

International Ethics Standards Board for Accountants (IESBA)
Attn. Mr. Ken Siong

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Submitted via the IESBA website

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Subject: IESBA Request for Input: Changes to Part C of the Code Addressing Preparation and Presentation of Information and Pressure to Breach the Fundamental Principles

Date	Re	Our ref	Attachment	Direct dial nr
12 mai 2017	Changes to Part C of the Code	JTD	-	+31 20 3010281

Dear Mr. Siong,

The NBA welcomes the opportunity to be able to respond to the PROPOSAL TO CLARIFY THE APPLICABILITY OF EXTANT PART C TO PROFESSIONAL ACCOUNTANTS IN PUBLIC PRACTICE.

We agree that in general the part of the code that is directed at accountants in business is applicable to all professional accountants when performing a role within their organization. We feel that the solution as provided is helpful. At the same time we suggest a more fundamental change.

At least in the Netherlands we experience that more and more accountants are changing roles working in part time assignments. Therefore an accountant could be working as an accountant in business in the morning and as an accountant in public practice in the afternoon.

We therefore suggest that it would be better to clarify that the extant part is always applicable to professional accountants when a threat is related to the own organization and that extant part B is applicable to threats that relate to the services provided to a client.

Given the fact that we have not implemented the CoE as is in the Netherlands, but that we have implemented the requirements in a different structure, we have no comments regarding translation issues.

For further information on this letter, please contact Jan Thijs Drupsteen via e-mail at j.th.drupsteen@nba.nl.

Yours sincerely,
NBA, the Netherlands Institute of Chartered Accountants,

Signed by

Anton Dieleman
Chair of the Dutch Ethics and Assurance
Standards Board

Royal Netherlands
Institute of Chartered
Accountants

