

Hilde Blomme
Director of Practice Regulation
Federation des Experts Comptables Europeens (FEE)
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29 January 2010

Dear Hilde

The Chartered Institute of Management Accountants (CIMA) welcomes this opportunity to comment on FEE's 'Integrity in professional ethics' discussion paper. CIMA is supportive of the paper's aim to generate discussion about the ethical responsibilities of professional accountants working both in public practice and in business.

We have had the opportunity to input into the development of this paper via our membership of the FEE Ethics Working Party and so will provide only general comments here. We have also sought feedback on the paper from our members.

1. We are supportive of the work that has been done in developing this paper. It provides an excellent starting point for discussion. We do not agree, though, that 'integrity' is the principle from which the other principles of the IFAC code of ethics derive. It is our view that acting with integrity (as used in general English rather than as defined by IFAC) as a professional accountant means applying and upholding all of the principles of the CIMA code of ethics, which is based on that of IFAC, as well as adhering to the Institute's other regulations and standards. However, the principle of 'integrity' as defined by IFAC has a more specific meaning than this. The paper argues that 'integrity' is at the core of all the other principles because 'without integrity, no professional activity can be relied on'. In our view this argument is somewhat circular and the same logic could, in theory, be applied to any of the other principles because failing to uphold any of these would indicate a lack of integrity.
2. Question 8 refers to the 'quality of a person's character'. This assumes that essential qualities of character exist, which is a particular viewpoint. From a professional standards and ethics point of view CIMA would look to a person's behaviour as the indicator of their integrity or otherwise rather than to any underlying fundamental characteristic.
3. CIMA agrees that accountants have a responsibility to promote an ethical culture within the organisation that they work. At the same time we recognise that an accountant's control over the decisions taken by their organisation and the way

ethics is embedded within it will generally be limited, depending upon the accountant's seniority and the size of the company.

I hope that these general comments are useful, and look forward to CIMA continuing to input into this debate via the FEE Ethics Working Party.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Danielle', with a stylized, cursive script.

**DANIELLE COHEN
HEAD OF ETHICS
CHARTERED INSTITUTE OF MANAGEMENT ACCOUNTANTS**