

Structure of the Code—High Level Summary of Respondents' Comments on the Consultation Paper

How the Project Serves the Public Interest

Through the development of a restructured Code, the project serves the public interest by:

- Enhancing understandability of the Code, facilitating compliance by professional accountants and enforcement by regulators; and
- Improving the usability of the Code, thereby facilitating adoption, effective implementation and consistent application.

A. Overview of Responses

1. In November 2014, the IESBA issued its Consultation Paper (CP) [Improving the Structure of the IESBA Code](#). The comment period for matters raised in the CP closed on February 4, 2015. As at February 15, 2015, 51 responses have been received. For a complete listing of respondents, see the Appendix. All the responses have been posted on the IESBA website and can be accessed here: <http://www.ifac.org/publications-resources/improving-structure-code-ethics-professional-accountants>

Category	Number of responses received
Regulators and Public Authorities, including: <ul style="list-style-type: none"> • IOSCO (28 national securities regulators)¹ • Dual regulatory and national standard setting bodies (IRBA (South Africa), NASBA (USA), FRC (UK)) • 20 EUAR (20 independent European audit regulators and/or oversight bodies)² 	6
National Standards Setters	2
IFAC Member Bodies ³	28

¹ IOSCO Committee 1 members include the securities regulators of Argentina, Australia, Belgium, Brazil, Canada (Ontario), Canada (Quebec), China, France, Germany, Hong Kong SAR, India, Ireland, Israel, Italy, Japan, Luxembourg, Mauritius, Mexico, the Netherlands, New Zealand, Poland, Spain, Switzerland, Taiwan, Thailand, Turkey, UK, USA and Uruguay.

² The content of the 20 EUAR response was discussed and agreed upon by the audit regulators of Austria, Bulgaria, Czech Republic, Denmark, Estonia, France, Germany, Hungary, Ireland, Lithuania, Luxembourg, The Netherlands, Norway, Portugal, Romania, Slovakia, Slovenia, Spain Sweden, and Switzerland

³ Certain IFAC Member Bodies also hold the dual role of ethics standard setter in their jurisdictions.

Category	Number of responses received
Firms	7
Other Professional Organizations	7
Individuals and Others	1
Total	51

2. Respondents expressed widespread support for the project, subject to some cautions and comments, highlights of which are discussed below.
3. Some respondents⁴ noted their support for the project but raised concerns that the project may become more than a restructuring exercise, which could inadvertently result in substantive changes creating new requirements that are not subject to due process.
4. Some respondents⁵ who expressed support for the project noted that stakeholders in EU member states will also have to address major audit reform during the proposed timeframe and may need more time to implement any changes to the structure of the Code. A respondent⁶ suggested the Board should “take proper time and wait for the implementation of the EU reform in order to assure that the proposed modifications correspond to the needs of users.”
5. Another respondent⁷ did not support the project due to the burden of changes and the risk of unintended consequences.

B. Key Matters Raised by Respondents – Referred to IESBA for Separate Consideration

Responsibility for Breaches

6. The CP included an illustration of how a responsibility requirement could be established particular to the Code. Respondents were asked for their views on whether the illustrated approach was an appropriate means to enhance the usability and enforceability of the Code.
7. A regulatory respondent⁸ expressed concern that the open-ended approach suggested by the Board “lacks specificity and does not address the fundamental threat we identified of potentially having an individual in the local office tasked with resolving a local engagement team’s breach of an independence requirement. Audit firms serving the capital markets should have sufficient resources

⁴ **Regulators and Public Authorities** IRBA SCM **National Standard Setter** APESB **Member Bodies** AICPA CNCC CPA **Audit Firms** BDO DTT PwC EY **Other Professional Organization** FEE

⁵ **Member Bodies** CNCC ICAS **Firm** DTT **Other Professional Organization** FEE

⁶ **Member Body** CNCC

⁷ **Member Body** AICPA

⁸ **Regulator and Public Authority** IOSCO

and personnel to enable issues such as these breaches to be addressed by the appropriate members of senior management most qualified to objectively deal with the breach.”

8. The Task Force believes this issue would be outside the scope of the Structure project and will refer the matter to the Board for further consideration.

Safeguards

9. Some regulatory respondents⁹ commented on the importance of addressing safeguards in the Code. A project proposal to address safeguards in the Code was approved by the IESBA in January 2015. Comments received from respondents to the CP which are relevant to the safeguards project have been provided to the Safeguards Task Force.

C. Key Matters Raised by Respondents

Rebranding the Code as Standards

10. There was general agreement that the labelling of the section containing the fundamental principles and conceptual framework as a code or standards should reinforce and not detract from the principles-based approach. Many respondents¹⁰ emphasized that the fundamental principles are dealing with good behavior and are not readily presented as measurable standards; in contrast, independence and various other parts of the Code may be presented as standards.
11. There was clear support from respondents for labelling and presenting independence sections as standards. Views on the labelling of other parts of the Code were mixed. A few alternative suggestions were made by respondents for the Task Force to consider. These include:
 - Creating a “one-page” code with code and some standards to support;¹¹
 - Creating a “one-page” International Standard on Ethics supported by a code;¹²
 - Presenting a “one-page” code at the front and structuring the remaining code around the fundamental principles, not the users;¹³ and
 - A code containing the fundamental principles while provisions that are derived from the fundamental principles could be contained within standards¹⁴. For example, objectivity is a fundamental principle and would therefore be included within the Code while independence, which is derived from the fundamental principle of objectivity, might form a supporting standard.

⁹ **Regulators and Public Authorities** 20 EUAR FRC IOSCO IRBA

¹⁰ **Regulators and Public Authorities** FRC IRBA **Member Bodies** ACCA CNCC CPA Au FSR ICAEW ICAS IDW JICPA WPK **Firm** KPMG **Other Professional Organizations** FEE SMPC (IFAC)

¹¹ **Member Bodies** ACCA IDW

¹² **Other Professional Organization** IMA

¹³ **National Standards Setter** NZAuASB

¹⁴ **Other Professional Organization** FEE

Matters for Consideration

1. Representatives are asked to:
 - a) Share any reactions to the suggestions made by respondents;
 - b) Reflect on the merits of having a shortened code supported by standards; and
 - c) Advise what actions, if any, the IESBA should take with regard to re-branding the Code as Standards.

Requirement to Apply the Fundamental Principles and Conceptual Framework

12. There was widespread support for distinguishing requirements from guidance.
13. Many respondents¹⁵ supported emphasizing the requirement to apply the fundamental principles and conceptual framework. However, many respondents¹⁶ noted repetition as a concern. Several respondents¹⁷ expressed caution that repetition may unduly lengthen the Code.
14. A respondent¹⁸ suggested distinguishing between the fundamental requirements in Part I and the specific requirements in the remainder of the Code. This respondent explained that requirements in Part I could be named “Fundamental or Core requirements” and, for the remainder of the Code, requirements could be named “Specific requirements.”
15. The CP used a Purpose component to outline relevant/typical threats and remind users to apply the fundamental principles and conceptual framework. This general requirement to apply the fundamental principles and conceptual framework was presented as a requirement at the beginning of the independence part in Section 400.¹⁹
16. The Purpose component was described in the CP as follows:

“The Purpose component includes introductory comments to broadly describe the context and then briefly describe what threats may exist, referring users to the fundamental principles and, where relevant, the independence provisions. It sets out the context in which the requirements are to be read, and is not to be read as creating any requirements in itself. The language is intentionally broad. More specific language is used in the Requirements component. The Purpose component includes a reminder, at the start of each section, of the importance of the fundamental principles and the requirement to comply with the principles-based conceptual framework.”

¹⁵ **Regulators and Public Authorities** 20 EUAR FRC IOSCO IRBA **National Standard Setter** NZAuASB **Member Bodies** ACCA CAANZ CPA Au FSR HKICPA ICAEW ICAS **Firm** KPMG **Other Professional Organization** FEE

¹⁶ **National Standard Setters** APESB NZAuASB **Member Bodies** ACCA FAR FSR ICAEW IDW WPK **Firms** DTT EYG PwC **Other Professional Organizations** FEE SMPC (IFAC)

¹⁷ **Regulator and Public Authority** IRBA **National Standard Setter** NZAuASB **Member Bodies** ACCA FSR ICAS WPK **Firms** DTT EY **Other Professional Organization** FEE

¹⁸ **Other Professional Organization** EFEI

¹⁹ CP Appendix 1 Illustrative Examples Part IV Section 400, Introduction

17. Some respondents²⁰ commented that the Purpose component as drafted in the Illustrative Examples did not have a clear role. A few respondents²¹ suggested the Purpose component should be replaced by an objectives component such as that in the International Auditing and Assurance Standards Board's (IAASB) International Standards on Auditing (ISAs). A regulatory respondent²² suggested an objectives component to:

“clearly and specifically identify the threat that could be reasonably possible with respect to the provision of the Code and the auditor's overall goal in addressing the threat.

The objectives section should also emphasize that requirements may not be all encompassing so that having complied with the requirements the auditor should always step back to determine whether the objectives were met having considered the specific facts and circumstances of the issue at hand.”

18. Some respondents²³ however, commented that following the ISA approach may not be appropriate for the Code which, by its nature, is different from the ISAs as it addresses professional behavior rather than simply process. A respondent²⁴ commented that it understood why consideration was being given to clarifying the IESBA Code using an approach similar to the ISAs. However, it was of the view that time had moved on and it believed that current concerns about professional accountants' ethics may not necessarily be best addressed by a move to an ISA-type model (with a 'purpose' in place of the ISA objectives and then 'requirements' followed by 'application and other explanatory material' as illustrated in the consultation paper). It added that “ISAs establish standards that are focussed on ensuring auditors obtain sufficient appropriate audit evidence and exercise professional scepticism. Accordingly, many of the requirements are process based. Ethics, however, is not about process but rather about good behaviours, driven by high personal values/morals and a mind-set focussed on serving the public interest.”

Matters for Consideration

2. CAG Representatives are asked for views on:
- (a) The advantages and disadvantages of replacing the Purpose component with an objectives component; and
 - (b) Doing so:
 - Throughout the restructured Code; and
 - For the Independence sections of the restructured Code only.

²⁰ **Regulators and Public Authorities** FRC IOSCO **Member Body** WPK Firm PwC RSM

²¹ **Regulator and Public Authority** IOSCO **Firms** RSM

²² **Regulator and Public Authority** IOSCO

²³ **Regulator and Public Authority** FRC **Member Bodies** ACCA CPA Au CNCC

²⁴ **Regulator and Public Authority** FRC

Distinguishing Requirements and Guidance

19. Comments from most respondents support the separation of requirements from guidance. However, many²⁵ respondents also commented that the separation of requirements from guidance could lead to:
- The Code becoming disjointed and less understandable; and
 - A risk that “Requirements” are read without reference to the “Application and Other Explanatory Material.”
20. These respondents noted the importance of distinguishing, but not separating, requirements from guidance. A few suggested methods for making the distinction were received from respondents. These include: showing requirements in bold font; surrounding requirement paragraphs with a box; and distinguishing Application and Other Explanatory Material by including “A” within the paragraph numbering.
21. A few respondents²⁶ did not support the headings used within sub-sections such as: “Business relationships specifically identified as threats” and “Specific threats related to professional appointments”. These respondents commented that the headings were:
- Not wholly appropriate to the material which followed; and
 - Leading to content becoming over structured.

Matters for Consideration

3. CAG Representatives are asked to provide input on how best to distinguish requirements from guidance while retaining due weight on each, appropriate linkage and readability?
4. Representatives are asked for views as to whether application guidance, appropriately distinguished from requirements, should be located closer to the related requirements?

Identification of a Firm’s or Individual Professional Accountant’s Responsibility

22. As noted in Section B above, a concern raised by a regulatory respondent²⁷ regarding responsibility for breaches will be referred to the IESBA for further consideration.

²⁵ **Regulators and Public Authorities** 20 EUAR FRC IRBA **Member Bodies** AICPA CNCC FAR ICAEW KICPA MIA WPK **Firms** DTT EYG KPMG PwC **Other Professional Organizations** FEE GAO SMPC (IFAC)

²⁶ **Firms** DTT PwC

²⁷ **Regulator and Public Authority** IOSCO

23. There was support from most respondents for reducing the use of the passive voice and developing the guidance currently in paragraph 290.12²⁸ to clarify responsibility in the Code. However, several respondents²⁹ were of the view that the existing cross reference to ISQC1³⁰ was sufficient.
24. Many respondents did not support the examples³¹ of who may be a responsible individual within the firm. Of the respondents who did support the examples, some³² suggested improvements.
25. Several respondents³³ noted the importance of individual professional accountants taking responsibility for complying with the Code. They requested that the IESBA exercise caution in not creating an environment where responsible individuals can be treated as scapegoats. A respondent³⁴ commented that “In determining responsibilities for various requirements, it is important that those responsible for doing so avoid an abdication of individual responsibility for ethical behaviour. However it is not the role of the Code to create scapegoats should regulatory intervention be required. Collective responsibility at a senior level should be emphasised, as well as ensuring that there are no ‘gaps’ in responsibility.”
26. Some respondents³⁵, including a few regulatory respondents³⁶, encouraged the Board to work with the IAASB to ensure that any requirements or guidance regarding responsibility included within the Code do not conflict with ISQC1 or the ISAs.

²⁸ Section 290, *Independence – Audit and Review Engagements* paragraph 290.12: This section does not, in most cases, prescribe the specific responsibility of individuals within the firm for actions related to independence because responsibility may differ depending on the size, structure and organization of a firm. The firm is required by *International Standards on Quality Control* (ISQCs) to establish policies and procedures designed to provide it with reasonable assurance that independence is maintained when required by relevant ethical requirements. In addition, *International Standards on Auditing* (ISAs) require the engagement partner to form a conclusion on compliance with the independence requirements that apply to the engagement.

²⁹ **Member Bodies** AAT AICPA FAR FSR NASBA

³⁰ International Standard on Quality Control (ISQC) 1, *Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements*

³¹ Such responsible individuals may include:

- (a) The engagement partner;
- (b) Senior individuals responsible for ethics or independence matters for the firm;
- (c) Any other individual within the firm identified as a responsible individual in relation to a particular matter.

³² **Regulator and Public Authority** IRBA **Member Bodies** CPA Canada ICAB **Firm** RSM **Other Professional Organization** GAO

³³ **National Standard Setter** NZAuASB **Member Bodies** AAT ACCA HKICPA ICAEW ICAGH NASBA **Firm** BDO

³⁴ **Member Body** ICAEW

³⁵ **Regulators and Public Authorities** 20 EUAR IOSCO **Member Body** AAT **Firm** Crowe Horwath

³⁶ **Regulators and Public Authorities** 20 EUAR IOSCO

Matter for Consideration

5. Do CAG Representatives have any comments on further actions the Board should take to clarify responsibility in the Code?

Reordering Extant Parts B and C

27. There was widespread support for reversing the order of extant Parts B³⁷ and C³⁸ to allow all of the material related to professional accountants in public practice to be grouped together and independence to be presented at the end.³⁹ Several respondents⁴⁰, some of whom are in jurisdictions that have not adopted Part C, did not favor reversing the order of the Parts. Reversing the order of the Parts would not alter the categories of professional accountants to which the parts apply.
28. A few respondents⁴¹ who did not favor the suggested reordering noted that due to the importance of, and the regulatory interest in, the independence provisions, these sections should be positioned earlier in the restructured Code as close to the fundamental principles and conceptual framework as possible.
29. A few respondents⁴² supported the reordering on the basis that provisions in extant Part C apply to all professional accountants. A respondent⁴³ commented:
- “We agree with the Board’s proposal to reverse the order of extant Part B and Part C, since accountants in public practice are also accountants in business, i.e. these are not mutually exclusive subsets. In fact the extant Code acknowledges this as it states at paragraph 100.12 that “professional accountants in public practice may also find part C relevant to their particular circumstances”. We therefore believe the proposed re-ordering is more logical. For example, extant Part C addresses matters such as employee performance quality, disciplinary procedures, and the establishment of “whistle-blowing” channels, which apply also to professional accountants in public practice.”
30. A few respondents⁴⁴ suggested creating separate codes for Professional Accountants in Business and Professional Accountants in Public Practice. The respondents suggested that each code would stand alone and include the fundamental principles and conceptual framework content from extant Part A. This idea has been debated by the IESBA previously and concerns were raised that splitting the code would create a risk that professional accountants and other users of the Code might overlook the material which they see as irrelevant to them.

³⁷ Part B, *Professional Accountants in Public Practice*

³⁸ Part C, *Professional Accountants in Business*

³⁹ **Regulator and Public Authority** IRBA **National Standard Setters** APESB NZAUASB **Member Bodies** ACCA CAANZ CPA Au CPA Canada ICAEW ICAGH ICAS ICPAU HKICPA **Firms** KPMG RSM **Other Professional Organizations** AAA FEE

⁴⁰ **Member Bodies** CNCC FAR FSR ICAP JICPA NASBA **Firm** EY **Other Professional Organization** EFEI **Individual and Other** Jean Thiomas Giraud

⁴¹ **Member Bodies** JICPA NASBA **Other Professional Organization** EFEI

⁴² **Member Body** CPA Canada **Firm** KPMG

⁴³ **Firm** KPMG

⁴⁴ **Member Bodies** AAT CNCC

Matter for Consideration

6. Do CAG Representatives have any views on the re-ordering of extant Parts B and C of the Code?

Unintended Changes in Meaning Due to Restructuring

31. Many respondents⁴⁵ believe the proposed timeframe is acceptable. Many others,⁴⁶ however, feel it should be longer. Several respondents⁴⁷ noted the risk of inadvertent changes in meaning and unintended consequences arising from simplifying the language used in the Code. A few⁴⁸ highlighted the importance of arriving at the right structure rather than being unduly constrained by the timeline.
32. As noted in paragraph 44 of the CP, the restructured Code would be subject to IESBA's normal due process.
33. A respondent⁴⁹ noted it had recently been through a similar process and had made use of pilot testing to identify unintended consequences of the changes made.

Matter for Consideration

7. CAG Representatives are asked to share their views on pilot testing and other means of avoiding unintended changes in meaning?

D. Other Matters

34. Respondents also raised a number of other matters as follows. These will be analyzed for the Board's consideration in due course.

Audit Includes Audit and Review

35. Many respondents⁵⁰ were not in favor of creating a separate section for review engagements. Several of the respondents⁵¹, however, believed the current approach of using the term "audit" to include "review engagement" should be changed. Some respondents⁵² were in favor of retaining the current approach. Alternative suggestions made by respondents included the following:

⁴⁵ **Regulators and Public Authorities** AIC 20 EUAR FRC IRBA **Member Bodies** ACCA CPA Canada FAR ICAB ICAGH ICPAK ICPAU IMCP KICPA SAICA ZICA **Firms** Crowe Horwath KPMG PwC **Other Professional Organizations** AAA NYSSCPA

⁴⁶ **National Standard Setter** APESB **Member Bodies** AICPA CNCC CPA Au FSR ICAEW ICAS IDW **Firms** BDO DTT EY **Other Professional Organizations** FEE SMPC (IFAC)

⁴⁷ **Regulators and Public Authorities** IRBA SCM **National Standard Setter** APESB **Member Bodies** AICPA CNCC CPA Au **Firms** BDO DTT PwC EY **Other Professional Organization** FEE

⁴⁸ **Member Bodies** ACCA CPA Australia **Other Professional Organization** FEE

⁴⁹ **Member Body** AICPA

⁵⁰ **Regulator and Public Authority** FRC **National Standard Setters** APESB NZAuASB **Member Bodies** AICPA ACCA CPA Canada HKICPA ICPAK JICPA NASBA SAICA **Firms** BDO EY Crowe Horwath

⁵¹ **Regulator and Public Authority** FRC **National Standard Setters** APESB NZAuASB **Member Bodies** ACCA CPA Canada HKICPA ICPAK JICPA SAICA

⁵² **Member Bodies** AICPA NASBA **Firms** BDO EYG Crowe Horwath

- Use “audit or review” as appropriate;
 - Establish upfront that the material in the common section is relevant to both audit and review engagements unless stated otherwise and then just using the term “engagement” rather than “audit”;⁵³
 - Using the term “audit and review engagement” for requirements that are applicable to those types of engagement;⁵⁴
 - Use the words “audit” and “review” only where necessary for reasons of accuracy. Instead of defining the terms “audit team”, “audit engagement”, “audit client” and “audit report”, the defined terms would be “team”, “engagement”, “client” and “report”;⁵⁵ and
 - Being clear on the application of a term (such as audit or review engagement) when it is used for the first time in a paragraph and subsequently use an abbreviated term (such as engagement).⁵⁶
36. One respondent⁵⁷ identified the use of “audit client” as giving a misleading message about the relationship between the auditor and the entity being audited.

Public Interest and Non-Public Interest Entity Requirements

37. Some respondents⁵⁸ questioned why the IESBA had not proposed any delineation or separation of the requirements for public interest entities (PIE).

Use of Language

38. There was widespread support for the proposed clarification of language designed to enhance the readability and clarity of the Code by various means, especially for those users whose first language is not English. Such clarification is intended to be achieved through means such as:
- Using simpler and shorter sentences.
 - Simplifying complex grammatical structures.
 - Adding a link from the definitions section to terms which although defined, are described at greater length within the text of the Code, such as “network firm.”
 - Increased use of the active voice.
 - Avoiding repetition of the text of definitions which are included in the list of defined terms.
 - Avoiding legalistic and archaic terms, nuances, and superfluous adjectives.
 - Aligning terminology used in the independence sections with that used by the IAASB.

⁵³ **Regulator and Public Authority** FRC **Member Body** ICPAK

⁵⁴ **National Standard Setter** NZAuASB **Member Body** HKICPA

⁵⁵ **Member Body** ACCA

⁵⁶ **National Standard Setter** APESB

⁵⁷ **Member Body** ICAEW

⁵⁸ **Member Bodies** FSR IDW **Firm** BDO **Other Professional Organization** SMPC (IFAC)

Highlighting Definitions and Terms Used

39. Several respondents⁵⁹ noted the use of blue, bold and underline to identify definitions and other terms as distracting for the reader.

Definitions and Descriptions

40. Several respondents⁶⁰ commented on the repetition in the “Terms Used” sections and noted a preference for maintaining an enhanced glossary of definitions and descriptions in one location rather than throughout the Code.

Numbering conventions

41. Most respondents were supportive of the proposed numbering conventions and recognized the importance of having a numbering system that allows for future expansion of the code. Some respondents⁶¹ commented that numbering should be kept simple and that starting at “.1” rather than “.001” would be preferable.

Matter for Consideration

8. Do CAG Representatives have any comments on the matters raised by respondents?

⁵⁹ **Regulator and Public Authority** IRBA **Member Bodies** ACCA FSR ICAGH ISCA **Firms** DTT EY PwC RSM **Other Professional Organization** FEE

⁶⁰ **National Standard Setter** APESB **Member Bodies** FAR FSR ISCA WPK **Firms** DTT EY RSM

⁶¹ **Regulator and Public Authority** IRBA **Member Bodies** ACCA JICPA **Firm** PwC **Other Professional Organization** FEE

APPENDIX

List of Respondents

ABBR.	ORG.
REGULATORS & PUBLIC AUTHORITIES	
AIC	Interamerican Accounting Association; Asociacion Interamericana de Contabilidad
20 EUAR	20 European Audit Regulators
FRC	Financial Reporting Council (UK)
IOSCO	International Organization of Securities Commissions
IRBA	Independent Regulatory Board for Auditors (South Africa)
SCM	Securities Commission of Malaysia
NATIONAL STANDARD SETTERS	
APESB	Accounting Professional & Ethical Standards Board Limited-Australia
NZAuASB	New Zealand Auditing and Assurance Standards Board
IFAC MEMBER BODIES	
AAT	Association of Accounting Technicians
ACCA	The Association of Chartered Certified Accountants
AICPA	American Institute of CPA
CAANZ	Chartered Accountants Australia and New Zealand
CNCC	Compagnie Nationale des Commissaires aux Comptes
CPA Au	CPA Australia
CPA Canada	The Canadian Institute of Chartered Accountants
FAR	FAR
FSR	Foreningen af Statsautoriserede Revisorer (Denmark)

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ABBR.	ORG.
HKICPA	Hong Kong Institute of Certified Public Accountants
ICAB	The Institute of Chartered Accountants of Bangladesh
ICAEW	The Institute of Chartered Accountants in England and Wales
ICAGH	The Institute of Chartered Accountants (Ghana)
ICAP	Institute of Chartered Accountants of Pakistan
ICAS	The Institute of Chartered Accountants of Scotland
ICPAK	Institute of Certified Public Accountants of Kenya
ICPAU	Institute of Certified Public Accountants of Uganda
IDW	Institut der Wirtschaftsprüfer
IMCP	Instituto Mexicano de Contadores Publicos
ISCA	Institute of Singapore Chartered Accountants
JICPA	The Japanese Institute of Certified Public Accountants
KICPA	Korean Institute of Certified Public Accountants
MIA	Malaysian Institute of Accountants
NASBA	National Association of State Boards of Accountancy
SAICA	The South African Institute of Chartered Accountants
SAIPA	The South African Institute of Professional Accountants
WPK	Wirtschaftsprüferkammer
ZICA	Zambia Institute of Chartered Accountants
FIRMS	
BDO	BDO Global Coordination B.V.
Crowe Horwath	Crowe Horwath International

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ABBR.	ORG.
DTTL	Deloitte Touche Tohmatsu Limited
EYG	Ernst & Young Global
KPMG	KPMG
PwC	PricewaterhouseCoopers
RSM	RSM International
OTHER PROFESSIONAL ORGANIZATIONS	
AAA	American Accounting Association
EFEI	European Financial Executives Institutes
FEE	Fédération des Experts Comptables Européens
GAO	United States Government Accountability Office
IMA	Institute of Management Accountants
NYSSCPA	New York State Society of Certified Public Accountants
SMPC (IFAC)	IFAC Small and Medium Practices Committee
INDIVIDUALS AND OTHERS	
Jean Thiommas Giraud	Jean Thiommas Giraud