

## GENERAL MATTERS

1. Where law or regulation requires the reporting of identified or suspected NOCLAR to an appropriate authority, do respondents believe the guidance in the proposals would support the implementation and application of the legal or regulatory requirement?

I consider that the measures or consequences for engaging in an act of non-compliance are clear and help his legal application also is structured in a way that can identify cases and is due to meet.

2. Where there is no legal or regulatory requirement to report identified or suspected NOCLAR to an appropriate authority, do respondents believe the proposals would be helpful in guiding PAs in fulfilling their responsibility to act in the public interest in the circumstances?

I believe that the breakdown by category of the professional accountant about their actions before a failure and duty to give its shares to the public interest to correct reporting the case to the competent authority is specified.

3. The Board invites comments from preparers (including TCWG), users of financial statements (including regulators and investors) and other respondents on the practical aspects of the proposals, particularly their impact on the relationships between:

- a) Auditors and audited entities;

For auditors should implement a process to monitor, report and determine actions in the event of a breach, your responsibility is greater when informing the competent authority.

For companies audited new obligations to follow; as presented in the report or semi-annual or annual reports the breaches and its actions to remedy or mitigate the event.

- b) Other PAs in public practice and their clients; and

In case of noncompliance identified by the professional accountant should inform management, trusted person in the company to remedy the breach.

- c) PAIBs and their employing organizations

Very similar to the above is due to present a report to the administration, monitoring for the mitigation of default.

## SPECIFIC MATTERS

4. Do respondents agree with the proposed objectives for all categories of PAs?

Is correctly determinated, I think that they cover all cases would be missing only indicating examples of each, for example and where accountants working in the government sector, or those who work in civil associations be grouped.

5. Do respondents agree with the scope of laws and regulations covered by the proposed Sections 225 and 360?

Yes I consider the scope and regulations are well identified, however in the case of the scope of the laws think you should first go through an evaluation if you really must notify a public authority, not to harm the company or partnership if that the breach is not significant or have a low impact; and which can be resolved within the company.

6. Do respondents agree with the differential approach among the four categories of PAs regarding responding to identified or suspected NOCLAR?

- AUDITORS
- SENIOR PAIBS
- PAS IN PUBLIC PRACTICE PROVIDING SERVICES OTHER THAN AUDITS
- OTHER PAIBS

I consider appropriate differentiation approach that made the last classification includes counters that provide various services to accounting or auditing, such as managers in other areas of the company. Just I consider any breakdown in the example section of professional accountants included in each category.

7. With respect to auditors and senior PAIBs:

(a) Do respondents agree with the factors to consider in determining the need for, and the nature and extent of, further action, including the threshold of credible evidence of substantial harm as one of those factors?

I agree, I think the factors cover the possible activities that may present the professional accountant, to include whether there is substantial damage is key to measuring the impacts acts against business ethics.

- (b) Do respondents agree with the imposition of the third party test relative to the determination of the need for, and nature and extent of, further action?

I agree because it is important the opinion of a third party who has not been involved in the operation and serves as deliberate Review whether there is truly an act against the code of ethics, or determining whether to inform a public authority.

- (c) Do respondents agree with the examples of possible courses of further action? Are there other possible courses of further action respondents believe should be specified?

This should include presenting a report of the finding or improvement was found in the process to make the public interest for it to be reviewed by a competent authority

- (d) Do respondents support the list of factors to consider in determining whether to disclose the matter to an appropriate authority?

I think it is not necessary that the company is public or publicly traded, must apply in any case in which they are committing an act against business ethics. It should confirm that there is no authority in the country with the authority to pursue the case to determine whether to make any fine or penalty. Submit a remedial action or mitigation of default.

8. For PAs in public practice providing services other than audits, do respondents agree with the proposed level of obligation with respect to communicating the matter to a network firm where the client is also an audit client of the network firm?

I think it must have the same level of obligation should be to identify since we are committed to comply with a code of ethics alike. No matter what level impact people should govern the possibility of identifying any act or malpractice

9. Do respondents agree with the approach to documentation with respect to the four categories of PAs?

The auditor for the role it is playing, must comply with the actions included in the code, I think it is very complete and is the least we should cover. For the rest of the categories the documentation requested is complete

## Request for General Comments

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

- (a) *PAIBs working in the public sector*— Recognizing that many PAIBs work in the public sector, the Board invites respondents from this constituency to comment on the revised proposals and, in particular, on their applicability in a public sector environment.

In Mexico it has a limitation in the absence of guidelines regarding authority exercising control and acts against the code of business ethics for public sector. There is exerting pressure audits to assess compliance of processes; however you do not have a guideline for professional accountants who provide services to the public sector.

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

The main difficulty is the adoption of this code because it has institutions with their own codes, as well as in Mexico so that it can apply to go through the approval of the chamber of deputies and senators for it to become law.

We do not have a body to regulate enterprises in terms of ethics or corruption which sanctions are applied for misuse is not allowed.

- (c) *Translations*—Recognizing that many respondents may intend to translate the final pronouncement for adoption in their environments, the Board welcomes comment on potential translation issues respondents may note in reviewing the revised proposals.

Further examples of the implications in each country in the implementation of a new code of ethics could help illustrate the proposals and not leave him alone to translation