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Mr K Siong,
Technical Director,
International Ethics Standard Board for Accountants,
529 Fifth Avenue, 6th Floor,
New York,
NY 10017,
USA.

Dear Mr Siong

Proposed Revisions to the Code Addressing the Objectivity of Engagement Quality Reviewers

Crowe Global is delighted to present a comment letter on the Exposure Draft *Proposed Revisions to the Code Addressing the Objectivity of Engagement Quality Reviewers*. Crowe Global is a leading global network of audit and advisory firms, with members in some 130 countries.

We agree with your objective to amend the Code of Ethics to achieve alignment with the IAASB's forthcoming ISQM 2.

We trust that our comments assist the IESBA in progressing this project. We shall be pleased to discuss our comments further with you.

Kind regards

Yours sincerely

A handwritten signature in black ink, appearing to read "David Chitty".

David Chitty
International Accounting and Audit Director

Appendix – Response to Request for Specific Comments *Proposed Revisions to the Code Addressing the Objectivity of Engagement Quality Reviewers*

Question	Response
Do you support the proposed guidance addressing the topic of the objectivity of an EQR?	<p>We agree with the proposed guidance. It an appropriate threats and safeguards approach.</p> <p>Smaller firms with a limited pool of potential EQ reviewers or who rely upon external EQRs might benefit from implementation guidance which could be presented outside of the Code.</p>
If so, do you support the location of the proposed guidance in Section 120 of the Code?	We support the location of the proposed guidance.
Do you agree with the IESBA that it would be more appropriate for the IAASB to determine whether a cooling-off requirement should be introduced in proposed ISQM 2 as discussed in Section III.C above, and that the Code should not be prescriptive in this regard?	We agree that this matter ought to be addressed by the IAASB.