

International Ethics Standards Board for Accountants  
International Federation of Accountants  
545 Fifth Avenue, 14<sup>th</sup> Floor  
New York, New York 10017 USA

27 July 2012

Dear Sir/Madam

**Exposure Draft – Proposed Change to the Definition of “Those Charged with Governance”**

On behalf of RSM International Limited, a global network of independent accounting and consulting firms, we are pleased to have the opportunity to respond to your request for specific comments on the aforementioned Exposure Draft issued by the IESBA in July 2012.

In general it is important that standards issued by IFAC’s International Standard Setting Boards are consistent and include requirements and guidance that are complementary with one another.

**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?**

Yes, we agree with the proposed change to more closely align the definition.

**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?**

Yes, we agree that the proposed cases are appropriate.

We would be pleased to discuss our comments further with members of the IESBA or its staff. If you wish to do so, please contact Robert Dohrer (tel: +44 207 601 1080; email: [robert.dohrer@rsmi.com](mailto:robert.dohrer@rsmi.com)).

Yours sincerely



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