



PUBLIC ACCOUNTANTS AND AUDITORS BOARD

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Our ref: AN/comments/110416

11 April 2016

Ken Siong
Technical Director
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Dear Sir

**PAAB SUBMISSION ON- : Improving the Structure of the Code of Ethics for Professional Accountants—
Phase 1**

In response to your request for comments: **IESBA Improving the Structure of the Code of Ethics for Professional Accountants— Phase 1**, attached is the comment letter prepared by the Zimbabwe Accounting Practices Board (ZAPB) of Public Accountants and Auditors Board (PAAB). The comment letter is a result of deliberations of the Zimbabwe Accounting Practices Board (ZAPB), which comprises members from reporting organisations, regulators, auditors and academics.

We are grateful for the opportunity to provide our comments on this project.

Please do not hesitate to contact us should you wish to discuss any of our comments.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Admire Ndurunduru', written over a circular stamp or seal.

Admire Ndurunduru
PAAB SECRETARY

**PAAB SUBMISSION ON- : Improving the Structure of the Code of Ethics for Professional Accountants—
Phase 1**

Question 1:

- 1. Do you agree with the proposals, or do you have any suggestions for further improvement to the material in the ED, particularly with regard to:**
- a) Understandability, including the usefulness of the Guide to the Code?**
 - b) The clarity of the relationship between requirements and application material?**
 - c) The clarity of the principles basis of the Code supported by specific requirements?**
 - d) The clarity of the responsibility of individual accountants and firms for compliance with requirements of the Code in particular circumstances?**
 - e) Clarity of language?**
 - f) The navigability of the Code, including:
 - i) Numbering and layout of the sections;**
 - ii) Suggestions for future electronic enhancements; and**
 - iii) Suggestions for future tools?****
 - g) The enforceability of the Code?**

Comments to Question 1

- a) Yes, the Guide will work as a useful tool in enhancing understandability of the Code.
- b) Yes. The separation of the two also distinguishes between the principle and application material for better understanding of the requirements of the code. The application material also enhances understandability of the requirements as it is guidance on what a requirement is or what it is intended to cover.
- c) Yes.
- d) Yes.
- e) Yes. It is true that as this Code is going to be used worldwide, consideration for those users whose first language is not English should be made.
- f)
 - i) The numbering and layout of the sections have improved understanding and the flow of the Code.
 - ii) No comment.
 - iii) No comment.
- g) Yes. Use of the word “shall” removes ambiguity in terms of enforcing the requirements of the Code which enables enforceability, rather than using “may”.

Question 2

Do you believe the restructuring will enhance the adoption of the Code?

Comments to Question 2

Yes. Restructuring the Code will enhance adoption as all ambiguity will have been removed in terms of enforcing the requirements on the part of professional accountants.

Question 3

Do you believe that the restructuring has changed the meaning of the Code with respect to any particular provisions? If so, please explain why and suggest alternative wording.

Comments to Question 3

We do not believe the restructuring has changed the meaning of the Code, but rather it has removed ambiguity by separating the requirements from the application material.

Question 4

Do you have any comments on the clarity and appropriateness of the term "audit" continuing to include "review" for the purposes of the independence standards?

Comments to Question 4

No.

Question 5

Do you have any comments on the clarity and appropriateness of the restructured material in the way that it distinguishes firms and network firms?

Comments to Question 5

No.

Question 6

Is the proposed title for the restructured Code appropriate?

Comments to Question 6

The title of the restructured Code is appropriate as it also includes standards which professional accountants are expected to adhere to.

General comments

Para R100.4 - "Take whatever actions might be available..."

There is a grammatical error on the identified statement. We propose it to be rephrased to:
"Take whatever actions that might be available..."