



香港華人會計師公會
The Society of Chinese Accountants & Auditors



3 September 2020

Mr Johnson KONG
The President
The Hong Kong Institute of Certified Public Accountants
37/F., Wu Chung House
213 Queen's Road East
Hong Kong

Dear Johnson,

Arrangements for the December 2020 Session of the Qualification Programme

We refer to the e-mail to the students of the Final Examination and Module Examinations of the December 2020 Session (“the Examinations”) of the Qualification Programme of the Hong Kong Institute of Certified Public Accountants (“the Institute”) and the notice in the Institute’s website and noted that the Examinations have been re-scheduled to 22, 28 and 29 November 2020 from the original schedule on 1, 28 and 29 December 2020, respectively. On behalf of a group of the students of the Examinations, fellow members and the small and medium-sized CPA firms (“SMPs”), we shall be grateful if you would re-consider your re-schedule decision and proceed the Examinations in accordance with the original schedule.

We understand that the QP Examination for June 2020 diet was cancelled due to the outbreak of COVID-19 and are grateful and appreciative of all the necessary precautionary measures taken by the Institute for combating virus spread and keeping health and safety of our students at the highest priority. Furthermore, we also understand that the professional examination is extremely important for nurturing our future CPAs and that the Qualification Programme Examination must be held continuously in this respect. We also fully support the Examinations be held as scheduled.

However, the re-scheduling of the Examinations dates have created a surprise to the students of the Examinations, fellow members and the SMPs as all of them would not have sufficient time to prepare for all aspects resulting from the re-scheduling.

To the students of the Examinations, the re-scheduling has reduced their preparation period for the Examinations. In accordance with the Institute’s original schedule, the original date for the Final Examination would be on 1 December and the original dates for the Module Examinations would be on 28 and 29 December. The re-scheduled dates are almost one month earlier than the original schedule.

Moreover, to the students, the Examinations would be the last diet of the original Qualification Programme and the new Qualification Programme would commence in 2021. In the new Qualification Programme, for example, students of the Final Examination will be required to take the workshops, which are not required in the original Qualification Programme. In other words, the students would surely prefer to put in their best effort in this last chance pursuing the original Qualification Programme. However, now, they are told that they would have less time to prepare for that the Examinations.

To members and the SMPs, as you are aware that our profession has to face different deadlines and a tax reporting deadline for corporations with financial period ended from 1

January 2020 to 31 March 2020 (the M-code deadline) falls due on 16 November 2020 this year.

In addition to the tax reporting deadline, please refer to sections 429 to 431 of the Companies Ordinance (Cap. 622), extracts of part of these sections are as follows:

A company's directors must, in respect of each financial year, lay before the company in the annual general meeting, or in any other general meeting directed by the Court, a copy of the reporting documents for the financial year within 9 months from the year end date.

A director of a company who fails to take all reasonable steps to secure compliance with subsection (1) commits an offence and is liable to a fine of \$300,000. A director of a company who wilfully fails to take all reasonable steps to secure compliance with subsection (1) commits an offence and is liable to a fine of \$300,000 and to imprisonment for 12 months. (Then, it would be an offence in this case is a criminal offence).

If a company is required to hold an annual general meeting in accordance with section 610 in respect of a financial year, the company must send a copy of the reporting documents for the financial year to every member at least 21 days before the date of the meeting at which the copy is required by section 429 to be laid.

The period from early October 2020 to 15 November 2020 is definitely a very busy season for financial statements preparers, auditors, tax practitioners, and other professionals. Nevertheless, because of the rescheduled Examination dates, we can expect that many students of the Examinations would apply for long leaves prior to the Examinations in order to prepare for the Examinations.

In view of the above, having the Examinations around 6 days and 12 days shortly after the above tax reporting deadline would definitely exert undue pressures on both the students, who have a shortened period of Examinations preparation, and on all the relevant practitioners, whose manpower is significantly reduced during the peak season. In addition, we are not certain whether the shareholders of the clients of our members and CPA firms can sue the directors or the auditors if the defence is only because the firms needed to allow students to take time off to prepare and join the Examinations.

We understand that this is a very difficult task to organize public examinations with a large number of participants in this special period when social distancing is one of the key considerations. However, we would humbly request the Institute to re-consider the re-scheduling decision.

Yours sincerely,



Edmund Wong
President
The Society of Chinese
Accountants and Auditors



Webster Ng
Director
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Limited



Louis Chow
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cc Chairman, Qualification and Examinations Board
Chairman, Qualification Oversight Board