

30 November 2022

Mr Channa Wijesinghe  
Chief Executive Officer  
Accounting Professional & Ethical Standards Board Limited  
Level 11, 99 William Street  
Melbourne VIC 3000

By email: [sub@apesb.org.au](mailto:sub@apesb.org.au)

Dear Channa,

***Re: Exposure Draft 05/22 Proposed Revisions to the Definitions of Listed Entity and Public Interest Entity in APES 110 Code of Ethics for Professional Accountants (including Independence Standards)***

Thank you for the opportunity to comment on Exposure Draft 05/22.

IPA is generally supportive of the range of proposed amendments to the Code to align with the requirements of the IFAC IESBA *International Code of Ethics for Professional Accountants (including Independence Standards)*.

IPA encourages the APESB to provide a timely compilation of the Code once the proposed amendments are adopted to facilitate useability and comprehension of the Code without the need for users to refer to multiple documents and to minimise the risk of misapplication.

Our response to the request for specific comments is included in the Attachment.

If you have any queries with respect to our comments or require further information, please don't hesitate to contact me at [vicki.stylianou@publicaccountants.org.au](mailto:vicki.stylianou@publicaccountants.org.au) or on mobile 0419 942 733.

Yours sincerely



Vicki Stylianou  
Group Executive, Advocacy & Policy  
Institute of Public Accountants

## **About the IPA**

The IPA is one of the professional accounting bodies in Australia with over 47,000 members and students across 80 countries. Approximately three-quarters of our members either work in or are advisers to the small business and SME sectors. Since merging with the Institute of Financial Accountants UK, the IPA Group has become the largest SME and SMP focused accounting body in the world.

## **Attachment – IPA Responses to APESB Request for Specific Comments**

APESB is seeking respondents' specific comments and feedback as to whether there are categories of entities not captured by the extant AUST application material that should be included in proposed paragraph AUST 400.18 A3 as these entities are generally considered to be a Public Interest Entity in Australia.

IPA is not aware of any further categories of entities not captured by the extant AUST application material and we are supportive of the proposed paragraph AUST 400.18 A3 as drafted.