

**PROPOSED REVISION TO THE CODE ADDRESSING THE
OBJECTIVITY OF ENGAGEMENT QUALITY REVIEWERS**

The below text is shown as marked up against the extant Code.

SECTION 300**Requirements and Application Material****Identifying Threats**

300.6 A1 Threats to compliance with the fundamental principles might be created by a broad range of facts and circumstances. The categories of threats are described in paragraph 120.6 A3. The following are examples of facts and circumstances within each of those categories of threats that might create threats for a professional accountant when undertaking a professional service:

(a) Self-interest Threats

- A professional accountant having a direct financial interest in a client.
- A professional accountant quoting a low fee to obtain a new engagement and the fee is so low that it might be difficult to perform the professional service in accordance with applicable technical and professional standards for that price.
- A professional accountant having a close business relationship with a client.
- A professional accountant having access to confidential information that might be used for personal gain.
- A professional accountant discovering a significant error when evaluating the results of a previous professional service performed by a member of the accountant's firm.

(b) Self-review Threats

- A professional accountant issuing an assurance report on the effectiveness of the operation of financial systems after implementing the systems.
- A professional accountant having prepared the original data used to generate records that are the subject matter of the assurance engagement.

(c) Advocacy Threats

- A professional accountant promoting the interests of, or shares in, a client.
- A professional accountant acting as an advocate on behalf of a client in litigation or disputes with third parties.
- A professional accountant lobbying in favor of legislation on behalf of a client.

(d) Familiarity Threats

- A professional accountant having a close or immediate family member who is a director or officer of the client.
- A director or officer of the client, or an employee in a position to exert significant influence over the subject matter of the engagement, having recently served as the engagement partner.
- An audit team member having a long association with the audit client
- An individual, who serves as an appropriate reviewer on an engagement, having a close relationship with the engagement partner.

(e) Intimidation Threats

- A professional accountant being threatened with dismissal from a client engagement or the firm because of a disagreement about a professional matter.
- A professional accountant feeling pressured to agree with the judgment of a client because the client has more expertise on the matter in question.
- A professional accountant being informed that a planned promotion will not occur unless the accountant agrees with an inappropriate accounting treatment.
- A professional accountant having accepted a significant gift from a client and being threatened that acceptance of this gift will be made public.

Evaluating Threats

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Addressing Threats

300.8 A1 Paragraphs R120.10 to 120.10 A2 set out requirements and application material for addressing threats that are not at an acceptable level.

Examples of Safeguards

300.8 A2 Safeguards vary depending on the facts and circumstances. Examples of actions that in certain circumstances might be safeguards to address threats include:

- Assigning additional time and qualified personnel to required tasks when an engagement has been accepted might address a self-interest threat.
- Having an appropriate reviewer who was not a member of the team review the work performed, or advise as necessary might address a self-review threat.
- Using different partners and engagement teams with separate reporting lines for the provision of non-assurance services to an assurance client might address self-review, advocacy or familiarity threats.
- Involving another firm to perform or re-perform part of the engagement might address self-interest, self-review, advocacy, familiarity or intimidation threats.

- Disclosing to clients any referral fees or commission arrangements received for recommending services or products might address a self-interest threat.
- Separating teams when dealing with matters of a confidential nature might address a self-interest threat.

300.8 A3 The remaining sections of Part 3 and *International Independence Standards* describe certain threats that might arise during the course of performing professional services and include examples of actions that might address threats.

~~Appropriate Reviewer~~

~~300.8 A4 — An appropriate reviewer is a professional with the necessary knowledge, skills, experience and authority to review, in an objective manner, the relevant work performed or service provided. Such an individual might be a professional accountant.~~

~~This term is described in paragraph 300.8 A4.~~

The below text is shown as marked up against the text in the ED.

SECTION 325

OBJECTIVITY OF APPROPRIATE REVIEWERS

Introduction

325.1 Professional accountants are required to comply with the fundamental principles and apply the conceptual framework set out in Section 120 to identify, evaluate and address threats.

325.2 A professional accountant in public practice might appoint an appropriate reviewer to review work performed in an audit, other assurance or non-assurance engagement for different purposes, for example:

- To apply a safeguard against threats to compliance with the fundamental principles or, where applicable, to independence.
- To meet a quality management objective under [proposed] ISQM 1 or other applicable quality framework.

325.3 An appropriate reviewer is a professional with the necessary knowledge, skills, experience and authority to review, in an objective manner, the relevant work performed or service provided by a firm or an individual professional accountant. Such an appropriate reviewer might be a professional accountant. An engagement quality reviewer appointed under [proposed] ISQM 2 is an appropriate reviewer.

325.4 This section sets out specific application material relevant to applying the conceptual framework in relation to the objectivity of an appropriate reviewer.

Application Material

Engagement Quality Reviews

~~120.14 A1—Quality engagements are achieved through planning and performing engagements and reporting on them in accordance with professional standards and applicable legal and regulatory requirements. [Proposed] ISQM 1 establishes a firm's responsibilities for its system of quality management and requires the firm to design and implement responses to assessed quality risks related to engagement performance. Such responses include establishing policies or procedures addressing engagement quality reviews in accordance with ISQM 2.~~

Identifying Threats

325.5 A1+20.14 A2 Threats to compliance with the fundamental principle of objectivity might be created in certain circumstances in which an individual professional accountant is appointed as an appropriate engagement quality reviewer. The following are examples of threat that might be created:

- Self-interest threat
 - Two engagement partners individuals who each who serves as an engagement quality appropriate reviewer for the each other's engagement.

(b) Self-review threat

- ~~The A professional~~ accountant serves as an ~~engagement quality appropriate~~ reviewer on an audit engagement after previously serving as the engagement partner ~~or other engagement team member~~.

(c) Familiarity threat

- ~~The An individual~~ accountant who serves as an appropriate engagement quality reviewer has a ~~long association or~~ close relationship with, or is an immediate family member of, ~~an audit team member~~ another individual who is involved in the engagement.

(d) Intimidation threat

- ~~An individual The accountant~~ who serves as an appropriate engagement quality reviewer for an ~~audit~~ engagement ~~also~~ has a direct reporting line to the ~~engagement partner~~ responsible for the engagement.

Evaluating Threats

325.6 A1420.14 A3 Factors that are relevant in evaluating the level of ~~such~~ threats to the objectivity of an individual being considered for appointment as an appropriate reviewer include:

- The role and seniority of the ~~individual professional accountant~~.
- The nature of the individual's relationship with others involved on the engagement.
- The length of time the individual was previously involved with the engagement and the individual's role.
- When The length of time since the accountant individual was last a member of involved in the engagement team prior to being appointed as appropriate engagement quality reviewer and any subsequent relevant changes to the circumstances of the engagement.
- The nature and complexity of issues that required significant judgment from the ~~individual accountant in any when~~ previously involvement a member of in the engagement ~~team~~.

Addressing Threats

325.7 A1420.14 A4 Examples of ~~safeguards or~~ actions that might be safeguards to address such threats include:

- Implementing a period of sufficient duration (a cooling-off period) before the ~~professional accountant individual who was on the engagement team~~ is appointed as an engagement quality appropriate reviewer.
- ~~Having an appropriate reviewer review specific areas of significant judgment.~~
- Reassigning reporting responsibilities within the firm.

325.7 A2 [Proposed] ISQM 2 sets out a requirement for firms to establish policies or procedures to specify a cooling-off period to address threats to objectivity created by an individual being

appointed as an engagement quality reviewer after previously serving as the engagement partner.