

## BACKGROUND NOTE ON ACTION PLANS

The SMO Action Plan is intended to provide a summary of:

1. The legal and regulatory environment for the profession;
2. The status of adoption of international standards and best practices in the jurisdiction; and
3. The actions undertaken by IFAC Members and Associates to support adoption and implementation of international standards and best practices and fulfill the membership requirements.

IFAC [Statements of Membership Obligations](#) (SMOs) require IFAC Members and Associates to support the adoption<sup>1</sup> and implementation<sup>2</sup> of international standards and other pronouncements issued by independent standard-setting boards (IAASB, IESBA, IPSASB), and the IES, as well as by the International Accounting Standards Board (IASB); and to establish a quality assurance (QA) review and investigation and disciplinary (I&D) systems. The SMOs are recognized as the international benchmarks for credible and high-quality PAOs that are focused on and have the necessary expertise to serve the public interest and meet the market demands of their respective jurisdictions.

IFAC Members and Associates conduct a self-assessment against the requirements of SMOs and identify areas where, if any, improvements are needed. Members and Associates should develop an Action Plan to (a) demonstrate how they fulfill the requirements of the SMOs and (b) where some requirements are not yet addressed, to present plans towards their fulfillment. Action Plans are designed to be ever-green documents that take into consideration IFAC recommendations. Depending on the PAO's level of fulfillment, an Action Plan may not be necessary for each SMO section and instead the '*Attestation of Ongoing SMO Compliance*' is used to confirm their ongoing commitments. However, PAOs may wish and are welcome to utilize the Action Plan as a tool to demonstrate how they are using 'best endeavors' and going beyond their mandate with innovative approaches to fulfilling the SMOs and strengthening the national profession.

The specific details of each organization's actions will vary even where two PAOs are involved in the same SMO area. Each PAO operates in its own unique regulatory and standard-setting framework and has different operating, technical, and resource capacities. Moreover, in deciding when and how a particular SMO requirement is to be addressed, PAOs might have differing timeframes and objectives to achieve. Notwithstanding these inevitable differences, seeking the advice and assistance of other PAOs who have already faced and dealt with similar challenges can save significant time and resources. IFAC staff will offer assistance as needed.

### Use of Information

Please refer to the [Disclaimer](#) published on the IFAC website.

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<sup>1</sup> *Adoption* is concerned with the decision that international standards are appropriate for use in specific national financial reporting environments and with the actions necessary to affect those decisions, including incorporation into national requirements or requiring the use of international standards through law. Adoption may include a process to review draft international standards, translation, public exposure of proposed standards, approval, incorporation into national requirements as necessary, and promulgation of final standards, and, where applicable, a convergence process to eliminate or minimize differences between international and national standards.

<sup>2</sup> *Implementation* may include a process to build awareness of the adopted standards, provide relevant education and training, develop, or disseminate implementation guidance and any other activities that promote proper understanding and use of the standards in practice.

The regular updates of the SMO Action Plans are required as part of the [IFAC Member Compliance Program](#). The SMO Action Plans are also essential to IFAC's [reporting on the global status of international standards](#). The SMO Action Plans are a key source of information that IFAC utilizes as part of its process and methodology for [assessing the status of adoption of international standards in each member jurisdiction](#) in collaboration with the international independent standard-setting boards. IFAC also assesses the adoption, implementation support, and other best practices (also known as SMO Fulfillment) for [each IFAC member organization](#) utilizing information contained in the SMO Action Plans along with a plethora of third-party sources. This information is summarized in Dashboard Reports (DBRs) which are updated by IFAC alongside each SMO Action Plan submission. Therefore, it is important that the SMO Action Plan contains the most up-to-date, relevant information and actions related to the SMOs.

## **ACTION PLAN**

<b>IFAC Associate:</b>	Ordre National des Experts Comptables et des Comptables Agréés au Togo (ONECCA-TOGO)
<b>Approved by Governing Body:</b>	ONECCA-TOGO Council
<b>Original Publish Date:</b>	October 2013
<b>Last Updated:</b>	December 2024

## **Attestation of SMO Compliance**

The ***Ordre National des Experts Comptables et des Comptables Agréés au Togo (ONECCA-TOGO)*** has developed an Action Plan to demonstrate how it fulfills the requirements of the SMOs. The abovementioned *Governing Body* has reviewed the information contained within the SMO Action Plan and affirms that the ***ONECCA-TOGO*** continues to undertake these and other relevant actions to maintain ongoing compliance and fulfillment of the membership obligations where IFAC's assessments are at *Review & Improve* and/or *Sustain*. In areas where IFAC's assessments are at *Execute, Plan, Consider, or Not Active* the ***ONECCA-TOGO*** has updated the Action Plan to reflect the specific actions to adopt or support adoption and support implementation that must be taken to achieve the improvement accompanied by a timeline.

On behalf of the ***ONECCA-TOGO***, the *Governing Body* endorses the information contained within the SMO Action Plan as of the publication date and its publication on the IFAC website in the interests of transparency and to demonstrate our commitment to enhancing the quality and credibility of the accountancy profession worldwide.

## **GLOSSARY**

<b>AUDCIF</b>	OHADA Uniform Act on Accounting Law and Financial Information
<b>CAMES</b>	Conseil Africain et Malgache pour l'Enseignement Supérieur/African and Malagasy Council for Higher Education
<b>CCIT</b>	Chambre de Commerce et d'Industrie du Togo
<b>CCOA</b>	Conseil Comptable Ouest Africain (West African Accounting Council)
<b>CNC</b>	Conseil National de la Comptabilité
<b>CNC-OHADA</b>	Commission de Normalisation Comptable
<b>CNP</b>	Conseil National du Patronat
<b>CPPC</b>	Conseil Permanent de la Profession Comptable
<b>DDPI</b>	Département pour le Développement des Partenariats Internationaux
<b>DECOFI</b>	Diplôme d'Expertise Comptable et Financière
<b>DECOGEF</b>	Diplôme d'Etudes de comptabilité et Gestion Financière
<b>DESCOGEF</b>	Diplôme d'Etudes Supérieures de Comptabilité et Gestion Financière
<b>IAASB</b>	International Auditing and Assurance Standards Board
<b>IES</b>	International Education Standards
<b>IFRS</b>	International Financial Reporting Standards
<b>IGE</b>	Inspection Général d'Etat
<b>IPSAS</b>	International Public Sector Accounting Standards
<b>ISA</b>	International Standards on Auditing
<b>MEF</b>	Ministère de l'Economie et des Finances
<b>OHADA</b>	Organisation pour l'Harmonisation en Afrique du Droit des Affaires/ Organization for the Harmonization of Business Law in Africa
<b>PCE</b>	Plan Comptable de l'Etat / State Accounting Standards
<b>QA</b>	Quality Assurance
<b>ROSC</b>	Report on Observance of Standards and Codes
<b>SMO</b>	Statement of Membership Obligations
<b>SYSCOA</b>	Système Comptable Ouest Africain
<b>SYSCOHADA</b>	Système Comptable OHADA
<b>UEMOA/WAEMU</b>	Union Économique et Monétaire Ouest Africaine / West African Economic and Monetary Union

**Action Plan Subject:** SMO 1–Quality Assurance  
**Action Plan Objective:** Development of a mandatory QA review system

**Background:**

**Regional**

The World Bank financed in 2011 a project for the implementation of a QA review system in the West African Economic and Monetary Union (WAEMU) countries. The World Bank grant PACI (Project to improve business climate in OHADA area) to OHADA on June 21 2012, has been successfully completed and the 17 OHADA member states are from now on governed by the outcomes of the review as far as the IFAC ISQC 1 was adopted and a QAS guide developed. Anticipating the subsequent tools and guidance on ISQC 1 (guidance, soft, hard, publications, questionnaires, templates, technical solutions, etc.) developed by the selected Consultant from the French Department for the Development of International Partnerships (DDPI), and on behalf of WAEMU, ONECCA-TOGO set up a module of training session on ISQC 1 to sensitize its members.

**National**

ONECCA-TOGO is responsible for establishing a quality assurance (QA) review system for its members. After its admission as an associate member of IFAC, the Statements of Membership Obligations (SMOs) were presented to all the members in order to raise their awareness. Committees on SMOs were then set up to work on how to achieve these obligations. Committee 1 was in charge of SMO 1 Quality Assurance. ONECCA-Togo received technical assistance from a World Bank consultant who conducted a quality assurance review mission for members, an information session for members, trained volunteer members through review and training programs, and launched a pilot program to enable volunteer firms to apply to the quality control review process.

The results of those actions include:

- Two (02) individual members of ONECCA-TOGO after going through the above process are now qualified to ensure the quality review for other members.
- The following quality assurance review system reference tools are adopted by the Institute in application of SMO1: a manual of organization of quality control, adoption of International Standard on Quality Control (ISCQ) 1 and International Standard on Auditing (ISA) 220, templates and/or models of implementation of the quality control for members.

Members are aware of the necessity of the quality assurance review system for the profession.

In light of these actions and results, the Council is proposing to assist each member firm to undergo a mandatory quality control review in the next three (3) years.

ONECCA Togo has conducted training on ISQM1, ISQM 2 and ISA 220. ONECCA is advocating for the adoption of the new quality management at the regional level via the CPPC. ONECCA Togo was not able to support the second phase of the implementation of QA review due to the COVID, it was postponed.

#	Start date	Actions	Completion Date	Responsibility	Resources
<i>Establishing/Supporting the Establishment of QA Review System</i>					

*Action Plan Developed by  
Ordre National des Experts Comptables et des Comptables Agréés au Togo (ONECCA-TOGO)*

1.	2013	Two (02) individual members of ONECCA-TOGO after going through the QA review process are now qualified to ensure the quality review for other members.	Completed	President of ONECCA-TOGO	World Bank
2.	2017	The Council of ONECCA TOGO is proposing to assist each member firm to undergo a mandatory quality control review in the next three years. At the end of the process in 4 years, the council will set out a permanent QA team. Report Quality control on firm locations was conducted in 2019 The second phase of the quality control review was interrupted by the outbreak of COVID 19 but will be taking place in September 2021	2020  2021	President of ONECCA-TOGO	Members of the institute
<i>Support Implementation of Quality and Assurance Review System</i>					
3.	2014	ISQC1 and all ISAs as approved by IAASB are adopted by ONECCA TOGO including templates and models of implementation of the quality control. Training sessions have been organized on ISQC1 and ISA 220 for members on July 2020.	July 2020 Ongoing	President of ONECCA-TOGO	Members of the institute
4.	2014	The following quality assurance review system reference tools are offered by the Institute: a manual of organization of quality control, adoption of International Standard on Quality Control (ISQC) 1 and International Standard on Auditing (ISA) 220, templates and/or practical models of implementation of the quality control for members. The Council is planning to renew and update training sessions on quality control review system for the upcoming three years.	Completed	President of ONECCA-TOGO	Members of the institute
5.	2014	Raising member awareness of the necessity of the quality assurance review system for the profession. In the last year, ONECCA Togo has planned CPD and training sessions for their members on the requirement of a quality assurance system. Most training and CPD events are planned during the month of July - September	Completed	President of ONECCA-TOGO	Members of the institute
6.	2018	The first part of the quality control is done, and it concerns the physical control of our members, the adequation of their offices and the existence of internal control manual.	2018 & 2019	President of QC commission	Members of the institute
7.	2020	ONECCA Togo will introduce training on Quality management standards	August -September  2021	President of ONECCA-TOGO	Members of the institute

8.	2024	Training on the theme: "Preparing colleagues for quality control: current IAASB international quality control standard" so that firms can take the necessary steps to host quality control properly.	June 2024	President of ONECCA-TOGO	Members of the Institute
9.	2024	Ongoing actions concerning the quality control: - Set up of quality control tool and a manual for quality control, a manual for the controller and a manual for the auditee.	2025	President of ONECCA-TOGO	Members of the Institute

## Main Requirements of SMO 1

Requirements	Y	N	Partially	Comments
<p><b>Scope of the system</b></p> <p>1. At a minimum, mandatory QA reviews are required for all audits of financial statements.</p>			<b>X</b>	<p>The Council of ONECCA TOGO is proposing to assist each member firm to undergo a mandatory quality control review in the next three years.</p> <p>The Council of ONECCA TOGO is proposing to extend the quality assurance review system to other professional services such as preparation of financial statements.</p> <p>Criteria for extending the scope of engagements that will be subject to the quality assurance review system include:</p> <ul style="list-style-type: none"> <li>- The tax law applicable in our jurisdiction (CGI), money laundering applicable law....</li> <li>- Stakeholders who made decisions based on the engagement result like Government, Central Bank, WAEMU, banks, courts, Insurance companies, Investors.</li> <li>- Unusual circumstances such financial scandals</li> </ul>
<p><b>Quality Control Standards and Other Quality Control Guidance</b></p> <p>2. Firms are required to implement a system of quality control in accordance with the quality control standards.</p>			<b>X</b>	<p>Technical assistance from a World Bank consultant who conducted a quality assurance review mission to members, information session were provided to members, volunteer members went through review and training programs, a pilot program was initiated to enable volunteer firms to apply to the quality control review process.</p> <p>The results of those actions are that two (02) individual members of ONECCA-TOGO after going through the above process are qualified to ensure the quality review for other members;</p> <p>In light of these actions and results, the Council is proposing to assist each member firm to undergo a mandatory quality control review in the next three years.</p>

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3. Most up to date versions of ISQC 1 and other relevant ISA are adopted as the quality control standards.	<b>X</b>			Adoption <ul style="list-style-type: none"> <li>- ISQC1 and all ISAs as approved by IFAC are adopted by ONECCA TOGO</li> <li>- Training sessions have been organized on ISQC1 and ISA 220 for members on May 16th, 2014</li> </ul>
4. Member Body assists firms in understanding the objectives of quality control and in implementing and maintaining appropriate systems of quality control.			<b>X</b>	Implementation <ul style="list-style-type: none"> <li>- During a Special General Assembly on May 6<sup>th</sup>, 2014, the standards (ISQC1 and ISA 220) have been presented and their relevancy and implementation discussed within the members.</li> <li>- Members were invited for the coming training session on May 16<sup>th</sup> 2014 as indicated above.</li> <li>- Manual of organization of quality control and templates (practical models) of implementation of quality control were made available on May 13<sup>th</sup>, 2014 to members.</li> </ul> <p>The Council is planning to renew and update training sessions on quality control review system for the upcoming three years.</p>
<b>Review cycle</b> 5. A cycle-based, risk-based, or a mixed approach for selecting firms for QA review is used.		<b>X</b>		ONECCA TOGO is planning the effectiveness of the review process using all available materials to assist each member firm to undergo a mandatory quality control review in the next three years. During this first review process, member will freely choose the year in which the will be submitted to the quality review control (1st, 2nd or 3 <sup>rd</sup> year).
6. For cycle-based approach, quality control reviews are required to take place at least every six years (and every three years for audits of public interest entities).		<b>X</b>		At the end of the above process, based on its result, ONECCA TOGO will decide which of the approaches (cycled-based, risked-based, or mixed) will be suitable.
<b>QA Review Team</b> 7. Independence of the QA Team is assessed and documented.		<b>X</b>		Two (02) individual members of ONECCA-TOGO after going through the above process are qualified to ensure the quality review for other members. They are those who will assume the temporally QA team for our Institute. The QA team members are independent of the other firms they will review. At the end of the process in 4 years, the council will set out a permanent QA team.
8. QA Team possesses appropriate levels of expertise.	<b>X</b>			The QA team members are volunteers who went through the review and training programs that ensure they have the required expertise to control and assist other firms.
<b>Reporting</b> 9. Documentation of evidence supporting the quality control review report is required.		<b>X</b>		The QA team members will use the available standards (Manual of organization of quality control and templates (practical models) of implementation of quality control adopted by the Institute on May 13 <sup>th</sup> , 2014) to document the the quality control review report.
10. A written report is issued upon conclusion of the QA review and provided to the firm/partner reviewed.			<b>X</b>	Based on the model in the Manual of organization of quality control and templates (practical models) of implementation of quality control adopted by the Institute on May 13 <sup>th</sup> , 2014, report will be issued upon conclusion of the QA review and will be provided to the firm/partner reviewed.

<p><b>Corrective and disciplinary actions</b> 11. Reviewed firms/partners are required to make timely adjustments to meet recommendations from the review report.</p>		X	<p>Upon the report issued the QA team, firms/partners will be required to make timely adjustments to meet recommendations from the review report.</p>
<p>12. QA review system is linked to the Investigation and Discipline system.</p>		X	<p>The Council is proposing to establish the link within 2 years after processing the QA.</p>
<p><b>Consideration of Public Oversight</b> 13. The body responsible for QA reviews cooperates with its oversight body and shares information on the functioning of the QA review system, as needed.</p>		X	<p>In the coming years, the QA team will submit in annual basis a report to the Council which is both the disciplinary and oversight body on the functioning of the QA review system.</p>
<p><b>Regular review of implementation and effectiveness</b> 14. Regular reviews of implementation and effectiveness of the system are performed.</p>		X	<p>One the system will operational, regular review on annual basis.</p>



**Action Plan Subject:** SMO 2–International Education Standards for Professional Accountants and Other Pronouncements  
**Action Plan Objective:** Ensure accountancy education program compliance with International Education Standards

**Background:**

1-The initial professional development (IPD) is carried out at two levels:

**National**

The initial professional development leads to a master’s degree in finance, management and accounting that partially meets the entry requirements to Professional Accounting Education Programs. The Bodies responsible are the Ministry of Higher Education and the Ministry in charge of Technical and Professional Education.

**Regional**

The initial professional development of professional accountants involved two bodies: the West African Economic and Monetary Union (UEMOA/WAEMU) and the African and Malagasy Council for Higher Education (CAMES). The process on one hand leads to a professional master’s degree in accounting and finance (DESCOGEF). On the other hand, a candidate holding such degree is then admitted in an accounting firm registered with ONECCA TOGO for a three year professional and practical training. Within that period, the trainee is subject to 120 hours of professional education and the presentation of 2 reports every year to a jury presided by a professor of CAMES. At the end of the 3 years process, the candidate will seat for the final exam and degree (DECOFI). The initial professional development as described meets the international education standards: *IES 1-Entry Requirements to Professional Accounting Education Programs, IES 2-Initial Professional Development – Technical Competence, IES 3-Initial Professional Development – Professional Skills, IES 4-Initial Professional Development – Professional Values, Ethics, and Attitudes, IES 5-Initial Professional Development – Practical Experience, IES 6-Initial Professional Development – Assessment of Professional Competence.*

In 2022, there was a reform of the DECOFI teaching program. This reform which is effective from 2023 put in place a diploma in 3 levels: DECOGEF, DESCOGEF and DECOFI.

Anyone holding DECOFI degree is qualified to register with ONECCA TOGO as a professional accountant. Other initial professional development such as DEC of France and Tunisia, US and Canada CPA can register with ONECCA TOGO as professional accountant. To further the implementation of the DECOFI, each WAEMU countries have identified two educational institutions accredited to deliver the tuition for the DECOFI starting in September 2020.

2- The continuous professional development (CPD) is a mandatory requirement of 120 hours within 3 years for all ONECCA TOGO members as defined in the law 2001-001 of the 23 January 2001 creating the institution and its Code of Ethics. The process is organized through different planned actions described below.

The continuous professional development (CPD) meets the *IES 7-Continuing Professional Development and IES 8-Professional Competence for Engagement Partners Responsible for Audits of Financial Statements.*

#	Start Date	Actions	Completion Date	Responsibility	Resources
Adoption/Supporting Adoption of IESs					

1.	2013	ONECCA TOGO obtained a grant from the World Bank and the Ministry of Finance to finance and support the revision of the accounting and finance programs.	2015 Completed	President of ONECCA-TOGO	World Bank and the Ministry of Finance
2.	2014	ONECCA-TOGO with a grant from the World Bank and the Ministry of Finance supported training sessions for the accounting and finance teachers on the national level.	2015 Completed	President of ONECCA-TOGO	World Bank and the Ministry of Finance
3.	2015 2017	ONECCA TOGO organized training sessions for DECOFI trainees.	2015- 2017 Completed	President of ONECCA-TOGO	Members of the institute
4.	2017	ONECCA TOGO is planning training sessions for the accounting and finance teachers on the national level after the adoption of the Revised OHADA Uniform Act on Accounting Law and Financial Information (AUDCIF) and the Revised OHADA Accounting System on January 26, 2017.	Ongoing	President of ONECCA-TOGO	Members of the institute
5.	2018	ONECCA TOGO hosts each year one of the three (03) sessions of the Technical Days of the Diploma of Chartered Accountancy and Finance (JT DECOFI) for trainees as part of the WAEMU chartered accountant training program.	Ongoing	President of ONECCA- TOGO	Members of the institute
<i>Support Implementation of Educational Standards</i>					
5.	2013	ONECCA TOGO provide relevant education and training to its members on ISA and IFRS, IPSAS to enhance Continuing Professional Development and Professional Competence for Engagement Partners Responsible for Audits of Financial Statements.	2013 Completed	President of ONECCA-TOGO	Members of the institute
6.	2014	ONECCA TOGO provided relevant education and training to its members ISA 220, ISQC 1.	2014 Completed	President of ONECCA-TOGO	Members of the institute
7.	2015	ONECCA TOGO provided relevant education and training to its members on specific sectors (banks, microfinance, insurance), tax law.	2015 Completed	President of ONECCA-TOGO	Members of the institute
8.	2022	Training on the "ISQM1 & 2 and ISA 220" standards	March 2022	President of ONECCA-TOGO	Members of the institute

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8.	2016	ONECCA TOGO provided relevant education and training to its members on specific sectors (public sector), tax law, and Labor law.	2016 Completed	President of ONECCA-TOGO	Members of the institute
9.	2017	ONECCA TOGO plans to build awareness on the newly adopted standards: <i>Revised OHADA, Revised ISA.</i>	2017 Completed	President of ONECCA-TOGO	Members of the institute
10.	2018	ONECCA TOGO plans relevant education and training to its members on Tax law, Revised OHADA, Revised ISA, money laundering.	Ongoing	President of ONECCA-TOGO	Members of the institute
11.	2019	ONECCA TOGO provide relevant education and training to its members on Tax law, uniform Law N°2018-004 of May 2018 relating to the fight against money laundering and the financing of terrorism. Quality control, how to prepare audit files, accounting estimations, ISA540, Post balance sheets events, ISA560, 570, Code of ethics, IFRS1.	2018 Completed	President of ONECCA-TOGO	Members of the institute
12.	2020	ONECCA TOGO provide relevant training to its members on Tax regulations on a continuous basis.	2020 -2021	President of ONECCA-TOGO	Members of the institute
13.	2021	ONECCA members are involved in the training of students in the Chartered Accountancy Diploma course	On going	President of ONECCA-TOGO	Members of the Institute

**Action Plan Subject:** SMO 3–International Standards and other Pronouncements Issued by the IAASB

**Action Plan Objective:** Adopt and implement ISAs

**Background:**

Prior to June 2017, ONECCA TOGO adopted the International Standards issued by the IAASB in General Assembly in May 2014. In order to act them into law, the Minister of Finance is supposed to enhance their applicability through a decree or mandate and is the formal standard-setter.

Building capacity awareness was provided and relevant education and training sessions were organized to members on ISAs and International Auditing and Assurance Standards Board (IAASB) other Pronouncements.

The Organization for the Harmonization of Business Law in Africa (OHADA) Uniform Act Relating to Commercial Companies and Economic Interest Groups 4/1997 (revised January 2014) and OHADA Uniform Act Organizing and Harmonizing Company Accounting Systems 2/2000 stipulate that statutory audits are mandatory for all public companies and limited liability companies (LLCs) that exceed determined thresholds. Banking and insurance legislations also require mandatory audits of banks, financial institutions, and insurance companies. However, no auditing standards are specified.

January 26, 2017, OHADA adopted the Uniform Act Relating to Accounting Law and financial information including the Revised SYSCOHADA. The revised SYSCOHADA effective January 1, 2018 adopted IAASB audit standards and updates and consequently, all the OHADA 17 member states are therefore compulsorily bound to IFAC, IASB pronouncements and OHADA guidelines. In June 2017, OHADA adopted a mandate applicable from January 1<sup>st</sup>, 2018 to harmonize the Accounting and Audit Standards (*Pratiques Professionnelles de la Comptabilité et de l'Audit dans les pays membres*). The upcoming Standard states in its article 3 stipulates that all professional accountant auditing financial statements in OHADA jurisdiction must apply the International Standards on Auditing (ISA) published by IFAC.

#	Start Date	Actions	Completion Date	Responsibility	Resources
<i>Adoption/Supporting Adoption of ISAs</i>					
1.	2014	ONECCA TOGO adopted the International Standards issued by the IAASB in General Assembly in May 2014.	2014 Completed	President of ONECCA-TOGO	Members of the institute
2.	2014	ONECCA TOGO sent to the Ministry of Finance the adopted standards (International Standards issued by the IAASB) in order to act them into law.	Ongoing	President of ONECCA-TOGO	Members of the institute

3.	2017	ONECCA TOGO took note of the mandate of the Council of Ministers of OHADA countries acted in June 2017 applicable from January 1 <sup>st</sup> , 2018 that harmonizes the Accounting and Audit Standards ( <i>Pratiques Professionnelles de la Comptabilité et de l'Audit dans les pays membres</i> ) and plans to raise awareness to its members.	Ongoing	President of ONECCA-TOGO	Members of the institute
4.	2017	ONECCA TOGO plans relevant education and training to its members on the upcoming Accounting and Audit Standards.	2018 Completed	President of ONECCA-TOGO	Members of the institute
5.	2019	ONECCA TOGO plans relevant education and training to its members on the tax law, ISA 540, 560, 570, code of Ethics, legal framework of statutory audit, IFRS1 first application, IAS 1, Balance sheets of banks in IFRS, Consolidation in SYSCOHADA accounting standards.	2018 & 2019 Completed	President of ONECCA-TOGO	Members of the institute, their staff and public
6.	2024	As part of the implementation of the accounting framework for Non-Profit Entities (SYCEBNL), which comes into force on January 1, 2024, ONECCA-TOGO, in collaboration with the OTR, is planning training sessions: " <i>Transition from an old accounting framework to the SYCEBNL and Opening balance sheet: the case of an association, a professional order and a development project</i> "	2025	President of ONECCA-TOGO and OTR	Members of the institute
<b>Support Implementation of Auditing Standards</b>					
6.	2013	Building capacity awareness was provided to members on ISAs and International Auditing and Assurance Standards Board (IAASB) other pronouncements. Relevant education and training to its members on ISA.	2013 Completed	President of ONECCA-TOGO	Members of the institute
7.	2014	ONECCA TOGO provides each member with the 2012 French version of the adopted ISA.	2014 Completed	President of ONECCA-TOGO	Members of the institute
8.	2018	ONECCA-TOGO provides each member with the 2018 OHADA harmonized accounting and audit standards Regulation N°1.	2018 & 2019	President of ONECCA-TOGO	Members of the institute

**Action Plan Subject:** SMO 4–IESBA Code of Ethics for Professional Accountants

**Action Plan Objective:** Adopt and implement the IESBA Code of Ethics

**Background:**  
Prior to June 8<sup>th</sup>, 2017, ONECCA TOGO adopted its Code of Ethics in compliance with the requirements of the Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants (IESBA) during a General Assembly in May 2014. In order to act it into law, the Minister of Finance is supposed to enhance its applicability through a decree.  
Building capacity awareness was provided and relevant education and training sessions were organized to members on the Code of Ethics. OHADA Uniform Act sets guidelines for companies to have their financial statements audited. Additional requirements are set up for specific sectors such as banks, financial institutions, listed companies, insurance companies etc.  
On June 8<sup>th</sup>, 2017, OHADA acts a mandate applicable from January 1<sup>st</sup>, 2018 to harmonize the Accounting and Audit Standards (*Pratiques Professionnelles de la Comptabilité et de l’Audit dans les pays membres*). The upcoming Standard states in article 6 that all professional accountant in OHADA jurisdiction must comply with the Code of Ethics issued by International Ethics Standards Board for Accountants (IESBA) and the dispositions of OHADA Uniform Act on Accounting Law and Financial Information (AUDCIF).

#	Start Date	Actions	Completion Date	Responsibility	Resources
<i>Adoption/Supporting Adoption of IESBA Code of Ethics</i>					
1.	2013	ONECCA-TOGO revised its Bylaws and Code Ethics to fully comply with the IESBA requirements.	2014 Completed	President of ONECCA-TOGO	Members of the institute
2.	2014	ONECCA TOGO adopted a new Code of Ethics in compliance with the requirements of the Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants (IESBA) during a General Assembly in May 2014.	2014 Completed	President of ONECCA-TOGO	Members of the institute
3.	2014	Capacity awareness was provided and relevant education and training sessions were organized to members on the adopted Code of Ethics.	2014 Completed	President of ONECCA-TOGO	Members of the institute
4.	2014	ONECCA TOGO sent to the Ministry of Finance the adopted Code of Ethics to act it into law.	2014 Completed	President of ONECCA-TOGO	Members of the institute
5.	2017	ONECCA TOGO is acquainted with the OHADA new mandate applicable from January 1 <sup>st</sup> , 2018 that harmonizes in members countries the Code of Ethics issued by International Ethics Standards Board for Accountants (IESBA) and the dispositions the of OHADA Uniform Act and plans to raise awareness to its members.	2018 & 2019	President of ONECCA-TOGO	Members of the institute

*Action Plan Developed by  
Ordre National des Experts Comptables et des Comptables Agréés au Togo (ONECCA-TOGO)*

6.	2017	ONECCA TOGO has trained its members on the Code of Ethics of IFAC adopted by OHADA	2018 & 2019	President of ONECCA-TOGO	Members of the institute
7.	2019	Training on "Ethics and professional practice"	February 2019	President of ONECCA- TOGO	Members of the institute
8.	2024	Training on "Ethics and responsibility of the chartered accountant"	May 2024	President of ONECCA- TOGO	Members of the Institute
<i>Support Implementation of IESBA Code of Ethics</i>					
7.	2014	The adopted Code of Ethics and the French version IFAC Code of Ethics were provided to members.	2014 Completed	President of ONECCA-TOGO	Members of the institute
8.	2018	The Code of Ethics of IFAC adopted by OHADA by Regulation N°1 was provided to our members.	2018 & 2019	President of ONECCA-TOGO	Members of the institute
9.	2021	Training and CPD events planned to provide updates to members on the 2018 International Code of Ethics, that includes the important NOCLAR standard effective since June 2019. ONECCA Togo has also introduced training on anti-money laundering	August-September 2021	President of ONECCA-TOGO	Members of the institute





**Action Plan Subject:** SMO 5–International Public Sector Accounting Standards and Other Pronouncements Issued by the IPSASB  
**Action Plan Objective:** Promote the adoption and implementation of IPSASs in Togo

**Background:**  
 International Public Sector Accounting Standards (IPSASs) are not yet adopted in Togo.  
 However, WAEMU directive N° 09/2009/CM/UEMOA of June 26<sup>th</sup>, 2009 set the standards on Public Sector Accounting applicable to all member countries from January 1<sup>st</sup>, 2017. The provisions of this directive shall be transposed by each Member Country into law by 31 December 2017. The directive in its article 3 indicated that the standards on Public Sector Accounting should be inspired by the International Standards.  
 The Ministry of Finance is responsible for the adoption and the implementation of the WAEMU directive N° 09/2009/CM/UEMOA. Once the WAEMU directive will be transposed into the national law, ONECCA TOGO is proposing to support the Ministry of Finance and the stakeholders for its implementation.  
 For the purpose to be updated with the International Standards, ONECCA TOGO will continue to provide relevant education and training sessions on the International Public Sector Accounting Standards and Other Pronouncements issued by the IPSASB to its members.

#	Start Date	Actions	Completion Date	Responsibility	Resources
<i>Adoption/Supporting Adoption of IPSASs</i>					
1.	2013	ONECCA TOGO is proposing to support the Ministry of Finance and the stakeholders once the WAEMU directive will be transposed into the national law.	Ongoing	President of ONECCA-TOGO	Members of the institute
2.	2019	WAEMU adopted the Regulation relating to the State Accounting Standards (Plan Comptable de l'Etat - PCE) at the regional level but its transposition in Togo has not yet taken place.	Ongoing	President of ONECCA-TOGO	Members of the institute
<i>Support Implementation of International Public Sector Accounting Standards</i>					
3.	2017	ONECCA TOGO will continue to provide relevant education and training on the International Public Sector Accounting Standards and Other Pronouncements Issued by the IPSASB to its members.	Ongoing	President of ONECCA-TOGO	Members of the institute
4.	2019	ONECCA TOGO provides its members with the regional adopted State Accounting Standards (Plan Comptable de l'Etat - PCE).	2019	President of ONECCA-TOGO	Members of the institute
5.	2023	Training: WAEMU State Chart of Accounts and IPSAS	2023	President of ONECCA-TOGO	Members of the Institute

6.	2022	One member of ONECCA-TOGO is designated as a member of the PAFA Public Value Management (PVM) Technical Advisory Group (TAG)	Ongoing	President of ONECCA-TOGO	Member of ONECCA-TOGO
7.	2022	ONECCA-TOGO, in collaboration with PAFA, hosted the 3rd PAFA conference on Public Financial Management Reforms, the Francophone agenda in Africa, on February 8 and 9, 2022 in Lomé.  Several public finance actors took part in this conference and explained the modes of operation and management of States.	February 2022	President of ONECCA-TOGO and PAFA	Member of ONECCA-TOGO and PAFA members
8..	2023	ONECCA-TOGO is designated as a pilot country (with 3 other countries) for the implementation of the PAFA Public Sector Engagement Framework	Ongoing	President of ONECCA-TOGO	Members of the Institute
9.	2024	A commission composed of members of the Court of Auditors and the Ministry of Finance and ONECCA-TOGO, took part in the 4th conference held in Algiers on 20 and 21/02/2024.	February 2024	President of ONECCA-TOGO	ONECCA-TOGO, Ministry of finance and Court of Auditors
10.	2024	Actions concerning IPSAS: - Accelerate the adoption and implementation of accrual-based IPSAS - Accelerate support for the implementation of IPSAS; - Advance IPSAS projects on sustainability reporting and natural resources	Ongoing	President of ONECCA-TOGO	Member of ONECCA-TOGO



**Action Plan Subject:** SMO 6–Investigation and Discipline  
**Action Plan Objective:** Develop an operational I&D system for members

**Background:**

The law creating ONECCA-TOGO (loi N° 2001-001 portant création de l'Ordre National des Experts Comptables et Comptables Agréés au TOGO) and the adopted Code of Ethics set up the disciplinary mechanism that includes investigation, discipline and appeals proceedings for the accountancy profession. The I&D systems is comprised of:

- « Conseil de discipline » at the council level;
- « Chambre Nationale de Discipline » for appeals;
- « Chambre Administrative de la Cour Suprême » for the appeals before the Supreme Court.

The types of misconduct which may bring about the investigation actions; initiation of proceedings; disciplinary process; sanctions; right of representation and appeals; public interest considerations and liaison with outside bodies are defined by this mechanism. Loi N° 2001-001 establishes sanctions such as: reprimands; loss or restriction of practice rights; loss of professional title (designation); suspension from membership; exclusion from membership.

The Council is in charge of its implementation. ONECCA Togo plans to strengthen of the I&D processes. In 2021, 3 members were sanctioned but ONECCA was not able to enforce the sanctions as the members fought the decision through the judicial system.

#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Establishing/Supporting the Establishment of I&amp;D</i>					
1.	2001	A Discipline Council has been established and is operational.	Ongoing	President of ONECCA-TOGO	Members of the institute
2.	2014	A National Chamber for Discipline (for appeals) and an investigative committee are established.	Ongoing	President of ONECCA-TOGO	Members of the institute
3.	2020	ONNECA TOGO has elected new representatives of the institute at the National Chamber for Discipline	November 2020	President of ONECCA-TOGO	Members of the Institute

*Support Implementation of Investigation and Discipline*

4.	2014	All members of ONECCA- TOGO are aware of the type of misconducts related to the profession published in the Law and the Code of Ethics. The Council is proposing to make public communication on the types of misconducts of the Professional Accountant which may bring about investigation actions as indicated in the law and the Code of Ethics. Suitable communication panels will be undertaken to create public awareness of the investigation and disciplinary system for the professional accountancy in Togo.	Ongoing	President of ONECCA-TOGO	Members of the institute
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5.	2001	As indicated in article 63 of the Law creating the Institute, the investigation and disciplinary proceedings will be published in the head-office for members and insert in the "Journal officiel de la République du Togo.	As necessary	President of ONECCA-TOGO	Members of the institute
6.	2001	The article 62 of the law mentioned above said that the disciplinary sanctions' decisions should be notified the "Conseil Permanent de la Profession Comptable" of WAEMU within 10 days.	As necessary	President of ONECCA-TOGO	Members of the institute
7.	2020	Disciplinary sanctions were imposed to three of our members and published in the Togolese Republic's legal announcement newspaper and notified to the WAEMU CPPC in 2020.	August 2020	President of ONECCA-TOGO	Members of the institute
8.		Training and CPD events planned to keep members updated on investigation and discipline requirements.	August - September 2021		

## Main Requirements of SMO 6

Requirements	Y	N	Partially	Comments
<b>Scope of the system</b> 1. A system of investigation, discipline and appeals exists for the accountancy profession. The system is operational.			X	The law creating ONECCA- TOGO (LOI N° 2001-001 portant création de l'Ordre National des Experts Comptables et Comptables Agréés au TOGO), in its articles 53 to 63 foresaw a system of investigation, discipline and appeals for accountancy profession in Togo. The system is compound in : <ul style="list-style-type: none"> <li>• « Conseil de discipline » at the council level ;</li> <li>• « Chambre Nationale de Discipline » for appeals ;</li> <li>• « Chambre Administrative de la Cour Suprême » for the appeals before the Supreme Court.</li> </ul> Up to this date, only the « Conseil de Discipline » is operational. The Council of ONECCA- TOGO intends to take attach with the institutions of the Republic in charge to propose the members of the « Chambre Nationale de Discipline ».
2. Information about the types of misconduct which may bring about investigative actions is publicly available.			X	All members of ONECCA- TOGO are aware of the type of misconducts related to the profession published in the Law and the Code of Ethics. In regard to the general public, no action is undertaken to make them aware of the misconduct of the Professional Accountant. The Council is proposing to make public communication on the types of misconducts of the Professional Accountant which may bring about investigative actions as indicated in the law and the Code of Ethics.

<b>Initiation of Proceedings</b>				
3. Both a “complaints-based” and an “information-based” approach are adopted.		X		The Council is proposing to act Both a “complaints-based” and an “information-based” approach for initiation and proceedings.
4. Link with the results of QA reviews has been established.		x		The Council is proposing to establish the link within 2 years after processing the QA.
<b>Investigative process</b>				
5. A committee or similar body exists for performing investigations.		X		The Council is proposing to set out the investigative committee.
6. Members of a committee are independent of the subject of the investigation and other related parties.		X		Once the committee will be created, the independence rules will be applicable.
<b>Disciplinary process</b>				
7. A separate disciplinary committee/entity exists to make disciplinary decisions on referrals from the investigation committee.	X			Disciplinary decisions are made by the council of ONECCA- TOGO
8. Members of the committee/entity include professional accountants as well as non-accountants.			X	« Conseil de discipline » at the council level: only professional accountants are members. « Chambre Nationale de Discipline » for appeals: Both professional accountants as well as non-accountants are members.
9. The tribunal exhibits independence of the subject of the investigation and other related parties.	X			« Chambre Administrative de la Cour Suprême » for the appeals before the Supreme Court.
<b>Sanctions</b>				
10. The disciplinary system allows imposing an extensive range of penalties. It is particularly important to include (a) loss of professional designation; (b) restriction and removal of practicing rights; and (c) exclusion from membership.	X			The law creating ONECCA- TOGO (LOI N° 2001-001 portant création de l’Ordre National des Experts Comptables et Comptables Agréés au TOGO) in article 59 permit : <ul style="list-style-type: none"> <li>• Reprimands ;</li> <li>• Loss or restriction of practice rights ;</li> <li>• Loss of professional title (designation) ;</li> <li>• Suspension form membership ;</li> <li>• Exclusion form membership.</li> </ul>
<b>Rights of representation and appeal</b>	X			
11. A third appeals body exists which is separate from both the disciplinary committee and investigative committee.				« Chambre Nationale de Discipline » for appeals exist and is separate from the disciplinary and investigative bodies.
<b>Administrative Processes</b>				
12. Timeframe targets for disposal of all cases are set.				
13. Tracking mechanisms to monitor progress in investigation and discipline and related procedures are established.		X		The Council, once established the investigative process, will determine a mechanisms to monitor progress in investigation and discipline and write the appropriate procedures.
14. Records of investigations and disciplinary processes are established.		X		A documentation of the process of investigation will be set out by the council

<p><b>Public Interest Considerations</b></p> <p>15. Activities are supported to ensure that the public is aware that an investigative and disciplinary system exists in the jurisdiction.</p>		X		<p>Suitable communication panels will be undertaken to create public awareness of the investigation and disciplinary system for the professional accountancy in Togo.</p>
<p>16. A process for the independent review of complaints on which there was no follow-up is established.</p>		X		<p>An independent review of complaint without follow – up will be set out by the council</p>
<p>17. The results of the investigative and disciplinary proceedings are made available to the public.</p>	X			<p>As indicated in article 63 of the Law creating the Institute, the investigation and disciplinary proceedings will be publish in the head-office for members and insert in the “Journal officiel de la Republique du Togo”.</p>
<p><b>Liaison with Outside Bodies</b></p> <p>18. There is an appropriate process for liaison with outside bodies on possible involvement in serious crimes and offences.</p>	X			<p>The article 62 of the law mentioned above said that the disciplinary sanctions’ decisions should be noticed the “Conseil Permanent de la Profession Comptable” of WAEMU within 10 days;</p>
<p><b>Regular review of implementation and effectiveness</b></p> <p>19. Regular review of implementation and effectiveness of the system are performed and corrective actions are implemented.</p>		X		<p>Once the system will operational, regular review on annual basis.</p>

**Action Plan Subject:** SMO 7–International Financial Reporting Standards and Other Pronouncements issued by the IASB

**Action Plan Objective:** Adoption and implementation of IFRS

**Background:**

Prior to January 26, 2017, OHADA Uniform Act on Organization and Harmonization of Accounting and OHADA Accounting System (SYSCOHADA) adopted by Council of Ministers of OHADA countries were the law that specifies accounting standards. It set guidelines on how companies should have their accounting system organized. Specific sectors such as banks, financial institutions, listed companies, insurance companies have their accounting standards set by supervision institution such Central bank, Stock Market etc.

The Ministry of Finance is responsible for overseeing the applicability of adopted accounting standards

On January 26, 2017, the Council of Ministers of OHADA countries adopted a Uniform Act on Accounting Law and Financial Information (AUDCIF) to replace the existing Uniform Act on Organization and Harmonization of Accounting. The new Act comes into force on January 1<sup>st</sup>, 2018 for the individual accounts and on January 1<sup>st</sup>, 2019 for the consolidated accounts and the IFRS accounts.

The new Uniform Act states in its article 8 that listed companies and those collecting public savings in addition to regular accounts must present their accounts in their sector's accounting standards and in IFRS.

Despite IFRS are not formally adopted, ONECCA TOGO actions pertained to building awareness and organizing training sessions for its members. Adoption may include a process to review draft international standards, translation, public exposure of proposed standards, approval, incorporation into national requirements as necessary, and promulgation of final standards, and, where applicable, a convergence process to eliminate or minimize differences between international and national standards.

#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Adoption/Supporting Adoption of IFRSs</i>					
1.	2012	ONECCA TOGO had discussions on whether to adopt or adapt IFRS.	2014 Completed	President of ONECCA-TOGO	Members of the institute
2.	2013 2014	ONECCA TOGO built awareness and organized training sessions on IFRS.	2014 Completed	President of ONECCA-TOGO	Members of the institute
<i>Support Implementation of International Financial Reporting Standards</i>					
3.	2017	ONECCA TOGO plans actions to make members aware of the dispositions of the new Uniform Act in regard to IFRS and to integrate training sessions in the process.	2018 & 2019	President of ONECCA-TOGO	Members of the institute
4.		Training and CPD events planned to provide updates to members on all the new IFRSs requirements.	August – Sept 2021		
5.	2022	IFRS training was provided to members through IFRS reporting.	2022 and 2023	President of ONECCA- TOGO	Members of the institute
6.	2024	In 2024, IFRS training is planned with the specificity of bank auditing.	2024	President of ONECCA-TOGO	Members of the institute