

29 October 2012

International Ethics Standards Board for Accountants
529 Fifth Avenue, 6th Floor
New York, NY 10017 USA

(By email: janmunro@ethicsboard.org)

Dear Sirs,

RESPONSE TO THE PROPOSED CHANGE TO THE DEFINITION OF “THOSE CHARGED WITH GOVERNANCE”

The Institute of Certified Public Accountants of Singapore (ICPAS) appreciates the opportunity to comment on the proposed change to the International Ethics Standards Board for Accountants (IESBA) *Code of Ethics for Professional Accountants* (the Code) on the definition of “those charged with governance”, issued by IESBA in July 2012.

Question 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*?

We agree with the proposed change to align closely the definition of “those charged with governance” in the Code to that in ISA 260. We agree that this would enhance clarity, which otherwise could result in different interpretations to the definition and scope of “those charged with governance”.

Question 2

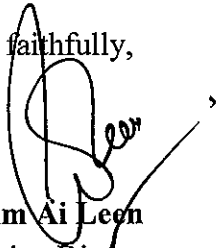
Do respondents agree that in each case as noted in the Exposure Draft, communication to “those charged with governance or a subgroup thereof” would be appropriate?

We agree with the proposed change. This change will reflect common practice by recognising that communications with a subgroup of those charged with governance constitute communications with those charged with governance. However, as ISA 260 does not make reference to the subgroup throughout the standard when it refers to communication

with those charged with governance, we propose that IESBA discuss with the International Auditing and Assurance Standards Board to consider similar changes to be made to ISA 260.

Should you require any further clarification, please feel free to contact Mr Kang Wai Geat, Deputy Head, Technical Standards Development and Advisory, or Ms Fua Qiu Lin, Manager, Technical Standards Development and Advisory, from ICPAS via email at waigeat.kang@icpas.org.sg or qiulin.fua@icpas.org.sg respectively.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Ms Lim Ai Leen', written over a large, faint circular watermark or stamp.

Ms Lim Ai Leen
Executive Director

Technical Knowledge Centre and Quality Assurance
Institute of Certified Public Accountants of Singapore