

July 16, 2018

Mr Ken Siong
Senior Technical Director
International Ethics Standards Board for Accountants
International Federation of Accountants
529 5th Avenue, 6th Floor
New York, New York 10017
United States of America

Via Online Submission

Dear Mr Ken Siong

**COMMENTS ON IESBA CONSULTATION PAPER,
PROPOSED STRATEGY AND WORK PLAN, 2019-2023**

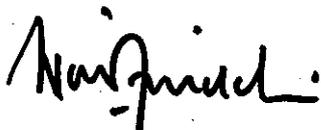
We thank you for the opportunity to comment on IESBA Consultation Paper, *Proposed Strategy and Work Plan, 2019-2023*.

In this regard, we are pleased to attach the Institute's comments as set out in Appendix I for your consideration.

Please do not hesitate to contact the undersigned or the Institute's Senior Technical Manager, Ms Hoh Kim Hyan, at +603-2698 9622 should you require any clarification.

Thank you.

Yours sincerely



NOVIE TAJUDDIN
Chief Executive Officer

THE MALAYSIAN INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS
(INSTITUT AKAUNTAN AWAM BERTAULIAH MALAYSIA)

International Ethics Standards Board for Accountants

Proposed Strategy and Work Plan, 2019-2023

Questionnaire

The consultation paper seeks views from all stakeholders on the IESBA's proposed strategy for 2019-2023, and the proposed actions and priorities (work plan) to implement the strategy. The IESBA invites comments on any aspect of its proposed strategy and work plan.

Question 1

Do you agree with the proposed criteria for the IESBA to determine its actions and priorities over the strategy period?

MICPA's Comments:

Yes the Institute agrees with the proposed criteria for the IESBA to determine its actions and priorities over the strategy period.

Given that IESBA intends its SWP to be dynamic and responsive to public interest, the Institute would like to emphasise the importance of defining "public interest" as this would ensure the SWP has the right and appropriate focus.

Question 2

Do you support the actions that have been identified with respect to each strategic theme? If not, please explain why.

MICPA's Comments:

Yes, the Institute supports the actions that have been identified with respect to each strategic theme.

Question 3

Recognizing that this proposed strategy and work plan (SWP) is ambitious, do you believe the IESBA should accelerate or defer any particular work stream(s)? If so, please explain why.

MICPA's Comments:

The Institute does not have any objection to the proposed strategy and work plan. However, given that the Code is equally applicable to both PAPPs and PAIBs, there should be a balance as it would appear that the priorities are skewed towards areas affecting the PAPPs with less emphasis on those impacting the PAIBs.

Question 4

Do you have comments on any other matters addressed in this consultation paper or any significant matters not covered in this consultation paper that you believe the IESBA should address?

MICPA's Comments:

The gap between public's expectation of the ethics to be adopted by professional accountants' and the code of ethics professional accountants abide by appears not to have narrowed over time.

In this regard, the Institute has the following suggestions/comments:

1. The IESBA, together with IAASB and IAESB, should as a priority continue to have more engagements with stakeholders to ensure that the purpose and mission of the IESBA are fully understood and appreciated.
2. The Code should be given more emphasis in the curriculum of accounting and auditing degrees to embed the importance of having a firm foundation of ethics on par with technical excellence.
3. As mentioned, the Code presently appears to govern PAPPs more than PAIBs. As indicated, there needs to be a balance as more and more regulations for those in public practice may enforce the perception that being in public practice is no longer attractive which could result in undesired consequences.
4. There have been cases where it might be permissible under the Code for professional accountants to undertake certain assignments but in the eyes of the public, as unethical bordering on mercenary. The Code should consider including guidance for such situations.