

Our Ref: STA/001

17 June 2019

International Ethics Standards Board for Accountants (IESBA)  
529 Fifth Avenue,  
New York, NY 10017,  
United States of America.

Submitted via website: [www.ethicsboard.org](http://www.ethicsboard.org)

Dear Sir/Madam,

**PROPOSED REVISIONS TO PART 4B OF THE CODE TO ALIGN WITH TERMS AND CONCEPTS USED IN ISAE 3000 (REVISED)**

The Institute of Certified Public Accountants of Uganda (ICPAU) appreciates the opportunity to respond to the **Proposed Revisions to Part 4B of the Code to align with the terms and concepts used in ISAE 3000 (Revised)**.

Our comments are herein the attached.

We hope you will find our comments helpful.

Yours sincerely,



CPA Charles Lutimba  
**MANAGER, STANDARDS AND TECHNICAL SUPPORT**  
Institute of Certified Public Accountants of Uganda

*Appendix: Comments to the Proposed revisions to Part 4B of the Code to align with the terms and concepts used in ISAE 3000 (Revised)*

EK/....

## **COMMENTS ON THE EXPOSURE DRAFT FOR THE PROPOSED REVISIONS OF PART 4B OF THE RESTRUCTURED AND REVISED CODE OF ETHICS FOR PROFESSIONAL ACCOUNTANTS**

The International Ethics Standards Board for Accountants (IESBA) issued an exposure draft about the proposed revisions to Part 4B of the Code. The proposals in the exposure draft include changes in key terminology including a revised definition of the term “assurance client”, enhanced and clarified independence requirements for attestation engagements, clarification of the types of assurance engagements as well as simplified guidance on assurance engagements. Below are comments from the Institute of Certified Public Accountants of Uganda (ICPAU) in regards to the exposure draft:

**QUESTION 1:** Do you believe that the changes in the key terminology used in the Exposure Draft, including the definition of ‘assurance client’, are clear and appropriate for use in Part 4B?

**COMMENT:**

Yes, ICPAU believes that the changes in the key terminology used in the exposure draft are clear and appropriate for use in Part 4B of the Code. For example, since the term assurance client was not clearly defined in ISAE 3000 (Revised), the definition in the draft makes it handy as it provides scenarios in which practitioners can refer to the Code for definitions that are not found in the standard.

**QUESTION 2:** Do you have any comments on the application of the IESBA’s proposals to the detailed independence requirements and application material as explained above and summarized in the appendix?

**COMMENT:**

Yes, ICPAU appreciates the inclusion of the definition of the assurance client in both types of assurance engagements as this makes it clear to establish independence requirements for the engagement team in either instance. This was lacking in the ISAE 3000 (Revised).

**QUESTION 3:** Do you have any comments on the other proposed changes, including on the consistency of terms and concepts in Part 4B in relation to the text of ISAE 3000 (Revised)? If so, please specify the area of inconsistency and suggest alternative wording.

**COMMENT:**

ICPAU does not have any comments on the other proposed changes.

**QUESTION 4:** Are there any other matters that you consider should be addressed with respect to the alignment with ISAE 3000 (Revised) in Part 4B or in other material, for example in an

IESBA Staff? If so, please provide sufficient explanation, including practical examples of the matter where available.

**COMMENT:**

No, ICPAU does not have any suggestions for other matters that should be considered with respect to the alignment of ISAE 3000 (Revised) in Part 4B.

**QUESTION 5:** Do you agree with the proposed effective date? If not, please indicate why not and explain your reasoning.

**COMMENT:**

ICPAU agrees with the proposed effective date since the exercise of alignment of ISAE 3000 (Revised) with the Code is not as cumbersome as the introduction of a new standard which would require a lot of research and feedback from practitioners before being finalized.