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Proposed Changes to Part C of the Code Addressing Presentation of Information and Pressure to Breach the Fundamental Principles

I am Denise Juvenal this is pleased to have the opportunity to comment on this consultation Proposed Changes to Part C of the Code Addressing Presentation of Information and Pressure to Breach the Fundamental Principles. This is my individual commentary for International Ethics Standards Board for Accountants – IESBA-IFAC. I agree with this exposure draft.

Request for Specific Comments

The IESBA would welcome views on the following specific questions:

Proposed Revised Section 320

- 1. Is the enhanced guidance on applying the “fair and honest” principle in Section 320 helpful?**

Yes, the enhanced guidance on applying the “fair and honest” principle in Section 320 is helpful, so considering the principal problems in relation the corruption around the world I understand that these principles are important and responsible.

Although, the Transparency International elaborated survey how you think we should stop corruption¹, I believe that this discussion can improve this process for reduction of corruption.

So, ethics, transparency, accountability and responsibility depend of good development of culture and governance of the business organization, in my opinion, if the Board's agrees.

2. In particular, do respondents support the guidance in paragraph 320.3 addressing the issue of misuse of discretion in a manner that is intended to mislead? If not, please explain why. Are there any other considerations relating to this issue that should be addressed in Section 320?

Yes, I support the guidance in paragraph 320.3 addressing the issue of misuse of discretion in a manner that is intended to mislead.

There are not other considerations relating to this issue that should be addressed in Section 320.

3. Paragraph 320.4 provides guidance as to what PAIBs are expected to do ethically in order to prepare or present fairly and honestly information that does not have to comply with a relevant reporting framework. Is this guidance sufficient? If not, what further guidance could Section 320 usefully provide?

Yes, I think that is sufficient for this moment, the paragraph 320.4 provides guidance as to what PAIBs are expected to do ethically in order to prepare or present fairly and honestly information that does not have to comply with a relevant reporting framework.

I understand that this discussion needs to improve after conclusion about Reporting 2025² elaborated by Global Reporting G4 because I do not know if this report is considering ethical values in relation the connection of financial statements reporting and sustainability reporting, resulting in high quality auditor reporting if the Board's agrees.

¹ https://www.transparency.org/news/feature/have_your_say_in_how_we_stop_corruption

² <https://www.globalreporting.org/information/Pages/Reporting-2025.aspx>

- 4. Do respondents agree that where a PAIB relies on the work of others, the PAIB should be required to take reasonable steps to be satisfied that such work enables the PAIB to comply with the overarching principle in paragraph 320.2?**

Yes, I agree that where a PAIB relies on the work of others, the PAIB should be required to take reasonable steps to be satisfied that such work enables the PAIB to comply with the overarching principle in paragraph 320.22.

- 5. Do respondents agree with the guidance proposed in paragraphs 320.6 and 320.7 regarding disassociation with misleading information? Are there other actions that could be specified?**

Yes, I agree with the guidance proposed in paragraphs 320.6 and 320.7 regarding disassociation with misleading information.

No. There are not other actions that could be specified.

Proposed Section 370

- 1. Do respondents agree with the overarching requirements in paragraphs 370.1 and 370.2?**

I agree with the overarching requirements in paragraphs 370.1 and 370.2.

- 2. Are the illustrative examples of types of pressure that could result in a breach of the fundamental principles in paragraph 370.4 helpful?**

Yes, the illustrative examples of types of pressure that could result in a breach of the fundamental principles in paragraph 370.4 are helpful.

- 3. Is it sufficiently clear that Section 370 addresses pressure that could result in a breach of fundamental principles, as opposed to the routine pressures that exist in the workplace? In particular, does paragraph 370.5 provide sufficient guidance to assist the PAIB in making that distinction? If not, what other considerations should the PAIB take into account?**

Yes, it is sufficiently clear that Section 370 addresses pressure that could result in a breach of fundamental principles, as opposed to the routine pressures that exist in the workplace.

Yes, the paragraph 70.5 does provide sufficient guidance to assist the PAIB in making that distinction.

No, there are not other considerations should the PAIB take into account.

4. Do respondents find the guidance in paragraph 370.6 on responding to pressure that would result in a breach of the fundamental principles helpful? Are there other actions that should be considered?

Yes, I find the guidance in paragraph 370.6 on responding to pressure that would result in a breach of the fundamental principles helpful.

No, there are not other actions that should be considered.

5. Are the references to other sections of Part C of the Code, in paragraph 370.9, helpful?

Yes, the references to other sections of Part C of the Code, in paragraph 370.9 are helpful.

Request for General Comments

In addition to the request for specific comments above, the IESBA is also seeking comments on the matters set out below:

(a) *Preparers (including Small and Medium Entities), and users (including regulators)*—The IESBA invites comments on the proposed changes from preparers (particularly with respect to the practical impacts of the proposed changes), and users.

I agree that these proposed changes including for training and development from preparers (including small and medium entities), and users (including regulators).

(b) *PAIBs working in the public sector*— Recognizing that many PAIBs work in the public sector, the IESBA invites respondents from this

constituency to comment on the proposed changes, and in particular, on their applicability and usefulness in a public sector environment.

I agree that these proposed changes including PAIBs working in the public sector – recognizing that many PAIBs work in the public sector, I consider extremely important for this moment.

(c) *Developing Nations*—Recognizing that many developing nations have adopted or are in the process of adopting the Code, the IESBA invites respondents from these nations to comment on the proposals, and in particular, on any foreseeable difficulties in applying them in their environment.

I agree with recognizing that many developing nations have adopted or are in the process of adopting the Code.

(d) *Translations*—Recognizing that many respondents may intend to translate the final changes for adoption in their own environments, the IESBA welcomes comment on potential translation issues respondents may note in reviewing the proposed changes.

I agree with translations the recognizing that many respondents may intend to translate the final changes for adoption in their own environments.

Thank you for opportunity for comments this proposal, if you have questions do not hesitate contact to me, rio1042370@terra.com.br.

Yours,

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