

29 September 2021

Mr. Ken Siong
IESBA Technical Director
International Ethics Standards Board for Accountants
International Federation of Accountants
529 5th Avenue
New York, New York 10017
USA

Re: Proposed Quality Management-related Conforming Amendments to the Code

Dear Mr. Siong,

BDO International Limited¹ (BDO) is pleased to have the opportunity to comment on the International Ethics Standards Board for Accountants' (IESBA or Board) Exposure Draft (ED) in respect of the Proposed Quality Management-related Conforming Amendments to the Code.

BDO is dedicated to upholding the highest ethical standards and complying with both global and firm policies and external professional standards. Independence is the cornerstone of our profession and the fundamental principle from which reliability of audit, review and other assurance reports to third parties is based. As a member of the accountancy profession, we accept the responsibility to act in the public interest. We support the Board in working to keep the IESBA Code relevant and fit for purpose.

Responses to Specific Questions

1. Do you agree with the proposed conforming amendments in this ED?

BDO agrees with the proposed conforming amendments contained in the ED as we believe that they result in alignment with the suite of quality management standards.

2. In addition to the proposed conforming amendments, the IESBA also considered the matter raised concerning decisions about accepting or providing services to a client in paragraph 300.7 A5. Do you agree with the IESBA's view on this matter? If not, please explain why.

BDO agrees with the IESBA's view on this matter. However, we suggest that amending the wording to better align with the suite of quality management standards will eliminate confusion in practice, as follows:

...including the appropriateness of the judgement exercised and decision reached by the firm on whether to accept or continue a client relationship or specific engagement ~~decisions about accepting or providing services to a client.~~

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3. Do you agree with the proposed effective date? If not, please explain your reasoning.

To achieve the objective of the Code being aligned to and interoperate with the suite of quality management standards, the effective dates should correlate. BDO therefore agrees with the proposed effective date as they align with those contained in the quality management standards.

We appreciate the opportunity to comment on the ED. We hope that our comments and suggestions will be helpful to you in your deliberations and development of future recommendations.

Please contact me should you wish to discuss any of these comments.

Yours sincerely,
BDO International Limited
Chris Smith
Global Head of Audit and Accounting