

SRA
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The Netherlands

Mr. Ken Siong,
Technical director,
International Ethics Standards Board for Accountants (IESBA)
545 Fifth Avenue, 14 th Floor,
New York
USA

Nieuwegein, 1 September 2015

Re : IESBA Exposure Draft : Responding to Non-Compliance with Laws and Regulations

Dear Mr. Siong,

SRA is pleased to provide you with its comments on the above ED.

As communicated to you earlier in our 14 December 2012 response to the 2012 ED on the same subject, we believe that any reporting to relevant authorities by a professional accountant in public practice regarding suspected illegal acts should be dealt with in law and not in a Code for professional accountants.

We noted, that the present ED takes a different approach on the subject than the earlier ED. The approach proposed now entails a determination by the professional accountant whether disclosure to a relevant authority is in the public interest. This approach is in clear contradiction with our view, that reporting should be limited to reporting, mandated by law. In addition we believe that the approach, proposed in the ED, is complex and the outcome is subjective.

We advise to seriously consider to limit reporting to relevant authorities to reporting, mandated by law.

Yours sincerely,

Paul Dinkgreve,
Chairman SRA