

11 June 2020

Mr Ken Siong
Senior Technical 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”) – PROPOSED REVISIONS TO THE FEE-RELATED PROVISIONS OF THE CODE

In preparation of this comment letter, the Institute of Singapore Chartered Accountants (“ISCA”) has gone through a rigorous due diligence process to deliberate over the proposals in the ED. ISCA has sought views from its members on the ED through a one-month public consultation and discussed the ED with members of the ISCA Ethics Committee (“ISCA EC”).

Prior to the issuance of this ED, ISCA EC formed a working group (“ISCA NAS WG”) to deep-dive into the local concerns in applying NAS and fee-related provisions in ISCA’s EP 100 *Code of Professional Conduct and Ethics*, and to recommend practices that are relevant and practical to strengthen auditor independence.

To consider inputs across all stakeholders, the ISCA NAS WG was formed, comprising representatives who are practitioners from accounting firms, those charged with governance (“TCWG”), professional accountants in business, academic community and members from regulatory bodies.

ISCA NAS WG received feedback indicating diversities in interpretations and practices in applying certain NAS and fee-related provisions in ISCA’s EP 100 *Code of Professional Conduct and Ethics*. There was also no empirical evidence to ascertain what information is relevant to TCWG in assessing the independence of audit firms.

With this in mind, ISCA NAS WG conducted a survey of directors (who are Audit Committee members) to obtain views on matters concerning auditor independence when providing NAS to audit clients; and on certain ISCA NAS WG’s recommendations to address NAS independence concerns. Based on the outcome of the survey, we put forth the following recommendations for IESBA’s consideration:

- (i) Confirmation by each network firm that the NAS fees earned by the network firm from the parent, penultimate parent, ultimate parent and sister entities of the audit client do not exceed 1% of the network firm's revenue

94% of directors surveyed agreed that the above confirmation would mitigate any perceived or real independence threats (intimidation and undue influence threats). If the percentage exceeds 1% of the network firm's revenue, 94% of respondents agreed that the below is an appropriate safeguard:

- a confirmation from the audit firm that there is no undue influence from network firms on the audit firm for the execution of audit; or
- a confirmation from the audit firm's ethics and independence partner (or equivalent) that there is no undue influence from network firms on the audit firm for its execution of audit.

Our survey also included questions on the appropriate threshold to trigger TCWG's review of the provision of NAS to the audit client. Majority of the directors [87% of the respondents] view that the computation of such threshold should only cover NAS fees earned by the audit firm and its network firms from services rendered to controlled/downstream entities of the audited entity, i.e. the audit client's downstream entities. This is consistent with the ED's requirement for the firm to communicate with TCWG of an audit client that is a public interest entity ("PIE"), the fees for services other than audit by the firm or a network firm to the client's downstream entities in paragraph R410.23.

Paragraph 410.10 A2 of the ED lists the ratio of fees for services other than audit to the audit fee as one of the factors relevant in evaluating the level of threats (self-interest threat, intimidation threat, threat to auditor's objectivity) to independence.

Paragraph 410.10 A1 states that the proportion of fees for services other than audit include fees for services other than audit charged by both the firm and the network firms to the audit client and related entities of the audit client.

We agree with IESBA that the exact ratio of fees for services other than audit to the audit fee would be a complex task, and firms might not be able to obtain all the necessary information in a timely manner.

Accordingly, we recommend the following:

- (a) to exclude NAS fees earned by network firms from audit client's parent and sister entities in the fee proportion computation in paragraph 410.10 A1. Only NAS fees earned by network firms from controlled/downstream entities of the audited entity should be included in the fee proportion computation; and
- (b) to adopt the above-mentioned confirmation by each network firm as an alternative safeguard to mitigate any perceived or real independence threats (intimidation and undue influence threats).

Further detail is included in our comment on question 5.

(ii) Introducing the concept of “Audit-related services” and excluding it from the computation of the proportion of fees for services other than audit to audit fee

- Concept of “Audit-related services”

The scope of NAS under the extant Code might be too wide as it covers all services other than audit and review engagements. In the UK FRC Revised Ethical Standard 2019, “audit-related services” is defined as non-audit services that are largely carried out by members of the audit engagement team, and where the work is closely related to the work performed in the audit and the threats to auditor independence are clearly insignificant and, as a consequence, safeguards need not be applied.

The ISCA NAS WG observed that in Singapore, audit engagement teams might undertake certain NAS as required by laws or regulations since they are best placed to perform certain NAS under legislation, regulations or contracts, given their knowledge of the audit client’s system of internal controls and financial reporting process gained through the audit. Examples of such NAS include assurance services or agreed upon procedures engagements (i) related to specific financial line items or internal controls; (ii) for purposes of reporting compliance with industry specific regulations; and (iii) in connection with government grant schemes.

With reference to UK FRC Revised Ethical Standard 2019, such services would be considered as “audit-related services”. Accordingly, the ISCA NAS WG proposes to introduce the concept of “audit-related services” for application in Singapore. This proposal is fully endorsed by the directors [100% of the respondents] we surveyed. Hence, we recommend that IESBA adopts the concept of “audit-related services” in the Code to reflect non-audit services carried out by the audit engagement team, whose work is closely related to the work performed in the audit, and the threats to auditor independence are clearly insignificant such that no safeguards are required. Scoping out “audit-related services” from the current definition of NAS would better reflect the essence of what NAS is.

- For computation, exclude “audit-related services” from formula

Taking into consideration the nature of “audit-related services”, a question on whether such “audit-related services” should be excluded from the formula to compute the ratio of fees for services other than audit to audit fees was included in the survey. The directors were supportive [97% of the respondents] of ISCA NAS WG’s proposals on “audit-related services”. More information is included in our comment on question 5.

- “Audit-related services” to be separately disclosed

We also believe that a separate category of “audit-related services” would better clarify the nature of services provided by the firm or its network firms to audit clients. This would better assist the public in their judgments and assessment about the firm’s independence. More information is included in our comment on question 12.

Accordingly, we recommend that IESBA:

- (a) introduces and develops the concept of “audit-related services”;
- (b) excludes “audit-related services” from the computation of the proportion of fees for services other than audit to audit fee to focus on identifying and evaluating the threats created by ‘genuine’ NAS; and
- (c) requires “audit-related services” to be separately disclosed from other NAS.

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

Evaluating Threats Created by Fees Paid by the Audit Client

Question 1: Do you agree that a self-interest threat to independence is created and an intimidation threat to independence might be created when fees are negotiated with and paid by an audit client (or an assurance client)?

We agree that theoretically and inherently, a self-interest threat and an intimidation threat to independence may be created when fees are negotiated with and paid by an audit client (or an assurance client).

However, provisions in the proposed International Standard on Quality Management 1 *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements* (“ISQM 1”) would provide significant safeguards, which we believe would be adequate to address the threat to auditor independence.

ISQM 1 deals with a firm’s responsibilities to design, implement and operate a system of quality management for audits or reviews of financial statements, or other assurance or related services engagements. One of the components for a firm’s system of quality management required under ISQM 1 is relevant ethical requirements, which should comprise of a firm’s processes for managing compliance with relevant ethical requirements and includes how threats to complying with relevant ethical requirements are identified, assessed and addressed. We believe that ISQM 1 is a sufficient safeguard to ensure that firms and their personnel comply with relevant ethical requirements.

Another safeguard to independence is having an independent audit regulator perform regular audit inspections. Such inspections provide an independent oversight on audit firms and ensure that audit firms hold themselves to high ethical standards.

Question 2: Do you support the requirement in paragraph R410.4 for a firm to determine whether the threats to independence created by the fees proposed to an audit client are at an acceptable level:

- (a) Before the firm accepts an audit or any other engagement for the client; and**
- (b) Before a network firm accepts to provide a service to the client?**

Although we agree in principle that a firm should determine whether the threats to independence created by the fees proposed are at an acceptable level, we disagree with the proposed paragraph R410.4 in its current drafting.

Under the extant Code, audit client is defined as “an entity in respect of which a firm conducts an audit engagement. When the client is a listed entity, audit client will always include its related entities.”

If an audit client is listed, related entities will therefore include an entity that has direct or indirect control over the client if the client is material to such entity (“parent entity”) and an entity which is under common control with the client (a “sister entity”) if the sister entity and the client are both material to the parent entity.

We question the appropriateness of the proposed paragraph R410.4 for a firm to determine whether the threats to independence created by the fees proposed to an audit client are at an acceptable level before a network firm accepts an engagement to provide a service to the audit client’s parent and sister entities, if the audit client is a listed entity.

In our view, it is practically difficult for a firm to implement such requirements as it might not have visibility of all the audit or other engagements to be provided by its network firms to the audit client’s parent and sister entities, especially when the nature of the services provided to the parent and sister entities is price sensitive and confidential.

The engagement/operational effectiveness and efficiency erosion resulting from the significant additional efforts required may not justify the proposed measure.

Alternatively, as mentioned in our cover letter, the ISCA NAS WG proposed requesting each network firm to confirm to the firm, that the NAS fees received by the network firm from the parent, penultimate parent, ultimate parent and sister entities of the audit client do not exceed 1% (cumulative per annum) of the network firm’s revenue. This could provide the firm with information to enable the firm to assess if there were any threats to independence.

Question 3: Do you have views or suggestions as to what the IESBA should consider as further factors (or conditions, policies and procedures) relevant to evaluating the level of threats created when fees for an audit or any other engagement are paid by the audit client? In particular, do you support recognizing as an example of relevant conditions, policies and procedures the existence of an independent committee which advises the firm on governance matters that might impact the firm’s independence?

We note the proposed paragraph 410.4 A2 on factors relevant in evaluating the level of threats created when fees for an audit or any other engagement are paid by the audit client. Although these factors are helpful, we believe that a holistic approach or framework is needed.

In our view, compliance with the proposed ISQM 1 and professional standards should be sufficient. There should also be greater acknowledgement of International Standard of Auditing 220 *Quality Control for an Audit of Financial Statements* (“ISA 220”), whereby the engagement partner is required to ensure that the audit engagement team complies with relevant ethical requirements, including independence requirements that apply to an audit engagement.

The holistic approach or framework should require the consideration of the various aspects already embedded within ISQM 1, ISA 220 and professional standards for the purpose of evaluating whether the inherent self-interest threat is at an acceptable level.

Notwithstanding the above, an audit firm’s independence may be affected by its client’s threats to subject a potential audit engagement to a ‘Request for Proposal (RFP)’. The RFP could be under the ambit of the client’s corporate governance policies or best practices and leaves the audit firm with little or no room to negotiate.

Impact of Services other than Audit Provided to an Audit Client

Question 4: Do you support the requirement in paragraph R410.6 that a firm not allow the level of the audit fee to be influenced by the provision by the firm or a network firm of services other than audit to the audit client?

Paragraph R410.6 – A firm shall not allow the audit fee to be influenced by the provision by the firm or a network firm of services other than audit to the audit client

Yes, we support the requirement in proposed paragraph R410.6. However, the challenge lies in demonstrating compliance with this requirement. This requirement is in substance a precept regulating behavior and more research is required in this area.

Proportion of Fees for Services Other than Audit to Audit Fee

Question 5: Do you support that the guidance on determination of the proportion of fees for services other than audit in paragraph 410.10 A1 include consideration of fees for services other than audit:

- (a) Charged by both the firm and network firms to the audit client; and**
- (b) Delivered to related entities of the audit client?**

Paragraph 410.10 A1 – The evaluation of the level of the self-interest threat might be impacted when a large proportion of fees charged by the firm or network firms to an audit client is generated by providing services other than audit to the client, due to concerns about the potential loss of either the audit engagement or other services. Such circumstances might also create an intimidation threat. A further consideration is a perception that the firm or network firm focuses on the non-audit relationship, which might create a threat to the auditor's objectivity.

Yes, we agree in theory that fee information on NAS provided by network firms (of the audit firm) to the related entities of the audit client (parent, penultimate parent, ultimate parent and sister entities of the audit client) should be included in the determination of the proportion of fees for NAS.

However, there is a risk that the cost of doing this analysis will outweigh the benefit. Furthermore, as mentioned in Question 1, the proposed ISQM 1 contains provisions that will provide significant safeguards against self-interest threat.

Accordingly, we recommend that IESBA excludes NAS fees earned by network firms from audit client's parent and sister entities in the fee proportion computation. Only NAS fees earned by network firms from controlled/downstream entities of the audited entity should be included in the fee proportion computation.

We note that the proposed paragraph 410.10 A3 provides an example of a safeguard of "...having an appropriate reviewer who was not involved in the audit or the service other than audit review the relevant audit work". It is unclear who this "appropriate reviewer" would be.

We recommend an alternative safeguard (see below), which 94% of the directors (who are Audit Committee members) we surveyed, believe would mitigate any perceived or real independence threats (intimidation and undue influence threats). We view that any threats to independence would be clearly insignificant in situations where the NAS fees earned by each

network firm from the parent, penultimate parent, ultimate parent and sister entities of the audit client is less than 1% of the relevant network firm's revenue.

Alternative safeguard – Each network firm confirms to the audit firm, that the NAS fees earned by the network firm from the parent, penultimate parent, ultimate parent and sister entities of the audit client do not exceed 1% (cumulative per annum) of the network firm's revenue.

In the event that the above threshold exceeds 1%, 94% of the directors we surveyed agree that obtaining a confirmation from the audit firm/the audit firm's ethics and independence partner (or equivalent) that there is no undue influence from network firms on the audit firm for its execution of audit to TCWG would be an adequate safeguard.

"Audit-related services"

NAS under the extant Code would include any services other than audit and review engagement.

We recommend that IESBA develops the concept of "audit-related services" to reflect non-audit services carried out by the audit engagement team, whose work is closely related to the work performed in the audit, and the threats to auditor independence are clearly insignificant such that no safeguards are required. "Audit-related services" should then be excluded from the computation of the proportion of fees for services other than audit to audit fee.

100% of the directors surveyed agree that the concept of "audit-related services" as defined below should be developed for application in Singapore. 97% of the directors surveyed agree to exclude "audit-related services" from the fee proportion computation.

In our view, "audit-related services" are work that is (i) closely related to the work performed in the audit engagement; and (ii) usually carried out by audit engagement team members who are required to comply with the independence requirements.

We also note that the UK FRC Revised Ethical Standard 2019 defines "audit-related services" as non-audit services that are largely carried out by members of the audit engagement team, and where the work is closely related to the work performed in the audit and the threats to auditor independence are clearly insignificant and, as a consequence, safeguards need not be applied.

Fee Dependency for non-PIE Audit Clients

Question 6: Do you support the proposal in paragraph R410.14 to include a threshold for firms to address threats created by fee dependency on a non-PIE audit client? Do you support the proposed threshold in paragraph R410.14?

Paragraph R410.14 proposes that when total fees from a non-PIE audit client exceed 30% of the total fees received by the audit firm for each of 5 consecutive years, the audit firm shall determine whether a pre-issuance or post-issuance review on the fifth year's financial statements might be a safeguard to address the threats created by fee dependency on a non-PIE audit client, and if so apply it.

We note that the proposal in R410.14 mirrors the existing fee dependency model for PIE audit clients with greater latitude in the threshold and safeguards applied, with the aim of creating a consistent approach to address the threats for non-PIE audit clients. IESBA may consider reviewing the threshold after a period of implementation to assess whether any adjustments are needed.

We generally agree and support the above. However, we wish to highlight the risk that a bright line percentage threshold would direct the focus on the calculation of percentage instead of evaluation of threats. A statement to remind users of the need to observe the spirit and intent of the Code might be warranted.

Question 7: Do you support the proposed actions in paragraph R410.14 to reduce the threats created by fee dependency to an acceptable level once total fees exceed the threshold?

As mentioned in Question 6, we support the proposal to include a threshold for firms to address threats created by fee dependency on a non-PIE audit client. However, we observe that it might be practically challenging for small-medium practitioners (SMPs) to apply the proposed actions in paragraph R410.14, i.e. pre-issuance or post-issuance review on the fifth year's financial statements to reduce the threats created by fee dependency to an acceptable level once total fees exceed the threshold. Such proposed actions might result in higher costs for the audit of non-PIE audit clients and burden the SMPs.

We also question the appropriateness of having a professional body review the audit work of a firm before an audit opinion is issued on a non-PIE audit client's sixth year's financial statements, taking into consideration the resources and time required to perform the review. Professional bodies would need to be authorized to perform such review.

In addition, it is vital for IESBA to clarify the expected scope of review on the audit work to facilitate implementation of this proposal by firms.

Fee Dependency for PIE Audit Clients

Question 8: Do you support the proposed action in paragraph R410.17 to reduce the threats created by fee dependency to an acceptable level in the case of a PIE audit client?

We note the proposed action in paragraph R410.17 for audit firm to determine whether a pre-issuance review on the second year's financial statements would be a safeguard if the fee dependency continues in the second year of the audit engagement and if so, apply it. The pre-issuance review is proposed to be equivalent to an engagement quality review and be performed by a professional accountant who is not a member of the firm expressing the opinion on the financial statements.

In general, we observe that an engagement quality review would be required for the audit of listed entities or PIEs and should be undertaken throughout an engagement, rather than prior to the issuance of financial statements. Such review is normally performed by a professional accountant from the same firm expressing the opinion on the financial statements and who is not involved in the audit engagement. Accordingly, it will be costly for the firm to have another round of pre-issuance review being performed by a member who is not from the firm opining on the financial statements. It is necessary for IESBA to provide clarity on the expected scope of 'pre-issuance review' for users to understand the comparison against engagement quality review.

We also note that IESBA proposes to remove both pre-issuance review on the second year's financial statements by a professional body and post-issuance review on the second year's financial statements (by a member who is not from the firm opining on the financial statements or by a professional body) from the extant Code.

In our opinion, SMPs might face challenges in performing pre-issuance reviews on the financial statements as there will be additional costs to be borne by the SMPs to comply with this proposal.

Question 9: Do you agree with the proposal in paragraph R410.19 to require a firm to cease to be the auditor if fee dependency continues after consecutive 5 years in the case of a PIE audit client? Do you have any specific concerns about its operability?

We agree with the proposal to require an audit firm to cease to be the auditor if fee dependency continues after consecutive 5 years in the case of a PIE audit client as stated in paragraph R410.19. We believe that this proposal will mitigate situations in which fee dependency on a PIE audit client become persistent and no safeguard could be applied to reduce the self-interest and intimidation threats to an acceptable level.

We question the operability of this proposal if it is expected to be applied on the network firms. If this proposal applies to network firms, it raises the question on whether the network firm is able to continue as the statutory auditor of the related entities in other jurisdictions when the threshold of fee dependency is crossed, i.e. when the total fees from audit client and its related entities exceed 15% of the total fees of the firm expressing the audit opinion on the financial statements.

Question 10: Do you support the exception provided in paragraph R410.20?

We support the exceptions in paragraph R410.20 to allow an audit firm to continue as the auditor for a PIE audit client after 5 consecutive years if there is a compelling reason with regard to the public interest.

We believe that the exception would cater for circumstances in which no other appropriate audit firm is available to perform the audit for the PIE audit client as proposed in paragraph 410.20 A1.

However, we question the appropriateness of IESBA's proposal for the firm to consult with a professional body in the relevant jurisdiction to obtain concurrence for the firm to continue as the auditor for a PIE audit client, if fees from a PIE audit client crosses the 15% threshold for 5 consecutive years. In Singapore, only relevant regulatory bodies have the authority to assess whether the appointment of audit firm will be in the public interest. It also raises the question whether professional bodies would be equipped to perform such consultation even if they are authorized to do so. Accordingly, we recommend that IESBA considers restricting such consultation and concurrence to be provided by an independent regulatory body.

Transparency of Fee-related Information for PIE Audit Clients

Question 11: Do you support the proposed requirement in paragraph R410.25 regarding public disclosure of fee-related information for a PIE audit client? In particular, having regard to the objective of the requirement and taking into account the related application material, do you have views about the operability of the proposal?

We support the proposed requirement in paragraph R410.25 to publicly disclose the following fee-related information for a PIE audit client:

- (a) Fee for the audit of the financial statements;
- (b) Fees for services other than audit provided by the firm or a network firm; and
- (c) Fact of fee dependency, if applicable.

In our view, this proposed requirement provides clarity to the public on the nature and value of the services provided by audit firm. The proposed disclosure requirement promotes transparency and facilitates the public's assessments about the audit firm's independence.

In addition to the above, we propose that IESBA consider a requirement to disclose fees for "audit-related services" for a PIE audit client. The concept of "audit-related services" is highlighted in the cover letter, as well as in our comment on question 5.

We generally support the proposed application materials and believe that they would better assist audit firms to determine the relevant matters to be communicated to the public. On the ED's proposal to disclose actual or estimated fees paid or payable by a PIE audit client to other audit firm that have performed audit procedures on the group audit engagement for the audit of the financial statements, we observe from our survey of directors, that majority of the directors [87% of the respondents] were of the view that such a proposal would enable the public to better assess the audit firm's independence.

We also agree with IESBA that such information might not be readily available or provided by a component auditor outside the network of the audit firm in a timely manner for disclosure purpose. In this regard, we note that the exception proposed in paragraph R410.26 which requires disclosures of an explanation of the qualitative significance of the fee information that is not available, would assist the audit firm to fulfill the transparency objective.

Paragraph 410.25 A4 proposed that it would be appropriate for audit firm to disclose the fee-related information required by paragraph R410.25 in the audit report as part of the auditors' other reporting responsibilities in accordance with ISA 700 (Revised) *Forming an Opinion and Reporting on Financial Statements*. It is important for TCWG and the public to understand the rigor of the proposed ISQM 1 and the applicable auditing standard that firms need to comply with to form an audit opinion on the financial statements. In our view, including fee-related information in the auditors' report is inappropriate as the public might have a perception that there could be an implicit relationship between the firm's opinion on the financial statements and the fees earned from the client. Its inclusion in the auditors' report might also raise doubts or create an impression that the fees paid by an audit client creates a self-interest threat to the firm. Hence, it would be more appropriate for the audit client to make such disclosure.

Question 12: Do you have views or suggestions as to what the IESBA should consider as:

- (a) Possible other ways to achieve transparency of fee-related information for PIEs audit clients; and**
- (b) Information to be disclosed to TCWG and to the public to assist them in their judgments and assessments about the firm's independence?**

We believe that IESBA's coordination with the International Auditing and Assurance Standards Board is important for IESBA to propose any requirements or guidance on public disclosure of fee-related information. This will help to ensure consistencies between the requirements in respective standard.

As mentioned in question 5, we recommend that IESBA develops the concept of "audit-related services" and excludes "audit-related services" from the computation of the proportion of fees for services other than audit to audit fee.

We also believe that a separate category of "audit-related services" as per UK FRC Revised Ethical Standard 2019¹, would better clarify the nature of services provided by audit firm and its network firms to audit client and assist the public in their judgments and assessment about the firm's independence. Accordingly, we recommend that IESBA requires "audit-related services" to be separately disclosed from other NAS.

Anti-Trust and Anti-Competition Issues

Question 13. Do you have views regarding whether the proposals could be adopted by national standard setters or IFAC member bodies (whether or not they have a regulatory remit) within the framework of national anti-trust or anti-competition laws? The IESBA would welcome comments in particular from national standard setters, professional accountancy organizations, regulators and competition authorities.

We do not have views regarding the above.

Proposed Consequential and Conforming Amendments

Question 14. Do you support the proposed consequential and conforming amendments to Section 905 and other sections of the Code as set out in this Exposure Draft? In relation to overdue fees from an assurance client, would you generally expect a firm to obtain payment of all overdue fees before issuing its report for an assurance engagement?

We support the proposed consequential amendments to Section 905 and other sections of the Code as set out in the ED. We generally do not expect a firm to obtain payment of all overdue fees before issuing its report for an assurance engagement.

¹ See UK FRC Revised Ethical Standard 2019's *Appendix A: Illustrative template for communicating information on audit and non-audit services provided to the group.*

Question 15. Do you believe that there are any other areas within the Code that may warrant a conforming change as a result of the proposed revisions?

We have no further recommendations related to the Fees project, other than those commented above.

Should you require any further clarification, please feel free to contact myself or Ms Alice Tan, Senior Manager, TECHNICAL: Ethics & Specialised Industries, from ISCA via email at jumay.lim@isca.org.sg or alice.tan@isca.org.sg respectively.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Ju May', with a stylized flourish at the end.

Ms Ju May, LIM
Deputy Director
TECHNICAL: Financial & Corporate Reporting;
Ethics & Specialised Industries;
Audit & Assurance