
MEMO

SLF

Date: November 11, 2014

To: Ken Siong – IESBA Technical Director

From: Jonathan Ragnauth – Independence Officer - Schwartz Levitsky Feldman LLP – Toronto, Ontario, Canada

Subject: **Comments on Proposed Changes to Certain Provisions of the Code Addressing the Long Association of Personnel with an Audit or Assurance Client**

- Our firm has only a few people with the necessary knowledge and experience to serve as key audit partners on the audits of public interest entities, therefore partner rotation on these audits would create a burden on the firm. As such, we are pleased to read that the exceptions as set out in 290.153 have been retained in the proposed changes; perhaps this section should be given some prominence in the proposed changes or appropriately cross-referenced as necessary.
- We agree that the proposed safeguards to eliminate the threat or reduce it to an acceptable level for “Long association of Personnel (including partner rotation) as it pertains to **non-public audit clients** is reasonable i.e. leaving it up to the judgment of the firm. (291.137D).