

**Review of Submissions – General Comments**  
**Exposure Draft 02/19: Revision of APESB pronouncements**

*Note: Specific comments relating to ED 02/19 are addressed in separate tables for each relevant pronouncement. This table excludes minor editorial changes.*

Item No.	Paragraph No. in ED	Respondent	Respondents' Comments	Change made to standard?
1	n/a	CA ANZ	Thank you for providing us with the opportunity to comment on the Accounting Professional & Ethical Standards Board's (APESB) proposed changes to the APESB pronouncements included in ED 02/19.	No
2	n/a	CPAA	CPA Australia represents the diverse interests of more than 164,000 members working in 150 countries and regions around the world. We make this submission on behalf of our members and in the broader public interest.	No
3	n/a	EY	Ernst & Young welcomes the opportunity to offer its views on the APESB's Exposure Draft 02/19 issued in June 2019.	No
4	n/a	CA ANZ	Other than the points raised below, Chartered Accountants ANZ (CA ANZ) is supportive of the proposed amendments to the pronouncements.	No
5	n/a	CA ANZ	You have specifically sought feedback on whether existing standards require amendments due to the use of digital technology and artificial intelligence. We do not consider that these developments require the standards to be amended, provided the terms used in the standards have universal application. For example, the word 'file' can refer to a hard or soft copy file; these could be stored in any number of ways. The form of the file is not the issue, rather what it contains meets mandatory requirements. Similarly the word 'review' in say a requirement for evidence of partner review could be via manual signature on paper or via electronic means; the key issue is that evidence of review exists.	No
6	n/a	CPAA	<p>CPA Australia is supportive of key proposed amendments to pronouncements identified on Page 6 of ED 02/19 being:</p> <ul style="list-style-type: none"> <li>• Revisions to reflect the restructured Code;</li> <li>• Matters raised by respondents in APESB's issues Register;</li> <li>• Matters noted through review of pronouncements by APESB Technical Staff; and</li> <li>• Minor Editorials.</li> </ul> <p>CPA Australia supports the amendments to three standards, being APES 310 <i>Client Monies</i>, APES 320 <i>Quality Control for Firms</i> and APES 325 <i>Risk Management for Firms</i>. CPA Australia further supports amendments to Guidance Notes APES GN 40 <i>Ethical Conflicts in the Workplace – Considerations for Members in Business</i> and APES GN 41 <i>Management Representations</i>.</p>	No
7	n/a	CPAA	In accordance with the development of the eCode by IESBA, CPA Australia supports the creation of interactive PDF features in revised versions of all pronouncements.	No

## Exposure Draft 02/19 Revision of APESB Pronouncements

Item No.	Paragraph No. in ED	Respondent	Respondents' Comments	Change made to standard?
8	n/a	EY	We fully support the revisions to the APESB pronouncements to include updated references and provisions from the restructured <i>Code of Ethics for Professional Accountants (including Independence Standards)</i> (APES 110), NOCLAR references, references to the updated whistleblower legislation and other amendments as outlined in Parts 1 and 2 of the exposure draft.	No
9	n/a	CA ANZ	Information about Chartered Accountants Australia and New Zealand can be found in Appendix A to this letter. If you have any questions regarding this submission, please contact Kristen Wydell on (02) 9290 5535 or <a href="mailto:kristen.wydell@charteredaccountantsanz.com">kristen.wydell@charteredaccountantsanz.com</a>	No
10	n/a	CPA	If you have any questions regarding this submission, please do not hesitate to contact Josephine Haste CPA, Policy Adviser – Ethics and Professional Standards on +613 9606 9693 or <a href="mailto:josephine.haste@cpaaustralia.com.au">josephine.haste@cpaaustralia.com.au</a> .	No
11	n/a	EY	Should you wish to discuss this letter with us, please contact Chris George ( <a href="mailto:christopher.george@au.ey.com">christopher.george@au.ey.com</a> or on (02) 8295 6051).	No
12	n/a	CA ANZ	<p><b>Appendix A</b>  <b>About Chartered Accountants Australia New Zealand</b></p> <p>Chartered Accountants Australia and New Zealand is a professional body comprised of over 120,000 diverse, talented and financially astute members who utilise their skills every day to make a difference for businesses the world over.</p> <p>Members are known for their professional integrity, principled judgment, financial discipline and a forward-looking approach to business which contributes to the prosperity of our nations.</p> <p>We focus on the education and lifelong learning of our members, and engage in advocacy and thought leadership in areas of public interest that impact the economy and domestic and international markets.</p> <p>We are a member of the International Federation of Accountants, and are connected globally through the 800,000-strong Global Accounting Alliance and Chartered Accountants Worldwide which brings together leading Institutes in Australia, England and Wales, Ireland, New Zealand, Scotland and South Africa to support and promote over 320,000 Chartered Accountants in more than 180 countries.</p> <p>We also have a strategic alliance with the Association of Chartered Certified Accountants. The alliance represents 788,000 current and next generation accounting professionals across 181 countries and is one of the largest accounting alliances in the world providing the full range of accounting qualifications to students and business.</p>	No

RESPONDENTS

1	CA ANZ	Chartered Accountants Australia & New Zealand
2	CPAA	CPA Australia
3	EY	Ernst & Young Australia