

中華民國會計師公會全國聯合會

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NATIONAL FEDERATION OF CERTIFIED PUBLIC ACCOUNTANT ASSOCIATIONS
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March 31, 2016

Ken Siong
IESBA Technical Director
IFAC
529 Fifth Avenue, 6th Floor
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Dear Mr. Siong,

Comment letter on Exposure Draft - Proposed Revisions Pertaining to Safeguards in the Code-Phase 1

The National Federation of Certified Public Accountant Associations of the Republic of China (NFCPAAROC) is delighted to present a comment letter on the proposed changes to the Code of Ethics for Professional Accountants (the Code) set out in the above exposure draft presented by IESBA.

We acknowledge the efforts that IESBA is making and are supportive of the aim of the proposals to improve the clarity, appropriateness, and effectiveness of the safeguards in the Code. We apologize for submitting our response after the due date but hope that you find our comments helpful and take them into consideration.

We address below the specific matters detailed in the IESBA's request for comments.

Proposed Revisions to the Conceptual Framework

We support the proposal to revise the conceptual framework due to the fact that it strengthens the descriptions of requirements and application material regarding identifying threats, evaluating threats, addressing threats, re-evaluating threats and the overall assessment, which should assist the professional accountants taking actions to address threats.

Proposed Revised Description of “Reasonable and Informed Third Party” and “Acceptable Level”

We support the proposal to clarify the concepts of “reasonable and informed third party” and “acceptable level” considering the enhanced description and streamlined definition, which will assist the professional accountants to evaluate and address the threats.

Proposed Revised Description of Safeguards

We support the proposal to revise the description of “safeguards” and agree with the IESBA’s conclusions based on the better definition, which will assist the professional accountants to clarify the certain conditions, policies and procedures that are not regarded as safeguards.

Proposals for Professional Accountants in Public Practice

We agree with the IESBA’s Approach to the revisions in proposed Section 300 for professional accountants in public practice owing to the streamlined examples and better description, which are helpful to the professional accountants to clarify and address the threats.

Yours Sincerely,



Charles Chen

Chairperson of the Board