Mr. Ken Siong Senior Technical Director International Ethics Standards Board for Accountants International Federation of Accountants 529 Fifth Avenue, 6th Floor New York, NY 10017 USA

Dear Mr. Ken Siong

Below you will find the comments from the Ethics Commission of the Mexican Institute of Public Accountants (IMCP as per its acronym in Spanish), to the IESBA document exposure draft "Proposed Revisions to the Non-Assurance Services Provisions of the Code". We are addressing your request for specific comments, as follows.

	Prohibition on NAS that Will Create a Self-review Threat for PIEs	
1.	Do you support the proposal to establish a self-review threat prohibition in proposed paragraph R600.14?	Yes
2.	Does the proposed application material in 600.11 A2 set out clearly the thought process to be undertaken when considering whether the provision of a NAS to an audit client will create a self-review threat? If not, what other factors should be considered?	Yes
	Providing Advice and Recommendations	
3.	Is the proposed application material relating to providing advice and recommendations in proposed paragraph 600.12 A1, including with respect to tax advisory and tax planning in proposed paragraph 604.12 A2, sufficiently clear and appropriate, or is additional application material needed? Project on Definitions of Listed Entity and PIE	No additional application guide is required
4.	Having regard to the material in section I, D, "Project on Definitions of Listed Entity and PIE," and the planned scope and approach set out in the approved project proposal, please share your views about what you believe the IESBA should consider in undertaking its project to review the definition of a PIE. Materiality	Yes
5.	Do you support the IESBA's proposals relating to materiality, including the proposal to withdraw the materiality qualifier in relation to certain NAS prohibitions for audit clients that are PIEs (see Section III, B "Materiality")?	Yes
6.	 Do you support the proposal to prohibit the following NAS for all audit clients, irrespective of materiality: Tax planning and tax advisory services provided to an audit client when the effectiveness of the tax advice is dependent on a particular accounting treatment or presentation and the audit team has doubt about the appropriateness of that treatment or presentation (see proposed paragraph R604.13)? Corporate finance services provided to an audit client when the effectiveness of such advice depends on a particular accounting treatment or presentation and the audit team has doubt about the appropriateness of that treatment or presentation (see proposed paragraph R610.6)? 	Yes
	Communication with TCWG	
7.	Do you support the proposals for improved firm communication with TCWG (see proposed paragraphs R600.18 to 600.19 A1), including the requirement to obtain concurrence from TCWG for the provision of a NAS to an audit client that is a PIE (see proposed paragraph R600.19)?	Yes
	Other Proposed Revisions to General NAS Provisions	
8.	Do you support the proposal to move the provisions relating to assuming management responsibility from Section 600 to Section 400, and from Section 950 to Section 900?	Yes
9.	Do you support the proposal to elevate the extant application material relating to the provision of multiple NAS to the same audit client to a requirement (see proposed paragraph R600.10)? Is the related application material in paragraph 600.10 A1 helpful to implement the new requirement? Proposed Revisions to Subsections	Yes
10.	Do you support the proposed revisions to subsections 601 to 610, including: The concluding paragraph relating to the provision of services that are "routine or mechanical" in proposed paragraph 601.4 A1? The withdrawal of the exemption in extant paragraph R601.7 that permits firms and network firms to provide accounting and bookkeeping services for divisions and related entities of a PIE if certain conditions are met? The prohibition on the provision of a tax service or recommending a tax transaction if the service or transaction relates to marketing, planning or opining in favor of a tax treatment, and a significant purpose of the tax treatment or transaction is tax avoidance (see proposed paragraph R604.4)? The new provisions relating to acting as a witness in subsection 607, including the new prohibition relating to acting as an expert witness in proposed paragraph R607.6?	Yes
	Proposed Consequential Amendments	
11.	Do you support the proposed consequential amendments to Section 950?	Yes



Are there any other sections of the Code that warrant a conforming change as a result of the NAS project?

At first view no, but we suggest a deep review of all those other areas.

Sincerely,

Eduardo García-Fuentes
President of the Ethics Commission of the
Mexican Institute of Public Accountants (IMCP)
IFAC Member Body

Mexico City, Mexico, June 16, 2020.