

Constituents' Submissions – General Comments
Exposure Draft 02/11: APES 325 Risk Management for Firms

Note: Specific comments relating to APES 325 Risk Management for Firms are addressed in a separate table. This table excludes minor editorial changes.

Item No.	Paragraph No. in Exposure Draft	Respondent	Respondents' Comments
1		TLS	<p>Comments on Exposure Draft APES 325 Risk Management for Firms</p> <p>Thank you for the opportunity to comment on the proposed Standard APES 325 <i>Risk Management for Firms</i> setting out mandatory requirements and guidance for Members in Public Practice. Risk management is fundamental to the success and sustainability of any activity and it is therefore commendable that the APESB is proposing a risk management standard. However, in doing so it is important that the proposed standard clearly sets out a consistent objective together with essential procedures to be undertaken, including sufficient guidance, in order to comply with the standard.</p>
2		Deloitte	<p>Re: Response to Proposed Standard APES 325 – Risk Management for Firms</p> <p>We appreciate the opportunity to respond to the Exposure Draft of Proposed Standard: APES 325 Risk Management for Firms as developed by the Accounting Professional & Ethical Standards Board (“APESB”).</p> <p>Overall we are supportive of a standard that includes requirements to strengthen the Risk Management Framework for Firms.</p>
3		GT	<p>Exposure Draft ED 02/11 - Proposed Standard: APES 325 Risk Management for Firms</p> <p>Grant Thornton Australia Limited (Grant Thornton) appreciates the opportunity to comment on the Accounting Professional and Ethical Standards Board’s (APESB) Proposed Standard APES 325.</p> <p>Grant Thornton’s response reflects our position as auditors and business advisers both to listed companies and privately held companies and businesses.</p> <p>Grant Thornton supports the release of APES 325 as an APES standard and given the absence of an equivalent international standard, it is recommended that a copy be sent to the International Ethics Standards Board so that a global standard can be considered in time.</p>

Exposure Draft 02/11: Proposed Standard: APES 325 Risk Management for Firms

Item No.	Paragraph No. in Exposure Draft	Respondent	Respondents' Comments
4		EY	<p>Comments on proposed Exposure Draft APES 325 Risk Management for Firms</p> <p>We support the introduction of a standard that outlines risk management for professional firms and we agree with the content set out in proposed standard APES 325 Risk Management for Firms.</p> <p>We would consider it beneficial if some additional practical guidance was added to the standard.</p>
5		JAB	<p><i>Exposure Draft 02/11 Proposed Standard: APES 325 Risk Management for Firms</i></p> <p>Thank you for the opportunity to comment on this Exposure Draft for the Proposed Standard: APES 325 Risk Management for Firms. CPA Australia, the Institute of Chartered Accountants in Australia and the Institute of Public Accountants (the Joint Accounting Bodies) have considered the exposure draft and our comments follow. The Joint Accounting Bodies represent over 190,000 professional accountants in Australia. Our members work in diverse roles across public practice, commerce, industry, government and academia throughout Australia and internationally.</p> <p><i>General Comments</i></p> <p>The Joint Accounting Bodies support the adoption of the proposed Standard: APES 325 Risk Management for Firms. We believe that Risk Management does not stand on its own and that there is a close link between developing a Risk Management Framework and the requirements set out in APES 320 Quality Control for Firms. A more explicit recognition that the two standards need to be considered together should be recognised within them, particularly in relation to paragraph 3.1 of the proposed standard.</p>
6		GAAP	<p>Good afternoon, I would like to make the following brief comments on the proposed APES 325 'Risk Management for Firms':</p>

Staff Instructions:

- Comments of a “general” nature should be dealt with first, followed by paragraph specific comments.
- Respondents’ comments must be copied verbatim into this table.
- Comments should be dealt with in paragraph order, not respondent order.
- Use acronyms only for respondents. Update the attached table with details of additional respondents.

RESPONDENTS

1	TLS	Tiina-Liisa Sexton
2	Deloitte	Deloitte
3	GT	Grant Thornton
4	EY	Ernst and Young
5	JAB	The Joint Accounting Bodies
6	GAAP	GAAP Consulting