

30 April 2024

Mr Ken Siong  
IESBA Program and Senior Director  
International Ethics Standards Board for Accountants  
529 Fifth Avenue  
New York, NY 10017  
USA

Dear Sir,

**RESPONSE TO THE INTERNATIONAL ETHICS STANDARDS BOARD FOR ACCOUNTANTS (“IESBA”) EXPOSURE DRAFT (“ED”) – USING THE WORK OF AN EXTERNAL EXPERT**

For this ED, the Institute of Singapore Chartered Accountants (ISCA) sought views from its members through a 6-week public consultation and discussed the ED with members of the ISCA Ethics Committee.

We are supportive of having an ethical framework to guide professional accountants (PAs) and sustainability assurance practitioners (SAPs) in evaluating whether an external expert has the necessary competence, capabilities and objectivity in order for PAs and SAPs to use their work for the intended purposes.

Our comments to selected questions in the ED are as follows:

*Evaluation of CCO for all Professional Services and Activities*

**Question 2. Do respondents support the approach regarding evaluating an external expert's competence, capabilities and objectivity? Are there other considerations that should be incorporated in the evaluation of CCO specific to PAIBs, PAPPs and SAPs?**

We support the proposal to evaluate an external expert's competence, capabilities and objectivity (CCO) prior to using their work for the intended purposes.

The evaluation of CCO is aligned with the requirement of ISA 620 *Using the Work of an Auditor's Expert* which supports the application of the proposal by professional accountants in public practice.

*Evaluation of CCO for Audit or Other Assurance Engagements*

**Question 4. In the context of an audit or other assurance (including sustainability assurance) engagement, do respondents agree that the additional provisions relating to evaluating an external expert's objectivity introduce an appropriate level of rigor to address the heightened public interest expectations concerning external experts? If**

**not, what other considerations would help to address the heightened public interest expectations?**

We agree that the work of an external expert without the necessary CCO should not be used. However, we are of the view that evaluation of CCO should be principle-based and should not extend to evaluating independence attributes of an external expert as set out under proposed paragraphs R390.8 and R5390.8.

External experts engaged by the PA or SAP are not members of the audit team or sustainability assurance team. Hence, it appears unduly onerous to request or expect an expert outside of the team to provide information relating to, for example, financial interests, loans and guarantees, under sub-paragraphs (a) to (d) of proposed R390.8 / R5390.8.

Should you require any further clarification, please feel free to contact Mr Terence Lam at [terence.lam@isca.org.sg](mailto:terence.lam@isca.org.sg), Ms Alice Tan at [alice.tan@isca.org.sg](mailto:alice.tan@isca.org.sg) or Ms Ng Shi Zhen at [shizhen.ng@isca.org.sg](mailto:shizhen.ng@isca.org.sg).

Yours faithfully,



Mr Wai Geat, KANG  
Divisional Director  
Professional Standards