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HQ 502/141 Pt.25

Mr. Simon Riley

Acting Director, Standard Setting

Hong Kong Institute of

Certified Public Accountants

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INLAND REVENUE DEPARTMENT

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Dear Mr. Riley,

Re: IFAC's International Ethics Standards Board for Accountants (IESBA) Exposure Draft on Proposed Changes to Certain Provisions of the Code Addressing Non-assurance Services for Audit Clients

I refer to HKICPA's letter of 6 June 2014 inviting for comments on the above IESBA Exposure Draft.

The IESBA proposes changes to the Code of Ethics for Professional Accountants ("the Code") to enhance the independence provisions by:

- -Providing additional guidance and clarification regarding what constitutes management responsibility when the auditor provides nonassurance services to an audit client;
- -Providing enhanced guidance and clarification on the concept of "routine or mechanical" services relating to the preparation of accounting records and financial statements for non-public interest entity audit clients; and

JR 678(1) (5/2012)

-Removing the provision that permits an audit firm to provide certain bookkeeping and taxation services to public interest entity audit clients in emergency situations.

Independence is cornerstone for the audit profession in providing quality assurance services. The performance of non-assurance services to audit clients by auditors may create threats to their independence. In this respect, I welcome the IESBA Exposure Draft to strengthen the independence provisions of the Code, and broadly support the additional guidance and clarification provided to assist the accounting and audit professions in the provision of non-assurance services to audit clients.

I appreciate the opportunity to comment on the Exposure Draft.

Yours sincerely,

(Mrs WU LAM Choi-wah)

Lan Chi www

for Commissioner of Inland Revenue