



## Foreningen af Statsautoriserede Revisorer

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Dear Hilde Blomme,

Re.: Integrity in Professional Ethics. FEE Discussion Paper – Comments from FSR, Denmark

The Ethics Committee of the Institute of State Authorized Public Accountants in Denmark (FEE) has discussed the FEE discussion paper on Integrity.

We are pleased to submit the following comments:

We agree that integrity is a widely comprehensive and very fundamental principle for activities performed by professional accountants. We agree that integrity and ethics must be at the heart of professional life in order to achieve public trust. It is of utmost importance that any public accountant behaves in a manner which is expected by the general public. Furthermore, it is helpful to have some clarification on the practical interpretation of "integrity" as stated in the Code of Ethics for Professional Accountants.

We, therefore, support the issuance of and the main content of this FEE discussion paper. We find it important that FEE by this contributes to the awareness of these relevant issues connected with ensuring integrity and ethical considerations by the public accountants.

We do not find it necessary to answer all the specific questions in your discussion paper. However we like to mention – regarding questions no. 2, 6 and 7 – that we are not convinced that integrity is more fundamental or more important than the other fundamental principles. Finally we can inform you that integrity is stated in the quite new Danish act on auditors, section 16, in line with the other fundamental principles for the auditor's behaviour.

Yours sincerely,

Sven Carlsen,  
Chairman of the Ethics committee of FSR