

Denise Silva Ferreira Juvenal

rio1042370@terra.com.br

Accountant

Commentary individual

Rio de Janeiro / Brazil

Sir

Chair and Steering Committee

Technical Manager

IESBA Code of Ethics for Professional Accountants (the Code).

The International Ethics Standards Board for Accountants (IESBA)

International Federation of Accountants

janmunro@ethicsboard.org.

October 31, 2012

Proposed Change to the Definition of “Those Charged with Governance”

I’m Denise Juvenal this is pleased to have the opportunity to comment on this consultation **Proposed Change to the Definition of “Those Charged with Governance”**. This is my individual commentary for IFAC-IES.

Guidance to Respondents

The IESBA welcomes comments on all matters addressed in the Exposure Draft. Comments are most helpful when they include the reasons for the comments, and, where appropriate, make specific suggestions for any proposed wording changes. When a respondent agrees with proposals in the Exposure Draft (especially those calling for modification in current practice), it is helpful for the IESBA to be made aware of this view.

The IESBA would welcome views on the following questions:

- 1. Do respondents agree with the proposed change to more closely align the definition of “those charged with governance” to the definition contained in ISA 260, Communication with Those Charged with Governance?**

I agree with the proposed change to more closely align the definition of “those charged with governance”.

2. Do respondents agree that in each case as noted in the Exposure Draft, communication to “those charged with governance or a subgroup thereof” would be appropriate?

I agree that in each case as noted in the Exposure Draft communication, but I have doubt in relation which people will be have access of the informations and reporting (communication) elaborated for internal audit and external audit for clients.

I think that in relation the discussion rotation of audit firms, this consideration need to be observed with results of PCAOB¹ and European Commission² for don't have problems in relation the important viewpoints about internal control, that can be impact the audit work (internal or external).

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

Yours,

Denise Silva Ferreira Juvenal

rio1042370@terra.com.br

552193493961

¹ http://pcaobus.org/News/Events/Pages/10182012_PublicMeeting.aspx and <http://pcaobus.org/Rules/Rulemaking/Pages/Docket037.aspx>

² http://ec.europa.eu/internal_market/auditing/reform/index_en.htm