1**

a. *Mixture of mandatory requirements and guidance: In accordance with APESB drafting conventions, should the revised APES 110 be formatted so that mandatory requirements appear in separate paragraphs to guidance?*

**The G100 believes that the APESB should not depart from the way in which its standards are drafted and formatted. It is important for ease of understanding by constituents that a consistent and recognizable style is used. Accordingly, the separation of mandatory requirements from guidance makes the standards clearer for constituents.**

b. *Defined terms: Should the revised APES 110 use IFAC defined terms, use defined terms tailored to the Australian environment, or, where applicable, use defined terms which are consistent with those used in Australian Auditing Standards?*

**As a standard applying in Australia, the G100 believes that defined terms should be refined so that they reflect the environment in which the standards are to be applied. This would also facilitate understanding and implementation by constituents.**

c. *Capitalisation of defined terms: Should defined terms be differentiated from non-defined terms by capitalizing defined terms in the revised APES 110?*

**Yes, if this is consistent with the APESB drafting convention.**

d. *Definition of 'public interest entity': Should the revised APES 110 use the IFAC definition of 'public interest entity' or provide guidance on the application of the IFAC definition in the Australian context or redefine this term in the Australian context?*

The G100 believes that the definition of 'public interest entity' proposed in section 290 of the IFAC Code is acceptable. However, it may be useful to consider the definition and guidance of 'public accountability' used in the IASB's standard 'IFRS and SMEs' and in the AASB's proposals in respect of a revised differential reporting framework.

**Question 2**

*Should specific references to the Corporations Act 2001 and the Australian Auditing Standards be incorporated into the revised AES 110 where relevant?*

**Yes. As the standards are to be applied in the Australian environment the requirements are more meaningful and useful to constituents if relevant references to the Corporations Act and Australian Auditing Standards are included.**

**Question 3**

*Do you believe sections 290 and 291 of the IFAC Code should be presented in their current form in the revised APES 110 or should they be restructured to remove duplication where possible?*

**The revised APES 110 should avoid duplication and repetition in order to facilitate readability and understanding by constituents. The G100 believes that as the standard is issued to be operational in the Australian environment it should be written in a style which is consistent with other Australian standards and should be as user-friendly as possible to facilitate readability and understanding.**

Yours sincerely  
Group of 100 Inc



**Peter Lewis**  
National President