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**Proposed Changes to Certain Provisions of the Code Addressing the Long
Association of Personnel with an Audit or Assurance Client**

I am Denise Juvenal this is pleased to have the opportunity to comment on this consultation Proposed Changes to Certain Provisions of the Code Addressing the Long Association of Personnel with an Audit or Assurance Client. This is my individual commentary for IFAC/IESBA - International Ethics Standards Board for Accountants, I agree with this proposal.

I suggest for the Board, if agrees, that consults local regulators for to know if in taxation laws or internal laws has some exceptions for this case, because in relation audit firm rotation in some countries can have specific laws for this point. So, I observe that is important the Board's, if agrees, considering the specific laws for small entities in relation audit services that can be useful for this exposure draft principal for rotation firms and persons.

Guide for Respondents

The IESBA welcomes comments on all matters addressed in the exposure draft. Comments are most helpful when they refer to specific paragraphs, include the reasons for the comments, and, where appropriate, make specific suggestions for any proposed changes to wording. When a respondent agrees with proposals

in this exposure draft (especially those calling for change in current practice), it will be helpful for the IESBA to be made aware of this view.

Request for Specific Comments

The IESBA would welcome views on the following specific questions:

General Provisions

1. Do the proposed enhancements to the general provisions in paragraph 290.148 provide more useful guidance for identifying and evaluating familiarity and self-interest threats created by long association? Are there any other safeguards that should be considered?

Yes. I think that the proposed enhancements to the general provisions in paragraph 290.148 provide useful guidance for identifying and evaluating familiarity and self-interest threats created by long association. I suggest for the Board, if agrees, that consults local regulators for to know if in taxation laws or internal laws has some exceptions for this case, because in relation audit firm rotation in some countries can have specific laws for this point.

2. Should the General Provisions apply to the evaluation of potential threats created by the long association of all individuals on the audit team (not just senior personnel)?

In relation of effectiveness of evaluation of potential threats for long association of all individuals on the audit team that in this case I agree, however, I have doubt in which mechanisms for reduction of problems for audit firm rotation in the organizations, I suggest for the Board, if agrees, consults local and regional regulators for to know about exceptions.

3. If a firm decides that rotation of an individual is a necessary safeguard, do respondents agree that the firm should be required to determine an appropriate time-out period?

I have doubt in which mechanisms for reduction of problems for audit firm rotation in the organizations, I suggest for the Board, if agrees, consults local and regional regulators for to know about exceptions, because rotation of an individual can have specific legislation for labor or tax with different point and can impact in relation to determine an appropriate time-out period.

Rotation of KAPs on PIEs

4. Do respondents agree with the time-on period remaining at seven years for KAPs on the audit of PIEs?

Yes, I agree with the time-on period remaining at seven years for KAPs on the audit of PIEs, so I suggest for the Board, if agrees, consults local and regional regulators for to know about exceptions.

5. Do respondents agree with the proposal to extend the cooling-off period to five years for the engagement partner on the audit of PIEs? If not, why not, and what alternatives, if any, could be considered?

Yes, I agree with the proposal to extend the cooling-off period to five years for the engagement partner on the audit of PIEs, so I suggest for the Board, if agrees, consults local and regional regulators for to know about exceptions.

6. If the cooling-off period is extended to five years for the engagement partner, do respondents agree that the requirement should apply to the audits of all PIEs?

Yes, I agree that the requirement should apply to the audits of all PIEs, but I suggest for the Board, if agrees, consults local and regional regulators for to know about exceptions.

7. Do respondents agree with the cooling-off period remaining at two years for the EQCR and other KAPs on the audit of PIEs? If not, do respondents consider that the longer cooling-off period (or a different cooling-off period) should also apply to the EQCR and/or other KAPs?

Yes, I agree with the cooling-off period remaining at two years for the EQCR and other KAPs on the audit of PIEs, but I suggest for the Board, if agrees, consults local and regional regulators for to know about exceptions.

8. Do respondents agree with the proposal that the engagement partner be required to cool-off for five years if he or she has served any time as the engagement partner during the seven year period as a KAP?

Yes, I agree with the proposal that the engagement partner be required to cool-off for five years if he or she has served any time as the engagement partner during the

seven year period as a KAP, I suggest for the Board, if agrees, consults local and regional regulators for to know about exceptions.

9. Are the new provisions contained in 290.150C and 290.150D helpful for reminding the firm that the principles in the General Provisions must always be applied, in addition to the specific requirements for KAPs on the audits of PIEs?

Yes, I think that new provisions contained in 290.150C and 290.150D helpful for reminding the firm that the principles in the General Provisions must always be applied, so I suggest for the Board, if agrees, consults local and regional regulators for to know about exceptions.

10. After two years of the five-year cooling-off period has elapsed, should an engagement partner be permitted to undertake a limited consultation role with the audit team and audit client?

I have doubt in relation this question because is not clear for me the fact about small entities if attend with audit firm for rotation, I believe that in the local regulators around the world can have laws or specific internal laws that impact in the execution of work considering the legislation.

11. Do respondents agree with the additional restrictions placed on activities that can be performed by a KAP during the cooling-off period? If not, what interaction between the former KAP and the audit team or audit client should be permitted and why?

Yes, I agree with additional restrictions placed on activities that can be performed by a KAP during the cooling-off period, so I suggest for the Board, if agrees, consults local and regional regulators for to know about exceptions.

12. Do respondents agree that the firm should not apply the provisions in paragraphs 290.151 and 290.152 without the concurrence of TCWG?

Yes, I agree that the firm should not apply the provisions in paragraphs 290.151 and 290.152 without the concurrence of TCWG, so I suggest for the Board, if agrees, consults local and regional regulators for to know about exceptions.

Section 291

13. Do respondents agree with the corresponding changes to Section 291? In particular, do respondents agree that given the differences between audit and other assurance engagements, the provisions should be limited to assurance engagements “of a recurring nature”?

Impact Analysis

Yes, I agree with the corresponding changes to Section 291. I agree with differences between audit and other assurance engagements, the provisions should be limited to assurance engagements of a recurring nature, so I suggest for the Board, if agrees, consults local and regional regulators for to know about exceptions.

14. Do respondents agree with the analysis of the impact of the proposed changes? In the light of the analysis, are there any other operational or implementation costs that the IESBA should consider?

Yes, I agree with the analysis of the impact of the proposed changes, so I suggest for the Board, if agrees, consults local and regional regulators for to know about exceptions and key international regulators in relation the activity of labor in audit firms principally for small entities.

Request for General Comments

In addition to the request for specific comments above, the IESBA is also seeking comments on the following general questions:

(a) Small and Medium Practices (SMPs) –The IESBA invites comments regarding the impact of the proposed changes for SMPs.

Yes, I agree that this exposure draft can be important for Small and Medium Practices.

(b) Preparers (including SMEs) and users (including Regulators) – The IESBA invites comments on the proposed changes from preparers, particularly with respect to the practical impacts of the proposed changes, and users.

Yes, I agree that Preparers and users are very important for this draft considering the insights about practical impacts of the proposed changes and users.

(c) Developing Nations – Recognizing that many developing nations have adopted or are in the process of adopting the Code, the IESBA invites respondents from these nations to comment on the proposed changes, in

particular, on any foreseeable difficulties in applying them in a developing nation environment.

Yes, I agree that Developing Nations is very important considering the points and connection of countries around the world.

(d) Translations – Recognizing that many respondents may intend to translate the final changes for adoption in their own environments, the IESBA welcomes comment on potential translation issues respondents may note in reviewing the proposed changes.

Yes, I agree with translations and I consider principal point for development of reviewing the proposed changes.

(e) Effective date – Recognizing that the proposed changes are substantive, would the proposal require firms to make significant changes to their systems or processes to enable them to properly implement the requirements? If so, do the proposed effective date and transitional provisions provide sufficient time to make such changes?

Yes, I agree with effective date for implement the requirements.

Thank you for opportunity for comments this proposal, if you have questions do not hesitate contact to me, rio1042370@terra.com.br.

Yours,

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