



MALAYSIAN INSTITUTE
OF ACCOUNTANTS

29 July 2019

Dr. Stavros B. Thomadakis
IESBA Chair
The International Ethics Standards Board for Accountants
The International Federation of Accountants
545 5th Avenue, 14th Floor
New York, NY 10017

Dear Sir,

Comments on the Exposure Draft - Proposed Revisions to Part 4B of the Code to Reflect Terms and Concepts Used in ISAE 3000 (Revised)

The Malaysian Institute of Accountants (“the Institute”) appreciates the opportunity to provide comments on the Exposure Draft titled *“Proposed Revisions to Part 4B of the Code to Reflect Terms and Concepts Used in ISAE 3000 (Revised)”*.

Our comments to the questions in the Exposure Draft are as follows:

Specific Comments

- 1. Do you believe that the changes in the key terminology used in the Exposure Draft, including the definition of ‘assurance client’, are clear and appropriate for use in Part 4B?**

The changes in the key terminology used in the ED and the definition of “assurance client” are clear and appropriate for use in Part 4B.

However, there is no reference to the new term ‘direct engagement’ in the revised Part 4B of the Code other than in the definition of responsible party. We therefore would like to suggest that in paragraph 900.16 A1, an amendment be made to allow the defined term to be searched in the Code, as follows:

“In some attestation or direct engagements, there might be several responsible parties....”

Additionally, we would like to suggest that an example of an attestation engagement and a direct engagement with similar fact patterns be shown to illustrate the application of the Code in different situations.

2. **Do you have any comments on the application of the IESBA's proposals to the detailed independence requirements and application material as explained above and summarized in the appendix?**

We do not have further comments on this question.

3. **Do you have any comments on the other proposed changes, including on the consistency of terms and concepts in Part 4B in relation to the text of ISAE 3000 (Revised)? If so, please specify the area of inconsistency and suggest alternative wording.**

We do not have further comments on this question.

4. **Are there any other matters that you consider should be addressed with respect to the alignment with ISAE 3000 (Revised) in Part 4B or in other material, for example in an IESBA Staff publication? If so, please provide sufficient explanation, including practical examples of the matter where available.**

We do not have any other matters that need to be addressed with respect to the alignment with ISAE 3000(Revised) in Part 4B or in other material.

5. **Do you agree with the proposed effective date? If not, please indicate why not and explain your reasoning.**


We agree with the proposed effective date of 15 June 2021. This will allow users sufficient time to implement the revised Part 4B of the Code.

We hope the above comments are helpful in your final deliberations.

Thank you.

Yours faithfully,

MALAYSIAN INSTITUTE OF ACCOUNTANTS



DR NURMAZILAH DATO' MAHZAN
Chief Executive Officer