



CHARTERED ACCOUNTANTS
AUSTRALIA + NEW ZEALAND

1 October 2015

The Chairman
International Auditing and Assurance Standards Board
529 5th Avenue
6th Floor
New York 10017 USA

Dear Professor Schilder

Submission on Exposure Draft: Proposed Amendments to the IAASB's International Standards Responding to Non-Compliance or Suspected Non-Compliance with Laws and Regulations ("the ED")

Thank you for the opportunity to comment on the exposure draft. We agree that it is in the public interest that the IAASB's international standards and the IESBA's Code of Ethics ("the Code") are able to operate in concert and that IAASB standards do not undermine or fail to draw appropriate attention to, the requirements of the Code.

We believe the proposed limited amendments contained in the ED are sufficient to resolve actual or perceived inconsistencies of approach or to clarify and emphasize key aspects of the IESBA's Non Compliance or Suspected Non-Compliance with Laws and Regulations (NOCLAR) proposals in the IAASB's standards, subject to our comment below.

We note that in the proposed amendments to ISA 250 Consideration of Laws and Regulations in an Audit of Financial Statements paragraph A12a draws attention to the fact that the auditor may become aware of information about non-compliance with laws or regulations other than as a result of performing the procedures set out in paragraphs 12-16 in the standards.

One of the common ways this may occur will be via the auditor being alerted by an officer or employee of the entity or by another professional accountant involved with the entity, i.e. a whistle blower situation (the Code specifically contemplates a professional accountant informing the auditor of the entity in NOCLAR situations as a way they can respond to the situation in some circumstances). While we do not believe that a whistle blower situation should alter the procedures that the auditor is expected to perform in response to becoming aware of the possible non-compliance, many jurisdictions, including ours have specific laws or regulations that impose obligations in whistle blower situations that will also impact the auditor's response. It would be useful for the standard to include guidance which address the fact that the auditor needs to consider the impact of any whistle blower (or equivalent) laws or regulations in dealing with NOCLAR issues.

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The appendix (attached) provides information about Chartered Accountants Australia and New Zealand. If you have any questions regarding this submission, please contact Liz Stamford (Audit and Insolvency Leader) via email; Liz.Stamford@charteredaccountantsanz.com.

Yours sincerely



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Appendix: About Chartered Accountants Australia and New Zealand

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Members of Chartered Accountants Australia and New Zealand are known for professional integrity, principled judgment, financial discipline and a forward-looking approach to business.

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 capital markets.

We are represented on the Board of the International Federation of Accountants. Our global network also includes 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.

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