



12 September 2022

Tax Practitioners Board
GPO Box 1620
Sydney NSW 2001

By email to: tpbsubmissions@tpb.gov.au

Dear Sir/Madam,

Code of Professional Conduct – Confidentiality of client information

On behalf of the Institute of Public Accountants I submit our comments on Exposure draft *TPB(I) D50/2022 Code of Professional Conduct – Confidentiality of client information*.

We therefore welcome the opportunity to provide feedback and make the following comments for consideration.

We are supportive of the proposed amendments that provide additional guidance on a tax practitioner's confidentiality obligations when they disclose information under tax whistleblowing laws and non-compliance with laws and regulations (NOCLAR) requirements of APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)* (APES 110).

With respect to the reference to "APESB members" in paragraph 41 and Example 7, the NOCLAR provisions of APES 110 are primarily applicable to the respective members of the three professional accounting bodies that are APESB members. It would be more meaningful if the NOCLAR provisions were framed in the context of being applicable by members of Chartered Accountants Australia & New Zealand, CPA Australia and Institute of Public Accountants. Needless to say, APESB members ensure their members compliance with the NOCLAR provisions of APES 110, however the focus of TPB's guidance should remain focused at the practitioner level.

If you would like to discuss our comments, please do not hesitate to contact me.

Yours sincerely

Tony Greco
General Manager, Technical Policy
Institute of Public Accountants

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