

April 20, 2023

The Chairman
International Auditing and Assurance Standards Board
International Federation of Accountants
529 5th Avenue
6th Floor
New York 10017
United States of America

Via Online Submission

Dear Mr. Tom Seidenstein,

COMMENTS ON IAASB EXPOSURE DRAFT 'PROPOSED PART 10, AUDITS OF GROUP FINANCIAL STATEMENTS OF THE PROPOSED INTERNATIONAL STANDARD ON AUDITING FOR AUDITS OF FINANCIAL STATEMENTS OF LESS COMPLEX ENTITIES (ISA FOR LCE) AND PROPOSED CONFORMING AMENDMENTS'

The Malaysian Institute of Certified Public Accountants ("MICPA") appreciates the opportunity to comment on the IAASB Exposure Draft *'Proposed Part 10, Audits of Group Financial Statements of the Proposed International Standard on Auditing for Audits of Financial Statements of Less Complex Entities (ISA for LCE) and Proposed Conforming Amendments'* ("Exposure Draft"). We also applaud the effort of the International Auditing and Assurance Standards Board ("IAASB") to enhance the Standard.

In this regard, we are pleased to attach MICPA's comments as set out in Appendix for your consideration.

We trust our comments are valuable to the IAASB, for your onward deliberation. MICPA looks forward to further support the effort of the IAASB in setting and enhancing the auditing, assurance and quality management standards. Please do not hesitate to contact the undersigned or the Executive Director of Technical, Ms Chiam Pei Pei, at +603-2698 9622 should you require any clarification.

Thank you.

Yours faithfully



FOO YOKE PIN
Executive Director

Our responses to the specific questions are as follows:

Question 1

In the Authority, do you agree with the proposed prohibition on the use of the proposed ISA for LCE for group audits where component auditors are involved, other than in limited circumstances where physical presence is required?

Comment:

We suggested to the IAASB previously that the proposed ISA for LCE be issued in the form of guidance, instead of a separate standalone standard.

Nevertheless, we agree with the proposed prohibition on the use of the proposed ISA for LCE for group audits where component auditors are involved, other than in limited circumstances where physical presence is required.

Question 2

In the Authority, do you agree with the proposed group-specific qualitative characteristics to describe the scope of group audits for which the proposed ISA for LCE is designed to be used?

Comment:

In the event that the IAASB continues to issue this as a standard, we believe that the standards should not be prescriptive and suggest the IAASB to provide the group-specific qualitative characteristics separately.

Question 3

Do you agree with the content of proposed Part 10 and related conforming amendments?

Comment:

We do not have any objection to the content of the proposed Part 10 and the related conforming amendments.