

Objectivity of Appropriate Reviewers**Issues and Task Force Proposals****I. Introduction***Background*

1. In January 2020, the IESBA released the Exposure Draft (ED), [Proposed Revision to the Code Addressing the Objectivity of Engagement Quality Reviewers](#).
2. Thirty-eight responses were received from stakeholders across a range of categories and different jurisdictions ([Appendix 1](#) is a list of the respondents):
 - There was support from all the respondents (on the matter of the IESBA addressing the topic of Engagement Quality Reviewer (EQR) objectivity.
 - There was general support from a substantial proportion of respondents (31) on placing the proposed guidance in Section 120.¹
3. With respect to the question of a cooling-off requirement² for an individual being considered for appointment as an EQR after immediately serving as the engagement partner (EP) on the engagement, a significant proportion of respondents (27) supported the establishment of a cooling-off requirement as they viewed a cooling-off period as fundamental in addressing the self-review threat in such a situation. There were, however, mixed views as to whether such a requirement should reside in proposed ISQM 23 or the Code, as further discussed in section III below.
4. Analysis of respondents' comments is detailed in the June 2020 IESBA [Agenda 5-A Summary of Significant Comments on Exposure and Task Force Proposals](#).

II. Matters raised at the June 2020 IESBA meeting

5. At the [June 2020](#) board meeting, the IESBA was generally supportive of the direction of the Task Force's responses to the significant comments raised on the ED and the Task Force's related proposals.

A. Location of the Cooling-off Requirement

6. Of the 27 respondents who were in support of a cooling-off requirement to address the matter of an EP moving directly into an EQR role, 16 respondents were in agreement to place the cooling-off requirement in ISQM 2, leaving the Code to provide principles-based guidance in support of such a requirement. Eleven respondents, however, were of the view that the requirement would be more appropriate in the Code. In general, respondents who disagreed that there should be a cooling-off requirement mentioned that if such a matter were to be addressed, users might expect to see it dealt with by the

¹ Section 120, *The Conceptual Framework*

² Do you agree with the IESBA that it would be more appropriate for the International Auditing and Assurance Standards Board (IAASB) to determine whether a cooling-off requirement should be introduced in proposed ISQM 2 and that the Code should not be prescriptive in this regard?

³ Proposed International Standard on Quality Management (ISQM) 2, *Engagement Quality Reviewers*

IESBA and not the IAASB. (Refer to [Appendix 2](#) to sight detailed breakdown based on stakeholder categories.) Also, respondents asked that the Board take into consideration other requirements in the Code when determining if a cooling-off period for an EP moving into an EQR role is appropriate.

7. While views on the matter of location of the cooling-off requirement were somewhat split, there was a clear preponderance of support among respondents across all stakeholder categories, including the regulatory community, for the Code to take a principles-based approach to addressing threats to the objectivity of an individual being appointed as EQR, leaving ISQM 2 to impose a requirement for firms to establish policies or procedures that specify a cooling-off period in such a situation. Therefore, on the balance of respondents' views on the matter of location of the cooling-off requirement, the Task Force did not believe there was a sufficient basis for the Board to revisit the position previously held and explained in the ED regarding the location of the cooling-off requirement. This position maintained that it would be more appropriate for the IAASB to determine whether a cooling-off requirement should be introduced in proposed ISQM 2, following the principles set out in the Code, and if so, the circumstances in which the requirement should apply, to whom it should apply, and what the minimum cooling-off period should be.
8. At the June 2020 board meeting, IESBA members agreed with the Task Force's analysis of respondents' comments on the location issue and reaffirmed the position taken in the ED.

Coordination with ISQM 2 Task Force

9. To further inform its deliberations and as part of ongoing coordination with the IAASB, the Task Force reached out to representatives of the ISQM 2 Task Force to discuss the significant comments received on the ED. The ISQM 2 representatives continued to strongly support the coordinated approach between the two Boards to addressing the matter of an EP moving directly into an EQR role, i.e., clear principles-based guidance in the Code, with ISQM 2 requiring firms to establish policies and procedures that specify a cooling-off period. The ISQM 2 representatives were also supportive of the Task Force's proposal to further tighten the linkage between ISQM 2 and the Code through including a cross-reference in the proposed application material in the Code to the cooling-off requirement in ISQM 2.
10. Subsequent to the June 2020 board meeting, after considering the July 2020 PIOB comments on the matter (discussed further below), the ISQM 2 representatives reaffirmed their continued support for the coordinated position between the two Boards on the matter.
11. The ISQM 2 representatives, however, asked that the IESBA clarify whether (a) engagement team members who review work of less experienced team members would be considered appropriate reviewers, and (b) individuals performing inspections of engagements as part of a firm's monitoring activities would also be considered appropriate reviewers. As explained in paragraphs 49-51 of the June 2020 [issues paper](#), the context and objective of a review should guide whether an individual is suitable to serve as an appropriate reviewer. Thus:
 - If the aim under ISQM 2 is an objective evaluation of the significant judgments and conclusions of the engagement team, it would not be appropriate for an engagement team member to serve as the EQR. The individual who is appointed to serve in that role would need to be detached from the team.
 - If the aim under proposed ISA 220 (Revised)⁴ is for more experienced staff members to review the work performed by less experienced team members, the former would still need to have

⁴ Proposed International Standard on Auditing (ISA) 220 (Revised), [Quality Management for an Audit of Financial Statements](#)

some degree of objectivity (which would mean at a minimum not reviewing work in which they actively participated or performed), but not the same level of detachment as would be needed for an EQR under proposed ISQM 2.

- If the aim under proposed ISQM 1⁵ is for an individual to perform an inspection of engagements as part of the firm's monitoring activities, such an individual would need to have a level of detachment similar to an EQR.
12. In all three circumstances, the relevant individuals would be appropriate reviewers under the Code. However, in the context of an engagement team, it would be accepted that there would necessarily be less detachment than compared with an EQR or an individual assigned a monitoring responsibility at the firm level. Nevertheless, there would be an expectation that individuals reviewing work of less experienced staff would not be reviewing work which they actively participated in or performed.
13. The Task Force proposes that this be explained in the Basis for Conclusion.

B. Extension of Scope of Guidance to Appropriate Reviewer

14. At the June 2020 Board meeting, the Task Force's presented its proposal to not limit the guidance on addressing threats to objectivity narrowly to EQRs but to broaden the scope to address appropriate reviewers generally. As summarized in the June 2020 [issues paper](#), in arriving at this proposal, the Task Force had:
- Sought to respond to concerns among some respondents that a prescriptive cooling-off period may further limit the availability of individuals to serve in an EQR role, thereby further limiting the audit market to larger firms.
 - Recognized in that context, following coordination with IAASB representatives, that under proposed ISQM 1, firms are not limited to engagement quality reviews but may determine that other responses are appropriate to respond to assessed quality risks. Such other responses may include, for example, reviews of certain significant judgments by individuals within the firm who have specialized technical expertise but with the requisite objectivity, i.e., individuals who would be "appropriate reviewers" as described under the Code.
 - Recognized, therefore, that the proposed guidance should not be limited to EQRs but should apply broadly to any appropriate reviewer given that objectivity is a core attribute to the review function (as specified in the description of an appropriate reviewer). A few respondents to the ED had also advocated for this more holistic approach, which was furthermore considered at a prior Board discussion.
 - Recognized that an EQR is an example of an appropriate reviewer under the Code.
 - Reconfirmed the validity of the principles-based approach in the Code to address the matter of the objectivity of EQRs while not precluding the IAASB from establishing in proposed ISQM 2,⁶ for quality management purposes, any requirement for a cooling-off period that it determines firms should specify in their policies and procedures to address circumstances where an EP is being considered for appointment to the EQR role.

⁵ Proposed ISQM 1, [Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements](#)

⁶ Proposed International Standard on Quality Management (ISQM) 2, [Engagement Quality Reviews](#)

15. During the June session, Board members generally supported the direction of this proposal. Nevertheless, a few Board members raised the following matters:

Matter Raised	Task Force Response
<p>Whether addressing the objectivity of appropriate reviewers more broadly would be appropriate given that other key attributes of such individuals, for example, skills and experience, are not equally being addressed.</p>	<p>The Task Force believes that because an EQR is an example of an appropriate reviewer, it would not be in the public interest to address the matter of EQR objectivity without also addressing the objectivity of an appropriate reviewer. As explained above, the Task Force believes that there is a robust rationale for doing so, informed through consultation with, and input from, IAASB representatives as well as the perceptive input from a few respondents to the ED.</p> <p>More importantly, there is nothing particularly “unique” about the other attributes of an appropriate reviewer. All professional accountants (PAs) need the skills and competence to perform the professional activities relating to their roles and responsibilities. While equally all PAs require an appropriate level of objectivity, the extant Code focuses attention on the subject matter of the work and for PAs in public practice (PAPPs), the client relationship. In this case, the Code would be simply reminding PAs that they also need to take into account the relationships with those performing the work that is being reviewed.</p>
<p>Given that the concept of an appropriate reviewer is used in the Code mainly as an example of a safeguard, whether a consequence of pivoting the guidance to appropriate reviewers would mean that some circumstances might call for a safeguard to address threats against another safeguard.</p>	<p>Paragraph 120.14 A4 of the ED contained as an example of a safeguard “having an appropriate reviewer review specific areas of significant judgment.” Given that the scope of the guidance has been broadened to appropriate reviewers, the Task Force proposed in the June draft that this example be deleted to avoid introducing an element of circularity.</p> <p>This nevertheless does not detract from the fact that when threats to the objectivity of an appropriate reviewer are not at an acceptable level, the conceptual framework requires action to be taken to eliminate or reduce the threats to an acceptable level, regardless of the purpose for which an individual has been appointed as an appropriate reviewer. One action might be for another individual to act as an appropriate reviewer to the extent necessary to reduce threats overall to an acceptable level</p>
<p>Whether adding as an example of a familiarity threat “an individual who serves as an appropriate reviewer on</p>	<p>The Task Force believes that the <i>context</i> and <i>nature</i> of the relationship between the appropriate reviewer and the EP should guide the evaluation of the familiarity threat. For</p>

Matter Raised	Task Force Response
<p>an engagement having a <i>close relationship</i> with the EP” (paragraph 300.6 A1(d) and similar example in proposed paragraph 325.5 A1(c)) could raise a question as to the objectivity of, say, an ethics partner who is assigned as an appropriate reviewer with respect to threat situations involving the EP (for example, in relation to fees).</p>	<p>example, the familiarity threat created would be at a higher level if the two individuals have a close personal or family relationship compared with the familiarity threat created by virtue of their being colleagues within the same firm who, regardless of their individual roles and responsibilities, would still need to comply with the Code.</p>
<p>Whether it would be appropriate to use as an example of a familiarity threat a close relationship between an appropriate reviewer and the EP given that the Code defines a familiarity threat as one that arises due a PA’s long or close relationship with a client; or alternatively, whether that example would suggest that the definition of familiarity threat is too narrow.</p>	<p>The Task Force notes that the Code defines the familiarity threat as also one that arises due to the PA’s long or close relationship with the employing organization. The Task Force believes that this encompasses relationships with individuals within the employing organization, which in this case is the firm.</p>
<p>Whether there would be a need to re-expose the proposals given that the objective of the project as set out in the project proposal was to address threats to the objectivity of an individual when that individual is being considered for appointment to an EQR role after being previously involved on the engagement team for the same engagement.</p>	<p>The Task Force does not believe that there is a need to re-expose the proposals. The Task Force will present its rationale for its recommendation on this matter at the September 2020 IESBA meeting and will ask the IESBA to conclude on the matter.</p> <p>Nevertheless, given that the scope of the guidance has been broadened to appropriate reviewers, it is necessary that the project proposal be amended to reflect this enlarged scope. The revised project proposal is set out in Agenda Item B-5, which the Board is asked to consider and approve at its September 2020 meeting.</p>

<p>Matter for CAG Consideration</p> <ol style="list-style-type: none"> 1. Except for the matter of re-exposure, which the IESBA will be asked to conclude at its September meeting, do Representatives agree with the Task Force’s responses to the various matters summarized above?

C. Applicability of the Proposed Guidance to Professional Accountants in Business (PAIBs)

16. During the June 2020 board discussion, an IESBA member highlighted paragraph 250.11 A6 in the Code which also refers to an appropriate reviewer in the context of applying safeguards.⁷ Section 250, however, applies to PAIBs only.
17. Given that the proposed Section 325 is in Part 3 and therefore applies only to PAPPs, the Task Force noted that it would not apply to circumstances where PAIBs use appropriate reviewers, as in the example in paragraph 250.11 A6.
18. The Task Force has considered three options for addressing this matter which are:
 - (a) Option A: Develop a new section in Part 2 that would parallel the guidance in Section 325.

While Option A would comprehensively address the issue of objectivity of appropriate reviewers, whether used by PAPPs or PAIBs, it would further move away from the original scope of the project.
 - (b) Option B: Broaden the scope of the guidance in Section 325 to cover PAIBs.

This option would require further changes to the guidance to make it applicable to both PAPPs and PAIBs. The guidance would also need to be relocated to Part 1.
 - (c) Option C: No further action.

The Task Force acknowledges that this would leave a small gap in the Code. However, as there is only one reference to appropriate reviewer in Part 2, the Task Force does not believe that there is a compelling need to significantly expand the guidance to cover PAIBs. The Task Force notes that in any event, the conceptual framework would apply.
19. Based on the cost-benefit analysis above, the Task Force recommends Option C. The Task Force considers that if Part 2 of the Code is further developed in future and there is increased guidance addressing PAIBs' use of appropriate reviewers, the Board would have an opportunity to develop guidance similar to Section 325 in Part 2.

Matter for CAG Consideration

2. Do Representatives agree with the Task Force's recommendation to go with Option C?

⁷ Section 250, *Inducements, Including Gifts and Hospitality*, notes that an example of an action that might be a safeguard to address threats created by offering or accepting an inducement is having an appropriate reviewer, who is not otherwise involved in undertaking the professional activity, review any work performed or decisions made by the accountant with respect to the individual or organization from which the accountant accepted the inducement.

III. PIOB Public Interest Issues

20. As noted in **Agenda Item B-4**, in July the PIOB updated its list of public interest issues on the project and raised the following three matters:

- (a) Interaction of cooling-off period addressing EQR objectivity with cooling-off in Long Association provisions (Section 540)

The PIOB commented that the IESBA should clarify that the cooling-off period addressing threats to objectivity of an EP when moving to the role of an EQR is different from and does not substitute the cooling-off period required in Section 540 addressing independence and familiarity threats from an audit client.

The PIOB also commented that Section 540 should explicitly explain the implications of the cooling-off period addressing threats to objectivity on the 7-year “time-on” allowed with an audit client. It added that restrictions on the different key audit partner (KAP) roles allowed during that time of service should be clarified. It gave an example that an EP who has served for five years will not be able to become an EQR during the remaining “time-on” period, after which he or she will be also affected by the cooling-off period set in Section 540.

- (b) Cooling-off requirements should be explicit in the Code

The PIOB commented that identifying threats to the objectivity of the EQR and applying safeguards to address those threats are ethical matters that should be dealt with comprehensively within the Code.

The PIOB was of the view that while the Code should remain principles-based whenever possible, certain significant matters that impact the public interest may require more prescriptiveness (for example, the cooling-off period addressing long association in Section 540). The PIOB commented that the requirement of a cooling-off period for an EP who moves to an EQR role, as currently proposed in ISQM 2, should also be established in the Code to ensure consistency of both IAASB and IESBA standards. It added that scalability should be taken into account with respect to small and medium practices (SMPs).

- (c) Coordination between the IESBA and IAASB in relation to the scope of application of a cooling-off requirement

The PIOB commented that the scope of the cooling-off requirement in ISQM 2 should be fully aligned with the Code, especially in relation to applicability to public interest entities (PIEs) vs. other types of entities (e.g. listed entities). It was of the view that further coordination was needed between the two Boards to ensure consistent application of requirements across the universe of entities. It added that given the different level of adoption of International Standards on Auditing (ISAs) vs. the Code, the implications on the application of the requirements to different types of entities should be carefully considered.

Task Force Responses

Interaction of cooling-off period addressing EQR objectivity with cooling-off in Section 540

21. The Task Force agrees with the PIOB’s comments. The Task Force notes that paragraph 13 of the explanatory memorandum to the ED had explained that it would not be appropriate to place the proposed guidance addressing EQR objectivity in the International Independence Standards (IIS) as it is dealing

with an issue of objectivity. The Task Force proposes that besides reiterating this point, the Basis for Conclusions further emphasize that any cooling-off period to address circumstances where an EP is being considered for appointment to the EQR role is different from and does not substitute cooling-off required under Section 540.

22. With respect to the PIOB suggestion for an explanation of the implications of the cooling-off period addressing threats to objectivity on the 7-year “time-on” allowed with an audit client, the Task Force believes that this would be better addressed through a Frequently Asked Question (FAQ) as it concerns a matter of implementation.
23. Regarding the example situation the PIOB has outlined in particular, the Task Force notes that the maximum permissible time a KAP may serve on a PIE audit engagement is 7 years, measured cumulatively (paragraph R540.5). A break in service does not reset the “clock” unless the break in service is at least equal to the cooling-off period that would have been served in the relevant KAP role (i.e., 5 years for an EP, 3 years for an EQR, and 2 years for all other KAP roles) (see R540.6 in the Code). Therefore, if an EP has served 5 years on a PIE audit, then “cools off” as required under ISQM 2 before taking on the EQR role, that individual could serve only a maximum of 2 additional years in the EQR role. This is because he or she would come up to the 7-year maximum permitted time-on service on the engagement in a KAP role (the 5 years previously served as EP and the 2 years that can be served before reaching the 7-year limit). The partner rotation requirement under paragraph R540.14 of the Code would then apply, requiring a fresh 5-year cooling-off period before a new 7-year term can be served.

Explicit Cooling-off Requirement in the Code to Address EQR Objectivity

24. Regarding the PIOB’s recommendation to include an explicit cooling-off requirement in the Code to address circumstances where an EP is being considered for appointment to the EQR role on the same engagement, the Task Force acknowledges the PIOB’s valid concerns. The Task Force notes, however, that including a cooling-off requirement in the Code would represent a change of course from the IESBA’s previously coordinated efforts with the IAASB. Instead of a requirement in ISQM 2 linked to principles-based guidance in the Code, the PIOB is recommending duplication of the requirement in the Code. The Task Force believes that this change of course requires explicit IESBA consideration and decision.
25. To assist the IESBA’s consideration, the Task Force sets out below pros and cons of including the same cooling-off requirement in the Code.

PROS

- Supports a perception of a stronger Code.
- Possible benefit for jurisdictions adopting the Code only and not IAASB standards.
- Facilitates stakeholders looking for all “cooling-off requirements” in one place.

CONS

- Duplication is not optimal from the coordination perspective and not so beneficial if there is already a clear cross-reference in the Code (proposed paragraph 325.7 A2) to the requirement in ISQM 2.

- As detailed in section II.A above, while respondents were somewhat split on the location of the cooling-off requirement, there was a clear preponderance of support among them (including regulatory respondents) for ISQM 2 to set the requirement and for the Code to set the principles-based foundation.
 - The mechanism of cross-referencing is used in numerous places in the Code and IAASB standards to avoid duplicating requirements, recognizing also longstanding stakeholder concerns about the burden of increasingly detailed standards.
 - The coordinated response reflects the outcome of due process, following consultation with the Consultative Advisory Groups (CAGs) of the two Boards, public consultation on the IESBA and IAASB EDs, and close coordination between the two Boards.
 - Facilitation of stakeholders would be counterbalanced by queries from other stakeholders about why the same requirement is stated in two different places.
 - In some major jurisdictions such as the US,⁸ auditing standards require a cooling-off period but there is no duplication of such requirement in the national ethics standards.
 - Suggests that the Code automatically requires cooling-off as the default response to any threat to objectivity.
 - The Code instead calls for threats to objectivity that may arise in a range of situations to be addressed through thoughtful application of the conceptual framework. While cooling-off is one possible response, it is not the only one.
 - A prescriptive requirement in the Code might not address all possible circumstances, such as whether there should be a similar cooling-off requirement with respect to an EQR moving directly into the EP role on the same engagement.
 - Disincentive for jurisdictions to adopt both sets of standards.
 - Increasing efforts by the two Boards in making their standards fully interoperable under the established framework for coordination.
26. In addition to the above, the Task Force notes the following:
- Objectivity has a dual character as an ethical principle and a quality precondition. Consequently, the coordinated response of the two Boards reflects this duality of purpose.
 - The concept of an EQR is established in the IAASB's quality management standards. It is therefore appropriate for the IAASB to establish the preconditions, including objectivity, for an individual to be appointed to that role.
 - Not all appropriate reviewers will be covered under ISQM 2, hence the Task Force's proposal to delineate the scope of the guidance in the Code to appropriate reviewers to cover a broad range of situations.

⁸ See US Public Company Accounting Oversight Board's (PCAOB) [Auditing Standard 7](#), *Engagement Quality Review*, paragraph 8. As for partner rotation, the auditor independence requirements are detailed in Rule 2-01(c)(6) of SEC Regulation S-X.

Coordination between the IESBA and IAASB in relation to the scope of application of a cooling-off requirement

27. The Task Force considers that the issue of consistency cannot be definitely resolved within this project, but necessitates a coordinated effort of the two Boards on the definition of a “public interest entity”. A project is already underway to revise that definition (the PIE project) with close coordination between the IESBA and the IAASB. The particular scope of application of EQR provisions in ISQM 1 is a matter that will be considered by the IAASB based on the outcome of the PIE project.

Matters for CAG Consideration

3. Representatives are asked for their views on the matters raised by the PIOB, taking into consideration the Task Force’s responses as set out above.

Appendix 1

List of Respondents to the EQR Objectivity Exposure Draft

(Note: No members of the Monitoring Group responded to the exposure draft and there were no responses from those charged with governance.)

Responses by Stakeholder Category

Regulators and audit oversight authorities	3
National standard setters (NSS)	7
Accounting firms	9
IFAC Member bodies and other professional organizations	19
Total responses	38

#	Abbrev.	Respondent	Region
Regulators and Audit Oversight Authorities			
1.	AOBSEC	Audit Oversight Board - Securities Commission Malaysia	AP
2.	FRC	UK Financial Reporting Council	EU
3.	IRBA	Independent Regulatory Board for Auditors	MEA
National Standard Setters			
4.	APESB	Accounting Professional & Ethical Standards Board	AP
5.	AICPA	American Institute of Certified Public Accountants	NA
6.	MIA	Malaysian Institute of Accountants	MIA
7.	NZAuASB	New Zealand Auditing and Assurance Standards Board	AP
8.	GAO	US Government Accountability Office	NA
IFAC Member Bodies and Other Professional Organizations			
9.	ACCA/CAANZ	Association of Chartered Certified Accountants Chartered Accountants Australia and New Zealand	AP
10.	AE	Accountancy Europe	EU
11.	AGSA	Auditor General of South Africa	MEA
12.	BICA	Botswana Institute of Chartered Accountants	MEA

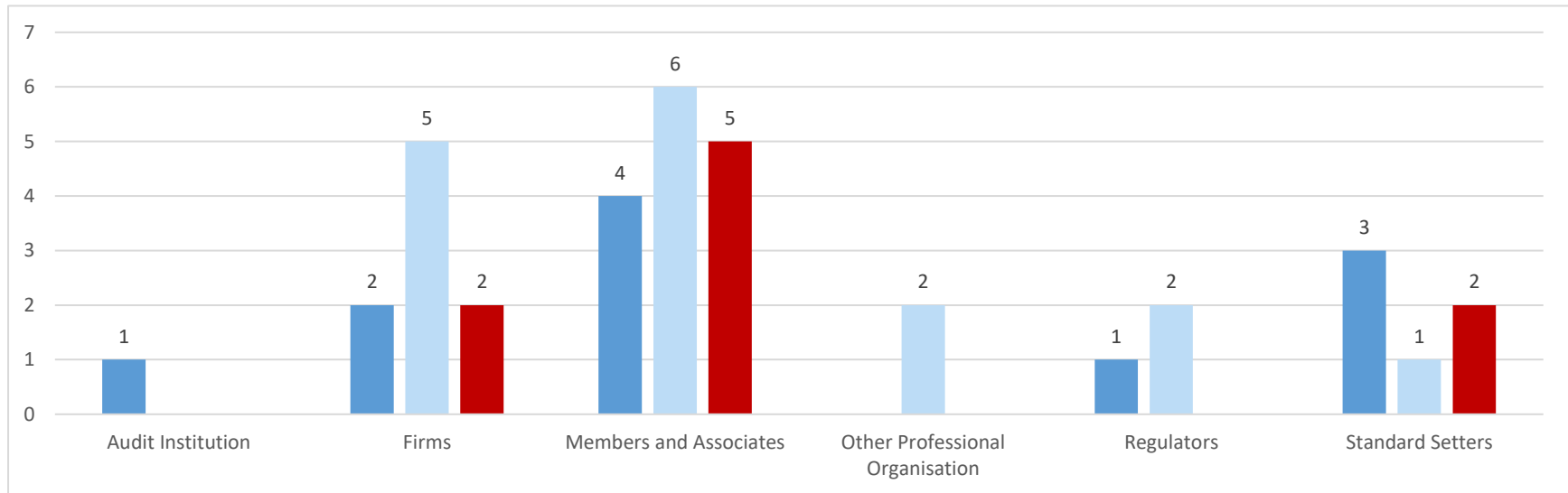
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#	Abbrev.	Respondent	Region
13.	CPAAu	CPA Australia	AP
14.	CPAC	Chartered Professional Accountants Canada	NA
15.	CPAM	The Malaysian Institute of Certified Public Accountants	AP
16.	IBRACON	Instituto dos Auditores Independentes do Brazil	SA
17.	ICAEW	Institute of Chartered Accountants in England and Wales	EU
18.	ICAS	Institute of Chartered Accountants of Scotland	EU
19.	IDW	Institut der Wirtschaftsprüfer in Deutschland e.V.	EU
20.	SMPC	IFAC Small and Medium Practices Committee	GLOBAL
21.	IPA	Institute of Public Accountants	AP
22.	IPAK	Institute of Public Accountants Kenya	MEA
23.	ISCA	Institute of Singapore Chartered Accountants	AP
24.	JICPA	Japanese Institute of Certified Public Accountants	AP
25.	KICPA	Korean Institute of Certified Public Accountants	AP
26.	NBAA	National Board of Accountants and Auditors Tanzania	MEA
27.	NYSSCPA	New York State Society of Certified Public Accountants	NA
28.	SAICA	South African Institute of Chartered Accountants	MEA
29.	WPK	Wirtschaftsprüferkammer	EU
Accounting Firms			
30.	BT	Baker Tilly International	GLOBAL
31.	BDO	BDO International Limited	GLOBAL
32.	CROWE	Crowe Global	GLOBAL
33.	DTTL	Deloitte Touché Tohmatsu Limited	GLOBAL
34.	EYG	Ernst & Young Global Limited	GLOBAL
35.	GTIL	Grant Thornton International Limited	GLOBAL

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#	Abbrev.	Respondent	Region
36.	KPMG	KPMG IFRG Limited	GLOBAL
37.	MGNL	Moore Global Network Limited	GLOBAL
38.	PwC	PricewaterhouseCoopers International Limited	GLOBAL

Question 3: Do you agree with having a cooling - off requirement? Do you agree that it would be more appropriate for the IAASB to determine whether a cooling-off requirement should be introduced in proposed ISQM 2?



Key:

- Agree - Code
- Agree – ISQM 2
- Disagree

11 (AGSA, AOBSEC, CPAAu, CPAC, GTIL, ICAS, IPA, MIA, MICPA, MGNL, NZAuASB)

16 (BT, BDO, BICA, Crowe, DTTL, FRC, IBRACON, ICAEW, IPAK, IRBA, JICPA, KICPA, KPMG, NBAA, NYSSPCA, SAICA)

11 (should be in the Code if so) (AE, APESB, AICPA, CAANZ, EY, GAO, IESBA SMPC, IDW, ICAS, PWC, WPK)