



For the attention of Mr. Willie Botha
Technical Director
International Auditing and Assurance Standards Board
529 Fifth Avenue, 6th Floor
New York, New York, 10017
USA

[Submitted via IAASB website]

10 January 2020

Dear Mr. Botha,

IAASB Exposure Draft: Conforming Amendments to the IAASB International Standards as a Result of the Revised IESBA Code

We¹ appreciate the opportunity to comment on the above Exposure Draft (ED).

Effective coordination between IAASB and IESBA is essential to the successful and timely delivery of the Boards' respective projects. Ensuring that the IAASB Handbook reflects appropriate and accurate references to the revised IESBA Code is important in supporting consistent understanding and effective application of the International Standards and relevant ethical requirements.

We support the proposed amendments and believe they are sufficient to resolve actual or perceived inconsistencies between the IAASB's International Standards and the changes made by IESBA in issuing the revised IESBA Code (*question 1*). We include within the appendix to this letter some editorial suggestions for certain proposed changes to aid their clarity.

Given the nature of the proposed changes, we agree that the proposed effective date of 90 days after approval by the PIOB is appropriate (*question 2*).

If you have any questions regarding this letter, please contact Diana Hillier, at diana.hillier@pwc.com, or me, at james.chalmers@pwc.com.

Yours sincerely,

A handwritten signature in black ink that reads 'James Chalmers'.

James Chalmers
Global Assurance Leader

¹ This response is being filed on behalf of the network of member firms of PricewaterhouseCoopers International Limited and references to "PwC", "we" and "our" refer to the PwC network of member firms.

PricewaterhouseCoopers International Limited
1 Embankment Place
London WC2N 6RH
T: + 44 (0)20 7583 5000, F: + 44 (0)20 7822 4652

Appendix 1 - Editorial suggestions

Suggested deletions are shown in strikethrough and additions in underline.

Glossary (and other paragraphs as indicated)

We suggest reordering the description of the Code to refer first to the title of the Code and secondly to the issuing body. We believe this aids readability:

Relevant ethical requirements (in the context of ISQC 1) — Ethical requirements to which the engagement team and engagement quality control reviewer are subject when undertaking audits or reviews of financial statements, or other assurance or related services engagements, which ordinarily comprise the provisions of the ~~International Ethics Standards Board for Accountants’ International Code of Ethics for Professional Accountants (including International Independence Standards)~~ issued by the International Ethics Standards Board for Accountants (IESBA Code) together with national requirements that are more restrictive.

The same change would also apply to:

- the definitions of “relevant ethical requirements” in the context of the ISAs, ISRE 2400 (Revised) and ISRS 4400 (Revised) within the Glossary
- ISQC 1 paragraph 12q
- ISA 200 paragraph A16
- ISA 220 paragraph 7(n)
- ISA 240 paragraph A6
- ISA 250 (Revised) paragraph A8
- ISA 260 (Revised) paragraph A31
- ISA 600 Appendix 1
- ISA 610 (Revised 2013) paragraph A14, footnote 17
- ISA 700 (Revised) paragraph 28 and illustrative reports (various)
- ISA 720 (Revised) paragraph 4, footnote 2
- ISA 810 paragraph A13, footnote 14
- IAPN 1000 paragraph 78, footnote 16
- ISRE 2400 (Revised) paragraph 17(i)
- ISAE 3000 (Revised) paragraphs 3 and A173
- ISAE 3402 paragraph 6 and Appendix 2
- ISAE 3410 paragraph 10 and Appendix 2
- ISAE 3420 paragraph 8 and Appendix
- ISRS 4400 (Revised) paragraphs 7 and 17(g) and Appendix

ISQC 1 para 25

As the threat in question is not defined until later in the sentence, use of “threat” in the initial part of the sentence has no context:

The firm shall establish policies and procedures: (Ref: Para. A10)

- (a) *Eliminating, ~~the threat~~ or setting out criteria for applying safeguards to reduce to an acceptable level, the threat of the long association with an entity ~~to an acceptable level~~, when using the same senior personnel on an assurance engagement over a long period of time.*