

**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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April 8, 2016

Ken Siong  
IESBA Technical Director  
IFAC  
529 Fifth Avenue, 6<sup>th</sup> Floor  
New York  
NY10017  
USA

Dear Mr. Siong,

**Comment letter on Exposure Draft – Improving the Structure of the Code of Ethics for Professional Accountants-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 enhance the understandability and usability of the code by restructuring it.

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

**Refinements to the Code**

We agree with the proposals which increase the understandability, clarity and navigability of the Code.

Besides, we believe the restructuring will enhance the adoption of the Code by distinguishing requirements and application material, adding a Guide to the Code, which would help a better understanding of the Code.

We don't believe that the restructuring has changed the meaning of the Code in terms of the comparison and comments on Mapping Table, a supplement to the Exposure Draft and prepared by the Staff of the IESBA.

**Other matters**

We are generally supportive of the clarity and appropriateness of the term "audit" continuing to include "review" for the purposes of the independence standards as well as the clarity and appropriateness of the restructured material in the way that it distinguishes firms and network firms.

**Title**

We agree that the proposed title for the restructured Code is appropriate.

Yours Sincerely,



Charles Chen

Chairperson of the Board