



INSTITUTE OF  
PUBLIC  
ACCOUNTANTS®

24 September 2024

Mr Channa Wijesinghe  
Chief Executive Officer  
Accounting Professional & Ethical Standards Board Limited  
Level 11, 99 William Street  
Melbourne VIC 3000

Submitted online: <https://apesb.org.au/tax-planning-and-related-services/>

Dear Channa,

***Re: Exposure Draft 03/24 Revisions to APES 110 Code of Ethics for Professional Accountants (including Independence Standards) Addressing Tax Planning and Related Services***

Thank you for the opportunity to comment on Exposure Draft 03/24.

IPA supports the range of proposed amendments to *APES 110 Code of Ethics for Professional Accountants (including Independence Standards)* (the Code) to:

- add new sections 280 and 380 from the *IESBA Code of Ethics for Professional Accountants (including International Independence Standards)*
- include consequential amendments to section 321 when Members in Public Practice provide a second opinion on the application of tax laws and regulations
- include editorial amendments as detailed in Exposure Draft 03/24 (marked-up version).

IPA also supports the proposed effective date of 1 January 2025, with earlier adoption permitted.

If you have any queries with respect to our comments or require further information, please do not hesitate to contact Erik Hopp at [erik.hopp@publicaccountants.org.au](mailto:erik.hopp@publicaccountants.org.au) or on 03 8665 3144.

Yours sincerely

Vicki Stylianou  
Group Executive, Advocacy & Professional Standards  
Institute of Public Accountants