



สภาวิชาชีพบัญชี ในพระบรมราชูปถัมภ์

FEDERATION OF ACCOUNTING PROFESSIONS
UNDER THE ROYAL PATRONAGE OF HIS MAJESTY THE KING

September 21, 2022

International Auditing and Assurance Standards Board (IAASB)
529 Fifth Avenue, 6th floor
New York 10017
USA

Dear Sir/Madam,

The Federation of Accounting Professions of Thailand welcomes the opportunity to comment on the Proposed Narrow Scope Amendments to ISA 700 (Revised) and ISA 260 (Revised) as a Result of the Revisions to the IESBA Code that Require a Firm to Publicly Disclose When a Firm Has Applied the Independence Requirements for PIEs.

Please find our comments on the proposed standard in the attachment. If you need any clarifications, please kindly contact the Federation of Accounting Professions of Thailand.

Yours sincerely,

Mr. Winid Silamongkol

Chairman of the Auditing Profession Committee
Federation of Accounting Professions of Thailand
Bangkok, Thailand

Request for Specific Comments

Transparency About the Relevant Ethical Requirements for Independence for Certain Entities Applied in Performing Audits of Financial Statements

1. Do you agree that the auditor's report is an appropriate mechanism for publicly disclosing when the auditor has applied relevant ethical requirements for independence for certain entities in performing the audit of financial statements, such as the independence requirements for PIEs in the IESBA Code?

Yes, we agree.

Please answer question 2A or 2B based on your answer to question 1:

2A. *If you agree:*

- (a) Do you support the IAASB's proposed revisions in the ED to ISA 700 (Revised), in particular the conditional requirement as explained in paragraphs 18-24 of the Explanatory

Yes, using conditional requirements is more practical.

- (b) Do you support the IAASB's proposed revisions in the ED to ISA 260 (Revised)?

Yes.

- 2B. *If you do not agree*, what other mechanism(s) should be used for publicly disclosing when a firm has applied the independence requirements for PIEs as required by paragraph R400.20 of the IESBA Code?

N/A

Transparency About the Relevant Ethical Requirements for Independence for Certain Entities Applied in Performing Reviews of Financial Statements

3. Should the IAASB consider a revision to ISRE 2400 (Revised) to address transparency about the relevant ethical requirements for independence applied for certain entities, such as the independence requirements for PIEs in the IESBA Code?

Yes. ISRE 2400 is for the review engagements not conducted by the company's auditors and emphasis on the independence requirements in the review report seems more appropriate.

4. If the IAASB were to amend ISRE 2400 (Revised) to address transparency about the relevant ethical requirements for independence applied for certain entities, do you support using an approach that is consistent with ISA 700 (Revised) as explained in **Section 2-C**?

Yes, it is more logical to adopt the same approach.

Matter for IESBA Consideration

5. To assist the IESBA in its consideration of the need for any further action, please advise whether there is any requirement in your jurisdiction for a practitioner to state in the practitioner's report that the practitioner is independent of the entity in accordance with the relevant ethical requirements relating to the review engagement.

There is no requirement in Thailand for a practitioner to state in the practitioner’s report that the practitioner is independent of the entity in accordance with the relevant ethical requirements relating to the review engagement. Our standard on the reviews is translated from the ISRE 2400. Therefore, the review report only includes a sentence stating, “This Standard also requires us to comply with relevant ethical requirements”

Request for General Comments

The IAASB is also seeking comments on the following matters:

6. Translations—Recognizing that many respondents may intend to translate the final pronouncement for adoption in their own environments, the IAASB welcomes comment on potential translation issues respondents note in reviewing this ED.

Based on the revisions suggested in the ED, no translation issues are expected.

7. Effective Date—Given the need to align the effective date with IESBA, do you support the proposal that the amendments to ISA 700 (Revised) and ISA 260 (Revised) become effective for audits of financial statements for periods beginning on or after December 15, 2024 as explained in paragraph 26?

Yes, the same effective date as that of the revised IESBA standards will not confuse the users of the financial statements.