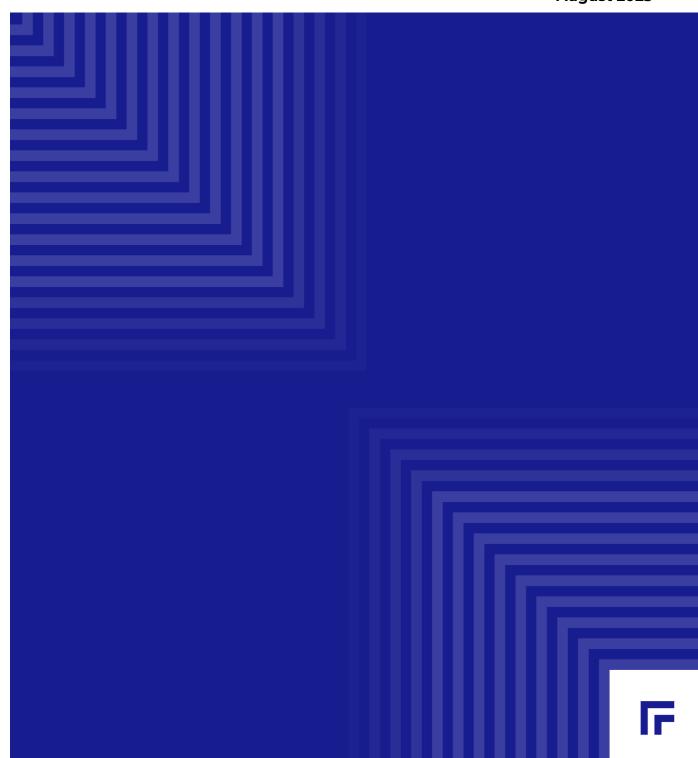


2024-25 Oversight Report on HKICPA's Performance of Specified Functions

August 2025



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Table of Contents

Executive summary4					
Section A: Oversight Approach6					
1. Scope of our assessment6					
2. How the AFRC conducted the assessment6					
Section B: Recommendations for 2024-25 Oversight Assessment7					
3. Adopt more deterrent actions to reduce non-compliance rate in CPD audits7					
4. Consider strengthening the composition of standard-setting advisory panels and enhancing the standard-setting process9					
5. Consider refining the classification framework for local guidance projects12					
6. Consider aligning the CPD requirements with international practices14					
7. Consider implementing more targeted CPD training to better achieve intended learning outcomes16					
8. Consider enhancing assessment criteria and guidelines for programme accreditation17					
Annex 1 Update on the previous year's findings19					
Annex 2 Glossary of terms20					

Executive summary

- The Accounting and Financial Reporting Council (AFRC) has completed its sixth oversight assessment of the Hong Kong Institute of Certified Public Accountants (HKICPA), covering the period from 1 April 2024 to 31 March 2025 (the Assessment Year).
- 2. This assessment reaffirms the AFRC's statutory mandate to oversee the HKICPA's performance of its Specified Functions, ¹ which include professional standards-setting, registration of certified public accountants (CPAs), mutual recognition arrangements, continuing professional development (CPD) requirements, and training.
- 3. In line with its strategic purpose, the AFRC focused on assessing the accountability, integrity, and effectiveness of the HKICPA in discharging its statutory responsibilities. This year's assessment involved observing meetings related to the Specified Functions, reviewing quarterly activity reports, conducting an on-site assessment, and engaging directly with the HKICPA Council's leadership and committee members.
- 4. This report highlights the **AFRC's recommendations to address one finding and five observations**, which are aimed at aligning the
 HKICPA's practices with its statutory obligations and international
 standards.
- 5. The finding pertains to CPD compliance among its members, where the HKICPA has demonstrated progress lowering the non-compliance rate from 32% to 17% over the past three years. Nonetheless, the rate remains elevated, and the continued use of grace periods without consequences risks diminishing the perceived importance of timely compliance.
- 6. To address the high CPD non-compliance rate, **the AFRC recommends implementing stronger deterrents**, refining messaging to reinforce professional obligations, enhancing the rigour of member declarations, and adopting a risk-based audit approach that prioritises roles with significant public interest impact.

¹ Specified Functions refer to statutory functions performed by the HKICPA that are within the remit of AFRC's oversight function under the AFRCO.

7. The recommendations to address the five observations are:

Observation 1: For standard-setting, consider strengthening stakeholder representation, improving the timeliness of publications, enhancing reporting and oversight between committees, and establishing clear internal timelines for issuing local pronouncements. This responds to the publication of two revised Practice Notes (PNs) after the legislation took effect, with their effective dates retrospectively applied.

Observation 2: For standard-setting, **consider refining the classification framework** for local guidance projects to eliminate potential overlap between categories and ensure consistent application of criteria. In addition, there is scope to **reinforce governance structures** for projects where the standard-setting department is not involved in drafting the technical content.

Observation 3: Consider aligning CPD requirements with international practice by **introducing mandatory ethics CPD hours**. We also support HKICPA's consideration for responsible persons of public interest entity (**PIE**) auditors and practising certificate (**PC**) holders to undertake additional verifiable CPD hours in accounting and auditing, and for all CPAs to obtain at least 50% of their verifiable CPD hours through structured learning.

Observation 4: Consider implementing more targeted CPD training to better support small- and medium-sized practices and CPAs in business. Opportunities include **designing curricula tailored to different career stages**, enriching virtual learning with interactive features such as knowledge checks and avenues to ask questions, and expanding depth of information technology (**IT**) audit training.

Observation 5: Consider enhancing assessment criteria and guidelines for programme accreditation. This follows an HKICPA investigation into an accredited programme that revealed gaps in the segregation of teaching and examination responsibilities.

8. The AFRC commends the HKICPA for its responsiveness to the previous year's recommendations. We would also like to express our appreciation of the HKICPA for its cooperation throughout this assessment.

Section A: Oversight Approach

1. Scope of our assessment

1.1. The AFRC has a statutory duty under section 9(b) of the AFRC Ordinance (Cap. 588) (AFRCO) to oversee the performance of certain Specified Functions of the HKICPA, which includes ascertaining qualifications for registration as CPAs by conducting examinations, and registering CPAs; arranging mutual or reciprocal recognition of accountants; setting CPD requirements for CPAs; issuing or specifying standards of professional ethics, and accounting, auditing and assurance practices for CPAs; as well as providing training for qualifying as CPAs, and for their CPD.

2. How the AFRC conducted the assessment

- 2.1. In conducting the Assessment, we performed the following procedures:
 - a. Observed 40 meetings of committees responsible for the performance of the Specified Functions (Specified Committees);
 - b. Reviewed meeting papers, minutes and quarterly activity reports submitted by the HKICPA during the Assessment Year;
 - c. Conducted an on-site assessment that involved reviewing relevant standard operating procedures (SOP) and guidelines to evaluate their design and effectiveness; performing sample reviews of tasks under each Specified Function to validate compliance with policies and procedures; and ensuring appropriate follow-up actions were taken by the HKICPA to address previous year's findings; and
 - d. Held individual meetings with the President and Vice President of the HKICPA Council, as well as 11 representatives from Specified Committees to gain insights into their strategic objectives.

Section B: Recommendations for 2024-25 Oversight Assessment

Follow-up finding

- 3. Adopt more deterrent actions to reduce noncompliance rate in CPD audits
- 3.1. In the 2023 assessment, we observed a high rate of non-compliance in the HKICPA's CPD compliance audit. In response, we recommended that the HKICPA consider additional measures to reinforce members' understanding of, and adherence to, CPD obligations.
- 3.2. During the 2024 assessment, the HKICPA took steps to address this issue by strengthening communication with members on the importance of CPD compliance. Despite increasing the sample size of CPD compliance audits, the overall non-compliance rate decreased from 32% to 20%.
- 3.3. To further support compliance, the HKICPA launched a free 48-minute elearning course in November 2024, aimed at enhancing members' awareness of CPD requirements and the audit process. Completion of this course has since been made mandatory for CPAs found to have CPD shortfalls.
- 3.4. To address repeated non-compliance, the HKICPA has approved a policy under which members who fail to comply without reasonable explanation may face removal from the register or disqualification from renewal. These measures will apply to audits conducted from 2025 onward.

Observations

3.5. While this initiative is a positive step towards increasing awareness of CPD requirements, the message within the e-learning course suggested that members might be granted a grace period to address shortfalls identified during compliance audits. This could be perceived as downplaying the consequences of non-compliance.

- 3.6. Under the current framework, CPAs who fall short of their CPD requirements are allowed a grace period to make up for the deficit. For example, completing the missing hours within two months of being notified. This effectively extends the actual compliance timeline and could weaken the incentive for timely compliance.
- 3.7. As a result, the **non-compliance rate has remained persistently high** at around 17% in the most recent audit.
- 3.8. In addition, a relatively small proportion of PC holders were selected for CPD non-compliance audits, compared to Professional Accountants in Business (PAIBs). Given higher public interest expectations placed on PC holders, the current audit approach may not sufficiently reflect risk-based or public interest considerations.

Recommendations

- 3.9. CPAs are required to declare CPD compliance at the time of annual membership renewal often before the CPD cycle is fully complete. This declaration is a formal professional commitment. If a member is later found to be non-compliant, it raises serious concerns about the accuracy of their declaration and their integrity. Such breaches of trust should be treated with appropriate seriousness.
- 3.10. We recommend the HKICPA pursue more deterrent measures to enhance CPA's compliance with CPD requirements, including:
 - a. **Revising the message in CPD training** to reinforce that timely compliance with CPD requirements is a professional obligation to be taken seriously;
 - b. **Extending annual CPA declaration** to confirm proper maintenance of attendance records for verifiable CPD hours; and
 - c. **Refining the sample percentage** for CPD compliance audits to prioritise members whose roles have a greater impact on the public interest.

HKICPA's response:

Given the HKICPA's continue efforts in enhancing the CPD compliance, the non-compliance rate continued to drop over the past three years. After providing additional time for CPAs to make up for the shortfall in meeting the CPD requirements, the ultimate CPD non-compliance rate was 4%.² All responsible persons of registered PIE auditors selected for audit were in full compliance.

The AFRC's recommendations to pursue more deterrent measures to enhance CPA's compliance with CPD requirements align with the HKICPA's plan. The HKICPA will inform CPAs identified as non-compliant in the CPD compliance audit that they will be selected for audit again in the subsequent year to ensure compliance. As the CPD requirements are currently under revision, the HKICPA will revise the CPD e-learning with the new requirements and update the message regarding the CPD audit. As part of its annual review exercise, the HKICPA will review its annual CPD declaration and audit sample selection criteria and make appropriate changes.

New observations

- 4. Consider strengthening the composition of standardsetting advisory panels and enhancing the standardsetting process
- 4.1. The HKICPA's standard-setting functions are performed by four committees, collectively known as standard-setting committees (SSCs). These are supported by Advisory Panels (APs), providing industry or subject-specific technical expertise to help draft local guidance, such as PNs. As of February 2025, seven APs focused on audit implications from legislative changes or emerging regulatory concerns.

² The CPD non-compliance rate was 0% for PC holders and 5% for non-PC holders.

Observations

4.2. During the Assessment Year, two revised PNs handled by APs were published after their stated effective dates and backdated, which may affect clarity and timely implementation by practitioners.

PN	Effective date of revised legislation	Provision of first draft to AASC ³	Publication of revised PN	Effective date of revised PN
PN 820 (Revised)	2 Oct 2024	15 Oct 2024	15 Jan 2025	31 Dec 2024
PN 860.1 (Revised)	26 Jun 2024 ⁴	13 Nov 2024	28 Feb 2025	31 Dec 2024

4.3. We note several areas where enhancements could be considered:



Stakeholder representation: Of the seven APs formed to address legislative or regulatory developments, one lacked representation from the PAIB community, and none included relevant regulators.



Communication during drafting: Prior to submitting the deliverables for SSCs' approval, APs did not regularly update SSC on technical content development.



Internal timeline for issuance: The HKICPA's internal SOPs does not include timelines governing the release of local guidance such as PNs.

Recommendations

4.4. We acknowledge the HKICPA's dedication to the public interest and the demands on its standard-setting function, especially when developing timely guidance for Hong Kong-specific issues. To maintain credibility and relevance, the standard-setting process must remain inclusive and responsive to the evolving needs of stakeholders.

³ AASC stands for Accounting and Auditing Standards Committee.

⁴ The eMPF Platform was launched on 26 Jun 2024 and the target completion date for onboarding by all Mandatory Provident Funds schemes is 31 Dec 2025.

- 4.5. We recommend enhancing the composition and operations of the seven APs by:
 - Strengthening Stakeholder Representation: Include a. representation or observers from relevant regulators and the PAIB community to enhance public interest considerations and legislative insights;
 - b. Addressing Timeliness of Publications: Conduct root cause analysis of the delays and implement targeted improvements. Issue PN before legislation takes effect and avoid backdating;
 - Enhancing Reporting and Oversight: Improve the reporting C. mechanisms between APs and SSCs by including regular updates on key milestones and challenges encountered, and appointing an SSC member to chair the APs; and
 - Establishing Internal Timelines: Revise the SOP to establish clear d. expectations for the timing of local pronouncements, including a reasonable interval between publication and effective dates.

HKICPA's response:

The development of any guidance would be expedited if the APs are able to engage in direct, multilateral conversations with the commentators from key stakeholders to align understanding, thereby expediting the comment resolution process.

Certain regulators have previously expressed reservations about becoming a member of HKICPA SSCs and APs due to potential conflicts of interests.

Based on the HKICPA's experience, it is often the case that a piece of legislation requires assurance on certain aspects, but the details of the assurance work are not stipulated in the legislation and would require further discussion with relevant stakeholders, including regulators, after the bill is passed before the development of any quidance can commence. The reporting period to which the revised assurance requirements first apply and the submission due date of the first assurance report, being 30 April 2025 and 30 June 2025 for the two PNs under review respectively (i.e. after the PNs' publication dates), are considered when planning the project timelines. Furthermore, at the time of publishing the PNs,

the respective revisions were applicable to fewer than 20 licenced corporations and only three MPF schemes.

The appropriateness of having PAIBs or non-practitioners as members would depend on the nature of the AP's work.

The HKICPA will consider and address the recommendations. The successful implementation of certain recommendations will require cooperation from relevant stakeholders.

Consider refining the classification framework for local 5. guidance projects

- 5.1. To prioritise local projects in the SSC's work plan, the HKICPA applies defined criteria including public interest, relevance, urgency, and achievability. Effect from 25 February 2025, local projects are classified into three categories:
 - Category A Projects to be considered in each fourth quarter for a. next year's work plan inclusion. Category A is a default category, when the project does not fall into Category B or C.
 - Category B Projects added immediately without Standard b. Setting Department (SSD) involvement in drafting the technical content. The criteria for Category B are based on procedural considerations.
 - Category C Projects added immediately with SSD involvement in c. drafting the technical content. The criteria for Category C focus on public interest matters, and with implications for Hong Kong's status as an international financial centre.

Observations

5.2. Our review identified the following areas where further clarification or refinement may be beneficial:



There is a degree of **overlap between Categories B and C**, which may lead to uncertainty in project classification. For example, a pilot project,

Assurance Framework for Virtual Assets, could reasonably meet the criteria for both categories, creating ambiguity in classification.



Category B's criteria on procedural capabilities may not reflect the public interest significance. Without SSD's involvement in drafting technical content, the oversight responsibility shift more heavily to the AASC. The pilot project above mentioned incorporated safeguards, such as having AASC member to the AP and ensuring balanced composition. These could be included in the SOP for consistency.



The SOP does not currently specify whether SSD involvement in drafting technical content is expected or required for projects classified under Category A.

Recommendations

- 5.3. A consistent and transparent framework for project classification is essential to support effective standard-setting. To support a coherent and accountable project governance framework, we recommend that the HKICPA adopts a unified criteria framework for evaluating and managing all local projects. The framework may include:
 - Adopting a two-step approach: By first assessing whether a a. project should be initiated based on factors such as public interest and overall relevance. Once approved for inclusion in the work plan, determine its execution strategy, including the appropriate oversight level and resource allocation. This structured approach ensure consistency and clarity across different project categories;
 - Applying consistent criteria to determine execution approach: b. Use a more streamlined approach involves consistently considering factors such as urgency and achievability to guide decisions on the extent of SSD involvement and the appropriate level of oversight; and
 - Strengthening governance for projects without SSD c. **involvement in drafting the technical content**: For projects where the SSD does not involve in drafting technical content, the HKICPA could enhance its SOP by incorporating appropriate safeguards, such as having AASC approval, appointing AASC member to lead

the project and / or establishing a process to ensure SSD input is considered prior to the approval of PNs.

HKICPA's response:

The project prioritisation framework is still in the pilot phase and it is always the HKICPA's intention to refine the framework based on experience gained from application thereof to real-life examples. Based on the HKICPA's experience so far, the HKICPA has already identified certain areas for improvement which are generally aligned with the AFRC's recommendations. The HKICPA also acknowledges that the current description of Category B projects is a misnomer in light of the actual substantive contributions the SSD has made to the technical contents of these projects.

The HKICPA will consider the AFRC's recommendations together with other pipeline improvements when refining the project prioritisation framework.

6. Consider aligning the **CPD** requirements with international practices

- 6.1. According to Statement 1.500 (Redrafted) of the HKICPA's member handbook, HKICPA members must complete 120 CPD hours over three years, with at least 60 verifiable. Additional requirements may apply to certain roles.
- 6.2. Globally, at least eight professional bodies, require members to complete between one and four verifiable CPD hours in ethics annually, and at least five accountancy bodies have moved further by requiring members who are audit practitioners or authorised to sign audit reports to complete five to 13 verifiable CPD hours annually on technical subjects.

Observations

6.3. In March 2025, the HKICPA's strategic plan emphasised "Building Trust" through ethics and integrity, committing to review and expand its existing ethics training programme. The HKICPA commenced a CPD requirements review in December 2024, with proposed mandatory ethics training set for public consultation in the third quarter of 2025.

6.4. While the HKICPA recognises certain professional activities, such as coaching and programme facilitation as valid CPD activities, allowing up to a maximum of 20 hours annually, it allows members to potentially fulfil their CPD requirements without structured training. This underscores the need to bridge the gap towards a more balanced CPD framework.

Recommendations

- 6.5. We recommend introducing mandatory ethics CPD hours through a phased approach, beginning with responsible persons of registered PIE auditors and PC holders in the CPD cycle commencing 1 December 2025. This approach is appropriate provided that the requirement does not increase the overall CPD hour obligation.
- 6.6. We are supportive of HKICPA's consideration to incorporate the following enhancements into its ongoing review:
 - For responsible persons of registered PIE auditors and PC a. **holders**, out of the existing 60 verifiable CPD hours over a rolling three-year period, at least certain number of hours annually must be dedicated to core technical areas such as accounting and auditing; and
 - At least 50% of verifiable CPD hours be fulfilled through b. structured learning activities for all CPAs.

HKICPA's response:

The HKICPA is well aware of the importance of ethics requirement and had initiated a review of the CPD requirements ("CPD Review") to prescribe ethics CPD requirement. The CPD Review entailed an international benchmark study on CPD requirements, as well as collecting views from relevant stakeholders. A timetable for the CPD Review was approved by the Registration Committee in December 2024.

Upon request from the AFRC, the CPD Review was extended to include prescribing accounting and auditing CPD requirements on PC holders and responsible persons of registered PIE auditors. It also included a holistic review of the policy on recognition of CPD activities to address AFRC's observation about the recognition of verifiable CPD hours for supervising Qualification Programme

(QP) students as authorised supervisors or counsellors. The HKICPA also revised the timetable responding to AFRC's earlier request to expedite the process.

The HKICPA sought views from its committee members and AFRC on the preliminary proposal for changes to CPD requirements and will present the proposal to the Registration Committee for review in due course. A member consultation on the proposed changes is scheduled to take place in the third quarter of this year before the final proposal is presented to Council for approval in the fourth quarter of 2025. The HKICPA would consider advancing the requirement for mandatory ethics CPD hours to responsible persons of registered PIE auditors and PC holders in the CPD cycle commencing 1 December 2025.

7. Consider implementing more targeted CPD training to better achieve intended learning outcomes

7.1. Larger CPA firms provide structured in-house training, including milestone-based courses and technical updates for managers and partners to ensure staff meet performance expectations and regulatory requirements while practitioners in small- and medium-sized practices (SMPs) and PAIBs primarily rely on CPD courses offered by the HKICPA.

Observations

7.2. We observed opportunities to enhance current offerings to better align with specific learning outcomes, particularly in the following areas:



Only two out of 29 audit trainings indicated target career stage, potentially limiting practitioners' ability to select relevant training.



Although the HKICPA expanded virtual learning offerings, some technical e-learning courses lack interactive features such as Q&As and assessments, limiting engagement and knowledge retention.



The availability of IT audit training remained limited, reducing practitioners' ability to critically assess critical IT controls essential for delivering high-quality audits in current digitalised landscape.

Recommendations

7.3. To this end, we propose the following enhancements for consideration:

- Design audit-related curricula tailored to different career stages a. to deepen competencies;
- Enhance the effectiveness of e-learning courses by incorporating b. knowledge checks and a Q&A platform for participants; and
- **Expanding coverage of current and emerging topics**, e.g. c. enhancing IT audit related training to uphold audit quality.

HKICPA's response:

The HKICPA has developed an audit roadmap to help audit practitioners access relevant resources throughout the audit engagement journey, from planning and execution to reporting. The HKICPA will consider developing an auditrelated curricula tailored to different career stages, assisting professionals, especially those in SMPs, in accessing relevant training.

The HKICPA regularly reviews CPD courses to ensure effectiveness. For e-learning courses, existing measures such as time-lapse expiry and anti-fast-forwarding help maintain participants' engagement. Additional improvements will be introduced to enhance participation and learning outcomes.

Digitalisation remains a key training focus, with an updated curriculum introduced in 2025 and new advanced courses in development. The HKICPA will continue assessing training gaps to align with industry needs. Additionally, the HKICPA has addressed audit deficiencies identified in AFRC reports by introducing new courses, now accessible via the "Audit Roadmap." A course on risk assessment (HKSA315) includes practical IT control case studies and has been promoted alongside AFRC materials to boost engagement. The HKICPA will further collaborate with Inspection team of AFRC to strengthen related courses.

8. Consider enhancing assessment criteria and guidelines for programme accreditation

8.1. The QP is the main route to CPA qualification in Hong Kong, consisting of 14 modules and a capstone exam. The HKICPA offers exemptions for certain modules to graduates of accredited programs, ensuring they meet professional standards through rigorous assessment criteria, including teaching staff qualifications and program quality assurance.

Observations

- 8.2. During the Assessment Year, the HKICPA investigated a complaint involving excessive student assistance by a teaching staff of a programme provider and found no role segregation between teachers and examination paper setters, with weak ethical safeguards on teaching staff.
- 8.3. The HKICPA follows the programme accreditation criteria and guidelines and relies on external oversight reports. However, existing assessment guidelines lack explicit requirements on assessing providers' quality assurance in ethics of teaching staff and student support methods, resulting in gaps in the programme accreditation record.

Recommendations

We recommend that the HKICPA enhance its guidelines and 8.4. procedures to assess whether the programme provider has effective quality assurance procedures that cover ethical standards of teaching staff and student support. Examples of such quality assurance procedures include obtaining declarations of conduct and conflict of interest from teaching staff and including expected ethical standards and obligations in teaching staff contracts.

HKICPA's response:

The HKICPA maintains a robust process for monitoring accredited programmes, ensuring they meet the required standards to prepare graduates for the QP. For programmes already accredited by recognised authorities, the HKICPA considers their evaluations while verifying fulfilment of any outstanding requirements. The HKICPA further assesses programme structure, curriculum content, and potential risk areas.

In this particular case, the programme concerned has received unconditional accreditation from the recognised authority. Upon receiving the complaint, the HKICPA took immediate action to address the issue. A remedial plan has been developed by the programme provider to prevent recurrence.

The HKICPA will make necessary refinements to its documentation and accreditation guidelines to properly account for assessments conducted by other recognised authorities, and incorporate additional evaluations, if any, performed by the HKICPA.

Annex 1 Update on the previous year's findings

The HKICPA has satisfactorily addressed all recommendations from the previous year, except for the matter raised in Section B of this report.

Previous findings and HKICPA's follow-up actions enhancing recommendations				
(a)	Compliance with the regulatory order is not considered in the fit and proper assessment of CPA registration	The HKICPA has updated the fit and proper assessment Guidelines for applicants with unfulfilled regulatory order and formed the basis of rejection of a renewal application.		
(b)	Gaps in Authorised Employee and Authorised Supervisor assessment	The HKICPA has published guidance to strengthen the assessment procedures.		
(c)	A lack of process for ensuring the quality of CPD courses prior to the event and that the course meets the identified learning objective	The HKICPA has revised the CPD Training Courses Design and Development Guidelines detailing the review process on CPD training's quality that aligns with the learning objectives.		
(d)	A lack of robust handling and review mechanism of feedback received on CPD training	The revised CPD guidelines included the revamped feedback process and refined course effectiveness thresholds.		
(e)	Provide a more detailed overview of the key proposals within Invitation to Comment for key standards, including discussion of how the changes may impact auditors in Hong Kong	The HKICPA has revised relevant SOPs to include in the Invitations to Comment, a high-level potential impact description for high-priority global standard-setting projects, and a comprehensive impact analysis for local standards refinements.		
(f)	Add additional detail to local Basis for Conclusions highlighting, where appropriate, the changes most likely to impact Hong Kong and how SMPs in particular might be impacted	The HKICPA has revised relevant SOPs to include, for high priority international standard-setting projects, publication of key highlights on changes that most likely impact local stakeholders alongside their release of the relevant standards.		

Annex 2 Glossary of terms

AASC	Auditing and Assurance Standards Committee	PIE	Public interest entity, which has the same meaning as in section 3(1) of the AFRCO, i.e. a listed
AFRC	Accounting and Financial		corporation, or a listed
	Reporting Council		collective investment scheme
AFRCO	Accounting and Financial Reporting Council	PN	Practice Note
	Ordinance (Cap. 588)	QP	Qualification Programme
Assessment	The assessment year from 1	SMP	Small- and medium-sized
Year	April 2024 to 31 March 2025		practices
СРА	Certified public accountant	SOP	Standard operating procedures
CPD	Continuing professional	Specified	Auditing and Assurance
	development	Committees	Standards Committee, Ethics Committee, Financial Reporting
НКІСРА	Hong Kong Institute of		Standards Committee,
	Certified Public		Professional Development
	Accountants		Committee, Qualification and
			Examination Board,
IT	Information technology		Registration Committee and
			Sustainability Disclosure
PAIB	Professional Accountants in		Standards Committee
	Business		
		SSC	Standard-setting committee
PC	Practising certificate		
		SSD	Standard-setting Department

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