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Dear Mrs O'Sullivan

APB Consultation on audit firms providing non-audit services to listed companies that they audit

In response to the above consultation paper, we do not consider it necessary to impose further restrictions on auditors' ability to provide non-audit services to listed companies they audit.

We believe that it is for boards and their auditors to decide, on a case by case basis, what additional services an auditor can provide. It is the audit committee's responsibility to review annually the appointment of the auditor and to satisfy itself as to their independence. The appointment of the auditors is also subject to annual shareholder approval.

Assuming the board and audit committee have adopted proper procedures then we believe that auditors should be able provide non-audit services. These procedures should normally include seeking more than one quotation for anything material and ensuring there is no improper link between audit fees and charges for other work.

Yours sincerely



Steven Hay
Company Secretary