

International Ethics Standards Board for Accountants

Strategy and Work Plan,
20110-2012



International Federation
of Accountants

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INTERNATIONAL ETHICS STANDARDS BOARD FOR ACCOUNTANTS
~~PROPOSED~~ STRATEGY AND WORK PLAN 20110-2012

CONTENTS

	Page
Chair’s Statement	
Strategy	
Work Plan 201 <u>10</u> -2012	
Appendix 1 IESBA Projects and Activities 201 <u>10</u> -2012	
Appendix 2 IESBA Work Plan 201 <u>10</u> -2012	
Appendix 3 Alignment of IFAC and IESBA Strategy	

Chair's Statement

I am pleased to present the ~~proposed~~ Strategy and Work Plan for 201~~10~~–2012 of the International Ethics Standards Board for Accountants (IESBA).

Vision

The objective of the IESBA is to serve the public interest by setting high quality ethical standards for professional accountants and by facilitating the convergence of international and national ethical standards, including auditor independence requirements, through the development of a robust, internationally appropriate code of ethics. Such a code can enhance the quality and consistency of services provided by professional accountants, which is in the public interest.

There are compelling reasons for facilitating the convergence of international and national ethical standards and, in particular, auditor independence requirements. High quality ethical standards for the accounting profession contribute to ~~the enhanced audit~~ quality of financial reporting, which is vital to building and sustaining vibrant capital markets that the public will continue to have confidence in. Convergence to a single set of ethical standards, particularly auditor independence requirements, can enhance the efficiency of the global capital markets by promoting a common understanding of the ethical standards that professional accountants adhere to. It also can promote a common understanding of what it means for an auditor to be independent, and thus better informing the view of making it easier for market participants as they~~to~~ select audit service providers.

Our strategy is to build on the strong base established by the revised Code issued in July 2009, significantly increase our efforts to promote the benefits of convergence to a single set of high quality ethical standards, including independence requirements, and engage in an active dialogue with key stakeholders of the IESBA to understand their perspectives on convergence and on how the Code can be the catalyst to achieve this objective.

The Strategy and Work Plan set out in this document reflect the outcome of consultations that have contributed significantly to establishing the priorities of the IESBA through 2010~~over the next few years~~.

Strategy

Pursuant to its 2008–2009 work plan, the IESBA devoted a significant amount of time and resources to clarifying the requirements of the Code. That included making changes to various provisions in the Code to improve their understandability and application, including the application of the Code's conceptual framework, and strengthening the Code's independence requirements. Throughout 2010, the IESBA has continued to make progress on its projects on Conflicts of Interest and Responding to Fraud and Illegal Acts, both of which were carried forward from the 2008-2009 work plan.

The IESBA believes the changes it made to the Code in 2009 have resulted in a more robust Code that increases the protection of the public interest. The IESBA's strategy ~~through for 20110~~–2012 is to continue to advance the protections afforded by the Code, further its adoption and implementation, and facilitate convergence of international and national ethical standards.

The IESBA's stated objective, as set out in its Terms of Reference¹, confirms that its primary role is that of a standard setter. Consultations, including through the survey of key stakeholders, have confirmed the IESBA's view that it should be active in providing adoption and implementation support materials and should actively further its objective of convergence.

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¹ The Terms of Reference can be accessed at <http://www.ifac.org/Ethics/>.

Accordingly, the ~~proposed~~ Strategy and Work Plan for 2010–2012 focuses on:

- Development of standards;
- Adoption and implementation of the Code; and
- Communications.

Development of Standards

To ~~IESBA's objectives are to increase~~~~maintain the a~~~~robustness of the~~ Code ~~in protecting the public interest and that not only remains relevant to look to the Code as but continues to be~~ the key to achieving convergence of international and national standards on ethics and independence. ~~–~~†The IESBA's plans to provide additional guidance for professional accountants when dealing with conflicts of interest and responding to fraud and illegal acts ~~is consistent with those objectives~~. The IESBA also plans to ~~re-consider the provisions in the Code that address an inadvertent violation of the Code, address the scope of the related entity definition in relation to the independence requirements in an audit of collective investment vehicles, including mutual funds.~~

Adoption and Implementation

The IESBA plans to continue to assess what additional material or activities would be useful to support those who are adopting and implementing the Code. Providing this additional assistance should increase adoption and implementation efforts by member bodies. The IESBA ~~and its staff~~ ~~has~~ already issued some materials to support adoption and implementation. The IESBA plans to monitor adoption and implementation of the Code by member bodies with the view to understanding and assisting member bodies to address the challenges they face in that process. ~~In that regard, the IESBA will be researching the application of the Code by professional accountants in small and medium entities (SMEs) and small and medium practices (SMPs) to understand the unique and challenging issues they face regarding the Code and determine how the board could assist them in addressing those issues.~~

Convergence

To further its objective of facilitating convergence of international and national ethical standards, including independence requirements, the IESBA plans to maintain regular contact with key stakeholders, including ~~investors and other users of audited financial statements~~, national standard setters, ~~auditor oversight bodies~~, and regulators. The IESBA believes that open and transparent sharing of information with its stakeholders and careful consideration of their feedback are critical to gaining further acceptance ~~and adoption~~ of the Code ~~by these stakeholders~~. The IESBA's communication activities ~~are consistent with~~~~reflect~~ this ~~objective~~~~belief~~.

Communications

The IESBA will continue to communicate its activities to its constituents in a manner that ensures the transparency of its processes and its decisions. ~~For example, the IESBA intends to make its key decisions accessible in writing by all interested parties shortly after they are reached.~~ During the period of this Strategy and Work Plan an increased focus of our communications initiatives will be directed at facilitating global acceptance and adoption of the Code. ~~In that regard, IESBA members~~

and staff will be engaging in various outreach activities to engage key stakeholders in discussions to understand their perspectives on this topic.

Conclusion

On behalf of the IESBA, and the ~~immediate past~~~~previous~~ Chair, Richard George, I would like to thank all those who contributed to the successful development of the revised Code that the IESBA released in July 2009. It is important that the Strategy and Work Plan for 2010–2012 build on the improvements made to this Code and that the IESBA work to further its global acceptance and adoption.

I hope that the direction of our work will be seen as responding to the feedback that we have received, and to the public interest, which continues to be our overriding ~~focus~~~~concern~~. Of course, events and circumstances may require us to amend our plan, and for this reason it will be kept under constant review.

Ken Dakdduk, IESBA Chair

Strategy

The ~~proposed~~ Strategy and Work Plan ~~will sets~~ the direction and priorities for activities of the International Ethics Standards Board for Accountants (IESBA)² for the ~~three-year~~ period 2010–2012. It considers the overall strategy of IFAC (see Appendix 3) and the IESBA's objective as established in the IESBA's Terms of Reference. It responds to the developments in the environment in which professional accountants provide services ~~and~~ for which standards for professional ethics, including auditor independence, are established. The projects and activities also assist the IESBA in facilitating convergence of international and national ethical standards, including independence requirements. The ~~proposed~~ Strategy and Work Plan is underpinned by the IESBA's communication initiatives.

The IESBA recognizes that adjustment to the ~~proposed~~ Strategy and Work Plan may be necessary to address urgent issues, including issues raised by the IESBA's Consultative Advisory Group (CAG) or the Public Interest Oversight Board. The ~~proposed~~ Strategy and Work Plan contemplates adjustments if any such matters arise.

This section sets out the IESBA's strategic focus for 2010–2012. The next section contains the ~~planned~~ work plan to implement the IESBA's strategy.

Development of Standards

In 2009, the IESBA completed its revisions to the Code to clarify the requirements for all professional accountants. It also significantly strengthened the independence requirements for auditors. These revisions, developed under public oversight, have created a robust Code that has been re-drafted in a manner to promote consistent application.

In the next few years, the IESBA intends to strengthen the Code further by providing additional ethical guidance for professional accountants when dealing with conflicts of interest and responding to fraud and illegal acts. The IESBA also plans to ~~address the scope of the related entity definition in relation to the independence requirements in an audit of collective investment vehicles, including mutual funds~~ re-consider the provisions in the Code addressing an inadvertent violation of the Code and begin focusing on the issues faced by SMEs and SMPs in complying with the Code.

The IESBA ~~also~~ intends to develop and implement an impact analysis process. The process will provide a systematic and structured approach to obtaining information about the potential impact on key stakeholders of proposed changes to the Code. The process ~~will be~~ continuous throughout a project and the information will be included in ~~each~~ exposure drafts and ~~base~~ conclusions.

Adoption and Implementation

The revised Code was issued in July 2009, with an effective date of January 1, 2011. To allow member bodies and firms an appropriate period of time to implement the revisions, the IESBA ~~plans will to~~ provide a period of stability during which no new independence requirements will be ~~developed by the IESBA and become developed and take~~ effective. The IESBA, therefore,

² More information on the IESBA is available at www.ifac.org/ethics.

plans to provide a period of ~~at least~~ two years after the effective date of the revised Code during which no new independence requirements will become effective, unless there is an urgent need to respond to new or unforeseen circumstances.

The IESBA recognizes that the effective adoption and implementation of the Code by IFAC member bodies is an important part of achieving international and national convergence of ethics and independence standards. The issuance of the revised Code was, therefore, followed by the issuance of materials to support adoption and implementation of the Code³. These materials include: PowerPoint presentations that can be used to explain the content of the Code; comparisons with the existing Code; a template that can assist individuals in understanding how the provisions in a particular jurisdiction compare to the provisions in the Code, ~~and~~ an overview of the independence requirements in the Code, and some staff questions and answers. The IESBA will continue to assess what additional material or activities would be useful to support further the adoption and implementation of the Code.

Under the IFAC Statements of Membership Obligations, a member body of IFAC is required to apply no less stringent standards than those stated in the Code, unless prohibited by law or regulation from complying with certain parts of the Code, in which case it should comply with all other parts of the Code⁴. The IFAC Compliance Advisory Panel⁵ (CAP) oversees the implementation and operation of the IFAC Member Body Compliance program. The IESBA plans to liaise closely with the CAP to understand the nature and extent of member body implementation of the Code with a goal of identifying, understanding, and helping member bodies address significant challenges to further adoption of the Code. The IESBA also plans to work closely with the IFAC Small and Medium Practices Committee⁶ and the IFAC Developing Nations Committee⁷ in this regard.

The IESBA will monitor the work of the International Auditing and Assurance Standards Board's project to develop a process for assessing the effectiveness of the implementation of new standards. The goal is for the IESBA to develop a similar process that can be applied to the implementation of the Code. The intention is that this would become a standing part of the IESBA's process of continuous improvement of its Code.

The IESBA's activities with regard to adoption and implementation and convergence are highlighted in the work plan but, being ongoing in nature, are not allocated to specific time periods. The work plan provides for periodic reports to the IESBA in this regard.

Convergence

³ The adoption and implementation support materials, which are non-authoritative and issued for information purposes, are available at <http://www.ifac.org/Ethics/Resources.php#implementation-and-adoption>.

⁴ Statement of Membership Obligations 4 paragraph 4.

⁵ <http://www.ifac.org/Compliance/>

⁶ More information on the IFAC Small and Medium Practices Committee is available at <http://www.ifac.org/SMP/>

⁷ More information on the IFAC Developing Nations Committee is available at <http://www.ifac.org/DevelopingNations/>

High quality ethical standards for the accounting profession are vital to building and sustaining vibrant capital markets. Further convergence to a single set of independence standards will enhance the efficiency of the global capital markets. Common auditor independence standards would provide a consistent understanding among investors, public authorities, and others of ~~the independence of auditors and~~ what it means ~~to be~~ when an auditor is independent. This would lead to increased confidence in auditors' reports, which is an essential element of the effective functioning of the capital markets and significantly contributes to public confidence in those markets. It also could increase choices for market participants when selecting ~~an auditor service providers~~.

~~The IESBA's long-term objective is the convergence between international and national standards on auditor independence and ethics standards.~~ The board's convergence activities will take different forms, but in general they will be aimed at bringing together (i.e., converging), to the extent feasible, the IESBA Code and the independence and ethics codes, standards, and regulations promulgated in other jurisdictions by national standard setters and regulators.

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The IESBA's convergence efforts will consist of three interrelated activities. First, the IESBA will seek input on the types of improvements to the Code that national standard setters and regulators believe should be made for the Code to gain acceptance and recognition in their jurisdictions. In this regard, ~~some certain~~ national standard setters and regulators have already provided input to the IESBA on certain aspects of the IESBA Code when commenting on previous board projects. Because that input dealt with matters that were beyond the scope of those projects, the IESBA deferred their consideration. The IESBA will consider that input as part of its convergence efforts and determine the extent to which it should focus its attention on those matters for possible future revisions to the Code. They include, among other things:

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- Reviewing the Code to determine how it might identify who a particular Code provision is aimed at (e.g., who within a firm has the responsibility to comply with the provisions of the Code).
- Determining how the Code could be improved to enhance its enforceability.
- Considering whether the use of materiality thresholds can be improved.
- Determining the extent to which the Code can be more adaptable to small firms
- Reexamining the examples of safeguards to determine whether they continue to be appropriate.
- Determining whether to enhance the visibility of the prohibitions and the most restrictive provisions of the Code and, if so, how.
- Reviewing provisions that function as exceptions and determining whether they continue to be appropriate.

Second, the IESBA intends to analyze the Code for purposes of comparing its key provisions to the standards and regulations of key jurisdictions. The IESBA did this for some provisions of the Code when revising the Code's independence provisions. The IESBA believes, however, that when focusing on the Code as the catalyst for convergence between ~~international and national independence standards~~, it is important to understand how all of the key independence provisions in the Code compare to the independence standards and

regulations of other jurisdictions and how in totality the Code compares to those other standards and regulations. Accordingly, the IESBA will first isolate the independence provisions in the Code that apply when auditing a public interest entity, specifically the provisions that convey prohibitions and those under which a situation is permitted only under certain conditions or if specified safeguards are applied.

The IESBA's isolation of the independence provisions in the Code may take the form of a standalone document that succinctly conveys those provisions, although other forms of isolation will be considered. The IESBA will then compare those provisions to the provisions of key jurisdictions. Differences identified will be analyzed to facilitate the IESBA's determination of whether it should take action to readdress a Code provision for the purpose of reducing or eliminating a difference. That analysis will include research into the reasons that differences exist, recognizing that the development of rules in a particular jurisdiction can be a function of several factors that are germane to that jurisdiction, such as the local practice environment, the history of auditor behaviors, and the regulatory experience.

The IESBA will also consider whether the standalone document developed to facilitate convergence could have alternative uses. Some respondents to the exposure draft of the work plan encouraged the IESBA to draw out provisions in the Code applicable to the audits of public interest entities and entities that are not public interest entities and give them separate prominence. The standalone document described above could serve as a supplement to the Code to describe briefly the prohibitions and other restrictions in the Code applicable to the audits of public interest entities. A similar document will be considered for development as part of this convergence effort that captures the prohibitions and other restrictions that apply to the audits of entities that are not public interest entities. That document also might have additional usage as a supplement to the Code.

The IESBA does not envision that it will readdress every provision in the Code that is found to be less stringent than a comparable provision in a key jurisdiction to make it equally or more stringent. The IESBA is not striving to have the most stringent code. Its goal is for the Code to strike an appropriate balance between being the driver of international convergence of ethics and independence rules while continuing to serve the public interest by setting out high quality standards that facilitate compliance with the fundamental principles of professional ethics for professional accountants, as described in the Code.

Third, the IESBA will continue to expand its outreach efforts to engage key national standard setters and regulators in a dialogue to facilitate its convergence efforts. The IESBA believes it is important to expand its channels of communication so that the IESBA and national standard setters and regulators have a clear understanding of each others' perspectives on various issues. This is important because while it is possible that the IESBA Code and the codes of national standard setters and regulators will change as a result of the IESBA's convergence activities, the IESBA expects that it will not always agree with national standard setters and regulators on every issue. However, the IESBA would like to make sure that where disagreements arise and differences remain, the reasons are completely understood by all parties. In the IESBA's view, such enhanced understanding is an important part of its convergence efforts.

~~In seeking to promote convergence of independence requirements, the~~ The IESBA recognizes that many regulators and other authorities are required to exercise their authority in relation to auditor independence. ~~In addition~~ Thus, changes to existing national laws and regulations are often time consuming to effect. Accordingly, during the period of this strategic plan the IESBA will liaise closely with national standard setters and regulators to determine identify and understand their perspectives on convergence and to obtain their views on how the Code can be the catalyst to achieve greater convergence. In particular, the IESBA will be seeking input on:

- (a) ~~Whether, as an interim step, a in a group audit situation, where the national independence standards in the jurisdiction of the parent auditor contain requirements that are more stringent than those contained in the Code, the parent~~ company's auditor would accept foreign auditors of foreign subsidiaries complying with the independence requirements in Code. The IESBA believes this is an important interim step toward convergence of international ethics and independence standards and will be seeking input on this in its ongoing dialogue with national standard setters and regulators. ; and
- (b) ~~The types of improvements to the Code that standard setters and regulators believe should be made for the Code to gain acceptance and recognition in their jurisdictions. The IESBA will consider input it has received from stakeholders, such as, for example, the need to more clearly identify the independence provisions in the Code related to public interest entities. Accordingly, it will prepare a document identifying those provisions to be used in discussions with national standard setters and regulators.~~

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Communications

The IESBA's communication initiatives are aimed at keeping stakeholders informed of its activities and promoting the adoption and implementation of the Code. They also assist the IESBA in understanding developments in the environment in which professional accountants provide services, and concerns about the requirements in the Code and their implementation.

The IESBA issues press releases and eNews communications that report on its work plan, activities, and progress in achieving its objectives. It further promotes its activities and publications through the IESBA website, <http://www.ifac.org/Ethics/>, and by way of presentations.

The IESBA's planned communication activities are highlighted in the work plan but, being ongoing in nature, are not allocated to specific time periods. The work plan provides for periodic reports to the IESBA by its task forces that are leading the planned projects.

Work Plan 2011~~0~~–2012

The IESBA has considered the relative priorities and importance of its activities for the period 2011~~0~~–2012 and has determined a work plan for that period. In developing this work plan, the IESBA conducted a formal survey of key stakeholders to obtain their views about issues that they believe should be addressed in the immediate future. The work plan is based on the IESBA's current working procedures, level of activity, and resources. The work plan is subject to periodic revision and changes by the IESBA. A new project is subject to the IESBA's approval of a project proposal that confirms that it is appropriate to commence the project, taking into account the effective and efficient utilization of resources, the likely output of the project, and its timescale. In the future, this decision will also be informed by an assessment of the impact of a proposed revision to the Code.

The IESBA plans to continue work on the two projects that it commenced in late 2009:

- *Conflicts of Interest* – The IESBA will consider whether to expand the guidance in the Code on conflicts of interest.
- *Responding to Fraud or Illegal Acts* – The IESBA will provide additional guidance for professional accountants on how to respond in situations where they encounter a suspected fraud or illegal act.

The IESBA will also commence a project to re-consider the provisions in the Code that address an inadvertent violation of the Code and a research effort to understand the issues faced by SMPs and SMEs in complying with the Code.

~~The Work Plan 2008–2009 contained a project to determine how the guidance in Parts A, B, and C of the Code should apply to professional accountants in government. The project was deferred at the beginning of 2007 in light of other priorities.~~

~~Respondents to the survey ranked three other projects as priority projects:~~

- ~~*Independence Requirements for Professional Accountants who are not in Public Practice who Perform Assurance Engagements*—Sections 290 and 291 of the Code address independence requirements for assurance engagements. The sections apply to professional accountants in public practice. The project would consider whether guidance is needed on the independence requirements that should apply to other professional accountants who perform assurance engagements, such as accountants in government and internal auditors.~~
- ~~*Ethical Guidance for Professional Accountants in Public Practice Providing Non-Assurance Services*—Part B of the Code addresses professional services provided by professional accountants in public practice to assurance clients. The project would consider whether additional ethical guidance is needed for professional accountants in public practice who provide non-assurance services, such as financial advisory services, taxation services, and actuarial advisory services, to non-assurance clients.~~
- ~~*Independence—Application of the Related Entity Concept in Audits of Collective Investment Vehicles*—This project would consider which entities should be considered to be a related entity of a collective investment vehicle, including a mutual fund, and whether the existing definition of "related entity" should be revised when applied to collective investment vehicles.~~

~~The IESBA considered the views expressed in relation to these projects and concluded that of these three projects, it is appropriate to commence the project addressing the application of the related entity concept in audits of collective investment vehicles. The IESBA believes that while the Code does not contain guidance that is specifically tailored to the situations that would be covered by the other two projects, the guidance it does contain, combined with the application of professional judgment, is sufficient to enable professional accountants to address those situations.~~

~~Collective investment vehicles are commonly used structures. The IESBA understands that the existing related entity definition may not work well with these entities because, for example, a fund manager does not control the collective investment vehicle in the same way that an individual who owns a majority of the equity of a corporation controls that corporation.~~

Appendix 1, IESBA Projects and Activities 2010–2012, shows the projects and activities to be undertaken and the quarter in which each activity or project will commence. Appendix 2, IESBA Work Plan 2010–2012, provides a more detailed description of each project and reflects how the IESBA intends to conduct its projects.

Key Factors

The following key factors have been considered in developing the IESBA's work plan for the period 2010–2012:

- The IESBA meets for 2–3 days, 3–4 times per year (generally for a total of 6–12 days per year);
- The amount of meeting time needed to discuss a project varies significantly depending upon the scope of the project and the stage of its development;
- Time is needed between meetings for Task Forces to study the key issues and develop recommendations for consideration by the IESBA;
- The IESBA may hold a public forum or roundtable, or issue a consultation paper, to solicit views on a matter under consideration. The IESBA may also determine that it is appropriate to conduct a field test of the application of a proposal;
- Under the IESBA's due process, the exposure period for proposed revisions to the Code is a minimum of 90 days. In the case of a major or significant revision, the IESBA considers whether a longer period is appropriate. In deciding on the appropriate exposure period, the IESBA is mindful of the need of some jurisdictions to translate an exposure draft before providing input ~~from that particular jurisdiction.~~
- Total lapsed time required for completion of a project ~~can run from 18–48 months or longer,~~ not including any period for re-exposure that might be necessary, and depends on the complexity and scope of the project and its output.

Appendix 1

IESBA Projects and Activities 2010–2012

PROJECTS AND ACTIVITIES	COMMENCING
DEVELOPMENT OF STANDARDS	
Conflicts of Interest	Added to agenda in Q4 2009
Responding to Fraud and Illegal Acts	Q3 2010
Independence—Application of the related entity concept in audits of collective investment vehicles Inadvertent Violation	Q4 2010
ADOPTION AND IMPLEMENTATION GUIDANCE	
<ul style="list-style-type: none"> Determine how to implement any proposals that IFAC might adopt for the analysis of the impact of proposed revisions to the Code (impact analysis) 	Commenced Q4 2009
<ul style="list-style-type: none"> Liaise with IFAC Compliance Advisory Panel to gain understanding of extent of compliance by member bodies and gain understanding of any barriers to convergence 	Ongoing
<ul style="list-style-type: none"> Develop, as necessary, additional materials to support further the adoption and implementation of the Code 	Ongoing
<ul style="list-style-type: none"> Monitor the work of the International Auditing and Assurance Standards Board’s project to develop a process for assessing the effectiveness of the implementation of new standards with the aim of developing a process that can be applied to the implementation of the Code 	Ongoing
<ul style="list-style-type: none"> ResearchConsult, as necessary, with the <u>assistance of representatives of IFAC Small and Medium Practices Committee and small and medium entities</u>, on issues of relevance to <u>SMPs small and SMEs medium-sized entities in complying with the Code</u> 	Ongoing
<ul style="list-style-type: none"> Consult, as necessary, with the IFAC Developing Nations Committee on issues of relevance to developing nations 	Ongoing

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PROPOSED STRATEGY AND WORK PLAN 2010–2012

PROJECTS AND ACTIVITIES	COMMENCING
CONVERGENCE	
<ul style="list-style-type: none"> Active discussion with national standard setters and regulators to identify and address matters important to achieving convergence of international and national ethical standards, including the types of improvements to the Code that would facilitate its acceptance in certain jurisdictions and whether the Code could be used as a benchmark for independence requirements for foreign auditors. 	Ongoing
COMMUNICATION	
<ul style="list-style-type: none"> <u>Make the IESBA's key project related decisions accessible in writing shortly after they are reached</u> 	<u>Q4 2010</u>
<ul style="list-style-type: none"> Publish with each revision to the Code a short note of key changes introduced 	Ongoing
<ul style="list-style-type: none"> Issue a press release, communicating the issue of each proposed or final revision to the Code and any other major activity of the IESBA; 	Ongoing
<ul style="list-style-type: none"> Issue IESBA eNews communications 	Ongoing
<ul style="list-style-type: none"> Promote activities of the IESBA through the IESBA website (this includes agenda material, meeting highlights and minutes, exposure drafts and related comment letter, final revisions to the Code and bases for conclusions) 	Ongoing

Appendix 2

IESBA Work Plan 2010–2012⁸

ACTIVITIES	STATUS	Q1 2010	Q2 2010	Q4 2010	Q1 2011	Q2 2011	Q4 2011	Q1 2012	Q2 2012	Q4 2012
Adoption and implementation	On going	✓	✓	✓	✓	✓	✓	✓	✓	✓
Convergence	On going	✓	✓	✓	✓	✓	✓	✓	✓	✓
CURRENT PROJECTS	STATUS	Q1 2010	Q2 2010	Q4 2010	Q1 2011	Q2 2011	Q4 2011	Q1 2012	Q2 2012	Q4 2012
Strategic Plan	Current		Approve ED	Approve Final	Discuss 2012 Work Plan		Approve 2012 Work Plan		Issue ED for 2013–2014	Approve 2013–2014 Work Plan
Conflicts of Interest ⁹	Current		Discussion	Issues paper	ED first read	Approve ED	Discussion	Consider ED comments and first read of final	Approve final	
Responding to Fraud and Illegal; Acts ¹⁰	Current		Approve project proposal	Discussion	Issues paper	ED first read	Approve ED	Discussion	Consider ED comments and first read of final	Approve final
Independence—application of related entity concept in audits of collective investment vehicles Inadvertent Violation	New				Approve project proposal Discussion and ED first read	Approve ED Discussion	Consider ED comments and first read of final ED first read Issues Paper	Final Standard ED first read	Approve ED	Discussion

⁸ The work plan assumes that there will be no need to re-expose any of the projects.

⁹ Project proposal approved Q4 2009

¹⁰ Timing subject to approval of project plan

PROPOSED STRATEGY AND WORK PLAN 2010-2012

<u>SMP/SME Research Project</u>					<u>Receive status report</u>	<u>Consider preliminary report</u>	<u>Final report</u> <u>Consider Board response</u>			
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<p>Conflicts of Interest</p>	<p>The project, which was approved in Q4 2009, will consider whether to expand the guidance in the Code on conflicts of interest and will address matters such as:</p> <ul style="list-style-type: none"> • Providing a definition of a conflict of interest; • Providing additional guidance on the types of conflicts that could be encountered; • Providing additional guidance on the mechanisms that can safeguard confidential information and assist in managing conflicts of interest; and • Developing a process that accountants could follow to identify and address conflicts of interest or potential conflicts of interest.
<p>Responding to Fraud and Illegal Acts</p>	<p>A professional accountant in public practice or business may encounter situations including:</p> <ul style="list-style-type: none"> • The professional accountant suspects that a fraudulent or illegal act has occurred; • The professional accountant has reported an alleged fraudulent or illegal act but no action has been taken, or the action is inadequate; and • Another individual within the organization has informed the professional accountant about the existence of a suspected fraudulent or illegal act. <p>Section 140 contains general guidance for all professional accountants regarding disclosure of confidential information. It identifies three circumstances where professional accountants are required, or may be required, to disclose confidential information:</p> <ul style="list-style-type: none"> • Disclosure is permitted by law and is authorized by the client or the employer; • Disclosure is required by law; and • There is a professional duty or right to disclose when not prohibited by law. <p>The Code does not contain any guidance on when there is a professional duty or right to disclose confidential information when not prohibited by law. The goal of the project is to provide additional guidance for professional accountants on how to respond in situations where they encounter a suspected fraud or illegal act.</p>

<p><u>Inadvertent Violation</u></p>	<p><u>The Code contains several paragraphs addressing an inadvertent violation of a provision of the Code. The goal of the project is to re-consider these provisions, specifically:</u></p> <ul style="list-style-type: none">• <u>The purpose of an inadvertent violation provision and whether the Code should address inadvertent violations or whether it should be left to the discretion of those who enforce the Code;</u>• <u>If the conclusion is that the Code should address an inadvertent violation:</u><ul style="list-style-type: none">○ <u>Whether the provisions should apply to all of the Code or only the independence provisions;</u>○ <u>Whether “inadvertent” is the appropriate descriptor and, if so, whether guidance should be given on the meaning of inadvertent;</u>○ <u>The consequences and implications of an inadvertent violation; and</u>○ <u>Whether additional guidance is needed on the types of safeguards that are necessary.</u>
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<p>SMP/SME Research Project Independence— Application of related entity concept in audits of collective investment vehicles</p>	<p><u>The objective of this project is to determine and understand what unique and challenging issues are faced by SMEs and SMPs in complying with the Code.</u></p> <p><u>A working group chaired by an IESBA member will be formed. The working group will include a majority of individuals from the SME/SMP community.</u></p> <p><u>The working group will report its findings and recommendations to the IESBA. The recommendations will be consistent with the importance of SMPs and SMEs serving the public interest, reinforce the importance of high quality ethical standards, including independence standards, for professional accountants in business and, where feasible, offer practical solutions to the unique and challenging issues faced by SMPs and SMEs in complying with the Code.</u>The Code requires an auditor to be independent of certain related entities of an audit client. The definition of a related entity is based on control and significant influence (for example, an entity is a related entity of an audit client if the client has control over that entity). This construct does not work well with collective investment vehicles, including mutual funds. For example, while a fund manager may determine the types of instruments in which the vehicle invests, the manager does not “control” the vehicle in the same way that an individual who owns a majority of the equity of a corporation controls that corporation. The project will consider which entities should be considered to be a related entity of such investment vehicles.</p>
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Appendix 3

Alignment of IFAC and IESBA Strategy

The Strategic Plan¹¹ of the International Federation of Accountants (IFAC) identifies four themes reflecting the strategic direction of IFAC for the period 2011~~09~~–2012.

Strategic Theme 1: Be recognized as the international standard setter in areas of auditing and assurance, education, ethics and governmental financial reporting

The IESBA's Strategy and Work Plan 2011~~0~~–2012 will continue to focus on the development and maintenance of high quality ethical standards, including independence standards, for professional accountants. By adhering to due process activities and ensuring widely held public consultation, the IESBA will have a direct impact on the confidence of the public in the standard setting activities of IFAC's standard setting bodies.

Strategic Theme 2: Actively support the adoption of, and assist in the implementation of, international standards

The IESBA's Strategy and Work Plan 2011~~0~~–2012 contains several activities that support the adoption of and implementation of the Code. Specifically the IESBA will actively engage with national standard setters and regulators to identify and address matters that they believe are important for the Code to serve as the catalyst for achieving convergence of international and national ethical and independence standards. The IESBA will begin addressing one of those matters, i.e., the provisions of the Code dealing with an inadvertent violation.

Strategic Theme 3: Continually enhance the relevance of the profession

The IESBA's Strategy and Work Plan 2011~~0~~–2012 contributes to the development of the global profession by seeking to further convergence to a single set of high quality ethical standards, including independence standards, for professional accountants.

Strategic Theme 4: Be an influential voice for the global accountancy profession

The IESBA's Strategy and Work Plan 2011~~0~~–2012 includes outreach activities with stakeholders, including IFAC member bodies, with a goal of continuous improvement of the Code so that it can accommodate changing conditions as needed.

¹¹ International Federation of Accountants Strategic Plan for the period 2009–2012, available at <http://www.ifac.org/About/StrategicPlan.php>.



International Federation of Accountants

545 Fifth Avenue, 14th Floor, New York, NY 10017 USA
Tel +1 (212) 286-9344 Fax +1(212) 286-9570 www.ifac.org