

November, 3, 2014

## Potential Enhancements to The International Professional Practices Framework – comments from IIA Spain

The Institute of Internal Auditors of Spain Board of Directors appreciates the opportunity to provide comments on behalf of our members on the proposed enhancements to the IPPF.

Our Board has analyzed its content carefully and overall believes these changes will enhance the value proposition of the Framework and will help stakeholders to understand its contents.

We decided not to send minor comments since we understand the excellent job the task force has performed being aware that the framework has to reflect the reality of different industries and locations.

However, there are two aspects which we believe critical and we would appreciate if they are included in the new IPPF:

- Independence: It came to our attention the word “independence” is not included in the principles. We understand there must be some arguments about this since it is a word too important to be missed. Even though we recognize the concept is included in different principles, we firmly believe the word itself should be there and the place we suggest would be principle 4.
- Stakeholders: We also believe this term should be included, referring to internal audit (not to the organization). The place we suggest would be principle 10.

Finally we would like to suggest a translation aspect. At the mission we believe the term “Advise” should be translated into Spanish as “Asesoramiento” rather than “Consejo”

I hope our comments are helpful to improve the proposal. If you need further about any of the topics referred above, please let me know.

Yours sincerely



Ernesto Martinez

Chairman

The Institute of Internal Auditors of Spain