

Bogotá D.C., 30 April 2024

189-24

Sirs:

International Federation of Accountants -IFAC
International Ethics Standards Board for Accountants - IESBA
529 Fifth Avenue
New York, NY 10017 USA

Ref. Comment letters: Exposure Draft of proposed Using the Work of an External Expert

Dear Sirs:

The INCP (Colombia's National Institute of Public Accountants) would like to express its gratitude for this opportunity to make and submit some comments on the proposed proposed Using the Work of an External Expert. Included below are our responses to the questions asked in the exposure draft. Thank you for your consideration thereof.

Should you require further information on these answers, please do not hesitate to contact us.

Best regards,


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Executive director of INCP
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ANNEX

COMMENTS

Glossary

1. Do respondents support the proposals set out in the glossary concerning the proposed new and revised definitions? See Section III.

Yes, we support the proposals since these address the knowledge and skills that experts in specific fields must have regarding audit engagements and assurance engagements. In addition, it also deals with the sustainability assurance and how important it is to work together with the practitioner in order to obtain sufficient and appropriate evidence.

Evaluation of CCO for all Professional Services and Activities

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? See Section V.

We agree with the proposed approach. We consider that it includes the matters that should be evaluated for CCO for all professional services and activities.

3. Do respondents agree that if an external expert is not competent, capable or objective, the Code should prohibit the PA or SAP from using their work? See paragraphs 67 to 74.

We agree. If an external expert does not meet the CCO requirements, they should not perform the work, since the user of the information to be analyzed by the external expert expects that the work adheres to a transparency, ethics and efficiency principle. This cannot be replaced by allowing the practitioner or assurance professional to carry out other procedures to somehow cover these deficiencies in the external expert. Additionally, in that case, the external expert would be evaluating matters that are beyond the scope or expertise of said professional.

Evaluation of CCO for Audit or Other Assurance Engagements

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? See Section (V)(A).

We agree with the additional provisions relating to the evaluation of an external expert's objectivity for assurance or audit engagements. It is key and is in line and consistent with the minimum requirements expected so that the auditor can issue an objective opinion on the underlying matter.

Potential Threats Arising from Using the Work of an External Expert

5. Do respondents support the provisions that guide PAs or SAPs in applying the conceptual framework when using the work of an external expert? Are there other considerations that should be included? See Section (VI)(A).

We do support the provisions.

We consider that paragraph 390.14 A1 could be complemented by including examples of the threat of mutual interest given the subjectivity of this concept and the great relevance of the professional and the external expert maintaining adequate independence from the assurance client.