

Comments received on the exposure draft of revised ISSAI 30

Responses to comments – May 2016

Some statistics:

Responses were received from 55 organisations

Number of organisations that submitted comments: 32

Number of organisations that support the document and/or have no comments: 23

No	Organisation	Paragraph number (in Exposure Draft)	Comment on the paragraph	Decision	Response to the author of the comment (references are made to paragraph numbers in the Endorsement Version, unless otherwise stated)
1	Australia	general (Due care)	There is one matter which I believe should be dealt with in the Code and does not appear to be included in the revision. There should be a requirement for an SAI to ensure that it provides sufficient time for staff to properly undertake their engagements. This requirement could be added to the SAI level requirements under an expanded value of "Competence and due care".	Yes	
2	Brazil	general	Please add a summary to ISSAI 30, according to the ISSAI template approved by PSC.	Yes	Executive summary will be posted on www.intosai.org
3	Costa Rica (translation from Spanish)	general	We suggest adding the table of contents and the glossary, as it is in the existing ISSAI 30.	Partially accepted	Table of contents has been added. Terms are self-explanatory or explained in the text.
4	Denmark	general (link to other ISSAI)	Given that some of the issues covered by ISSAI 30 are also mentioned in other ISSAIs on level 2, you could consider creating a link to these ISSAIs where relevant. I.e. to ISSAI 10 under 2. Independence and to ISSAI 40 under 3. Competence.	No	The ISSAIs are a system of linked documents. It would require constant monitoring.
5	Ecuador	general	Recognizing the importance of the process of reviewing and updating the rules related to the Code of Ethics of INTOSAI, to October 2015; due to the relevance of positioning ethical standards, as well as having a reference in the current context of SAIs worldwide, without losing sight that this instrument will be applied in the particular situation of each country (laws, regulations, social rules,	Included	See Preamble: <i>To satisfy the diversity of culture, and legal and social systems [...] each SAI is encouraged to develop or adopt its own Code of Ethics [...]</i>

			powers of the FSA, etc.).		
6	Ecuador	general	The document is based on five core values described as principles, each with a detailed explanation of SAI requirements, staff requirements, application guide, vulnerabilities and responsibilities; therefore my suggestion is that the Ethical Code could be MORE summarized and complemented with the submission of an Implementation Guide, to make it more educational and easy to assimilate.	No	Creation of an implementation guide is not a change to the ISSAI, but it should be considered. The draft is a compromise that tries to satisfy two opposing needs: to be a concise document and to provide application guidance and more details, as requested by the INTOSAI community. Further guidance can be developed by regional bodies or individual SAIs themselves.
7	France	general	The draft is addressed to all SAIs, without consideration of differences between Audit Offices and Courts of Auditors. However Courts of Auditors comply with specific rules of ethics, sometimes stronger, related to the status of magistrate held by their auditors. We recommend introducing a mention in the preamble, pointing out that this standard has been established without prejudice to specific rules which apply to SAIs of judicial nature.	Yes	Added in the <i>Preamble</i> .
8	Iraq	general	We would like to mention that we have commented on a proposal draft presented by one of the INTOSAI committee, this draft handles the relation between SAI and executive, legislative and judicial authorities. We have suggested to include a paragraph concerned the communication with media, as well as, if this paragraph approved, it should be referred in this standard being introduced appropriate guide to activate the communication with media in a way that enhance credibility in the SAI, staff ethics and professional conduct.	Yes	See paragraph 73(a).
9	Iraq	general	There are some ethics on personal level for the staff during exercising their duties, such as: <ul style="list-style-type: none"> - Making sure to use communication means to achieve work such as computer, internet and mobiles, etc., just for performing works but not for personal use that may effect passively on work performance. - Adhere to time and official work hours and follow up the procedures determined by SAI bylaw in case of delay or absence. - Devote the work time to perform tasks rather than other activities 	Included	It is in the Code (<i>Integrity</i> . Requirements at the level of SAI staff).

			unrelated to work.		
10	Kazakhstan	general (Competence)	<p>There are 5 fundamental values in «Overall approach to ethical behavior» chapter, which are a base of ethical behavior. According to proposed explanation of «Competence» is a maintenance of knowledge and skills appropriate for the role, and action consistently with applicable standards.</p> <p>This remark is necessary as the Code of Ethics is created especially for Supreme Audit Institutions and its employees, who are professionals in public audit field and are guided by public audit professional standards.</p> <p>Furthermore, according with 54 (Continuing professional development) maintaining and developing professional competence is a key way to keep up with technical, professional and business development, to respond to a changing environment and increase stakeholders expectations.</p> <p>In this regard, we propose to add the word «Professional» to the word «Competence». In this case, the text will be as follows: «Professional competence is to maintain professional knowledge and skills appropriate for the role and to act consistently with applicable professional standards».</p>	No	It is included in the definition.
11	Malta	general	To consider providing Guidance when a SAI auditor encounters instances of fraud.	No	It is beyond the scope of this ISSAI, and there are other ISSAIs e.g. 1240 that deal with the topic.
12	Myanmar	general (values)	<p>[...] we would like to inform you that we have normally no comments on this draft after we went through this draft.</p> <p>However, we took notes that according to the International Standards on Auditing (ISA), the independence is separately mentioned in the fundamental principles for professional conduct, not mention the independence and objectivity together.</p> <p>So, to be consistent with the ISA, we would like to suggest you to take into account that the objectivity is only mentioned in the fundamental value and the independence should be mentioned separately.</p>	No	Independence is fundamental for external public auditors. In the IESBA Code only objectivity is a value.
13	Netherlands	general (values)	<p><u>No need to treat confidentiality as a separate entry</u></p> <p>The only element for serious reflection is, in our opinion, the separate treatment of confidentiality (section 5). We consider confidentiality a relevant condition to our work, but we do not consider it an ethical value in itself, like integrity,</p>	Partially accepted	The inclusion of confidentiality is consistent with having to balance transparency and accountability, so to discuss the topic with less

			objectivity, competence and professional behaviour. In our view confidentiality is part of Professional behaviour. The inclusion and extensive description of this topic raises the question why other professional requirements were not chosen as an independent ethical value.		specificity under professional behaviour would not be reflective of the current environment. Moreover, we elaborated on the issue of transparency within <i>Confidentiality</i> .
14	Norway	general	To include good practice in this document could have the effect that the users believe it is a part of the requirement. We recommend that good practice are included in application material.	No	It is distinguished in the text, and examples of good practices were demanded by respondents to the survey. This approach is suggested by the drafting conventions.
15	Norway	general	We refer to other ISSAI documents and suggest that the heading of the first section is renamed "Introduction".	No	It is a level 2 document – very high in the hierarchy which calls for a preamble. The contents of the preamble are not just introductory information. Furthermore, there is inconsistency in ISSAIs, level 2: ISSAI 10 – Preamble; ISSAI 12 – Preamble; ISSAI 20 – Introduction; ISSAI 40 – Introduction.
16	Norway	general	We believe that the structure of the second section should be changed. We suggest that "Risk and controls" are moved to the new "Introduction" and that it is renamed "Risk" and as such provide the background for the document and the need for a code of ethics. See below [specific comments].	No	The authors consider that Introduction is not a good place for such contents.
17	Oman	general	Illustrative scenario based examples including case studies are required to include to help practitioners or auditors to understand better.	No	The draft is a compromise that tries to satisfy two opposing needs: to be a concise document and to provide application guidance and more details, as requested by the INTOSAI community.
18	Oman	general	Reporting mechanism of conflict of interest, ethics dilemmas are required.	Included	It is included in the Code (paragraph 39 (a)). More details should be in guidelines.

19	Oman	general	Regular disclosure from auditors or staff should be required on net worth, financial interests, personal interests, family interests, related parties interests.	Included	It is included in the Code (paragraphs 39-49). More details should be in guidelines.
20	Oman	general	Monitoring mechanism should be specified to ensure preventive or corrective action on above [two last] points [(1) Reporting mechanism of conflict of interest, ethics dilemmas are required; and (2) Regular disclosure from auditors or staff should be required on net worth, financial interests, personal interests, family interests, related parties interests.]	Included	It is included in the Code (paragraphs 39-49). More details should be in guidelines.
21	Oman	general	Conflict of interest should also include financial and/or any beneficiary of families of SAI staff with auditee or potential auditee. SAI staff should disclose any such relationship.	Included	It is included in the Code (paragraphs 39-49). More details should be in guidelines.
22	Oman	general	There is need to emphasize the importance of responsibility to report unacceptable behavior demonstrated by other staff, if noticed.	Included	It is included in the Code (paragraphs 16 and 24(c)). More details should be in guidelines.
23	Philippines	Additional notes	It is noted that in the last revision of ISSAI 30 in 2013, the International Ethics Standards Board for Accountants (IESBA) joined the review committee of INTOSAI as observer. In view of the latest issuance of the IESBA on the revised Code of Ethics for Accountants in 2015, it is suggested that the same be considered in the revision of ISSAI 30.	Noted	IESBA observer is on the ISSAI 30 Revision Team.
24	South Africa	general	Document may need definitions/acronyms section and contents page for ease of reference	Partially accepted	Table of contents has been added. Terms are self-explanatory or explained in the text.
25	South Africa	general	Revised standard is detailed with application guidance for the SAI and SAI staff, as a key prerequisite for the functioning of a SAI the standard has been simplified and consistent with ethical standards of professional bodies e.g. SAICA. For each set of requirements there follows an explanation and then application guidance. What is the difference between the two, why not combine? The application guidance should be cross-referenced to the requirement.	Partially accepted	In the draft, the content rules the structure rather than the other way round. Consistent cross-referencing is not always possible, as some guidance may apply to more than one requirement. We decided to delete some of the explanations, or to include them in the application.
26	Sweden	general	We think it is inappropriate to define Confidentiality as one of the core five	Partially	The inclusion of confidentiality is

		(comment on the value of Confidentiality)	values that underpin ethical behaviour. There are numerous expressions of the need for SAIs being transparent and applying effective methods of communication in the Lima Declaration as well as in ISSAIs 10, 12 and 20. Consequently, one may argue that the necessity to report publicly and to maintain open communication with the stakeholders is a fundamental value in SAIs' work. It should be a fundamental ambition for all SAIs to report and inform about the results of their work in a transparent manner in accordance with the legislation and other regulations. It is hard to understand why it is a greater virtue to keep quiet when the task for a SAI assumes that the organization is communicative and informative. Of course rules on public access, privacy and freedom of speech applies to their business, and of course the SAI and its staff should not needlessly spread information that are not needed for the provision of audit findings. Confidentiality, in this respect should be a requirement. This is also mentioned in the extant ISSAI 30 as "Professional secrecy". It is also natural that a SAI deals with working materials as confidential during an ongoing audit and before quality control has been carried out and the result of the audit has been published. However, the elevation of Confidentiality to a fundamental value appears to be unbalanced and risks leading the SAIs and their staff on the wrong track. Against this background, we propose that Confidentiality is seen as an aspect of Professional behaviour and is described in a way that brings out the balance between transparency and confidentiality.	accepted	consistent with having to balance transparency and accountability, so to discuss the topic with less specificity under professional behaviour would not be reflective of the current environment. Moreover, we elaborated on the issue of transparency within <i>Confidentiality</i> .
27	Sweden	general	It is important that auditors in their work promote cooperation and good relations within the organization as well as with the profession as a whole. A continuous professional exchange between colleagues both inside and outside the organization, whether it is a SAI or a private firm, is crucial for the daily work and for the development of the profession at large. This is usually also an element in other Codes of Ethics. However, there is no expression for such a value or requirement in the draft ISSAI 30. In our opinion it is important that this aspect is dealt with in ISSAI 30 in order to make it more complete.	Yes	
28	Sweden	general	As we mentioned earlier, we believe that the selected structure with requirements, explanations and application guidance, is educational and well suited to serve as the basis for the formulation of national standards. This structure, however, has not been used in an optimal manner. Most explanations	Yes	Explanations have been moved to the application guidance sections, and the "Explanation" headings removed.

			contains no explanations at all, but are iterations or platitudes. All explanations should therefore be reviewed and developed. Alternatively, one may well consider to abolish the explanation paragraphs as requirements and application guidance are self-explanatory. The document should also gain from a graphic processing with a clearer use of fonts for headlines and subheads.		
29	Ukraine	general	However, to make ISSAI 30 more user-friendly it would be reasonable to put the “Content” prior to the “Foreword” chapter. It should ease the information search through the Standard.	Yes	Table of contents has been added.
30	Ukraine	general (values)	The term “value” is used in ISSAI 30 which is not always acceptable. Our point is that it should be replaced by the term “principles” as they are what auditors should adhere to in their practice. While the term “value” refers to a material or ideal phenomenon or points out quality of an object, the term “principles” refers to setting up some requirements, metrics or viewpoint.	Included	We included a definition of values and principles for the sake of this document, s in accordance with the way of thinking of the Code (please see paragraph 9.)
31	Venezuela (translation from Spanish)	general	It is considered important to include a glossary of terms so that all those involved have knowledge and understanding of concepts such as, e.g., credibility, responsibility and ethics, so that SAIs can unify criteria.	No	Terms are self-explanatory or explained in the text.
32	AFROSAI –E	general	A general problem is that if the text under application guidance is read without looking at the heading, the reader often would interpret it as requirement. Often the text add or specify elements in the requirement, rather than providing “guidance to help staff SAIs and staff to meet the requirements” – as mentioned in 5.	No	The language used in the application guidance varies from that used in the requirements part – in accordance with the PSC drafting conventions.
33	IESBA	general	Given the large number of professional accountants working within the supreme audit environment in a wide variety of roles, activities and services globally, it is important that INTOSAI’s proposed Code and the IESBA <i>Code of Ethics for Professional Accountants</i> (IESBA Code) are compatible and do not conflict with each other.	Included	It is not in conflict. Just the natural differences resulting from the fact that we are dealing with public auditors. An IESBA consultant participates in the revision.
34	IESBA	general (language)	[...] we also believe that the present tense should not be used in Application Guidance in relation to actions by a SAI or its staff. This is to avoid ambiguity as to whether or not there is an obligation on the SAI or its staff member to take the particular action. Statements referring to actions by a SAI or its staff in Application Guidance should be drafted to make it clear that there is no intention	No	INTOSAI/PSC has its own drafting conventions which are respected in the Code.

			to create additional requirements.		
35	France	1	The statement in preamble 1 that a code of ethics is a “key prerequisite for the functioning of a SAI” could be replaced by “ an essential condition for the functioning of a SAI ”.	Yes	It is one of the prerequisites. The word “key” has been removed.
36	Norway	1	We could like to point out that the definition of stakeholders in the paragraph differs from the definition in ISSAI 12/3.	No	Definition used in ISSAI 12/3 is not really a definition of SAIs’ stakeholders but of those of the government. The definition in draft includes others, which allows for the addition of other organisations and individuals.
37	Norway	1	We would like to point out that though code of ethics is important, this is hardly a key prerequisite for the functioning of a SAI.	Yes	It is one of prerequisites. The word “key” has been removed.
38	Oman	1	It would be better to include also Government as stakeholders.	Yes	Executive bodies added.
39	IESBA	1 (editorial comment)	We fully agree that the overriding imperative for SAIs is to earn the trust stakeholders. Accordingly, we suggest that the proposed Code reflect this in the second sentence by adding the concept of “trust” before “confidence,” as follows. This would then be consistent with the reference to “needed trust” in the third sentence: “Therefore, they need to act as model organisations and inspire <u>trust</u> , confidence and credibility.”	No	The concept of trust is brought about by an organisation that inspires confidence and credibility. The addition of trust would seem duplicative.
40	The IIA	1	<u>Comment:</u> The process of establishing trust and reputation is an ongoing one requiring sustained efforts, so we suggest that this is emphasized by adding the word "sustaining." <u>Suggested revision:</u> Supreme Audit Institutions (SAIs) are held to high expectations and must earn the trust of stakeholders (auditees, citizens, legislative bodies and others). Therefore, they need to act as model organisations and inspire confidence and credibility, As ethical behaviour is a key component in establishing and sustaining the needed trust and reputation, a code of ethics is a key prerequisite for the functioning of a SAI.	Yes	The change is consistent with the nature of a Code of conduct being an ongoing effort rather than a point-in-time event. It is now included in para 1 of the <i>Preamble</i> .
41	Ecuador	1-7	Highlight in a positive way, how ethical policies and its good management;	Included	

		(Preamble)	establish trust and credibility in the SAI's role within a specific audit sector.		
42	Ecuador	1-7 (Preamble)	Although the code of ethics in question, refers to all staff working in the SAI, its greater focus and application is for those who work in the auditing process, that's why I suggest to make more emphasis that the norm refers also to administrative and assistance staff.	Included	The definition of STAFF in paragraph 2 of the <i>Preamble</i> covers it all: the head of the SAI, its members in the case of collegial models, any management positions and all individuals directly employed by, or contracted to conduct business on behalf of, the SAI.
43	Ecuador	1-7 (Preamble)	The document mentions to promote an enabling work environment to compliance the ethical standards; in my opinion should be established specific parameters to enhance this area, since the development of the document is placed more strongly on personal behavior rather than institutional. Being said that, I recommend to refer more to specific activities that could promote a healthy work environment.	Included	It is now included in 18 (g): <i>providing an environment in which staff experience fairness of treatment conducive to good relationships among colleagues.</i>
44	Lithuania	2	We would suggest to delete "principles" since values (and not principles) which are the basis of ethical behaviour are examined and explained further in the draft Code.	Partially accepted	It is included a definition of values and principles for the sake of this document (9 (a) and 9(b)).
45	Norway	2	We question the need for the wordings in brackets when this is not explained further in the paragraph.	No	Without the information in brackets it is not clear what "additional guidance" refers to.
46	South Africa	2	To be consistent the reference to public audit institution should be amended to SAI.	Yes	
47	South Africa	3	Consider including definitions - e.g. par. 3 states "The Code of Ethics is intended for all those who work for, or on behalf of, a SAI. This includes the head of the SAI, its members in the case of collegial models, any management positions and all individuals directly employed by, or contracted to conduct business on behalf of, the SAI. All these individuals, hereafter referred to as staff, should consider the stated values in their professional activity and, as applicable, in their private life." - it is not clear whether governance committee members e.g. audit committee, should be included as part of the Staff of the SAI - unless the reference to "its members in the case of collegial models" is intended to achieve this.	Yes	The wording "any management positions" changed to "executive management".

			"Management positions" seems incorrect - perhaps senior or executive management or leadership		
48	IESBA	3 (editorial comment)	We are of the view that the term "should consider" in the last sentence of the paragraph is too weak, as it could suggest that individuals working within SAIs have a choice as to whether or not to follow the fundamental ethical values. We suggest a stronger statement is needed to convey how important it is that those ethical values in fact drive individuals' behavior or conduct: "All these individuals, hereafter referred to as staff, should consider <u>adhere to</u> the stated values in their professional activity and, as applicable, in their private life."	Yes	
49	South Africa	4	The last sentence seems superfluous. It should be rephrased.	Yes	
50	Brazil	5	Avoid using bullets in paragraphs of sub-items, as this hinders the referencing. Instead, use lowercase letters, as recommended in the drafting conventions for level 4, approved by PSC-SC.	Yes	Bullets have been replaced with letters.
51	South Africa	5	The 1st sentence says what the code includes. The second sentence then states that the code includes a "number of bullets". Should these be combined or is one part of the other?	Yes	See current version of paragraph 5.
52	AFROSAI –E	5	Should the only option be to "develop" the SAIs own code of ethics? Requirement 11 is about "adoption" rather than development. Even if it is important that the code of ethics reflects local conditions it might be an option to adopt ISSAI 30 or an existing government code of ethics. Now there is an explicit requirement to "establishing ethics control systems", but only for the specific value of integrity in 23 a). "Each SAI is responsible to for develop or adopting its own code of ethics and <u>an appropriate ethics control system policies to implement it...</u> "	Yes	
53	Norway	6	When this standard is said to be at a principle level, we question the use of the word "requirements". We believe that requirements should go for level 3 and 4 only.	No	While the Code is principle based, the ISSAI sets out requirements that the code should have, but provides leeway as to how a SAI meets them.
54	Norway	7	If you go on with the use of "requirement": We believe that the biggest challenge	Yes	The first sentence of this paragraph

			with this document is to make it clear to the SAIs and the auditors what they are required to do. This paragraph is, in our opinion, a requirement and should as such be moved to the requirement sections below. We would also suggest that the last part of the second sentence is rephrased to: "...which should be in accordance with the requirements of ISSAI 30".		has been rephrased: <i>To satisfy the diversity of culture, and legal and social systems (such as specific rules applying to SAIs of judicial nature), each SAI is encouraged to develop or adopt a code of ethics and an appropriate ethics control system to implement it.</i>
55	South Africa	7	States that each SAI is responsible for developing its own code of ethics. Can they not adopt the IFAC code or simply comply with this ISSAI, or at least be required to base their code they develop/adopt on an internationally accepted code of ethics?	Yes	See the comment above.
56	Sweden	7	This is an important requirement but one may consider to use the word "demanding" instead of "stringent" to avoid misinterpretations.	No	
57	Brazil	8	We suggest that the value "Competence" is called "Professional Competence and Due Care" so as to be consistent with the Handbook of the Code of Ethics IESBA / IFAC	Partially accepted	The notion of due care included.
58	Brazil	8	Reverse the positions of values "Professional behaviour" and "Confidentiality" in the text, so that it is consistent with the Handbook of the Code of Ethics IESBA / IFAC.	No	We stick to the values included in the draft, as they were largely preferred by the survey's respondents. Besides, the use of "Competence" is consistent with what is covered starting at paragraph 50(a). IFAC requirements are also not consistent with ISSAI, so it may create confusion to match the titles. Nevertheless, please take note that due care was added to several paragraphs: 9(c) "...and with due care", and 51(a) – "...and due care"
59	Costa Rica	8	The paragraph mentions 5 values. The second value (Independence and	Partially	The use of independence and

	(translation from Spanish)		<p>objectivity), comprising these two concepts, refers to two conditions or values that, despite being related to each other, have different contents in strict sense. Therefore, we suggest considering the option to refer to 6 values, all expressed in one concept and defining them separately, for example in the following manner (using the content of this draft and the Mexico Declaration):</p> <p>(a) Independence: act without actual or apparent connections that could affect confidence in the objectivity of the SAI.</p> <p>(b) Objectivity: reason and make judgments with impartiality necessary to always safeguard public interest.</p> <p>That distinction is possible because one can be free of the above connections and still act in an biased manner.</p> <p>The other option, although secondary, would be to coin a single value to consolidate these two, for instance "Impartiality", and develop its definition in terms of the two above, considering that in order to be and appear impartial independence and objectivity are required, while one can act without actual or apparent bias and still fail to be objective in reasoning and deciding.</p>	accepted	<p>objectivity is more uniform, so changing to impartiality is not recommended. Splitting this topic into two areas may create redundancy in the requirements and related guidance.</p> <p>Nevertheless, your comment was important to make us be aware that it was important to include some definitions which are now in 36 and 37.</p>
60	Costa Rica (translation from Spanish)	8	We suggest summarising "Professional behaviour" in one word, such as "Professionalism".	No	Professional behaviour conveys the value better.
61	Costa Rica (translation from Spanish)	8	<p>At present, the notions of good governance favour, in all areas of public management, the concept of transparency instead of confidentiality, provided that when being transparent confidentiality is duly protected, but by exception, only in those areas where legal mandate requires to protect individual and collective rights and guarantees (e.g. due process and the rule of law).</p> <p>All this should be no different for supreme auditing, more so if it is assumed that the standard should cover not only audit work but all activities of a SAI.</p> <p>Therefore, it is proposed to change the value of "Confidentiality" to "Transparency" which could be defined in accordance with the Declaration of Asuncion (OLACEFS) on the subject:</p> <p>"Transparency: providing clear and reliable communication and information to develop work and the accountability for activities and performance, with due protection of information to safeguard individual and collective rights".</p>	Partially accepted	No change of value but the issue of transparency has been more emphasised.

62	Lithuania	8	With regard to the title of the Section, to insert fundamental "The Code is based on five fundamental values that underpin ethical behaviour".	Yes	
63	Lithuania	8	With regard to para. 5 and the title of the Section "Fundamental values" we would suggest to add <i>fundamental</i> to the title: " Fundamental ethical values".	Yes	
64	Malaysia	8	Summarized explanation on "Competence" – Adding the phrase "to equip and" maintain knowledge and skills appropriate for the role, and to act consistently with applicable standards.	Yes	
65	Malaysia	8	Summarized explanation on "Professional behaviour" - Adding the word "standards" before the sentence "and conventions, and to avoid any activities that may discredit the SAI;	No	Standards are part of competence, and have been discussed in the "Competence" section of the Code.
66	Norway	8	We believe that competence should not a part of this document as it is covered by ISSAI 40. If this is kept in the document, we suggest that the last part of the sentence "...to act consistently with applicable standards" is deleted.	No	Competence is only mentioned in ISSAI 40; it was already in current ISSAI 30 at the time when ISSAI 40 was developed. As for standards, the issue was discussed in depth by the Team, and it was agreed that standards go under the "Competence" section. Also, the inclusion of competence is consistent with IFAC. The recommended deletion is not consistent with paragraph 51.
67	Norway	8	What is necessary is to be clear and consistent in the use of the words "objective" "independent" and "impartial" and related terms, including any interdependencies. Without this clarification the intended meaning of the content is not always apparent. Independence depends upon relationships, organizational structures, unbiased and disciplined approach.	Yes	The use of these terms has been reviewed. Definition of objectivity has been added.
68	Philippines	8	Bullet 1 - Integrity, After the word "public interest", insert the phrase " Integrity relates to ethics and culture and can be measured in terms of what is right and just"	No	Not consistent with the concept that is used in the Code. The suggested change alters the definition and is also redundant in the relationship integrity has with ethics.
69	Philippines	8	Last bullet - Confidentiality- after the words "to appropriately protect	Included	This is included, in other words, in

			information' add the phrase "Auditors should not disclose information obtained in the auditing process to third parties, either orally or in writing, except for the purposes of meeting the SAI's statutory or other identified responsibilities as part of the SAI's normal procedures or in accordance with relevant laws.		the detail of the value.
70	South Africa	8	The competence value should include duty of care.	Yes	
71	Sweden	8	However, neither impartial, nor impartiality, are repeated in the requirements in paragraphs 34 and 35. Impartial and impartiality are frequently mentioned in extant ISSAI 30 and we believe that this concept should be developed also in the new ISSAI 30.	Yes	The concept of impartiality is now more stressed, especially in paragraph 37.
72	AFROSAI –E	8	In the text only “values” are used, not “fundamental values”. Add “fundamental” in the text.	Yes	
73	IESBA	8 (editorial comment)	<ul style="list-style-type: none"> We suggest an editorial change to the description of the fundamental value of “competence” as follows: “Competence – to maintain knowledge and skills appropriate for the role, and to act consistently <u>diligently in accordance</u> with applicable standards” In its current project addressing professional accountants’ response to non-compliance with laws and regulations, IESBA has determined to amend the description of the fundamental principle of professional behavior to refer to the more comprehensive concept of “conduct” rather than “activities.” We suggest that INTOSAI adopt a similar change to the description of the fundamental value of “professional behaviour.” This would be consistent with the use of the term “conduct” already in paragraph 62. “Professional behaviour – to comply with applicable laws, regulations and conventions, and to avoid any activities <u>conduct</u> that may discredit the SAI” <p>We suggest a corresponding change to paragraph 60(b): “SAI staff shall not engage in behaviour <u>conduct</u> that may discredit the SAI.”</p>	Yes	The comment accepted by adding the notion of due care.
74	The IIA	8	<u>Comment:</u> Public interest is mentioned here and elsewhere in the text, but the concept is not defined.	No	It is self-explanatory for the public sector.

			<p><u>Recommendation:</u> Explain what is meant by the term public interest. For example: "In the public interest" refers to satisfying the legitimate interests of ; stakeholders who rely upon the objectivity and integrity of assurance services provided in the areas of governance, risk, and control.</p>		
75	The IIA	8	<p><u>Comments:</u></p> <p>a) To avoid confusion, differentiate between independence and objectivity. The IIA considers independence as a function of the reporting relationship(s) and objectivity as a function of approach and mental attitude.</p> <p>b) As explained in the text, integrity is to act (emphasis added) honestly , reliably, in good faith and in the public interest, Similarly, to behave means to act in a certain way. Due to these similarities , consider incorporating professional behaviour under integrity.</p> <p><u>Suggested revision:</u> The Code is based on five values that underpin ethical behaviour. These values, along with a summarised explanation of each value, follow:</p> <ul style="list-style-type: none"> • Integrity - to act honestly, reliably, in good faith and in the public interest; to comply with applicable laws, regulations and conventions; and to avoid any activities that may discredit the SAI; • Independence – to be free from conditions that threaten the ability to carry out audit responsibilities in an unbiased manner; and objectivity—to act in an impartial and unbiased manner; • Objectivity – to maintain an unbiased mental attitude, and to perform engagements without compromising quality or subordinating judgement on audit matters to others; • Competence - to maintain knowledge and skills appropriate for the role, and to act consistently with applicable standards; • Professional behaviour – to comply with applicable laws, regulations and conventions, and to avoid any activities that may discredit the SAI; and • Confidentiality - to appropriately protect information. 	Partially included	<p>Splitting “Independence and Objectivity” into two areas may create redundancy in the requirements and related guidance. The description of this value has been modified: <i>Independence and objectivity – to be free from circumstances or influences that compromise, or may be seen as compromising, professional judgement, and to act in an impartial and unbiased manner.</i></p> <p>Moreover a definition of objectivity, based on this comment, was added in 37.</p> <p>It has been agreed that “Professional Behaviour” and “Integrity’ are two different values (same in the IESBA Code), despite possible overlaps between their requirements.</p>
76	Bahrain	9	<p>4th bullet “long or close relationships; and” It should specify <u>or</u> mention examples of the parties in question.</p>	No	To be regulated by individual SAIs in accordance with national/cultural

					specifics.
77	Malta	9	As part of paragraph 9, examples of the five types of threats may be provided.	Included	Examples of threats are given throughout the document in the respective sections (e.g. paragraphs 28, 45)
78	Norway	9	See also point 2 above. We believe that the risks mentioned is mostly at an individual level and not on the SAI level. We understand that we cannot mention all possible risks. But as independency is a very important risk at the SAI level, we believe that it should be mentioned in the list of potential risk.	No	The risks may put at risk independence, but independence itself is not a risk.
79	Norway	9	We question the risk arising from inappropriate bias from previous judgements made by the SAI or SAI staff. If, by this point, we mean that we defend earlier statements e.g., we suggest you add that to this point.	No	The risk is stated broadly and it would be redundant to add the recommended text.
80	IESBA	9 onwards (editorial comment)	We note that INTOSAI has chosen to use the terminology of “risks” and “controls” in the proposed Code. The IESBA Code uses the analogous terms “threats” and “safeguards.” Whichever terminology INTOSAI decides to adopt in the final Code, it will be important that such terminology be used consistently throughout the Code to avoid user and stakeholder confusion. In particular, we note that the earlier part of the proposed Code tends to refer to “risks” and “controls,” whereas the latter part tends refer to “threats” and “safeguards” (for example, paragraphs 20, 35(b), 39 (lead-in), 40, 48, etc).	Partially accepted	All these terms are used. In some places, they have been reviewed and changed. In paragraph 10, it is relevant to include threats and vulnerabilities, as it assist the reader with understanding that multiple terms are used. Same with controls and safeguards in paragraph 11.
81	The IIA	9	<u>Comment:</u> The IIA defines risk as: “The possibility of an event occurring that will have an impact on the achievement of objectives, Risk is measured in terms of impact and likelihood”. The risk discussion in this paragraph is the risk of non-compliance with the fundamental values expressed in the code of ethics. The bullet points listed are not risks in and of themselves, but are risk factors that are used to evaluate the risk of non-compliance with the fundamental values expressed in the code of conduct. For example, inappropriate bias from previous judgements made by the SAI or SAI staff is a <i>risk factor</i> that may increase the <i>risk</i> of non-compliance with the value of objectivity. <u>Recommendation:</u> Revise the text to differentiate between risks and risk factors, and expand the list to include additional risk factors that could impact the likelihood of non-	Partially accepted	The list has been given the heading “risk factors”. Examples rejected as too detailed.

			<p>compliance with the code’s fundamental values.</p> <p><u>Suggested revision:</u></p> <p>The likelihood and impact Risks (often also referred to as “threats” or “vulnerabilities”) of non-compliance with the above values can arise in a number of different ways. These include, but are not limited to, risks arising from be influenced by a number of risk factors. These risk factors include, but are not limited to:</p> <ul style="list-style-type: none"> • personal interests; • inappropriate bias from previous judgements made by the SAI or SAI staff; • advocating the interests of auditees or other parties; • long or close relationships; • external pressure from auditees or other parties; • giving or accepting gifts; • assuming management responsibility for operating activities, including risk management; • conducting assurance and consulting engagements without due professional care; • failure to consider implications of, or controls relating to, organizational fraud with appropriate testing and follow up; and • unauthorized use of personal or organizational information. <p>These risks can be either real or perceived.</p>		
82	Lithuania	9-10 Risks and controls	<p>We would suggest moving paras. 9-10 and merging them with paras. 20-22 "Ethics management and control". Alternatively, moving of the entire Section "Overall responsibilities of Supreme Audit Institutions" to the end of the Code could be considered. It might make more sense to first list and describe values, and then to lay out the responsibilities of SAIs for the implementation of the values and the mechanism of the implementation.</p>	No	<p>The overall approach to ethical behaviour covering the fundamental values and risks and controls should be discussed first and then lay out what the overall responsibility of the SAI.</p>
83	Lithuania	10	<p>Is the following objective of control measures acceptable: "to reduce the risk of unethical behaviour to an acceptable level"? What do terms "legislation, regulation" refer to in the statement "These controls can be put in place by legislation, regulation or a SAI"? Do they refer to the national law?</p>	No	<p>It is hard to eliminate unethical behaviour completely and the statement indicates that the SAI via the Code is to manage ethical behaviour. The use of legislation</p>

					refers to national law.
84	Malta	10	To consider rewording first sentence to: Where risks are identified that threaten any of the five values, the significance of such threats is evaluated and appropriate controls (often also referred to as "safeguards") need to be put in place to reduce the risk of unethical behaviour to an acceptable level. This has been extracted from paragraph 100.2 of IESBA Code of Ethics for Professional Accountants 2015.	Yes	
85	Malta	10	To consider including examples of safeguards put in place by legislation or regulation, in addition to safeguards implemented by SAIs. Safeguards to mitigate risks by SAIs are also to be clearly identified by referring to the appropriate paragraphs in the Standard.	No	The addition of safeguard examples by legislation or regulation may not be consistent in different countries. The use of examples of safeguards should be in the application guidance.
86	Mexico	10	Change the title named as " Risks and Controls" for only "Controls"	No	The section discusses both risks and controls
87	Norway	10	We question the need to include this as a separate point and suggest that it is added to point 9.	No	They are covered under the same title and separating them by a paragraph is to allow for the list of examples. In the Code, paragraphs are numbered not issues.
88	Bahrain	11 (d)	"[...] The SAI shall require that any party it contracts to carry out work on its behalf commit to the SAI's ethical requirements". It would be very helpful if there is a sample text of the requirement from such contracted parties.	No	The contracting language used varies by country and the requirements it may put in place, so an example of this may not be applicable across multiple SAIs.
89	Costa Rica (translation from Spanish)	11 (e)	From this wording, it appears that the SAI should design a special system of internal or control or a separate internal control system in a SAI to manage ethical risks and confront violations of the ethical framework of the SAI. We suggest rewording so that it is clear that the existing system of internal control in each SAI should provide for this: "The internal control system of the SAI should be able to identify and analyse ethical risks, to mitigate them, to support ethical behavior, and to address any violation of ethical values".	Yes	

			This suggestion is also consistent with INTOSAI GOV on internal control and the approach of the COSO model which state that control over ethics is part of the control environment, and which do not refer to a special system of internal control for ethics, but regard it as part of that functional component of the internal control system.		
90	Mexico	11	Add three new parenthesis "g" "h" and "i" with the next information: (g) Appoint an "ethics officer" to strengthen the link between the auditors and the head of the SAI (h) Establish an ethics committee to strengthen the integrity and prevent possible transgressions. (i) Establish a mechanism for the reception and collection of complaints regarding ethical breaches and protect the claimants.	Partially accepted	It is not a requirement, but is included in the application guidance. The addition of (g) and (h) would establish a requirement that may not be the normal structure for ethics in a particular country. A SAI has the ability to individually add (g) or (h) in the establishment of its control system (e). The addition of (i) is also an area that would be incorporated into (e).
91	Norway	11	In general, we believe that the requirements to a certain extent communicate good intentions and not requirements. When e.g. performing a peer review and evaluate whether the SAI is in compliance with ISSAI 30, we find that this is difficult. We therefore suggest several improvements to this paragraph:		See responses to comments 92-94.
92	Norway	11 (a)	We suggest that the sentence is rephrased to: "the SAI shall implement....". We question the requirement that the SAIs code of ethics should be made public.	Partially accepted	The word "implement" has been added. Publishing a code of ethics shows that the SAI promotes ethics, and is transparent. Moreover, this is already stated in ISSAI 40: <i>Principle 10.4. SAIs should publish their core values and commitment to professional ethics.</i> Nevertheless, we understand the point of view, that can be easily overcome: an SAI can develop a

					principle-based Code of Ethics and publish it, and at the same time have more detailed internal guidance that does not have to be public.
93	Norway	11 (b)(c)	We find these requirements are formulated more as intentions than as actual requirements and we believe that they should be rephrased or deleted.	No	Since these are the overall responsibilities, the existing language is fine as requirements. These are requirements that can be measured as explained under 22 (b).
94	Norway	11 (d)	This should be moved to the application guidance.	No	This is a requirement.
95	Philippines	11	Add paragraph (g) "The SAI shall endeavor to conduct regularly a Self-Assessment of its organization to enables public sector organisations to assess their vulnerability and resilience to integrity violations and mitigate risks.	Included	It is in the application guidance section, as part of management control.
96	U.S. GAO	11(d)	<u>Clarity:</u> Paragraph 11 (d) requires SAIs to ensure that its staff and contractors comply with the SAI's code of ethics. The paragraph focuses on compliance with and understanding the SAI's code of ethics' rules and requirements. We believe that the paragraph should be modified to emphasize the importance of promoting ethical behavior and reinforce the concept that ethics are primarily principles-based, rather than rules-based in nature. Consider clarifying the paragraph as follows: <u>11(d). The SAI shall require all staff to adhere to the code of always engage in conduct consistent with the principles expressed in this code of ethics and shall provide guidance and support to influence the understanding of the code ethical principles. The SAI shall require that any party it contracts to carry out work on its behalf commit to the SAI's ethical requirements.</u>	Yes	
97	AFROSAI –E	11	Based on the principles of ISSAI 12 and 20 it may be applicable for SAIs to publicise the summary results of how they addressed ethical issues during a given reporting period; say through their annual performance report or other relevant communication tools. The suggestion here is to add this requirement to bullet 11 e), or add a new bullet in paragraph 11. Another option is to further develop paragraph 22. (e) The SAI shall implement a control system to identify and analyse ethical risks,	Yes	Please see rewording of paragraph 23: <i>A SAI may report to relevant stakeholders on these evaluations (for example in its annual performance report).</i>

			to mitigate them, to support ethical behaviour, and to address any breach of ethical values <u>and report the results of the system in its annual performance report or other applicable performance reporting tool.</u>		
98	AFROSAI –E	11 THIS COMMENT IS VALID FOR ALL VALUES AND NOT REPETED	<p>I think this is important. A question is if the requirement to adopt a code of ethics should be repeated here, as it is already covered by the Preamble. If it is repeated, shouldn't also the requirement to <u>develop</u> policies – or as suggested above an “ethics control system” be included?</p> <p>A problem in the text about different values is that some of them (23 a, 59 b) repeat the requirement on an ethics control system in general terms, without making it specific for the value where it is included. 34 b) and 70 a) mentions specific systems that are likely to also be covered by the concept of the ‘ethics control system’, even if this is not mentioned.</p> <p>A better solution would be to let 11 cover the development/adoption of the system, and under each value mention that the system should be used to “highlight, demonstrate and promote” that specific value – which would cover the implementation of the system.</p> <p>Remove the requirement on adopting a code, or add a requirement on developing/adopting an ethics control system.</p> <p>Consider to use 11 for requirements on developing/adopting an ethics control system, while the implementation of it is mentioned initially under each value by stating that the system should be used to “highlight, demonstrate and promote” the specific value (or a similar formulation). When there are specific requirements on the control system for a particular value, this can also be mentioned.</p>	Yes	<p>The wording in the <i>Preamble</i> is more general (SAI is <i>encouraged to develop...</i>), so it should remain under requirements.</p> <p>As for the reference to an ethics control system, it is now deleted in the requirements of Integrity and Professional Behaviour.</p>
99	IESBA	11(f)	<p>This subparagraph proposes to require the SAI to identify potential conflicts between its ethical requirements and the standards of professional bodies that the SAI's staff may be a member of, and establish procedures to address these conflicts.</p> <p>We question the practicality of imposing this obligation on all SAIs. This will in practice mean that each SAI must analyze and fully understand all the differences between its Code and the various other codes of ethics to which its individual</p>	Yes	The requirement has been reworded.

			staff members might also be subject, and identify any conflicts that might exist. We believe this could potentially place an onerous burden on the SAI, given that SAI staff members might belong to different professional bodies, including professional bodies that are members of IFAC. Further, codes of ethics evolve over time to remain relevant. This requirement could therefore compel SAIs to continually monitor developments in codes of ethics of other professions or professional bodies.		
100	IESBA	11(b) (editorial comment)	We do not believe that the word “highlight” conveys the weight that needs to be attached to the message that ethics is important. We suggest that this be changed to “emphasize” as follows: “The SAI shall highlight <u>emphasize</u> the importance of ethics and promote an ethical culture in the organisation.”	Yes	
101	IESBA	11(d) (editorial comment)	We suggest that the word “influence” be replaced by “facilitate” to better recognize that guidance and support are provided to make it easier for all SAI staff to understand the Code, not so much to try to encourage them to understand the Code: “The SAI shall require all staff to adhere to the code of ethics and shall provide guidance and support to influence <u>facilitate</u> the understanding of the code. ...”	Yes	
102	The IIA	11	<u>Comment:</u> Paragraph 11 states that the SAI's individual code of ethics should be made public, but there is no requirement on how to communicate the SAI's code. Transparency and accountability are mentioned in paragraphs 17 and 70, but they are not included as fundamental values. <u>Recommendation:</u> ISSAI 30 should require or encourage each SAI to publish an annual transparency statement to confirm commitment to or compliance with ISSAI30 (or alternatively a commitment to the fundamental values). In addition, consider including transparency and accountability as fundamental values (paragraph 8), or providing a link to ISSAI 21, <i>Principles of transparency and accountability</i> .	Partially accepted	It would be too detailed to specify how SAIs should communicate their codes of ethics. As for the fundamental values, transparency and accountability are part of the value of Confidentiality. The question of the transparency statement is already included under application guidance, paragraph 23. (A SAI may report to relevant stakeholders on these evaluations (for example in its annual performance report).
103	The IIA	11	<u>Comment:</u>	Yes	The proposed (g) added to item (e)

			<p>Several additional requirements could strengthen the code.</p> <p><u>Suggested revision:</u></p> <p>Add the following requirements (g) – (l):</p> <ul style="list-style-type: none"> (g) The SAI shall adopt a policy prohibiting retaliation against those who report suspected wrongdoing. (h) The SAI shall conduct timely, professional and thorough investigations of any potential violations of the code of ethics that come to its attention, commensurate with the severity of the alleged violation. The SAI shall consistently apply appropriate corrective and disciplinary actions upon completion of the investigation. (i) The SAI shall designate a person or persons responsible for ethics investigations, and make provision to ensure independence and objectivity for all investigations. (j) The SAI shall perform oversight and review of all ethics cases on a regular basis (at least quarterly) to review pending matters and confirm that all cases were investigated as appropriate and corrective actions were taken. (k) The SAI shall promote transparency and encourage communication throughout the organization, illustrating the organization’s commitment to ethical values and willingness to take action when behaviours are not aligned with the fundamental values of the code of ethics. (l) The SAI shall consider establishing an ethics officer staff position and/or ethics and compliance advisory committee (composed of members at various levels and functions in the organization). 		<p>in the requirements of SAI (in the Overall responsibilities section), and the rest is already included.</p>
104	Costa Rica (translation from Spanish)	12	<p>Like section 11 (e), this seems to refer to a special system of control, different or complementary to the general system of internal control.</p> <p>To us, this seems inconvenient because it may be interpreted as the need to develop additional or complementary control system apart from the existing one, which may make the system unnecessarily complicated.</p>	Yes	
105	Norway	12	<p>We question that an ethics control system will promote and safeguard ethics. We believe that working with the organizational culture and tone at the top will be more effective.</p>	Included	<p>That is precisely what a control system includes, along with other dimensions: organisational culture and Tone at the Top. See paragraphs</p>

					12 and 14.
106	Sweden	12	This is an important statements but not an explanation. It can be derived from the requirements and does not add any explanation We suggest that all specific strategies, policies and procedures to guide, manage and control ethical behaviour. explanations removed from the document, alternatively to be developed.	Yes	
107	The IIA	12	<u>Comment:</u> Consider adding the words "education" and "compliance" to more comprehensively note this point. <u>Suggested revision:</u> To promote and safeguard ethics in every aspect of the organization and its activities, the SAI implements an ethics control system ethics education, compliance and control program (or organizational behaviour program) that includes appropriate specific strategies, policies and procedures to guide, manage and control ethical behaviour.	No	Already included. Suggested changes are not consistent with the phrasing elsewhere in the ISSAI.
108	AFROSAI –E	12-22	I think this is important. The concept of an “ethics control system” is crucial for the code, at the same time as it’s not used in a uniform manner. According to 12, an ethics control system includes: strategies, policies and procedures, guidance, management and control. This is a slightly different description than the content of the following application guidance in 13-22 – which includes the code itself in the control system as well as leadership. On the other hand 13-22 do not cover strategies, policies and procedures. Establishment of such is not even mentioned under “leadership”. Clarify the concept of an “ethics control system” by making the elements of such a system crystal clear and mentioned all in a logical order in 12. Strictly speaking the application guidance would not necessary need to cover all elements. As it is written, however, the reader will easily interpret the listing in 13 – 22 as conclusive. For this reason we believe that all elements defined in 12 should be mentioned under application guidance. (Is for example, procedures to respond to breaches of the code part of the control system or not? It is not mentioned in 12-22). Another option could be to in general terms mention elements not covered by the application guidance initially in 13 – 22.	Yes	Respective paragraphs have been reworded (current 13 and 14).

109	Costa Rica (translation from Spanish)	13	Similarly to the comments on to subsections 11 (e) and 12, we suggest rewording: "The main components for controlling ethics as part of the internal control system are..." .	Yes	
110	Sweden	13	This is only a beginning text, a label, to a list and should therefore not be numbered as a paragraph.	Yes	
111	South Africa	13-22	Ethics control system, excellent preventative measures and clearly outlined for SAIs including leadership.	Included	
112	Malaysia	14	Add the word " principles" to the phrase "ethical principles and values"	Yes	
113	Norway	14	We suggest that the first sentence is rephrased to: "A code of ethics or a code of conduct sets out the was..." We also suggest that you delete the last sentence as it is already covered above.	Yes	
114	U.S. GAO	14	<p>We believe it is of critical importance that a code of conduct developed by an SAI that complies with ISSAI 30 be principles-based - that is, it should provide ethical values and principles to be observed by SAI leadership and staff, rather than just a set of rules to be followed. The draft ISSAI 30 preamble accurately notes that a code of ethics provides a set of values and principles on which to base behavior. Paragraph 14 emphasizes this point. A code that focuses on rules, rather than principles, may yield compliant yet unethical behavior. For example, a staff member may accept a gift valued slightly under a codified threshold when the ethical choice would have been to refuse the gift. Similarly, staff may comply with the letter of a codified threshold by awarding numerous contracts just under a threshold that would require competition even though doing so contradicts the principles behind the code. Rather, an SAI should ensure that its leadership and staff have an understanding of ethical principles expressed by the code sufficient to ensure appropriate decision-making. Paragraph 14 would be an appropriate place to highlight this point. Suggested edits to paragraph 14 are as follows:</p> <p>14. A code of ethics or a code of conduct expresses ethical values and sets out the way a SAI expects its staff to behave, therefore guiding individual behavior. It also functions as a professional statement and supports an ethical image, both internally and externally. <u>It is critical that a SAI's code of ethics provide ethical values and principles to be observed by SAI leadership and staff and that it</u></p>	Yes	

			<u>support an environment conducive to behaviour consistent with the principles expressed in SAI 30. This includes fostering an understanding that compliance with the SAI's code of conduct means aiding by the principles, and not just the letter of the code.</u>		
115	France	14-16 (use of the term "code")	The term "Code" might be misleading, by giving the impression that ISSAI 30 establishes the INTOSAI Community Code of Ethics: on the contrary, Preamble 7 states that "each SAI is responsible for developing its own code of ethics ...The INTOSAI Code of Ethics constitutes the foundation...". We recommend replacing the title "Code of Ethics" by "Standard for developing codes of ethics".	Yes	Reworded to make it clear when we speak about a SAI's code or the Code of INTOSAI.
116	Bahrain	15	"Each SAI sets standards in accordance with its culture, and legal and social systems " We suggest the following text: "Each SAI sets standards in accordance with its culture, legal and social systems, taking into account relevant good common practices for guidance ".	No	The paragraph has been reworded (current paragraph 16).
117	Honduras (translation from Spanish)	15	To disseminate guidance on alerting, set parameters. To indicate developing of regulations to provide details and adjust these mechanisms. In our code and regulations, there are preventive measures to combat ethical violations, and a regulation on sanctions will be soon adopted.	Included	
118	South Africa	15	SAIs do not normally set standards - they develop policies and procedures in accordance with standards which they have adopted. It is quite a difficult process to set standards (except if this is meant in the generic sense of behaviour)	Yes	
119	The IIA	15	<u>Comment:</u> We recognize that a SAI's standards will, of necessity, reflect its culture, and legal and social systems. However, the code of ethics could be strengthened by setting expectations for a minimum set of elements to be included. <u>Recommended revision:</u> Each SAI sets standards in accordance with its culture, and legal and social systems. The level of detail is determined by context and organisational culture. Minimum elements to be considered are statements about the values that guide conduct; descriptions of the associated expected behaviours; specific examples of ethical dilemmas and sensitive situations; and ethical conflict resolution, whistle-blowing procedures, and provisions for dealing with misconduct.	No	The identification of "Minimum" may not be appropriate given the variety of countries and cultures, legal and social systems that exist. To maintain principle approach the inclusion of "minimum" also is attempting to establish a rule-based floor.
120	Mexico	8-9	Add a new paragraph (number 9) with the next information:	No	There is no need to elaborate on risk

		(between 8 and 9)	Risk Assessment. Those events which can potentially affect the ethical values shall be evaluated regularly. Don't forget move or adjust the numeration according to the recently added paragraph number.		assessment in the Code.
121	Tajikistan	16	In terms of Guidelines on the application of main components of the management system of ethics (paragraph 16), it should be noted that the approved (adopted) code should be binding for observance by staff and the question of its adoption or rejection by the staff should not raised. Therefore, the paragraph 16 should be stated as follows : Openly discussed and finally adopted the code of ethics should be mandatory for the observance and execution by employees.	Yes	It has been rephrased to make it clear that it is not about rejecting but about following.
122	Malaysia	17	Bullet 5 - Add "sensitive" to the phrase "difficult and sensitive questions"	Yes	
123	The IIA	17	<u>Comment:</u> The code could be strengthened by addressing consistent enforcement by leadership. <u>Suggested revision:</u> Building an ethical culture in an organisation starts with its leadership. Leaders do this by: <ul style="list-style-type: none"> • setting ethics as an explicit priority; • reinforcing this priority by clear, consistent and regular messages; • leading by example; • maintaining high standards of professionalism, accountability and transparency in decision making; • encouraging an open and mutual learning environment, where difficult questions can be raised and discussed; and • recognising good ethical behaviour, while addressing misconduct; and • ensuring that ethics and compliance systems, policies and procedures are applied consistently and fairly. 	Yes	
124	Malaysia	18	To add the word "and instilling" after the word "on promoting". Another form of education practised at our SAI is that our Integrity Officer will disseminate monthly ethics topics through emails.	Partially accepted	Paragraph on ethics guidance has been expanded.
125	Norway	18	We believe that educating staff on promoting the SAIs value and addressing	Included	It is part of the application guidance.

			ethical dilemmas is very important and should be part of the requirements.		
126	The IIA	18	<u>Comment:</u> Increasing awareness of the code of ethics is also very important. <u>Suggested revision:</u> Clear communication is necessary to help increase staff's awareness and understanding of the code of ethics. This can include educating staff on promoting the SAI's values and addressing ethical dilemmas, offering workshops and training, and leadership engagements, etc.	Yes	
127	Malaysia	19	To reword the sentence as follows: "Although ethical behaviour is primarily the responsibility of individuals, SAIs can support staff by assigning responsibilities as ethics advisors, ethics committees, integrity coordinators, ethics/integrity officers, or counsellors to give views and advices on ethics/integrity issues. Confidentiality and a defined due process are critical elements for the effective use of this assistance.	No	Text as written better conveys the message. The suggested changes set forth that one of the groups the SAI assigns responsibility has to occur, which is not the intention of the Code.
128	South Africa	19	Ethics guidance should also include generally accepted best practice on ethics.	Yes	Added under paragraph 19.
129	IESBA	20	This paragraph notes that incorporating ethics in daily management "implies recognising good ethical behaviour and applying safeguards to specific risks, such as those arising from a conflict of interests, confidentiality issues or conflicts of requirements." It is unclear to us what the phrase "conflicts of requirements" mean. We suggest that this be clarified and, if necessary, an example provided.	Yes	The phrase "conflicts of requirements" has been removed from this paragraph.
130	Ecuador	20-22 (ethics management and control)	In reference of the values mentioned in your proposal, such as integrity, independence and objectivity, competence, professional conduct and confidentiality; it is important to recognise that we also mentioned some in our code (integrity, objectivity and autonomy). Other values are embedded in Article 3 "Principle of Legality". Hence, I consider your source, as a relevance tool to update our Code of ethics based on the new guidelines of INTOSAI, in a joint effort between the Department of Ethics, Citizen Participation and Patrimonial Control.	Noted	
131	Ecuador	20-22	Highlight the component of ethical leadership that should have any SAI, which is mentioned in the document and evidenced through the management of ethical	Included	Covered in the Leadership (paragraph 18).

			standards with clear, consistent and regular messages.		
132	Malaysia	21	Another monitoring controls will be "making spot checks/inspections on the grounds e.g, attendance, discipline during office hours, etc.	No	Too detailed.
133	Norway	21	We suggest to rewrite the first sentence: "monitoring controls help the SAI mitigate risk."	Yes	
134	South Africa	21	Monitoring controls should include procedures and organisational systems.	Included	
135	IESBA	21 and additional material	We note that paragraph 21 suggests that a SAI may apply policies on ethical misconduct and whistle-blowing as a monitoring control. We recommend that the proposed Code be expanded to provide some guidance on what a whistle-blowing structure within a SAI might look like. We also recommend that INTOSAI consider providing guidance on what form ethical conflict resolution might take.	Noted	Additional guidance will be considered.
136	The IIA	21	<u>Comment:</u> Policies are a type of internal control, but are not considered a “monitoring” control. Monitoring-Internal controls are integral to ethics to help the SAI mitigate risks. The SAI may apply the following monitoring-internal controls: <ul style="list-style-type: none"> • maintaining registers to track interests, gifts and hospitality; • conducting self-assessment, internal and external reviews that can be used regularly, as monitoring tools, as a way to identify and analyse vulnerabilities and recommend measures for improving ethics management, and/or as a routine to ensure accountability. Evaluations will have to consider that many ethical requirements refer to soft controls, which require the use of specific appropriate assessment methods. Tools available for these assessments include IntoSAINT, 1 peer review guidelines, surveys, interviews and feedback questionnaires; • establishing policies on ethical misconduct and whistle-blowing – these include procedures for reporting cases of misconduct, for investigation and for sanctioning. 	Partially accepted	“Conducting” and “establishing” have been added. The title of the section has been changed to: “Ethics management and monitoring”.
137	Bahrain	22	“[...] A SAI may report to relevant stakeholders on these evaluations”. It should mention examples of such stakeholders.	Included	The concept of stakeholders is expressed in the <i>Preamble</i> – see paragraph 1.

138	Norway	22	Who would be the stakeholders here?	Included	Examples of stakeholders are mentioned in the <i>Preamble</i> , and should be identified according to the situation.
139	Honduras (translation from Spanish)	23	To determine or suggest how ethical controls should be established in a SAI. To mention the adoption of a regulation governing ethical conduct of a public official – SAI member.	Included	
140	Lithuania	23	We suggest reversing the order of items a and b, since it would be purposeful to first confirm that the SAI supports the value of integrity, and only then state that this value is supported by establishing and maintaining ethics control systems.	Yes	
141	Norway	23 (a)	We suggest that you rewrite this sentence to put the essence of the requirement first: "The SAI shall establish and maintain a ethics control system to highlight, demonstrate and promote integrity."	Partially accepted	The requirement has been reworded: "The SAI shall emphasise, demonstrate, support and promote integrity". The change attempts to compromise on the suggestions received on this paragraph.
142	Norway	23 (b)	As above: "The SAI shall respond to integrity braches in a timely and adequate manner".	Yes	
143	South Africa	23(a)	Will there be more than one ethics control system?	Yes	The wording of the paragraph has been changed and no ethics control system is mentioned there.
144	Venezuela (translation from Spanish)	23	It is recommended that the subtitle is " Duties of the SAI" and the ethical principles that should characterise it are included.	No	The notion of a requirement is used in the Code.
145	Venezuela (translation from Spanish)	23	We consider that it should be defined what are Ethics Control Systems, which can be done in the glossary referred to in our first recommendation.	No	These are described in the body of the Code. A decision has been taken not to add a glossary.
146	Vietnam	23 onwards (Integrity)	Mostly agree with the contents given. However, if possible, please provide information on the appropriate and detailed coordination mechanism between SAI and stakeholders (auditees, citizens, legislative bodies and others) in order to	No	It would be too specific, as such mechanisms vary from country to country.

			ensure and promote integrity.		
147	AFROSAI –E	23	<p>I think this is important. 23 a) requires the SAI to “establishing and maintaining ethics control systems”, while 11 e) required the SAIs to implement one such system.</p> <p>The best is to use a consistent terminology and clear logic. Is it “an ethics control system” which then includes different components as stated under paragraph 12-22, or are there several control systems that need to work together?</p> <p>Since the requirement on the control system is not made specifically for integrity, the relation between 11 e) and 23 a) is not logical.</p> <p>See also the comments on 11 above.</p> <p>a) The SAI shall <u>use the ethics control system to</u> highlight, demonstrate, <u>support</u> and promote integrity by establishing and maintaining ethics control systems.</p> <p>b) The SAI shall support the value of integrity, which includes responding to <u>the fundamental value of integrity</u>breaches thereof in a timely and adequate manner.</p>	Yes	The wordings of these two items have been changed, trying to compromise on the suggestions received on this paragraph.
148	IESBA	23(a) (editorial comment)	<p>We suggest that the word “highlight” be replaced with “emphasize” to appropriately convey the degree of importance that one should attach to integrity:</p> <p>“The SAI shall highlight <u>emphasize</u>, demonstrate and promote integrity by establishing and maintaining <u>an</u> ethics control systems.”</p>	Yes	“Highlight” has been changed to “emphasise”, and the requirement has been reworded in an attempt to compromise on the suggestions received on this paragraph.
149	South Africa	23-24	From this point the requirements are split into requirements for the SAI and those of the staff. However the requirements all refer to policies and procedures that should be implemented by the SAI to drive the behaviour of the staff. This should be clear as this ISSAI is drafted for SAI level implementation and will reflect as such in the ISSAI framework.	No	The requirements of the Code would include the high-level responsibilities of the SAI and also the requirements the SAI expects its staff to use.
150	The IIA	23-33	<p><u>Comment:</u></p> <p>See paragraph eight. If our recommendation to incorporate professional responsibility with integrity is adopted, final content from paragraphs 59-66 to be reorganized to correspond to paragraphs 23-33 as appropriate.</p>	No	It has been agreed that “Professional Behaviour” and “Integrity” are two different values (same in the IESBA Code), despite possible overlaps between their requirements.
151	Malaysia	24	It is more appropriate to categorised "The SAI's leadership shall lead by example"	Yes	Added under requirement (b) for SAI

			under the requirements at the level of SAI. Alternatively, reword it to "SAI Staff at all levels shall set good example".		staff.
152	Norway	24	We believe that these requirements are formulated as intentions and it is difficult to decide to what degree the SAI staff actually comply with these requirements.	Included	The requirements set forth for the value are up to the SAI to encapsulate in its code of ethics in a manner to ensure staff meet the requirement. However, there are some tools in the SAI community and also in the public sector that try to elaborate on measurement tools to these soft controls
153	South Africa	24	Integrity vulnerabilities should also be proactively curbed.	Yes	Clause added under 25(d) on taking appropriate actions.
154	Tajikistan	24	In terms of Ethical values1. Honesty (paragraph 24), after the words "conscientiously " to add the word " responsibly ", because the observance of ethical norms involves a high degree of employees responsibility for their actions and inaction, as well as for decisions taken by them.	Yes	Please see reworded paragraph 25(b).
155	Venezuela (translation from Spanish)	24	It is recommended to replace the subtitle with "Duties of the SAI", and to include the principles which should govern the conduct, with particular emphasis on those who carry out the core work of the SAI.	No	The notion of a requirement is used in the Code. The Code is addressed to all staff, which is explained in the <i>Preamble</i> .
156	AFROSAI –E	24	Is a repetition of 11 c) and relevant for all values, but not mentioned for all of them. Remove 24 a).	No	Should be repeated. In 12 – leadership as a group; in 25 – individual representatives of the management.
157	Lithuania	25	A very short explanation, we suggest expanding it.	Yes	Explanations have been moved to application guidance.
158	Norway	25	We question what this paragraph means and would suggest more application guidance to what "being above reproach" actually means.	Yes	Explanations have been moved to application guidance.
159	Sweden	25	This is no explanation. Such an explanation should be directed at defining integrity as a concept. Integrity is the quality of being honest and having strong moral principles or as expressed in paragraph 27.	Yes	Explanations have been moved to application guidance.

			See also paragraph 12.		
160	U.S. GAO	11(a) and 14	<p><u>Clarity and additional guidance:</u> Paragraph 11(a) requires that the "SAI shall adopt a code of ethics consistent with this standard and shall make it public." To facilitate understanding of the requirement for the SAI to publicly disclose its code of ethics, we suggest that INTOSAI clarify and provide additional guidance on the formats and the types of media the SAI may use to make its code of ethics available both internally and externally. The guidance may be added to paragraph 14. The following addition would meet this objective:</p> <p>The SAI's code of ethics may be in a variety of forms or formats. For example, it may be contained in a unified book or in a collection of varying, but consistent guidance available to staff. Most importantly, the code should effectively promote a culture that is consistent with the principles expressed in ISSAI 30.</p>	Yes	
161	The IIA	25	<p><u>Observation:</u> Additional language could better convey what is meant by "above reproach".</p> <p><u>Suggested revision:</u> In order to sustain public confidence, the conduct of SAIs and their staff is expected to be above reproach, engaging in no improper activity whatsoever.</p>	Yes	
162	Iraq	26	<p>Clause 26 (the application guide for SAI level). We suggest adding a clause on the procedures that should be adopted by SAI, in case of suspicion that there is a breach or violation of integrity. These procedures represent proceedings to avoid the aggravation of the incident, for example:</p> <ul style="list-style-type: none"> - Warning the employee or transferring him/her to another work-field to keep him/her away from the influential source or any personal connect. - Adopting periodic job rotation policies for all the employees - Using developed electronic systems to maintain confidentiality of information and prevent violation. <p>In case integrity is violated, then necessary procedures must be applied.</p>	Included	The comment is covered in the application guidance in paragraph 39. <i>Independence and objectivity.</i>
163	Lithuania	26	<p>A blanket legal rule referring to the previous Section of the Code is not a very good choice. It reveals that the structure of the Code specified in para. 5 is slightly "far-fetched", artificial.</p>	No	It was done on purpose, in order not to repeat things.

164	AFROSAI –E	26	Does not add value, even less so with the changes suggested to 23. Remove 26.	No	The wording of paragraph 23(a) of ED has been changed (<i>The SAI shall emphasise, support and promote integrity.</i>) so adding a paragraph on ethics control system implementation is justified.
165	IESBA	26 (editorial comment)	We suggest that the singular be used when referring to “control systems” to convey the sense that controls are designed and implemented in a holistic and integrated manner, rather than as in an uncoordinated, disparate way: “To promote integrity, a SAI implements and maintains <u>a</u> control systems, consisting of a well-balanced set of measures and controls.”	Yes	
166	Mexico	27	<u>Comment:</u> Integrity implies that SAI staff shall act honestly, reliably, in good faith and in the public interest. Yet, focusing these values on some of the main auditing steps is suggested, by adding the following text between section 27 and 28: Application guidance at the level of SAI staff 27. ... <u>New section proposed:</u> <i>SAI staff shall perform their work, including planning and conducting audit engagements and issuing audit reports, in a professional, unbiased and consistent fashion, in conformance with the applicable professional standards and of the laws, regulations and conventions of the society in which they reside.</i>	Included	Is included in other values.
167	Norway	27	We find it difficult to understand what this personal responsibility would mean if the management does not lead by example. Who is to blame?	Yes	Paragraph deleted.
168	Malaysia	28	Integrity vulnerabilities may include "abusing his/her power for personal gains e.g. using his/her position to acquire assets for buying land, requesting personal contribution from others.	Yes	Phrase on abusing power has been added, but without the specific details.
169	Norway	28	We question that people working in a SAI are not allowed to be involved in political activities, participation in pressure groups and so on or if this should be up to the management or the individuals to decide.	Included	It is application guidance and not a requirement, so it is not a ban on political activities. It is meant to show that individuals must be aware of circumstances that “may” be integrity vulnerabilities.

170	South Africa	28	An additional vulnerability is the sharing of confidential information by staff.	Included	Please see paragraph 28(e).
171	Venezuela (translation from Spanish)	28	It is suggested indicating the type of personnel to which reference is made, since it must distinguish between those who regulate and those who are engaged in the organisation and administration of the SAI, and do not participate in the core activity of the SAI.	No	The vulnerabilities listed potentially impact the SAI regardless of the position of the person.
172	IESBA	28	We believe that the phrase “need to be alert to” in the first sentence is imposing a requirement on SAI staff. We suggest that this be properly characterized as a requirement, consistent with the imperative for SAI staff to pay attention to circumstances that might cause them not to act with integrity: “At the individual level, staff need to <u>shall</u> be alert to circumstances that might expose them to integrity vulnerabilities related to working for the SAI and in the public sector environment.”	No	It is in the application guidance, where – in accordance with PSC drafting conventions – the usage of “need to” is recommended.
173	IESBA	28 (editorial comment)	We suggest that the word “relations” in the first bullet be replaced with “relationships:” “personal, financial or other interests or relations <u>relationships</u> that conflict with the SAI’s interests or relations <u>relationships</u> ”	Partially accepted	The first suggestion accepted. In the other part of the sentence, “relationships” deleted.
174	Mexico	29	Suggested redraft paragraph positively: Strengthen the integrity and prestige of their work and the SAI.	No	The section covers integrity vulnerabilities, which are not considered positive.
175	Oman	14, 15	At page no 5 no 14 "sets out the way a SAI expects.....", the word "a" is not required. Similarly, code no 15, "Each SAI sets standards in accordance with its culture, and legal and social systems." It is better to exclude "and" before the word legal.	No	The changes are editorial and not in line with the way the document is written.
176	South Africa	29	Consider reference to social media.	Included	
177	Tajikistan	29	In terms of the integrity of the vulnerability (paragraph 29), after the words "private finance" it is necessary to add " material " relations, which can also occur and even predominate in the private lives of employees of SAI.	No	The materiality level of a relation may not be the sole decider as to it be an integrity vulnerability.
178	Lithuania	30	We suggest deleting this para., while moving the provisions regarding the promoting and supporting the policies on integrity to para. 31	Yes	Paragraphs rewarded and restructured.
179	Lithuania	31	With regard to concepts used in the entire draft Code, we suggest changing the term "individuals" to the term "staff" and formulate in the following way: "Staff	Yes	“Individuals” changed to “staff” along the section.

			need to be acquainted with the policies, regulations and rules on integrity adopted by the SAI, to promote and support them. Staff also need to be aware of the responsibilities for integrity assigned within the SAI, for example related to counselling or reporting of concerns or suspicions of integrity violations".		
180	Sweden	31	This last sentence seems complicated and hard to interpret. We suggest that the sentence is redrafted in order to clarify the meaning.	Yes	The paragraph has been reworted – see current paragraph 30.
181	Tajikistan	31	In terms of the Individual responsibility in relation to the integrity of SAI (paragraph 31) the definition of "separate persons also" should be replaced with word " employees " because the norm contained in this proposal should apply to all employees.	Yes	"Individuals" changed to "staff" along the section.
182	IESBA	31 (editorial comment)	We suggest that consistent terminology be used throughout the proposed Code. In this paragraph, for example, reference is made to both the SAI's "policies, regulations and rules" and the SAI's "policies and standards." Users and stakeholders might question whether a difference is intended and, if so, what that precise difference is. Further, regulations generally are issued by a regulatory body and compliance with which is required by a broad range of entities or individuals in a particular field or market.	Yes	
183	Mexico	16-17 (between 16 and 17)	Add a new paragraph (number 18) with the next information: The employees have the measures to report possible unethical acts and to present the potential dilemmas.	Included	
184	Lithuania	33	With regard to concepts used in the entire draft Code, we suggest changing the term "individuals" to the term "staff"	Yes	
185	South Africa	33	The SAI must ensure that environment is conducive for staff to raise ethical breaches in the organisation.	Yes	
186	IESBA	33	We believe this guidance paragraph contains an obligation. Accordingly, it should be drafted using the "shall" convention: "If an individual feels that integrity control weaknesses exist within the SAI, they are responsible for <u>shall</u> bringing these to the attention of ethics advisors or the SAI's management."	Yes	
187	Denmark	34(a)	Specify the first sentence in para. 34(a), so it reads (our suggested additions underlined): 'The SAI shall be independent of <u>government</u> as regards its status, mandate, <u>budget</u> , reporting, and....'	No	The change regarding independence of government as regards the SAI's budget may not be possible based upon the legal and regulatory

					structure the SAI is subject to.
188	Germany	34	Principle (c) requires policies for the periodic rotation of audit staff, particularly at senior levels. In the Bundesrechnungshof with its collegiate system, senior audit staff has the status of members with judicial independence. Periodic rotation is not in line with this status and not needed at our Sai, since we have a board model, our collegiate system. This system ensures no decision is ever made alone by one officer. All decisions are made by colleges of two or three members. We therefore suggest the following wording for Principle 34. (c) : "The SAI shall adopt policies for the periodic rotation of audit staff, particularly at senior levels, if it is compatible with its SAI model and status. Appropriate safeguards shall be adopted where rotation is not feasible."	Yes	
189	Iraq	34	Independence and objectivity – requirements at SAI level: We suggest to add the following clause to the requirements mentioned above due to its significance that impact on the independence in work: Total dedication to the audit work and avoid practicing other jobs that influence passively on audit, unless cases authorized by law in SAI - concerned, like writing books and delivering lectures.	Included	This matter is considered in a general basis in current 36, and detailed throughout application guidance – especially 48.
190	Latvia	34 (c)	We are currently evaluating pros and cons of staff rotation and have come to a conclusion that in some cases, in order not to break good teams, rotation of audit field (auditees) also could be used as an option. Therefore we would appreciate if you could supplement the above mentioned sentence adding “rotation of audit field” as a possibility.	Yes	Included under “other safeguards where rotation is not feasible”.
191	Lithuania	34 (d)	Are the requirements for the SAI stipulated in this para. are specifically linked to (are similar in character) to the requirements for the SAI staff set in the para 35 a)?	Noted	
192	Malta	34(a)	The first sentence may be reworded to: The SAI shall be independent as regards its status, mandate, reporting, funding and management autonomy.	No	See response to comment #187. The funding (budget) may not be a statutory ability afforded to it.
193	South Africa	34	Controls should identify and prevent or mitigate threats to independence.	Included	
194	Sweden	34	Section a) states that the independence can be prescribed by a regulatory framework. A regulatory framework not founded in constitutional law is not sufficient in this respect and contradicts what is said in the Lima Declaration:	Yes	

			<p>"The establishment of Supreme Audit Institutions and the necessary degree of their independence shall be laid down in the Constitution; details may be set out in legislation."</p> <p>This clearly states that SAI independence must be derived from the Constitution. There is no need to elaborate this matter in ISSAI 30. Requirements concerning Independence are treated in detail in other ISSAIs on Level 2. We suggest minimizing the text on this aspect by referring to relevant ISSAI.</p> <p>At least "and/or" should be replaced by "and" to avoid ambiguity.</p> <p>See also our commentary on paragraph 8 concerning the concept of impartiality.</p>		
195	Tajikistan	34	<p>In terms of Independence and objectivity (paragraph 34) Requirements at the level of SAI Supreme audit Institution in the text of subparagraph (d) "the SAI does not provide advice, "advisory" or other non-audit services to audited entities, where such services include management responsibilities".</p> <p>Note. For completeness and clarity of this norm it is necessary to add a prohibition on "Advisory (consulting)" service.</p>	Yes	The paragraph has been reworded – see current paragraph 34(d).
196	U.S. GAO	34(c)	<p>Consider clarifying the paragraph as follows:</p> <p>The SAI shall adopt policies for the periodic rotation of audit staff, particularly at senior levels, and appropriate safeguards where rotation is not feasible.</p>	Yes	<p>The paragraph has been reworded:</p> <p><i>The SAI shall adopt policies to ensure that audit staff, particularly at senior level, do not develop relationships to audit entities that may put their independence or objectivity at risk.</i></p> <p>Rotation is now explicitly mentioned in paragraph 39(f), where the following clause has been added: <i>or equivalent measures where rotation is not feasible.</i></p>
197	Venezuela (translation from Spanish)	34	<p>We suggest using less imperative terms in this paragraph, such as : "It is recommended to adopt policies for rotation..."</p>	Yes	See response to comment 196.
198	AFROSAI –E	34	<p>Rotation of staff is often not relevant in performance auditing, as the auditors in many SAIs normally not repeatedly audit the same entities. There are of course</p>	Yes	See response to comment 196.

			<p>exceptions to this, where it would be relevant to rotate staff. The main problem here it that the requirement addresses a particular action, not the principle that it should lead to. And that action is far from always appropriate.</p> <p>The SAI shall <u>adopt policies to ensure that audit staff, particularly at senior staff level, do not develop relations to audit entities that may put their independence at risk.</u>adopt policies for the periodic rotation of audit staff, particularly at senior levels, and appropriate safeguards where rotation is not feasible.</p> <p>Add explanations and/or application guidance explaining that staff rotation generally is needed in financial auditing, and that it sometimes can be relevant also in compliance and performance auditing. In many SAIs, however, repeated performance audits of the same entities are often not done.</p>		
199	IESBA	34(b)	<p>We do not believe that the use of the word “controls” in this requirement (i.e. controls not only to mitigate significant threats but also to identify them) is consistent with how controls are defined or described in paragraph 10 (i.e. controls are “put in place to reduce the risk of unethical behaviour to an acceptable level”). We suggest that this requirement be reworded as follows: “The SAI shall establish a <u>framework to enable the identification of significant threats to independence and the application of</u> for applying controls to identify and mitigate significant threats to independence <u>them</u>, as well as <u>to provide</u> guidance and direction for staff in this respect.”</p>	Yes	Paragraph 34(b) has been reworded.
200	IESBA	34(d) (editorial comment)	<p>We suggest that this requirement be edited to read: “The SAI shall not provide advice or other non-audit services to an auditee, where such services <u>would include assuming</u> management responsibilities.”</p>	Yes	Paragraph 34(d) has been reworded.
201	The IIA	34	<p><u>Comment:</u> While staff rotation is often an effective strategy for bringing new talent to the internal audit activity, some sensible safeguards are needed to ensure that this does not imperil internal audit effectiveness. In addition, it could be useful to include examples of management responsibilities that may threaten the independence of internal audit.</p> <p><u>Suggested revision:</u> (a) The SAI shall be independent as regards its status, mandate, reporting,</p>	Partially accepted	<p>The paragraph has been reworded (see response to comment #196). The suggested addition of examples is better addressed in the application guidance, as it may confuse the reader as to whether the example is really a requirement.</p>

			<p>and management autonomy. The SAI shall have full discretion in the discharge of its functions. This independence shall be prescribed by an appropriate and effective constitutional, legal and/or regulatory framework. The SAI shall adopt policies for its independent and objective functioning.</p> <p>(b) The SAI shall establish a framework for applying controls to identify and mitigate significant threats to independence as well as provide guidance and direction for staff in this respect.</p> <p>(c) The SAI shall adopt policies for the periodic rotation of audit staff, particularly at senior levels, and appropriate safeguards where rotation is not feasible. The SAI shall establish routine monitoring procedures to ensure that safeguards are effective.</p> <p>(d) The SAI shall not provide advice or other non-audit services to an auditee, where such services include management responsibilities such as responsibility for the design, development, or implementation of control activities or ownership of risks.</p>		
202	The IIA	34-48	<p><u>Comment:</u> As articulated in our October 7,2015 response to exposure drafts ISSAI 3000, 3100 and 3200 we believe there is a fundamental difference between independence and objectivity.</p> <ul style="list-style-type: none"> • The IIA's Standards define independence as: "The freedom from conditions that threaten the ability of the internal audit activity to carry out internal audit responsibilities in an unbiased manner." Therefore, the ability to be independent is generally a function of the reporting relationship(s). The IIA's Standards define objectivity as: "An unbiased mental attitude that allows internal auditors to perform engagements in such a manner that they believe in their work product and that no quality compromises are made. Objectivity requires that internal auditors do not subordinate their judgment on audit matters to others." • We suggest that the ability to be impartial/objective is the result of being able to take an unbiased approach to work. An internal auditor can be independent, while not being impartial/objective. Conversely, an internal auditor can be impartial/objective, while not having an independent 	Partially accepted	The separating of the two values creates the potential for redundant language in the requirements and application guidance. However, we included separate definitions in paragraphs 36 and 37.

			<p>reporting relationship.</p> <p><u>Recommendation:</u> Revise paragraphs 34-48 to distinguish between the concepts of independence and objectivity.</p>		
203	Sweden	35	<p>It is important to bear in mind that staff usually have all constitutional rights that applies to citizens in general. For example, a SAI staff member may be a member of a political party and may in this respect also participate in political activities. However, such a staff member must be aware of that a political engagements could influence on that staff members impartiality when performing SAI tasks.</p> <p>This text as it stands now seems to be correct from a purely literal point of view. However, it may lead to questions and misinterpretations why we propose that it be revised.</p> <p>See also our commentary on paragraph 8 concerning the concept of impartiality.</p>	No	It is not a ban on political engagements, but a requirement to maintain independence from bias and influence.
204	Tajikistan	35	<p>In terms of paragraph 35. Requirements for employees of the SAI in the text of subparagraphs (a) employees of the SAI should be free from violations of the independence and objectivity that are the result of political bias, participation in management, self-esteem, financial or personal interest or relationship, or undue influence , and others. For this purpose the staff of SAI must:</p> <ul style="list-style-type: none"> - maintain independence from political influence, free from political bias, must be supplemented with the following: "and to avoid membership in any political party". <p>Note. It is necessary to specify on the inadmissibility of any political priorities and preferences in the activities of SAI.</p>	No	This recommended change to the requirement may not be appropriate for every SAI given their individual statutory/legal framework.
205	Venezuela (translation from Spanish)	35	It is suggested clarifying that although the staff should be objective and free of political bias, it is also important for them to identify with patriotic values and principles (national identity) and to have a sense of institutional belonging.	Partially accepted	Partially covered under "Professional Behaviour" (institutional belonging as not discrediting).
206	IESBA	35(a)	We believe that the penultimate bullet should include a specific reference to relationships with the management or personnel of the auditee: "avoid circumstances where relationships with the management or personnel of <u>the auditee or other entities</u> could impact decision-making"	Yes	

207	The IIA	35	<p><u>Comment:</u> In addition to actual conflicts of interest, it is equally important to be aware of potential conflicts that may arise and of perceived conflicts that can be equally damaging.</p> <p><u>Suggested Revision:</u> a) The SAI staff shall be free of impairments to independence and objectivity that result from political bias, participation in management, self-review, financial or other actual, potential or perceived conflicts of interest, personal interest, or relationships with, or undue influence from, others. For this purpose SAI staff shall:</p>	Yes	The change has been addressed with another wording.
208	Sweden	36	<p>Not much of an explanation. See also paragraphs 12 and 25.</p>	Yes	Explanations have been moved to the application guidance sections, and the “Explanation” headings removed.
209	IESBA	36 (editorial comment)	<p>We suggest that the words “are independent” be deleted as the definition of the fundamental value of independence and objectivity in paragraph 8 already refers to “acting in an impartial and unbiased manner:” “The credibility of a SAI’s work depends on it being seen as fair and impartial. For that, it is essential that a SAI and its staff are independent, act impartially and are unbiased, and that their work is objective.”</p>	Yes	The paragraph has been removed.
210	IESBA	37	<p>We do not believe that the test for independence in appearance should be by reference to “a reasonable and informed stakeholder” because SAIs will have a variety of stakeholders, the views of which may be diverse or otherwise be incompatible with each other. We recommend that this test be aligned with the approach in the IESBA Code, which refers to a “reasonable and informed third party.” This would also be consistent with the reference to an “objective third party” in paragraph 62 of the proposed Code. In its December 2015 Exposure Draft, Proposed Revisions Pertaining to Safeguards in the Code—Phase 1 (the Safeguards ED), the IESBA has proposed guidance to explain the concept of a “reasonable and informed <u>third party</u>” as follows: The concept of a reasonable and informed third party is a test which involves an evaluation by a hypothetical person. Such a person possesses skills, knowledge</p>	Yes	The phrase has been changed to: <i>reasonable and informed third party.</i>

			<p>and experience to objectively evaluate the appropriateness of the professional accountant’s judgments and conclusions. This evaluation entails weighing all the relevant facts and circumstances that the accountant knows, or could reasonably be expected to know, at the time that the evaluation is made to determine whether the accountant complies with the fundamental principles.</p> <p>Subject to the finalization of the IESBA’s proposals, we suggest that INTOSAI consider including similar guidance in the proposed Code.</p> <p>Additionally, we suggest that INTOSAI reconsider the phrase “having knowledge of relevant information,” as this could be subject to an overly broadly interpretation. For example, it could mean information that is obtained after the fact, or information that was relevant at the time but which could not possibly have been available to the SAI or the individual staff member. We are concerned that such interpretations could lead to hindsight judgment or second guessing, thereby resulting in the SAI or staff member being unfairly sanctioned on grounds of lack of independence. We suggest that the proposed Code use the phrase “weighing all the specific facts and circumstances available to the SAI or SAI staff at that time” instead, consistent with the approach taken in the IESBA Code.</p> <p>The same comment applies with respect to the use of the phrase “knowledge of relevant information” in paragraph 62.</p>		
211	Lithuania	39 bullet 2	What kind of measures these could be? The same (or, in ethical sense even higher) requirements are applied to senior staff as to all the staff members.	No	It would be too specific. The Code is principle based, and cannot be too detailed.
212	South Africa	39	Declarations of interests and conflicts of interests must help identify and prevent or mitigate threat to independence.	No	The declaration help identify but do not specifically (“must”) identify and prevent threats. The use of “must” is too strong for what the declarations actually can deliver.
213	Sweden	39	<p>Bullet 3: “provisions on how to act in cases when a SAI is allowed to provide non-audit services [...]”</p> <p>In our opinion, the general response to such possibilities should be to refrain from such work.</p> <p>However, it may be necessary to set provisions when the SAI has an obligation to</p>	Yes	Paragraph 39(c) has been reworded.

			<p>carry out such tasks. We suggest to replace the words "is allowed to provide" with "has an obligation to provide".</p>		
214	AFROSAI –E	39	See 34 and the need to be more specific for different types of audit in mentioning staff rotation.	No	It would be too specific.
215	IESBA	39	<p>The IESBA is currently undertaking a project to review the safeguards in its Code and has issued the Safeguards ED noted above. One of the key objectives of this project is to clarify what constitutes a safeguard. In particular, the IESBA has agreed to propose that actions be regarded as safeguards only when they are effective in eliminating threats to compliance with the fundamental principles in its Code or reducing them to an acceptable level (i.e., there is direct correlation between safeguards and the identified threats).</p> <p>Further, in response to concerns from certain stakeholders about the quality and usefulness of the examples of safeguards in its Code, the IESBA has agreed to clarify that certain matters currently characterized as safeguards in its Code should in fact be regarded as conditions that might impact the professional accountant’s evaluation of whether a threat is at an acceptable level. As a result, the IESBA has proposed in its Safeguards ED that some of the measures or actions currently described as safeguards be recharacterized as conditions related to the firm and its operating environment, for example:</p> <ul style="list-style-type: none"> • Leadership of the firm that promotes compliance with the fundamental principles and establishes the expectation that professional accountants will act in the public interest. • Methods and processes for establishing and monitoring compliance with the fundamental principles by all personnel. • Educational, training and experience requirements. <p>We therefore suggest that INTOSAI consider the proposals in the IESBA’s Safeguards ED and review the examples of “safeguards” in the proposed Code to ensure that the measures or actions listed are only labeled as safeguards when they are directly correlated to the identified threats. Where measures or actions do not fall within the meaning of a safeguard, another term such as “conditions” might be used.</p>	Yes	The use of the term safeguard is not applied the same as proposed in the Safeguards ED. The document has been reviewed with regard to how the two terms are used, and certain modifications have been made.
216	IESBA	39	We suggest that the word “rules” in the fifth bullet be changed to “procedures.”	Yes	

		(editorial comment)	We are of the view that adhering to a policy or complying with a rule does not in itself lead to the identification of the situation noted. However, performing a procedure might: “policies and rules <u>procedures</u> to identify and address situations where an audit staff member has recently been an employee of the auditee or has audited the same subject matter under a different organization”		
217	Lithuania	40	Is such a para acceptable?	Yes	The paragraph has been modified.
218	Mexico	20-21 (between 20 and 21)	Add a new paragraph (number 23) with the next information: The ethics committee must hear and investigate the ethics complaints.	Included	Such addition would be too specific. However, see current paragraphs 20 and 22(c) that address the concerns presented.
219	South Africa	40	It would be safer not to refer to the audit report as the content and format of this is driven by the applicable standards. Rather state that the matter needs to be reported.	Yes	
220	Sweden	40	“SAI leadership may consider disclosing the threat to independence in the audit report” We suggest replacing “may” with “should”.	No	Such a change would be too strong, and would turn application guidance into requirement.
221	The IIA	40	<u>Comment:</u> Threats to independence always have the potential for weakening the veracity of findings and conclusions from an audit engagement, and so the decision to disclose such threats needs to be automatic rather than a matter of choice. <u>Suggested revision:</u> In accordance with its mandate, a SAI may be unable to refuse to engage in or continue with an audit, If no controls are effective to eliminate or reduce a threat to independence or objectivity to an acceptable level, SAI leadership may shall consider disclosing the threat to independence in the audit report.	No	Such a change would be too strong and would turn application guidance into requirement.
222	Iraq	20, 21	Clause 20: Ethics management and control is considered practically a very essential case. Code of Ethics should be applied practically on this case and effect directly on SAI reputation. Hence, we suggest to elaborate clauses (20-21) as follows: <u>(20) First stage / ethics management.</u> <ul style="list-style-type: none"> We suggest to add the following phrase: One of the applicable means to 	Partially accepted	Partially included under monitoring controls.

			<p>identify conduct as employment standard is to prepare Professional conduct form which represent a pledge for applicants to adhere to ethics imposed by the profession, and show their willingness to comply with in a way that hold a legal obligation in case of approving, signing and accepting their contents.</p> <ul style="list-style-type: none"> In some cases, it might be appropriate that the pledge has permanent effects keep on after retirement, resignation or work in another place especially with respect to confidential information. <p><u>(21) Ethics control</u> We endorse what is mentioned in sub items of this clause and suggest that SAI should identify obvious mechanism to report apprehension or potential risks that would threaten professional conduct principles especially integrity and independence. We see that adding such mechanism will indicate assurance and safety, urging to report any potential breach and everything that raises doubts. For example, the mechanism arranges reporting instances confidentially for major cases, providing means for reporting like phone numbers (hot lines for professional conduct and ethics) and other procedures that consolidate the significance of adhering to code of ethics.</p> <ul style="list-style-type: none"> Determining binding legal frame that provides disciplinary procedures and legal penalty as a result of violating code of ethics. There should be an encouraging approach for adhering to code of ethics, as an essential staffs annual evaluation, and allocating periodical rewards for complying with. 		
223	Lithuania	41	With regard to concepts used in the draft Code, we suggest changing the term "individuals" to the term "staff".	Yes	"Individuals" changed to "staff" along the section.
224	Sweden	41	This is only a beginning text, a label, to a list and should therefore not be numbered as a paragraph. See also paragraph 13.	No	The paragraphs are numbered for the sake of referencing. Other recently developed ISSAIs number all paragraphs, too.
225	IESBA	41	We believe that this provision is in effect imposing an important requirement, as indicated by use of the phrase "need to identify." Furthermore, we believe that such a requirement would complement paragraph 35(a). This is because to be	Yes	It has been added under 35(b).

			free from impairments to independence and objectivity (the overarching requirement), it is not only necessary to comply with the requirements in the bullet points (which are essentially a list of prohibitions) but also necessary to identify possible threats (i.e., a proactive obligation) and address them. Accordingly, we suggest that this provision be elevated to a requirement as part of, or next to, paragraph 35.		
226	Lithuania	42	We suggest inserting "and objectivity" after the phrase "may impair their independence".	Yes	
227	Germany	43	Principle 43. reminds SAI staff that participation in public political activities, public expression of political views or candidacy for election to public office may be perceived by stakeholders also having an impact on a SAI's ability to form unbiased judgements. The Bundesrechnungshof audits the federal budget. Participation of staff in public political activities in municipalities cannot influence the impartiality of the Bundesrechnungshof since our institution is not responsible to audit this state level. The first sentence of the Principle may therefore be amended as follows: "Involvement in political activities may impact the ability of a SAI's leadership or staff to discharge their professional duties impartially if the SAI is responsible to audit the state level where the political activity takes place." The last sentence should also be complemented: "...having an impact on a SAI's ability to form unbiased judgements if the SAI is responsible to audit the state level where the political activity takes place."	Noted	
228	Sweden	43	One could agree to this but as a matter of fact it may go too far with respect to citizens' constitutional rights. In order to make the text generally less judgemental, we suggest: "Especially as it impacts political neutrality, independence in appearance can be as important as independence in fact: participation in public political activities, staff need to be aware of that public expression of political views, or candidacy for election to public office may be perceived by stakeholders as having an impact on a SAI's ability to form unbiased judgements."	Yes	Modified using the wording of comment #229.
229	U.S. GAO	43	<u>Clarity:</u> We believe that auditors must always have both independence in mind and independence in appearance so that their opinions, findings, conclusions, judgments, and recommendations will be impartial and viewed as impartial by	Yes	Paragraph has been reworded.

			reasonable and informed third parties. Consider clarifying the third sentence of paragraph 43 as follows: Especially as it impacts political neutrality, Independence in appearance can be is as important as independence in fact: participation in public political activities, public expression of political views, or candidacy for election to public office may be perceived by stakeholders as having an impact on a SAI's ability to form unbiased judgements		
230	IESBA	44 (editorial comment)	We suggest that the term “controlling” be added to the first sentence, consistent with how IESBA has described the concept of management responsibility: “Management responsibilities involve <u>controlling</u> , leading and directing an entity, including making decisions regarding the acquisition, deployment and control of human, financial, physical and intangible resources.”	Yes	
231	IESBA	44 (editorial comment)	We suggest the following editorial refinements to the second bullet as follows: “a SAI staff member who serves as a voting member of an auditee’s management committee or board of directors, making policy decisions that affect the future direction and operation of an <u>the</u> entity’s programmes, supervising the entity’s employees, developing or approving policy, authorising an <u>the</u> entity’s transactions, or maintaining custody of an <u>the</u> entity’s assets”	Yes	
232	South Africa	44-47	The introductory paragraphs before the examples, use the words "may" or "could" - given that independence is an issue of fact and appearance (perceived) - these words should potentially be revised as the examples cited are actual or perceived independence breaches.	Yes	The use of “may” and “could” has been revised and made consistent.
233	Germany	45	Principle 45. wants to exclude that staff members get in contact with their previous work when auditing for their SAI. Like some other SAIs the Bundesrechnungshof recruits most staff that have gathered professional experience. This includes staff from all parts of public administration including bodies that are subjects to the audit by our SAI. This recruitment policy guarantees that auditors possess the expertise needed for ensuring high quality of audit work and audit reports. To prevent undue interference with audit work legislation prohibits audits by staff having personally been involved in the specific topic of audit (risk of bias). To reflect this approach, Principle 45 should be better worded as follows: First bullet point: "staff having been personally involved in the specific activity becoming the subject matter of the audit". Therefore, we also	Partially accepted	The separation of these two bullets should remain because an individual would be previously been employed by the auditee but not involved in the matter being audited. Also the person may not have been specifically employed by the auditee but may have been involved in the matter of the audit (contractor). However, the wording has been changed according to the comment.

			suggest deleting the second bullet point: "staff having recently been an employee of the auditee".		
234	South Africa	46	The 2nd bullet refers to "staff being responsible for engagements or opinions" The audit opinion will be the result of an audit engagement so "or opinions" should be deleted.	No	An audit opinion is not always the result of the audit engagement (e.g. performance reporting).
235	Sweden	46	We find this paragraph acceptable. However, it may lead to questions concerning a staff member s normal relations to public authorities, for example as a taxpayer in relation to the tax authorities. We suggest adding words that clarify that staff members' normal relations to public authorities in their capacity as ordinary citizens, is not an impairment to fulfilling SAIs' tasks.	No	It should be assessed and solved in specific cases.
236	IESBA	46	We suggest that INTOSAI clarify how independence could be impaired in the second circumstance described in the fourth bullet relating to another entity with which the SAI has a contractual or other relationship. For example, in a situation where the SAI has contracted with an external facilities management company for the regular maintenance of the SAI's office elevators, and the SAI staff happens to have a personal investment in the facilities management company, it is unclear how the staff's independence <u>with respect to the audited entity</u> would be impaired simply by virtue of the staff's investment in the facilities management company.	No	In this paragraph, "could" has been changed to "may". The size of the investment and the potential involvement of the individual in the company could have an impact as the staff could use the information gained in the audit to potentially influence pricing in a contract or exploit potential billing deficiencies to the company's advantage thus personally enriching themselves.
237	IESBA	47	We also suggest that INTOSAI clarify how independence <u>with respect to the audited entity</u> could be impaired as a result of the SAI staff's close private or professional relationships with other entities. Clarification is needed in particular regarding the circumstances set out in the first two bullets of this paragraph. For example, the second bullet appears to suggest that there may be a threat to a SAI staff member's independence in relation to the audit of a particular entity in any circumstance where the staff member's spouse happens to be an officer or director at another entity unrelated to the auditee. If this is INTOSAI's intention, we believe this may potentially disqualify many individuals from working for SAIs as they might automatically be deemed not independent (and therefore in potential breach of the proposed Code) simply by virtue of having a close family	No	The intent is not as the IESBA indicates. The bullets are examples of potential threats to independence related to where undue influence can occur. Again, the situations must be assessed case by case. One is not disqualified for working in a SAI if their spouses work in a potential audited entity; they are just disqualified to do the audit of that

			member working in an influential position in another entity.		very entity.
238	Bahrain	48	“[...], SAI staff are advised to consult with the ethics advisor or other appropriate parties to help [...]” It should mention examples of such parties.	Included	Current paragraph 20 explains what kind of nature the ethics advisory unit can be.
239	Malta	48	In paragraph 48, after the first sentence, the following sentence may be included: When addressing threats to independence, the following factors, either individually or together with other factors, may be relevant to the resolution process: (a) relevant facts; (b) ethical issues involved; (c) fundamental principles related to the matter in question; (d) established internal procedures; and (e) alternate courses of action. Having considered the relevant factors, the SAI shall consider the appropriate course of action, weighing the consequences of each possible course of action. This has been extracted from paragraph 100.20 of IESBA Code of Ethics for Professional Accountants 2015.	No	Valid for all values, not only for independence. This is about who to address and not about resolving ethical dilemmas.
240	Sweden	48	We question the focus on an ethics officer, or similar accessory functions, in this paragraph and several others. To maintain a high morale and applying good ethical principles is crucial for an SAI. This means that ethics must be one of the most important aspects in a SAI's work, and should therefore have the highest priority for management at all levels. Line-managers' primary responsibility for ethics may not be taken over by an accessory ethics officer. An SAI may very well establish an ethics officer or assign similar responsibilities to the HR department, legal department, etc. but, in our opinion, just to ensure expertise on a continuous basis for advice to line-managers.	Included	The paragraph does not indicate that management is not responsible for ethics. It focuses on the instances when an uncertainty exists and paragraph 20 gives all the options to SAIs, including dealing with ethics problem within the hierarchic line.
241	Iraq	49	Item (3). Efficiency – requirements at SAI level: We recommend adding the following phrase: Adopting policies to develop efficiency, urging the employee to boost his/her skills by adopting efficiency principle as one of the main standards used in staff evaluation and granting privileges and promotions should be based on permanent evaluation. We recommend that the standard may include specific procedures to enhance their efficiency through reviewing the training programs that confirmed to be inefficient or do not affect actively.	Yes	
242	Malaysia	49	Bullet 5 - The appropriateness of including "addressing challenges arising from changes in the public sector environment" is questionable. The focus here is on the subject matter "competence" in terms of the auditor's ability and capability	No	The bullet is applicable because it gets at the need to stay current in a changing public sector world, which

			to perform the auditing task in an effective manner with the required knowledge and skills. Probably, the statement could be inserted under "application guidance at the level of SAI - assembling the appropriate competence".		happens.
243	Mexico	49 (a)	<p><u>Comment:</u> Section 49 (a) establishes that SAIs shall adopt policies to ensure that tasks are performed by individuals or teams that have the appropriate knowledge and skills to complete them successfully, and includes a number of examples for accomplishing this. Yet, no mention is made regarding SAI's responsibility in planning audit engagements according to its own capabilities, as a way of ensuring that work will be competently carried out. Therefore, the following addition is suggested:</p> <p>49. Requirements at the level of SAI (a) ...</p> <ul style="list-style-type: none"> • ... • determining audit engagements that are reasonable according to the size, complexity and capabilities of the SAI. 	Yes	
244	South Africa	49	Consider including duty of care at SAI level, which is the moral/legal obligation to ensure the safety and well-being of staff.	Yes	
245	Tajikistan	49	<p>In terms of section 3. Competence, paragraph 49. Requirements at the level of SAI in subparagraph (a) must be supplemented by a definition as follows "provision of systematic conduction of obligatory certification (attestation) of staff to improve knowledge and skills.</p> <p>Note. In the interests of strengthening of requirements to achieve adequate competence of employees (personnel) it is necessary to add "the importance of conduction of mandatory periodic attestation to improve knowledge and skills of staff.</p>	Included	This is covered in Application guidance, for instance, current paragraph 55 and 56.
246	AFROSAI –E	49	Isn't a comma missing? "providing staff with appropriate training, support and supervision;"	Yes	
247	IESBA	49	We suggest that the last bullet point in this requirement be clarified and made more specific, as there can be many challenges arising from changes in the public sector environment that have no connection with the duties of SAI staff, and therefore of no relevance insofar as maintenance of their competence is	No	The requirement is broad to cover keeping up-to-date generally, as a specific SAI and its staff may have variable work that changes based

			concerned.		upon the needs or requirements of the SAI. The use of the term “optimally” also covers the SAI staff to focus on relevant areas to stay current on as opposed to irrelevant areas.
248	Norway	49-58	We believe that the users of the ISSAI find it confusing that competence is covered both here and in ISSAI 40. We suggest that it is deleted here.	No	Here we refer only to the ethical aspect of competence. Competence is included in current ISSAI 30, too. Following this logic, it should have not been touched upon in ISSAI 40.
249	Mexico	50	<p><u>Comment:</u> Section 50 establishes requirements for SAI staff regarding competence, yet no mention is made regarding issuance of reports based on relevant evidence, without distorting or omitting information. Therefore, the following addition is suggested:</p> <p>50. Requirements at the level of SAI staff a) ... b) ... c) ... d) SAI staff shall report all significant findings based on evidence that is sufficient, reliable and relevant to support the conclusions and/or recommendations related to the audit procedures performed, and ensure that reports do not contain or omit material information that may cause them to be misleading.</p>	No	Too detailed.
250	The IIA	50	<p><u>Comment:</u> It is a matter of professional integrity that individuals should only undertake roles for which they are competent. Therefore, we suggest that this be called out as a requirement.</p> <p><u>Suggested revision:</u> Requirements at the level of SAI staff (a) SAI staff shall perform their job in accordance with applicable standards. (b) SAI staff shall act in accordance with the requirements of the assignment,</p>	Included	It is included in the application guidance (paragraph 58; in this paragraph “complete” has been changed to “perform”).

			<p>carefully, thoroughly and on a timely basis.</p> <p>(c) SAI staff shall maintain and develop their knowledge and skills to keep up with the developments in their professional environment in order to perform their job optimally.</p> <p>(d) SAI staff shall engage only in those services for which they have the prerequisite knowledge, skills and experience.</p>		
251	Mexico	52	<p><u>Comment:</u> Section 52 establishes requirements for tasks to be performed by competent staff as well as for resources to be managed in an efficient and effective way, including identifying adequate knowledge and skills from staff, among others Yet, no mention is made regarding knowledge sharing among senior members and staff to optimize training. Therefore, the following addition is suggested:</p> <p>Assembling the appropriate competences 52. ...</p> <ul style="list-style-type: none"> • ... • Promotes knowledge sharing and lessons-learned analysis among the different levels of SAI staff and senior members to enhance capabilities. 	Included	This is covered in current paragraph 56(e), under application guidance.
252	AFROSAI –E	54	<p>Isn't a "d" missing? "Maintaining and developing professional competence is a key way to keep up with technical, professional and business developments, to respond to a changing environment and increased stakeholders' expectations."</p>	Yes	
253	IESBA	54 (editorial comment)	<p>We suggest that the word "increase" in the first sentence be replaced with the word "meet," as this could otherwise suggest that SAI staff have a responsibility to forever increase stakeholders' expectations, thereby setting the SAI staff up for failure to meet such ever rising expectations: "Maintaining and developing professional competence is a key way to keep up with technical, professional and business developments, to respond to a changing environment and increase <u>meet</u> stakeholders' expectations."</p>	Partially accepted	The wording has been changed.
254	Sweden	55	<p>We suggest "SAIs should create..."</p>	Yes	The text has been amended.
255	IESBA	55 (editorial comment)	<p>We suggest replacing the word "introducing" with "implementing:" "SAIs can create a continuous learning environment, and support individuals to apply and develop their competence, by introducing <u>implementing</u>:"</p>	Yes	The text has been amended.

			...”		
256	Sweden	56	Superfluous. Does not add any new or developed requirement.	Yes	Paragraph deleted.
257	Malta	57	To possibly also include in paragraph 57 that: In meeting the requirements, SAI staff shall possess a good understanding of the Constitutional, legal and institutional principles and standards governing the operations of the audited entity. This has been extracted from paragraph 30 of the current INTOSAI Code of Ethics.	Included	The requested change is part of 57 (a) and (b).
258	Malta	57	After paragraph 57, the following sentence may be included: Performance and exercise of technical skill should be of a quality appropriate to the complexities of a particular audit. Audit staff need to be alert to abnormal situations, control weaknesses, inadequacies in record-keeping, errors and unusual transactions or results which could be indicative of fraud, improper or unlawful expenditure, unauthorised operations, waste, inefficiency or lack of probity.	Included	All this is covered in other items of the draft standard.
259	South Africa	58	Include the element that the SAI will have the obligation to intervene.	Included	This is generally included in application guidance at the level of SAI.
260	Netherlands	59	<u>Extension of requirement 59</u> Furthermore, we would like to extend requirement 59 by explicitly including the expectations of relevant professional bodies like, for instance, judges. <u>Proposal for the wording of requirement 59 (section 4 - professional behaviour)</u> Requirements at the level of SAI (a) The SAI shall be aware of the standard of professional behaviour expected by its stakeholders and relevant professional bodies, as defined by the laws, regulations and conventions of the society in which they operate. (b) The SAI shall balance the confidentiality of audit-related and other information with the need for transparency and accountability. (c) The SAI shall develop an ethics control system to assist staff in adhering to these rules.	No	This was meant for the case in which the value of confidentiality would be deleted. As this was not the case, the change proposed is not consistent with the current structure.
261	Sweden	59	Professional behaviour is not just about ethics. Controlling staffs' professional behaviour takes other instruments than just an ethics control system.	No	This can be considered for the application guidance rather than the

			Adding a reference to ISSAI 40 on Quality Control for SAIs would be helpful.		requirements paragraph.
262	Norway	59-69	As above. [comment on paragraphs 49-58: We believe that the users of the ISSAI find it confusing that competence is covered both here and in ISSAI 40. We suggest that it is deleted here.]	No	The intention is for this to be a base to construct the code of ethics from. As with independence, which is covered separately but discussed here, it is ok to discuss competence here.
263	AFROSAI–E	59-69	Isn't the description of professional behaviour too narrow? I would be more comfortable if the "adopted audit standards" also were included in 59-69.	Included	In the "Competence" section.
264	Philippines	60	Add par. (c) "Auditors have a continuous obligation to update and improve the skills required for the discharge of their professional responsibilities."	Included	In requirement 57(d).
265	Sweden	61	Not much of an explanation. See also paragraphs 12, 25 and 36.	Yes	Explanations have been deleted.
266	Sweden	62	We think this goes too far. Those expectations may differ between different stakeholders and may not be consistent with the SAI's mandate. We suggest: "SAIs should understand the expectations of stakeholders and conduct their business accordingly and in line with their mandate."	Yes	
267	AFROSAI –E	63-64	Add no value.	No	Written as they are, the paragraphs do offer guidance on how to implement the requirements.
268	Sweden	66	Of course stakeholders' expectations should always be considered but they may not always be correct and consistent with the SAI's mandate.	Yes	
269	IESBA	67 (editorial comment)	We suggest that the word "correctly" be replaced with the word "appropriately" in the last line: "...applying diligence and care in performing their work and acting correctly <u>appropriately</u> when dealing with others."	Yes	
270	South Africa	68	Consider rephrasing this clause.	Yes	
271	IESBA	68 (editorial comment)	It would appear more appropriate that the example relating to confidentiality breach when using social media be used in the section dealing with the fundamental value of confidentiality than in the section dealing with professional	Yes	

			behaviour.		
272	Denmark	69	The sentence in para. 69 is a bit difficult to read. Replacing 'they' after the comma with i.e. 'staff should' or 'staff may' would make it easier to understand.	Yes	The sentence has been reworded.
273	South Africa	69	Insert the word "must" between "they" and "avoid".	No	Use of “must” is not permitted in the application guidance section, according to the PSC Drafting Conventions.
274	Malta	70(a)	The wording could be amended to: <u>The SAI shall establish an adequate system for maintaining confidentiality, especially when treating sensitive or personal data.</u>	Yes	
275	Netherlands	70(c)	<u>Inclusion of confidentiality in requirements for Professional behaviour</u> We would therefore like to suggest to include requirement 70c into requirement 59. In our view this alteration sufficiently emphasizes the importance of confidentiality for our work, without treating it as an independent ethical value. We think the remaining text proposals of section 5 can be deleted from the draft without hurting the content or intentions of the Code.	No	The inclusion of confidentiality is consistent with having to balance transparency and accountability, so to discuss the topic with less specificity under professional behaviour would not be reflective of the current environment.
276	Lithuania	71 (b)	With regard to provisions of para. 75 we suggest supplementing this para. by adding to its end the following phrase: "or there is a legal or professional right or duty to do so".	Yes	
277	Malaysia	71	Adding the word "and understand SAI's policies and guidelines on confidentiality" in para 71(a) after the phrase 'SAI staff shall be aware'.	Yes	The notion of “being aware” conveys “understanding”.
278	IESBA	71(d) (editorial comment)	We suggest the following editorial refinement: “SAI staff shall be alert to the possibility of unintended revealing <u>inadvertent disclosure to third parties of confidential information.</u> ”	Yes	
279	Sweden	72	Not much of an explanation. See also paragraphs 12, 25, 36 and 61.	Yes	Explanations have been deleted.
280	Malaysia	73	Adding the word "and secure" after the word "protect".	No	It is the same.
281	South Africa	73	Information management laws must also be abided by.	Included	Considered in 73.
282	IESBA	73	We suggest the following editorial refinement:	Yes	

		(editorial comment)	“The SAI needs to put in place policies to appropriately protect information and apply controls/safeguards to prevent <u>eliminate or reduce to an acceptable level</u> potential risks to confidentiality infringements.”		
283	Iraq	74	Item 5. Confidentiality, clause (74) includes examples on protection instructions/procedures used by SAI (communication policies with media). This clause states details in general, we suggest to add a brief explanation due to its significance as the following: SAI sets written instructions includes communication strategy with media. One of the most essential strategy is to establish department or specialized team to deal with media. Regarding the application on SAI level, these instructions should involve set of procedures that the staff must comply with to guarantee the balance between information confidentiality in one side and integrity and accountability in another side, as mentioned in clause (70). We suggest to add the following details: <ul style="list-style-type: none"> • The staff should abstain to disclose any information to media • Making effort to formulate press releases accurately and objectively to avoid misunderstanding or misinterpretation in reviewing materials. • Notify the staff to abstain publishing letter or written documents related to work tasks or duties. • Unless authorized people, the staff are forbidden to participate as spokesmen in conferences or seminars related to work. 	Yes	
284	Malaysia	74	Bullet 3 - Reword to "providing guidance on what kinds of information, documents or materials should be treated as confidential and the stage of work at which it should be treated as confidential, which ..."	Yes	
285	IESBA	74 (editorial comment)	We suggest replacing the word “carriers” with “media” as the word “carriers” may be interpreted to also mean individuals.	Yes	
286	Denmark	76	The third bullet in para. 76 should possibly be specified slightly. Depending on how you interpret the sentence it might be read as contradictory to the requirements in other standards (i.e. ISSAI 100 para. 42) on documenting audit evidence.	Yes	The item has been deleted.
287	Oman	76	In code no 76 page no 16, examples of control and safeguard at individual SAI Staff were mentioned. The following additional example of safeguard can be inserted:	Included	See paragraph 75(c).

			<ul style="list-style-type: none"> Office work is not required to be discussed even with families. 		
288	The IIA	76	<p><u>Comment:</u> Leaving records in the custody of the auditee may be impractical under some circumstances (e.g. electronic files). Suggested revision of the third bullet under paragraph 76:</p> <ul style="list-style-type: none"> where practical, leaving all records in the custody of the auditee unless there are specific legal provision not to do so; 	Yes	The sentence has been deleted.
289	France	8, 70	The word “confidentiality” is used in paragraph 70 at the place of “professional secrecy” in the current ISSAI 30. The two concepts are different and both of them should be mentioned.	No	The decision to use confidentiality over professional secrecy reflects the current environment (balancing transparency with confidentiality) and is in line with IESBA.
290	France	35 and 46	The expression “personal interest” (paragraphs 35 and 46) should be refined to include family acquaintance or friendship and not only individual financial interest.	No	This change may not be appropriate for individual SAIs based upon their legal and social structure.
291	Bahrain	44, 75	Replace “need to” with “must”.	No	“Need to” is used in accordance with the PSC Drafting Conventions regarding application guidance.
292	France	35, 44, 45	The word “recently”, used in paragraphs 35, 44, 45 on conflict of interest appears too vague and could result in differences over how this provision is interpreted. It could be replaced by “a few years”.	No	The use of “a few years” is not really more specific than “recently” and is ultimately up to how the SAI decides to define and structure it in their Code of Ethics.
293	South Africa	45, 46 and 47	The use of the word "and" in the second last bullet of each paragraph seems to suggest that all the conditions of the paragraphs must be met - therefore it is suggested to remove the word to avoid confusion.	Yes	
294	Bahrain	1, 10, 28, 31, 41, 43, 65, 66	Replace “need to” with “must” <u>or</u> “should”.	No	The verbs have been used in accordance with the PSC Drafting Conventions.
295	Brazil	8, 9, 17, 21, 28, 35, 39, 44, 45, 46, 47, 49, 52,	Same comment presented to para. 5: use lowercase letters instead of bullets in order to facilitate reference to the item to be in line with the drafting conventions.	Yes	

		55, 57, 74, 76			
296	Russian Federation		<p>Due to the fact that we have another system of terms and meanings, it is quite difficult to understand some points in the text of the document and also to catch the main idea. We suppose that it is necessary to have a strong basis of adjusted terms which are used in the document.</p> <p>We think that mostly it concerns the items 11, 23, 24, 34, 35, 49, 50, 59, 60, 70 and 71.</p> <p>In our view this points are needed to be more clarified and detailed.</p>	Included	Addressed with changes introduced in response to other comments.

Exposure Draft of revised ISSAI 30 – no comment or support for the document

Item	SAI	Content
1	Austria	<p>Thank you most cordially for forwarding the exposure draft of ISSAI 30 – INTOSAI Code of Ethics. We would like to congratulate you on the drafting of this revised version of ISSAI 30.</p> <p>There are no objections to the proposed guidelines by the Austrian Court of Audit and we do not wish to provide any detailed comments at this stage.</p> <p>Thank you again for all your efforts in benefit of INTOSAI.</p>
2	Azerbaijan	<p>We highly appreciate your efforts for revising ISSAI 30: INTOSAI Code of Ethics. Please be aware that we agree with the proposals and do not have any comments regarding the exposure draft.</p> <p>We are confident that it will be very useful for all SAIs.</p> <p>Taking the opportunity wish you all the success in your future activities.</p>
3	Belize	<p>Please be informed that SAI Belize had participated in a peer review conducted by SAI PERU concluded in October 2014. The Peer Review formed the basis for a review of our strategic plan which now incorporates the development for a code of ethics. In the interim we have adopted INTOSAI's code of ethics however it requires some tweaking and training, of which, is also now a part of the revised strategic plan.</p>
4	Botswana	<p>This is to indicate that SAI BOTSWANA has no comments on the ISSAI 30 Exposure Draft.</p>
5	Canada	<p>We have no comments on the ISSAI 30 Exposure Draft and agree with the proposed revision.</p>
6	Cyprus	<p>We would like to inform you that we have no comments regarding the exposure draft of the revised ISSAI 30.</p>
7	Czech Republic	<p>With reference to your letter concerning the exposure draft of the revised ISSAI 30, I would like to inform you that our colleagues have studied this document thoroughly and that they agree with the proposed wording, thus the Supreme Audit Office of the Czech Republic has no special comments on it.</p>
8	Estonia	<p>Thank you for distributing the draft. The NAOE does not have comments on the draft.</p>
9	European Court of Auditors	<p>Please note that the European Court of Auditors is not submitting any comment on the exposure draft of revised ISSAI 30: INTOSAI Code of Ethics.</p>
10	Finland	<p>The National Audit Office of Finland wishes to let you know that we have no comments on the document.</p>
11	Greece	<p>Thank you for reminding us of the deadline for submitting comments on the exposure draft of the revised ISSAI 30: INTOSAI Code of Ethics.</p> <p>We herewith confirm our agreement to the proposals included therein, which we consider to be along the right lines.</p> <p>We appreciate the work done so far.</p>
12	Guatemala	<p>In this regard, we inform you that we have no comments or proposed changes, since this draft ISSAI 30 adapts and applies without any inconvenient in this SAI.</p>

13	Ireland	No comment.
14	Japan	We have carefully reviewed the exposure draft and found there is no specific comment from our side. We very much appreciate your great effort on this matter.
15	Jordan	We highly appreciate your letter ,we don't have any comment on the draft of Exposure Draft of Revised ISSAI.
16	Kiribati	<p>I have read the Exposure draft that will replace the current ISSAI 30 and fully support the content. I am very pleased with the new format as it has also provided explanations for each level and specific areas, particularly the ethical requirements which to me had included pertinent areas SAIs should also consider when applying the standard.</p> <p>I fully support the revised version with its format and contents and I also join those that have congratulated the team for a job well done for the INTOSAI family.</p>
17	Moldova	[...] we fully support the draft and do not have any proposals.
18	Pakistan	SAI Pakistan has examined the Exposure Draft of revised ISSAI 30 and this is to intimate that we agree with the proposed revisions.
19	Romania	[...] we have no comments regarding the exposure draft of the revised ISSAI 30. We appreciate very much your team's efforts that are reflected in this project. We also are satisfied that a part of the TFA&E work, whose members we are together with Poland's representatives, is reflected in the exposure draft of revised ISSAI 30.
20	Slovakia	We would like to congratulate to the team on job well done, as the presented material is well thought out and presented. The theme is/was quite difficult and, considering variability of the INTOSAI community with possibility of different regional/national aspects, it was handled on outstanding professional level. The result is well thought out and written standard and we appreciate the effort taken by the whole team. The presented standard can be presented for INCOSAI for its approval.
21	Spain	[...] Spain hasn't made any comments because we agree with the draft as it is.
22	Tunisia	The Tunisian Cour des comptes has not particular comments to submit on the exposure draft of revised ISSAI 30.
23	Argentina	<p>[...] the ISSAI 30 revised draft is an improved version of the existing code of ethic, since it fully complies with the objectives of a more comprehensive code, which provides tools and guidelines for application, both from the perspective of the SAI and its staff.</p> <p>In this regard, this draft, in addition to setting values, is a practical guide that provides valuable information because it lists responsibilities of SAI and describes the appropriate controls needed to reduce the risk of unethical behavior. The code is written in a clear and simple manner that allow each SAI to adjust to its own code without contradicting its culture and legal and social systems.</p>