



Grant Thornton

Ms Kate Spargo
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Accounting Professional and Ethical Standards Board
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By E-mail: sub@apesb.org.au

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Dear Kate

Consultation Paper: Proposed Revision of APES 110 Code of Ethics for Professional Accountants

Grant Thornton Australia Limited (Grant Thornton) appreciates the opportunity to comment on the Accounting Professional and Ethical Standards Board's (APESB) Consultation Paper: Proposed Revision of APES 110 Code of Ethics for Professional Accountants.

Grant Thornton's response reflects our position as auditors and business advisers both to listed companies and privately held companies and businesses.

Consistency with IFAC Code of Ethics for Professional Accountants

As previously advised in our various submissions to the APESB and in particular our 9 April 2009 submission on ED 01/09 APES 320, Grant Thornton believes that only minimal necessary regulatory changes should be made to any recognised global standard that is being adopted in Australia given the need to ensure consistency of global standards. The 'look and feel' of an Australian standard should be instantly recognised as a global standard, and we note that this is the policy of both the Australian Accounting Standards Board (AASB) and the Auditing and Assurance Standards Board (AUASB), with neither of the Boards having a problem with accommodating Australian legislation and the local Australian environment.

Where the APESB believes that other editorial changes are necessary to a global standard, we believe that it is incumbent on the APESB to seek the views of the relevant global standards setter to ensure that any changes do not impact the effectiveness of the particular standard. As a general rule we would discourage any editorial changes, but where needed for regulatory reasons, we believe that such amendments need to be highlighted as an Aus reference along the lines that the AASB and AUASB follow.

Timing of Release of EDs and Standards

We also believe that the APESB needs to be issuing proposed amendments to its standards at the same time that the equivalent International Standards setter issues any proposed amendments, to ensure that Australian constituents have the opportunity to influence any resulting standard that needs to be adopted by Australia to ensure International compliance with world's best practice. The process followed by the AASB with roundtables and asking for submissions just prior to the submission deadline for International EDs works well, and ensures that Australian constituents have sufficient time to amend their own internal requirements to ensure compliance with International standards.

In particular we believe that the Australian equivalent to the IFAC Code of Ethics should have been released at the same time when it was released by the IFAC. The delay in releasing an Australian equivalent to the IFAC Code of Ethics means that Australian constituents have less time than other IFAC constituents have had to implement the revised standard.

If you require any further information or comment, please contact me.

Yours sincerely

GRANT THORNTON AUSTRALIA LIMITED



Keith Reilly
National Head of Professional Standards