

Our Ref: STA/001

31 October 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 THE CODE TO PROMOTE THE ROLE AND MINDSET EXPECTED  
OF PROFESSIONAL ACCOUNTANTS**

The Institute of Certified Public Accountants of Uganda (ICPAU) appreciates the opportunity to respond to the **Proposed Revisions to the Code to promote the role and mindset expected of Professional Accountants.**

Our comments are herein the attached.

We hope you will find our comments helpful.

Yours sincerely,



CPA Mark Omona  
**DIRECTOR, STANDARDS AND REGULATIONS**  
Institute of Certified Public Accountants of Uganda

*Appendix: Comments to the proposed revisions to the Code to promote the role and mindset expected of Professional Accountants*

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**APPENDIX: ICPAU'S COMMENTS ON THE IESBA EXPOSURE DRAFT- PROPOSED REVISIONS TO  
THE CODE TO PROMOTE THE ROLE AND MINDSET EXPECTED OF PROFESSIONAL  
ACCOUNTANTS**

**ICPAU'S COMMENTS**

**Role and values of Professional Accountants**

**Question 1:** Do you support the proposals in Section 100 that explain the role and values of professional accountants as well as the relationship between compliance with the Code and professional accountants acting in the public interest? Are there other relevant matters that should be highlighted in these paragraphs?

**Comment:**

ICPAU supports the proposals in Section 100 that explain the role and values of professional accountants because these ensure that professional accountants always act in the public interest. As the proposals clearly put it, the application of the skills and values in Section 100 enables professional accountants to provide quality services in a way that can be relied upon by the intended users of their work. This will go a long way in fostering public trust in the accountancy profession.

**Determination to Act Appropriately**

**Question 2:** Do you support the inclusion of the concept of determination to act appropriately in difficult situations and its position in Subsection 111?

**Comment:**

ICPAU supports the inclusion of the concept of determination to act appropriately in difficult positions because this concept further illustrates the principle of integrity that professional accountants are expected to adhere to. However ICPAU believes that IESBA should take care to ensure that the concept embraces and does not water down the aspirational aspects of moral courage as laid out in the Institute of Chartered Accountants of Scotland (ICAS) Code of Ethics. ICPAU believes that the concept can be supported by illustrative examples within the application material.

**Professional Behavior**

**Question 3:** Do you support the proposal to require a professional accountant to behave in a manner that is consistent with the profession's responsibility to act in the public interest in paragraphs 110.1 A1 (e) and R115.1?

**Comment:**

ICPAU supports the proposal for professional accountants to behave in a manner that is consistent with the profession's responsibility to act in the public interest because this will enhance public trust in the accountancy profession. Emphasis of acting in public interest will result in good quality work being performed by professional accountants at all times.

### **Impact of technology**

**Question 4:** Notwithstanding that the IESBA has a separate working group that is exploring the implications of developments in technology, are there any additional matters relating to the impact of technology beyond the proposals in paragraphs 110.1 A1 (b) (iii), 113.1 A2 and 120.12 A2 that you consider should be addressed specifically as part of the Role and Mindset project?

#### **Comment:**

ICPAU does not believe that the Role and Mindset project has appropriately addressed the impact of technology especially ethics in a digitalized world. ICPAU proposes that the Board addresses the skills and values that are needed in a digitalized world. There is need to develop skills to apply in a digitalized world and the professional accountant needs to be alert to the adequacy of their skills in a continuously changing technological environment. This will influence compliance with fundamental principle of professional competence.

### **Inquiring mind**

**Question 5:** Do you agree with the concept of an inquiring mind as set out in the proposals in Section 120?

#### **Comment:**

ICPAU agrees with the concept of an inquiring mind as set out in the proposals in Section 120. This is because the concept offers a clearer perception of the mindset expected of professional accountants as they perform their assignments. Professional skepticism was more suited for audits and other assurance assignments. The concept of an inquiring mind requires the professional accountant to always have a mindset that requires them to have all necessary information regarding the situation or task at hand before making any professional judgement. Therefore the concept of an inquiring mind is more suited to encourage professional accountants work as they work in public interest.

### **Bias**

**Question 6:** Do you support the approach to addressing bias? If so, do you agree with the list of examples of bias set out in paragraph 120.12 A2? Should any examples be omitted or new ones added?

**Comment:**

ICPAU supports the IESBA's approach to addressing bias. This will aid professional accountants especially in regards to compliance with the fundamental principle of objectivity. ICPAU further agrees with the list of examples of bias set out in the exposure draft.

**Organizational Culture**

**Question 7:** Are there any other aspects about organizational culture in addition to the role of leadership that you consider should be addressed in the proposals?

**Comment:**

ICPAU believes that the appropriate education and training programs as well as management processes that promote ethical culture should be expounded on especially for the non-practicing professional accountants. IESBA should clarify the necessary trainings that these accountants should have in order to promote a culture that is compliant with the requirements for accountants to have an inquiring mind in the execution of their duties.