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Individual Commentary

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Proposed Revisions pertaining to safeguards in the Code – Phase 1

22 May, 2016

I am Denise Juvenal this is pleased to have the opportunity to comment on this consultation of the International Education Standard - Proposed Revisions pertaining to safeguards in the Code – Phase 1 this is my individual commentary. I agree with this exposure draft.

Request for Comments:

The IESBA welcomes on all matters addressed in this ED, but especially those identified in the Request Comments below. Comments are most helpful when they refer to specific paragraphs, include the reasons for the comments, and, where appropriate, make specific suggestions for any proposed changes to wording. When a respondent agrees with proposals in this ED, it will be helpful for the IESBA to be made aware of this view.

Proposed Revisions to the Conceptual Framework

1. Do respondents support the Board's proposed revisions to the extant Code pertaining to the Conceptual Framework, including the proposed requirements and applications material related to:
 - a) Identifying threats;
 - b) Evaluating threats;
 - c) Addressing threats;

- d) Re-evaluating threats; and**
- e) The overall assessment.**

If not, Why not?

Yes, I agree and support the Board's proposed revisions to the extant Code pertaining to the Conceptual Framework, including the proposed requirements and applications material related to: identifying threats; evaluating threats; addressing threats; re-evaluating threats and the overall assessment.

Proposed Revised Descriptions of "Reasonable and Informed Third Party" and "Acceptable Level"

- 2. Do respondents support the proposed revisions aimed at clarifying the concepts of (a) "reasonable and informed third party", and (b) "acceptable level" in the Code. If not, why not?**

Yes, I support the proposed revisions aimed at clarifying the concepts of (a) reasonable and informed third party and (b) acceptable level in the Code.

Proposed Revised Description of Safeguards

- 3. Do respondents support the proposed description of "safeguards?" If not, why not?**

Yes, I support the proposed description of "safeguards".

- 4. Do respondents agree with the IESBA's conclusion that "safeguards created by the profession or legislation", "safeguards in the work environment", and "safeguards implemented by the entity" in the extant Code:**

I suggest for the Board's contact the National and Regional Regulators to know if have some impact of new definition in each country, because profession or legislation in country can be different points of research and subject for this matter.

- a) Do not meet the proposed description of safeguards in this ED?**

No, I do not meet the proposed description of safeguards in this ED.

- b) Are better characterized as "conditions, policies and procedures that affect the professional accountant's identification and potentially the**

evaluation of threats as discussed in paragraphs 26 – 28 of this Explanatory Memorandum?”

If not, why not?

Yes, are better characterized as “conditions, policies and procedures that affect the professional accountant’s identification and potentially the evaluation of threats as discussed in paragraphs 26 – 28 of this Explanatory Memorandum.

Proposals for Professional Accountants in Public Practice

5. Do respondents agree with the IESBA’s approach to the revisions in proposed Section 300 for professional accountants in public practice? If not, why not and what suggestions for an alternative approach do respondents have that they believe would be more appropriate?

Yes, I agree with the IESBA’s approach to the revisions in proposed Section 300 for professional accountants in public practice.

In addition to the request for specific comments above, the IESBA is also seeking comments on the matters set out below:

a) Small and Medium Practices (SMOs) – The IESBA invites comments regarding the impact of the proposed changes for SMPs.

Yes, I agree with IESBA invites comments regarding the impact of the proposed changes for SMPs.

b) Developing Nations – Recognizing that many developing nations have adopted or are in the process of adopting the Code, the IESBA invites respondents from these nations to comment on the proposals, and in particular, on any foreseeable difficulties in applying them in their environment.

Yes, I agree with Developing Nations adopted or are in the process of adopting the Code, the experience can reduce difficulties in applying them in their environment.

c) Translations – Recognizing that many respondents many intend to translate the final pronouncement for adoption in their environments, the IESBA welcomes comment on potential translation issues respondents may note in reviewing the proposals.

Yes, I agree with Translations, because are important issues respondents may note in reviewing the proposals.

Thank you for opportunity for comments this proposal, if you have questions do not hesitate contact to me, rio1042370@terra.com.br.

Yours,

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