

**ASSIREVI**  
*Associazione Italiana Revisori Contabili*

*Al Presidente*

IAASB  
International Auditing and Assurance Standards Board  
529 Fifth Avenue  
New York, NY 10017  
USA

21 October 2015

**IAASB Exposure Draft – *Proposed Amendments to the IAASB's International Standards – Responding to Non-Compliance or Suspected Non-Compliance with Laws and Regulations***

Dear Sirs,

Assirevi is the association of Italian audit firms. Its member firms represent the majority of the audit firms under the oversight of CONSOB (*Commissione Nazionale per le Società e la Borsa*) and are responsible for the audit of almost all of the companies listed on the Italian stock exchange. Assirevi promotes technical research in the field of auditing and accounting and publishes technical guidelines for its members. It collaborates with Governmental bodies, CONSOB, the Italian accounting profession and other bodies in the development of auditing and accounting standards.

Assirevi is pleased to submit its comments on the Exposure Draft "*Proposed Amendments to the IAASB's International Standards – Responding to Non-Compliance or Suspected Non-Compliance with Laws and Regulations*" issued by IAASB in July 2015.

Our detailed comments to the questions are set out in the attached document.

Should you wish to discuss our comments, please do not hesitate to contact us.

Yours faithfully,



Mario Boella  
Chairman of Assirevi

## COMMENTS ON THE IAASB EXPOSURE DRAFT

Proposed Amendments to the IAASB's International Standards  
*Responding to Non-Compliance or Suspected Non-Compliance with Laws and Regulations*  
(July 2015)

Assirevi would like to thank the IAASB for involving it in the subject consultation and is pleased to comment on the proposed amendments to certain International Standards, in particular on the proposed amendments to ISA 250 – Consideration of Laws and Regulations in an Audit of Financial Statements (hereinafter “ED-ISA 250”).

Assirevi appreciates that the basic framework of the auditing standard has not been changed in respect of the present version of ISA 250. Specifically, Assirevi believes that the auditor's responsibility as disclosed in paragraph 4 of ED-ISA 250 appropriately addresses the auditor's specific function, which remains focused on enhancing the reliability of financial statements.

In this respect, Assirevi considers it appropriate to make reference to its letter to the IESBA, dated 22 September 2015, containing its observations on the proposed changes to the Code of Ethics to address “Responding to Non-Compliance with Laws & Regulations” – May 2015.

Assirevi sets out herein its observations on the matters by which IAASB is seeking comments.

*1) Whether respondents believe the proposed limited amendments are sufficient to resolve actual or perceived inconsistencies of approach to clarify and emphasize key aspects of the NOCLAR proposals in the IAASB's International Standards.*

Assirevi considers it appropriate to reaffirm its critical considerations included in its letter dated 22 September 2015 mentioned above with respect to certain aspects of the definition of NOCLAR included in the IESBA's proposed changes to the Code of Ethics.

Nevertheless, Assirevi agrees to the proposed limited amendments included in ED ISA 250. Assirevi believes that such amendments are appropriate to resolve actual or perceived inconsistencies between auditing standards and relevant ethical requirements.

*2) The impact, if any, of the proposed limited amendments in jurisdiction that have not adopted, or do not plan to adopt, the IESBA Code. For example, would any of the changes to the IAASB's International Standards be deemed incompatible with the relevant ethical requirements that would apply in those jurisdictions?*

In Italy, the local regulatory framework includes the Code of Ethics and the International Standards on Auditing issued by the IAASB, adopted by law. Assirevi wishes to make reference to its letter dated 22 September 2015 mentioned above for its comments on the proposed changes to the IESBA Code and on the potential inconsistencies between

## **ASSIREVI**

simultaneously applicable rules relating to the reporting of identified or suspected non-compliance to the competent authorities.

However, Assirevi believes that the proposed changes are appropriate to address reference to applicable ethical requirements also in jurisdictions that have not adopted the IESBA Code.

Milan, 21 October 2015