

IESBA Strategy and Work Plan (SWP) Survey— Summary of Responses and Initial Planning Committee Analysis

I. Overview of Responses

- The SWP [survey](#) was publicly released on the IESBA website on April 19, 2017. It was also distributed directly to over 500 contacts among the IESBA's various stakeholders, including regulatory and audit oversight bodies, investors and corporate governance participants, national standard setters (NSS), preparers and other professional accountants (PAs) in business (PAIBs), IFAC member bodies (MBs), international and regional organizations, firms and the academic community. The survey closed on July 18, 2017. More than 130 responses were received. They can be accessed on the IESBA [website](#).
- The following table summarizes the number of responses received across the various stakeholder groups (the list of respondents is included in Appendix A). For comparison, the corresponding response rate for the 2013 strategy survey is provided.

Stakeholder group	# Responses ¹	%	# Responses (2013 Survey)
Regulatory and audit oversight bodies ("Regulators")	6	5%	9
Investors, corporate governance, users of financial statements	5	4%	12
NSS	4	3%	12
PAIBs	21	16%	6
IFAC MBs	18	13%	32
Professional accountants in public practice ("PAPPs"), including firms	63	46%	27
Academia	4	3%	4
Individuals and others	13	10%	14
TOTAL	134	100%	116

- Responses were received from 32 different jurisdictions; in addition, 19 were from respondents representing international organizations or networks, and two from regional organizations (see Appendix B). There was at least one response from each major region of the world, i.e., North America, South America, Europe, Middle East, Africa, Asia (including Far East), and Australasia.

¹ Certain responses represent the collective views of members of an international or regional group or organization, and not the views of individual organizations or firms. Accordingly, the absolute numbers of responses are not necessarily representative of the weight of responses across the various categories of respondents.

4. The substantive part of the survey was organized into four different sections as follows:
 - Section B: Possible future standards-related projects or initiatives
This section presented 13 different topics and respondents were asked to rank their top six priorities and include any comments they might have on any one of those topics.
 - Section C: Adoption and implementation (A&I)
This section presented a list of various activities or initiatives the survey indicated the Board will consider prioritizing with respect to A&I. Respondents were asked for any comments on those activities or initiatives, and whether they believed there other specific activities or initiatives the Board should undertake to promote A&I.
 - Section D: Pre-existing commitments
This section presented a number of pre-existing commitments related to standard setting or the Code more broadly that the survey indicated will likely continue beyond 2018 or start in the new strategy period. Respondents were asked whether there are any particular matters they believed the Board should consider in relation to any one of those pre-existing commitments.
 - Section E: Any other strategic matters
This final section asked respondents whether there any other matters of strategic importance not covered elsewhere in the survey or their earlier responses that they believed the Board should consider as it positions the Code for 2025.
5. The remainder of this paper presents the following:
 - II. Initial Planning Committee analysis and observations
 - III – VI. Summaries of responses on Sections B to E

II. Initial Planning Committee Analysis and Observations

General

1. Several major stakeholders have not responded to the survey as of the end of August 2017, including, among others, the International Organization of Securities Commission (IOSCO), the International Forum of Independent Audit Regulators (IFIAR) and other members of the Monitoring Group; most CAG member organizations; and some of the larger IFAC MBs. The PC agreed that at the September 2017 CAG meeting, CAG Representatives should be asked for their top 5 or 6 priority topics within Section B of the survey. The PC is of the view that this information will provide a more complete picture of what stakeholders believe should be the topics deserving priority focus in the next SWP.
2. Over three quarters of the responses came from the profession (i.e., PAPPs, PAIBs and IFAC MBs). Ten of these came from Forum of Firms (FoF) members. Many came from individual PAPPs and smaller firms. To address any particular skewing in the top 6 priority topics from this overweighting of responses from the profession, the PC has disaggregated the priority designations for each topic between those from the profession and those from the broader user community (i.e., all other respondents excluding those from the profession). (See the summary table at the beginning of Section III.)

3. About half of the responses came from India, many from individual PAPPs and PAIBs as well as smaller firms. To address any particular skewing in the top 6 priority topics from the overweighting of responses from this particular country, the PC has isolated the priority designations for each topic for the rest of the world (i.e., excluding India). (See the summary table at the beginning of Section III.)

Topic-Specific

4. Taking into account the results on Top-6 priorities as summarized in the table on pages 5-6, and generally controlling for the overweighting of responses from the profession and from India:
- There appears to be a strong convergence of views across all stakeholder categories regarding what should be the top 3 priority topics, i.e.:
 - B.1 – Trends and developments in technology and innovation
 - B.2 – Emerging or newer models of service delivery
 - B.5 – Tax planning and related services
 - There is a second tier of topics for which the convergence of views across stakeholder categories, while not as strong as for the three topics above, is still significant:
 - B.6 – Materiality
 - B.3 – Definitions of the concepts of “public interest entity” (PIE) and “listed entity”
 - There is a third tier of topics for which the convergence of views across stakeholder categories is less significant:
 - B.10 – Breach of the Code
 - B.13 – Meaning of “public interest” in global context
 - B.8 – Documentation
 - B.12 – Post-implementation review of restructured Code
 - B.7 – Communication with TCWG
 - Finally, there is a last tier of topics for which the convergence of views across stakeholder categories is relatively weak:
 - B.11 – Definitions and descriptions of terms
 - B.4 – Collective investment vehicles
 - B.9 – Familiarity threat in relation to extant Part C
5. A few of the topics that respondents generally appear to view as high priority, in particular B.1 (Technology) and B.5 (Tax planning and related services), can be very broad in scope and individually spawn a number of different initiatives or projects if they are addressed. Accordingly, it will be important to carefully define the scope and issues to be addressed should any one of those topics be prioritized.

6. For a topic like B.1 (Technology), a different approach might be needed compared with the usual standard-setting approach, especially if coordination with the IAASB and the International Accounting Education Standards Board (IAESB) will be necessary.
7. Some proposed topics such as B.5 (Tax planning and related services) and B.13 (meaning of “public interest”) might result in a concept paper or a thought piece rather than additions to the Code.
8. In past interactions with Board representatives outside of the survey process, IOSCO and the Basel Committee on Banking Supervision have expressed strong interest in B.3 (definitions of PIE and listed entity), although only 35% of respondents have ranked this as a priority.
9. B.12 (post-implementation review of the restructured Code) has attracted lukewarm support among respondents, especially among regulators. However, the PC noted that it should not be discounted as any post-implementation review will not be an urgent initiative for the beginning of the next strategy period. Instead, it would be best undertaken later in the period after the profession has had time to implement the restructured Code.
10. To some extent, the relatively weak support for B.9 (familiarity threat in relation to extant Part C) is not surprising as the level of input from the PAIB community to the Board’s consultations has historically not been high.

Other

11. It will be important to assess the strategic priorities holistically and in a complementary way, recognizing the slate of pre-existing commitments.
12. Respondents are generally supportive of the proposed focus on and approach to adoption and implementation (Section C of the survey), with a number of suggestions for actions that can be further considered during the development of the SWP.
13. Various comments have been received on the pre-existing commitments (Section D), which can be considered in due course as part of the relevant initiatives.
14. A handful of other comments have been received in relation to other strategic matters for consideration (Sections B and E), including a suggestion that the Board develop a framework for standard setting. The PC will consider these further in developing the draft CP.

III. Summary of Responses on Section B

6. The following table summarizes the numbers of respondents that ranked the various topics in Section B in their top six priorities:

Topic	Total Number of Responses (Top 6)	Of Which		Respondents from the Profession ² (Top 6)	Respondents from Broader User Community ³ (Top 6)	All Respondents Excluding India (Top 6)
		Highest Priority (1-2)	# Regulators (Top 6)			
1. Trends and developments in technology/innovation	103	66	4	80	23	50
2. Emerging/newer models of service delivery	86	45	1	66	20	42
3. Concepts of PIE and listed entity	47	13	5	35	12	29
4. Collective investment vehicles	29	7	1	19	10	12
5. Tax planning and related services	84	31	5	69	15	34
6. Materiality	64	17	4	48	16	32
7. Communication with TCWG	42	7	2	30	12	17
8. Documentation	60	12	1	51	9	19
9. Familiarity threat in relation to extant Part C	21	2	–	17	4	10
10. Breach of the Code	50	10	5	39	11	23

² Includes: PAPPs, PAIBs, IFAC MBs

³ Includes: Regulators, Investors, Corporate Governance, Users, NSS, Academia, Individuals and others

Topic	Total Number of Responses (Top 6)	Of Which		Respondents from the Profession ² (Top 6)	Respondents from Broader User Community ³ (Top 6)	All Respondents Excluding India (Top 6)
		Highest Priority (1-2)	# Regulators (Top 6)			
11. Definitions and descriptions	32	6	3	25	7	21
12. Post-implementation review of restructured Code	48	17	2	38	10	31
13. Meaning of “public interest” in global context	52	16	1	41	11	30

7. The detailed prioritizations by topic and summaries of the main comments received on each topic are set out below. Paragraph 114 summarizes a few comments or suggestions of a more general nature that some respondents submitted.

Matters for Consideration

1. CAG Representatives are asked to consider the input received on Section B of the survey and the PC’s initial analysis and:
 - (a) **Indicate the top five or six priority topics** they believe the PC should focus on for purposes of developing the preliminary SWP consultation paper (CP); and
 - (b) Whether there are any general strategic considerations, whether relating to matters raised by respondents or otherwise, that the PC should take into account in formulating its recommendations for the CP.

B.1 – Trends and Developments in Technology and Innovation

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest ⁴ priority (rated 1 or 2)	66	64%	37	66%
High ⁵ priority (rated 3-4)	21	20%	15	27%
Priority ⁶ (rated 5-6)	17	16%	4	7%
Total	104	100%	56	100%

8. By a significant margin, this topic was the most highly prioritized among all topics presented, with 101 of the 134 respondents prioritizing this, including close to two-thirds of them doing so at the highest priority level. This result is driven largely by respondents in the Professional Accountants in Public Practice (PAPP) category, with 48 ranking it as a priority (29 ranking as highest priority), including nine FoF members (with seven of these ranking it highest priority).
9. Among respondents who included this topic in their top 6, those not in public practice support this topic at a slightly higher rate, with 93% rating it the highest or high priority, compared to respondents overall at 84%.

Common Themes among Respondents

10. A significant number of respondents⁷ identified this as a priority or a topic of great importance. Reasons include the development of new technologies such as blockchain, implications of social media,⁸ issues relating to the availability of vast amounts of data (e.g., confidentiality, ownership, privacy, storage, and security).
11. Many⁹ pointed out the need for the IESBA to continually monitor developing technologies and act as necessary. The need to work closely with other standard-setting Boards (SSBs) like the International

⁴ **Regulators:** FAOA, SSX, SAC; **NSS:** APESB, INTOSAI, NZAuASB, IRBA; **Investor:** Individual 10; **Users:** RELIG; **FoF:** BDO, EY, HLB, PKF, PwC, KPMG, RSM; **Other PAPPs:** ACA, AGA, AKB, BDRS, DPB, Individual 3, KAR, SRA, TPS, ROOP, Individual 9, Individual 15, Individual 17, AAS, AMK, BSC, QUES, SGC, TRL, VS, Individual 5, Individual 20; **PAIBs:** EN, GEN, GIRNER, Individual 1, SHELL, Individual 21, Individual 12, Individual 14, Individual 24; **IFAC MBs:** CPAC, FAR, HKICPA, JICPA, NBA, SAICA, WPK, CNCC, CSOEC, IMA, MIA, SAICA, ICAS, ICPAU; **Academics:** ANSA, MOTI; **Others:** EFAA, Anonymous 1, Anonymous 2

⁵ **Regulator:** SLAASMB; **FoF:** CROWE; **Other PAPPs:** PH, SSA, DWE, Individual 13; **PAIBs:** CITEC, DNS, WOL, Individual 18, Individual 24; **IFAC MBs:** IDW, KICPA, CzCA, ICAIn; **Academic:** Individual 6; **Others:** AE, SMPC, Individual 4, Anonymous 3

⁶ **Investor:** L&T, **CorpGov:** SHRF; **FoF:** DTT; **Other PAPPs:** KA, M&M, NGK, TKS, TATA, Individual 8, Individual 19, Individual 23, PG, RGT, SRC, VHR; **PAIB:** DA; **IFAC MB:** ACCA

⁷ **Regulator:** SLAASMB; **NSS:** APESB, INTOSAI, NZAuASB; **FoF:** HLB, PKF; **Other PAPPs:** AGA, ANSAS, ARIF, BDRS, CROWE, Individual 1, Individual 3, Individual 5, VKA, VHR; **PAIBs:** HMT, WOL; **IFAC MBs:** HKICPA, ICAS, ICAIn, IMA, JICPA, MIA, SAICA, WPK; **Academic:** MOTI; **Others:** EFAA, Individual 2

⁸ **Regulator:** SLAASMB; **NSS:** NZAuASB; **FoF:** CROWE, Kreston; **IFAC MB:** SAICA

⁹ **Regulator:** SSX; **NSS:** NZAuASB; **FoF:** PKF, PwC; **Other PAPPs:** BDRS, NGK; **IFAC MBs:** ICAEW, NBA, WPK; **Other:** SMPC

Auditing and Assurance Standards Board (IAASB) and the International Accounting Education Standards Board (IAESB) was mentioned by several.¹⁰

12. Several¹¹ also pointed out that because the Code is principles-based it should remain in effect and is sufficient for the developing environment. That said, some¹² called for a clear link to the fundamental principles.
13. A few¹³ pointed to the need for standards regarding PAs offering cyber-related non-assurance services (NAS) and the implications on independence if these services impact financial systems.
14. A few¹⁴ cited the need to revisit terminology for more digital inclusion, and guidance including modern examples using emerging technologies.

B.2 – Emerging or Newer Models of Service Delivery

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest ¹⁵ priority (rated 1 or 2)	45	52%	24	51%
High ¹⁶ priority (rated 3-4)	29	34%	17	36%
Priority ¹⁷ (rated 5-6)	12	14%	6	13%
Total	86	100%	47	100%

15. This issue is highly ranked as a priority, particularly among PAPPs with 40 ranking it as a priority including 21 as the highest priority. Five FoF members ranked this among their two highest priorities.
16. Thirteen IFAC MBs also ranked this as a priority, as did four NSS.

¹⁰ **Regulator:** FRC; **NSS:** NZAuASB; **FoF:** PwC; **Other PAPP:** Individual 3; **IFAC MBs:** ICAS, IDW.

¹¹ **Regulator:** FRC; CNCC, CSOEC, **FoF:** DTT, EY, PKF; **Other PAPP:** Deloitte-Austria

¹² **Regulator:** FRC; **FoF:** PwC, PKF, RSM; **IFAC MB:** ICAEW

¹³ **FoF:** BDO, **IFAC MB:** KICPA; **Other:** ASSIREVI

¹⁴ **FoF:** DTT, EY, PKF

¹⁵ **Investor:** FUND, L&T, Individual 10; **NSS:** APESB, INTOSAI, NZAuASB; **CorpGov:** SHRF; **FoF:** Kreston, BDO, EY, PKF, PwC; **Other PAPPs:** AMK, R&S, Individual 5, Individual 19, ACA, AGA, AKB, DPB, Individual 1, Individual 3, RGT, SRA, TPS, ROOP, Individual 15, Individual 17; **PAIBs:** EN, GEN, GIRNER, Individual 1, SHELL, Individual 21, Individual 14, Individual 24; **IFAC MBs:** MIA, FAR, CPAC, CzCA, HKICPA, ICAEW, JICPA; **Academics:** ANSA, MOTI

¹⁶ **NSS:** IRBA; **FoF:** HLB, KPMG; **Other PAPPs:** ATF, BDRS, Deloitte-Austria, Individual 13, Individual 20, PG, QUES, SSA, TKS, Individual 23; **PAIBs:** DA, Individual 14, CITEC, DNS, WOL, Individual 25; **IFAC MBs:** CNCC, CSOEC, ICAS, IMA, IDW; **Others:** EFAA, AE, Individual 4, Anonymous 1, Anonymous 3

¹⁷ **Regulator:** SLAASMB; **User:** RELIG; **FoF:** CROWE; **Other PAPPs:** RCB, FTH, PH, SGC, Individual 9; **PAIB:** Individual 18; **IFAC MB:** WPK; **Academic:** Individual 6; **Other:** Anonymous 2

Common Themes among Respondents

17. A significant number of respondents¹⁸ identified this topic as high priority, priority, or important. Many of these cited the link between this issue and the technology issue at B.1. References were made to lines blurring between audit and NAS, firm networks, outsourcing, independence and confidentiality.
18. Some¹⁹ cited that the concepts of “office” and “engagement team” are less relevant given the current work environment, and this could have implications on independence. A few²⁰ added that traditional definitions may no longer apply or need to be refreshed.
19. Some²¹ cited the need to study the implications of the contingent workforce (also referred to as the “liquid” workforce). Similarly, questions were raised about remote workers, workers with multiple employers, and flexible workers, and how the Code impacts each of them.
20. Some²² raised the question of the application of the fundamental principles when utilizing outsourced services.
21. Some²³ assessed this issue as low, medium, or no priority.
22. A few²⁴ cited difficulties in determining at what point management responsibility is taken when providing NAS.
23. A few²⁵ commented that the principles-based approach is still relevant and no new rules are needed.
24. A few²⁶ recommended that the IESBA monitor new developments in service delivery as they will continue to evolve.
25. A few²⁷ cited confidentiality of data as it moves across jurisdictions.
26. Other questions raised include the implications on the fundamental principles when shared service centers are used, and independence issues when significant audit and NAS clients merge.

¹⁸ **Regulator:** SAC; **NSS:** APESB, NZAuASB; **CorpGov:** SHRF; **FoF:** HLB, PKF; **Other PAPPs:** AGA, BDRS, Individual 3, VHR; **PAIB:** EN; **IFAC MBs:** FAR, ICAS, IDW, ICAIn, IMA, JICPA, MIA; **Academic:** MOTI

¹⁹ **Regulator** SSX; **NSS:** APESB; **FoF:** Kreston, PKF; **IFAC MBs:** ACCA, ICAEW

²⁰ **FoF:** CROWE, EY

²¹ **Regulator** SSX; **NSS:** NZAuASB; **Other PAPPs:** BDRS, M&M; **IFAC MB:** ACCA, ICPAU

²² **NSS:** APESB, IRBA; **FoF:** BDO, DTT; **IFAC MB:** IMA; **Other PAPP:** QUES

²³ **Regulator:** SLAASMB; **PAIB:** Individual 7; **IFAC MB:** WPK; **Others:** ASSIREVI, EFAA

²⁴ **Regulator:** SSX; **FoF:** Kreston; **Other PAPPs:** VKA

²⁵ **Regulator:** FRC; **FoF:** EY; **PAIB:** WOL

²⁶ **IFAC MBs:** CPAC, IDW; **Other:** SMPC

²⁷ **Regulator:** SSX; **NSS:** APESB

B.3 – Concepts of PIE and “Listed Entity”

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest ²⁸ priority (rated 1 or 2)	13	28%	7	29%
High ²⁹ priority (rated 3-4)	21	44%	10	42%
Priority ³⁰ (rated 5-6)	13	28%	7	29%
Total	47	100%	24	100%

27. Five regulators listed this as a priority, with three the highest priority. It is a high priority for only one NSS.
28. Among the FoF, nine ranked this in their top 6 priorities. Fourteen other PAPPs ranked this in their top six.
29. Six IFAC MBs listed among their priorities, with most ranking it in the 4-5 priority range.

Common Themes among Respondents

30. Many respondents³¹ commenting on this topic identified it as high priority/priority or otherwise supported it, frequently commenting on the need for clarification of definitions, and the need to be principles-based. That said, several³² rated this a medium/low/no priority topic.
31. Several respondents³³ commented that defining a PIE is better left to jurisdictions that address the situations in their country. In line with this, some³⁴ noted that the IESBA’s role should be developing guidance for local standard setters to use when establishing jurisdictional definitions.
32. Some³⁵ cited the need to clarify key terms including “regulated market,” “recognized stock exchange,” and “regulated stock exchange.”

²⁸ **Regulators:** FAOA, FRC, SLAASMB; **FoF:** CROWE, RSM; **Other PAPPs:** Individual 1, NGK, VKA, PH; **PAIBs:** WOL; **IFAC MBs:** KICPA, WPK; **Academic:** Individual 6

²⁹ **Regulator:** SSX; **NSS:** NZAuASB; **FoF:** BDO, HLB, PwC; **Other PAPPs:** AAS, AKB, QUES, TATA, Individual 19, Deloitte-Austria, M&M, Individual 8; **PAIBs:** GIRNER, HMT, HSBC; **IFAC MBs:** ACCA, ICPAU, ICAIn; **Others:** EFAA, Anonymous 2

³⁰ **Regulator:** SAIAL; **FoF:** DTT, EY, KPMG, Kreston; **Other PAPPs:** DWE, ACA; **PAIBs:** CITEC, Individual 18, Individual 21; **Academic:** MOTI; **Others:** Individual 4, SMPC

³¹ **Regulator:** SLAASMB; **NSS:** NZAuASB, **FoF:** CROWE, KPMG, PwC; **Other PAPPs:** Individual 1, M&M, VHR; **PAIB:** WOL; **IFAC MBs:** FAR, ICAEW, MIA, WPK; **Others:** AE, ASSIREVI

³² **NSS:** APESB, IRBA; **Investor:** FUND; **FoF:** PKF; **PAPP:** AGA; **IFAC MBs:** HKICPA, IDW, NBA; **Other:** EFAA

³³ **Regulator:** FRC; **NSS:** IRBA; **FoF:** BDO; **PAPP:** AGA; **IFAC MBs:** ACCA, CzCA, ICPAU

³⁴ **FoF:** PKF, RSM; **IFAC MBs:** ACCA, KICPA

³⁵ **Regulator:** FAOA, SSX; **FoF:** EY, PwC; **Other PAPP:** QUES

33. Some³⁶ cited the need to consider whether certain entities should be exempt from the requirements, for example, SME listed entities, or entities whose shares or debt are not freely traded, or thinly traded.
34. A few³⁷ cited the need to work with IAASB and the International Accounting Standards Board (IASB).
35. A few³⁸ also observed the need to consider new forms of capital raising like crowd funding.

B.4 – Collective Investment Vehicles

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest ³⁹ priority (rated 1 or 2)	7	24%	3	19%
High priority ⁴⁰ (rated 3-4)	8	28%	4	25%
Priority ⁴¹ (rated 5-6)	14	48%	9	56%
Total	29	100%	16	100%

36. Only one regulator included this issue in its top six, at the priority level.
37. Two NSS called this issue a high priority.
38. The only corporate governance respondent rated this as highest priority.
39. Only 13 of the 73 PAPPs responding included this in their top six.

Common Themes among Respondents

40. Many⁴² respondents rated this as either “not a priority” or “not a topic for the IESBA.” Reasons mentioned include: regulatory requirements differ from jurisdiction to jurisdiction, which would complicate any attempt by the IESBA to set standards; the area is still subject to change; the area is too complex for a principles-based Code.

³⁶ **Regulator:** FRC; **FoF:** HLB; **Other PAPP:** VHR

³⁷ **IFAC MBs:** IDW, WPK; **Other:** SMPC

³⁸ **Regulator:** SSX; **PAIB:** WOL

³⁹ **Investor:** L&T; **CorpGov:** SHRF; **PAPPs:** SRC, AXIS, NGK, Individual 23; **PAIB:** Individual 18

⁴⁰ **NSS:** APESB, NZAuASB; **FoF:** DTT; **Other PAPPs:** AAS, KAR, RATS, **PAIBs:** GEN, Individual 21

⁴¹ **Regulator:** SAC; **Investor:** FUND; **User:** RELIG; **FoF:** BDO, RSM; **Other PAPPs:** PG, SRA, VKA; **PAIBs:** HSBC, CITEC, Individual 24; **Others:** Individual 4, Anonymous 3, Anonymous 5

⁴² **NSS:** IRBA; **FoF:** CROWE, EY, PKF, PwC; **Other PAPP:** Individual 23; **IFAC MBs:** ACCA, FAR, HKICPA, ICAEW, ICAS, WPK; **Others:** AE, ASSIREVI, SMPC

41. Several respondents⁴³ said the issue should be prioritized, citing reasons including the need for guidance on related party/independence issues within audit firms (firms auditing a fund, fund manager, advisor, trustees, etc.), as well as audit firms providing NAS.

B.5 – Tax Planning and Related Services

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest ⁴⁴ priority (rated 1 or 2)	31	36%	14	31%
High ⁴⁵ priority (rated 3-4)	34	40%	20	45%
Priority ⁴⁶ (rated 5-6)	20	24%	11	24%
Total	85	100%	45	100%

42. Five regulators rated this issue as a high priority or priority.
43. Two NSS ranked the topic at high priority.
44. Rankings among PAPPs were skewed towards higher priorities, with 31 PAPPs rating this in their top four priorities. Another nine rated it as priority 5-6.
45. Thirteen IFAC MBs included this in their top six priorities.

Common Themes among Respondents

46. Many⁴⁷ respondents indicated that this issue should be prioritized.
47. Several⁴⁸ suggested the need to draw boundaries around what is legal tax planning, when it becomes aggressive, and whether aggressive means tax evasion.

⁴³ **Regulators:** FRC, SSX, SAIAL; **NSS:** NZAuASB; **FoF:** HLB, DTT; **Other PAPPs:** BDRS, M&M; **PAIB:** Individual 7; **IFAC MB:** MIA

⁴⁴ **CorpGov:** SHRF; **User:** RELIG; **FoF:** CROWE, HLB, PKF; **Other PAPPs:** AAS, QUES, RCB, RGT, TRL, VS, Individual 20, BDRS, KAR, KAJ, KA, R&S, SRC, Individual 9; **PAIB:** CITEC, DA, HSBC, Individual 18, DNS, Individual 21; Individual 12, Individual 24, Individual 25; **IFAC MBs:** ACCA, ICAIn; **Other:** Anonymous 1

⁴⁵ **Regulator:** FAOA; **Investors:** L&T, Individual 10; **NSS:** APESB, IRBA; **FoF:** PKF; **Other PAPPs:** AMK, AGA, BSC, DPB, PG, TPS, VKA, Individual 5, Individual 8, Individual 17, VHR, Individual 15; **PAIBs:** HMT, SHELL, WOL, GEN, GIRNER; **IFAC MBs:** IMA, MIA, CPAC, ICPAU, CNCC, CSOEC, HKICPA, SAICA, WPK, **Academic:** MOTI

⁴⁶ **Regulators:** FRC, SAIAL, SSX, SLAASMB; **NSS:** INTOSAI; **FoF:** KPMG; **Other PAPPs:** AAS, AKB, PH, Individual 13, ACA, Deloitte-Austria, NGK, TKS; **PAIBs:** EN, Individual 7, MAR; **IFAC MBs:** KICPA, FAR; **Other:** AE

⁴⁷ **Regulators:** FRC, IRBA, SAIAL; **NSS:** APESB, INTOSAI; **FoF:** CROWE, PKF; **Other PAPPs:** AGA, BDRS, VKA, VHR; **IFAC MBs:** HKICPA, ICAIn, IMA, KICPA; **Academic:** Individual 6

⁴⁸ **Regulators:** FAOA, FRC; **FoF:** EY, KPMG; **PAIB:** WOL; **IFAC MB:** ICAEW

48. Some⁴⁹ commented about existing studies underway at the G20, OECD, and EU regarding aggressive tax strategies, suggesting that the IESBA monitor these developments before initiating a project at the international level.
49. Some⁵⁰ believe the issue should not be prioritized.
50. Some⁵¹ questioned whether aggressive tax planning is already prohibited by the Code, suggesting that such conduct is not in the public interest and thereby violates the fundamental principles. A few challenged whether tax planning creates self-review and advocacy threats; whether auditors should be permitted to provide tax planning services to clients; and whether tax planning violates the provisions in the Code addressing non-compliance with laws and regulations (NOCLAR). At the same time, a few commented that current requirements in the Code are sufficient for addressing these tax issues.
51. A few⁵² mentioned that the perception is that tax planning, strategies and structures amount to aggressive tax avoidance.

B.6 – Materiality

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest priority ⁵³ (ranked 1 or 2)	17	27%	8	25%
High priority ⁵⁴ (ranked 3-4)	26	41%	10	31%
Priority ⁵⁵ (ranked 5-6)	21	32%	14	44%
Total	64	100%	32	100%

52. Four regulators ranked materiality as one of their six priorities.
53. Three NSS ranked this in their top six priorities.
54. Close to half of the respondents in the PAPP category ranked this in their top six priorities, including just over 40% of FoF members who responded to the survey.

⁴⁹ **FoF:** CROWE; **IFAC MBs:** ACCA, CNCC, CSOEC, ICAEW; **Other:** AE

⁵⁰ **FoF:** EY; **IFAC MBs:** ICAS, IDW; **Other:** ASSIREVI

⁵¹ **FoF:** DTT; **Other PAPP:** Deloitte-Austria; **IFAC MBs:** KICPA, SAICA; **Other:** AE

⁵² **FoF:** PKF; **IFAC MBs:** CPAC, HKICPA

⁵³ **Regulators:** SAIAL, SSX; **Investor:** FUND; **FoF:** DTT; **Other PAPPs:** Deloitte Austria, FTH, PH, TKS, QUAL, M&M, SRB, SSA; **PAIBs:** DNS, HMT; **IFAC MB:** KICPA; **Others:** Anonymous 2, Anonymous 4

⁵⁴ **Regulator:** FAOA; **NSS:** INTOSAI; **Investor:** Individual 10; **FoF:** BDO, CROWE; **Other PAPPs:** AKB, Individual 1, KA, RCB, ROOP, Individual 20, DWE, Individual 3, KAR, KAJ, RGT, SRA, TRL, VS; **PAIBs:** EN, Individual 21, Individual 12; **IFAC MBs:** MIA; **Academic:** MOTI; **Others:** Individual 2, SMPC

⁵⁵ **Regulator:** FRC; **NSS:** IRBA, NZAuASB; **FoF:** Kreston, RSM; **Other PAPPs:** SRC, VHR AMK, VKA, Individual 13; **PAIBs:** DA, GEN, SHELL; **IFAC MBs:** HKICPA, ICAIn, ICAEW, NBA, IDW, JICPA; **Academic:** ANSA; **Other:** Anonymous 3

55. Nine IFAC MBs ranked this among their priorities, with only two at the highest level.
56. Among those respondents who included this topic in their top 6, respondents in public practice rated it higher overall than respondents as a whole – 78% of public practice respondents rated this as highest or high priority, compared to 68%.

Common Themes among Respondents

57. Many⁵⁶ noted the need for coordination with the IAASB and IASB on defining materiality.
58. Some⁵⁷ agreed that there should be discussion about materiality vs. significance.
59. Several⁵⁸ agreed that the concept needs clarification. Some⁵⁹ suggested that materiality should be a broad concept in the ethics standards, rather than being narrowly defined. A few⁶⁰ specifically pointed out the need for materiality to be defined qualitatively rather than quantitatively.
60. Some⁶¹ suggested the need for guidance on materiality as it applies to NAS.

B.7 – Communication with Those Charged with Governance (TCWG)

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest priority ⁶² (rated 1 or 2)	7	17%	4	17%
High priority ⁶³ (rated 3-4)	19	45%	10	44%
Priority ⁶⁴ (rated 5-6)	16	38%	9	39%
Total	42	100%	23	100%

61. Seven respondents rated this as their highest priority: three PAPPs, two PAIBs, two individuals.
62. Two regulators rated this as a high priority. It was not rated in the top six priorities by any standard setters.
63. Two FoF members put this in their top six priorities.

⁵⁶ **Regulator:** FAOA; **NSS:** APESB; **FoF:** BDO, CROWE, DTT, HLB, PKF; **IFAC MBs:** ACCA, ICAS, HKICPA; **Others:** AE, SMPC

⁵⁷ **FoF:** PKF; **IFAC MBs:** ACCA, ICAEW, ICAIn; **Other:** EFAA

⁵⁸ **Regulator:** IRBA; **IFAC MBs:** ACCA, IMA; **FoF:** Kreston, MOTI, SSX, KICPA; **Other PAPP:** Individual 1

⁵⁹ **Regulator:** SAC; **CorpGov:** SHRF; **FoF:** PKF, ACCA

⁶⁰ **Regulator:** FRC; **FoF:** DTT

⁶¹ **Regulator:** SSX, **NSS:** NZAuASB; **IFAC MBs:** KICPA, ICAIn, ICAS

⁶² **PAPPs:** VKA, RCB, Individual 13; **PAIBs:** ABTS, CITEC; **Academic:** Individual 6; **Other:** Individual 4

⁶³ **Regulators:** SAC, SSX; **FoF:** Kreston, PwC; **Other PAPPs:** NGK, SGC, ROOP, AMK, BSC, R&S, TATA; **PAIBs:** DA, EN, SHELL, HSBC; **IFAC MB:** NBA; **Academic:** MIA; **Others:** EFAA, Anonymous 2

⁶⁴ **Investor:** Individual 10; **FoF:** PwC; **Other PAPPs:** Individual 1, RGT, VS, KA, SSA, Individual 19; **PAIBs:** EN, GEN, Individual 12, Individual 14; **IFAC MBs:** CzCA, MIA; **Others:** EFAA, Anonymous 1

Common Themes among Respondents

64. Several⁶⁵ respondents shared the view that this issue should not be a priority of the IESBA for reasons including: it is not a problem; other issues are higher priority; it is already covered elsewhere; it would apply more to clients than to PAs; or that it is outside the IESBA's remit.
65. Several⁶⁶ pointed to the ISAs, suggesting that: the issue belongs to the IAASB; similar to the ISAs, the Code should require, not just encourage, certain communications; and that the IAASB might go further in its requirements regarding communication with TCWG than the Code.
66. Several⁶⁷ respondents pointed out the need for guidance on: information that should be communicated to TCWG; communicating with TCWG about NAS; guidance for PAIBs regarding overseeing audit services vs. NAS; and how auditors and TCWG can engage more effectively together.
67. Some⁶⁸ commented that communications should be strengthened to increase transparency.
68. A few others⁶⁹ commented on regulations and government frameworks that could differ from the Code's requirements. In this regard, it was suggested that the Code should clarify that compliance with national requirements in this area fulfills compliance with the Code.

B.8 – Documentation

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest priority ⁷⁰ (rated 1 or 2)	12	20%	4	16%
High priority ⁷¹ (rated 3-4)	29	48%	11	42%
Priority ⁷² (rated 5-6)	19	32%	11	42%
Total	60	100%	26	100%

69. Thirty-eight firms or individual PAPPs, including four in the FoF, rated documentation among their top six priorities. For eight of them, this was their highest priority.

⁶⁵ **NSS:** NZAuASB; **Investor:** FUND; **FoF:** HLB, PKF; **Other PAPP:** Individual 2; **IFAC MBs:** FAR, ICAS, SAICA.

⁶⁶ **Regulator:** SSX; **FoF:** EY, CROWE; **Other PAPPs:** Deloitte-Austria; **IFAC MB:** WPK; **Others:** ASSIREVI, AE

⁶⁷ **Regulator:** SSX; **NSS:** APESB, IRBA; **FoF:** DTT, Kreston, PwC; **IFAC MBs:** HKICPA, ICAIn.

⁶⁸ **FoF:** Kreston; **IFAC MBs:** HKICPA, IMA; **Other:** EFAA

⁶⁹ **FoF:** CROWE; **Other:** ASSIREVI

⁷⁰ **Regulator:** SAIAL; **PAPPs:** AXIS, DWE, PG, SSA, Individual 13, TKS, TATA, Individual 19; **PAIB:** HMT; **Others:** Individual 4, Anonymous 5

⁷¹ **Investor:** L&T; **User:** RELIG; **FoF:** RSM, PKF; **Other PAPPs:** KA, RCB, SRB, SRC, VHR, Individual 9, Individual 15, ACA, AGA, DPB, FTH, Individual 3, KAJ, NKG, PH, SGC, TRL, TPS, VS, Individual 17; **PAIBs:** Individual 12, EN; **IFAC MBs:** ACCA, KICPA; **Academic:** ANSA

⁷² **Investor:** Individual 10; **NSS:** NZAuASB; **FoF:** BDO, HLB; **Other PAPPs:** KAR, R&S, Individual 20, AAS, M&M, ROOP; **PAIBs:** GIRNER, Individual 14; **IFAC MBs:** MIA, SAICA, CPAC, ICAS, ICPAU, CzCA; **Other:** Anonymous 1

70. One regulator rated this as a priority.
71. Nine IFAC MBs rated this as a priority, though only three rated it as high or highest.

Common Themes among Respondents

72. Many⁷³ respondents rated documentation no or low priority for a variety of reasons, including: not consistent with the principles-based Code; documentation is a quality control issue, not an ethics one; increased workload needs to be cost justified; firms should establish their own documentation requirements; a documentation requirement is already embedded in the ISAs; and documentation is a regulatory issue and not for the Code.
73. Many⁷⁴ other respondents indicated that documentation is needed for a variety of reasons, including: without documentation there is no evidence of compliance with the Code; it is an important tool for transparency and against accusations of impropriety; it is needed as evidence of safeguards against threats to independence and conflicts of interest; the process of documenting helps the PA formulate a judgement; the passage of time makes it difficult for a PA to recollect a situation; documentation stands as evidence of work performed.
74. Some⁷⁵ respondents were of the view that further guidance would be useful. It was suggested that the IESBA consider unintended consequences of establishing requirements as opposed to guidance. It was also felt that the statement in the Code that “documentation is encouraged” is not clear.

B.9 – Familiarity Threat in Relation to Extant Part C

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest priority ⁷⁶ (rated 1 or 2)	2	10%	2	20%
High priority ⁷⁷ (rated 3-4)	9	43%	4	40%
Priority ⁷⁸ (rated 5-6)	10	47%	4	40%
Total	21	100%	10	100%

75. No regulators or NSS ranked this topic as a priority.
76. Eleven PAPPs ranked this as a priority; none of them ranked it as the highest priority.

⁷³ **Regulators:** FRC, SSX; **NSS:** APESB; **Investor:** FUND; **FoF:** CROWE, EY, PwC; **Other PAPP:** M&M; **IFAC MBs:** FAR, HKICPA, IDW, WPK; **Others:** AE, ASSIREVI, EFAA, SMPC

⁷⁴ **Regulator:** SSX; **NSS:** INTOSAI, NZAuASB; **FoF:** Kreston, PKF, RSM **Other PAPPs:** Deloitte Austria, Individual 5, ROOP; **PAIBs:** EN, Individual 7, WOL; **IFAC MBs:** ACCA, CPAC, ICAIn, KICPA, MIA, SAICA, ICAS, ICPAU, MIA, KICPA

⁷⁵ **Regulator:** FRC; **NSS:** IRBA; **FoF:** PKF, RSM; **IFAC MBs:** ACCA, SAICA

⁷⁶ **PAIB:** DA, Individual 7

⁷⁷ **User:** RELIG; **PAPPs:** AXIS, RGT, SRB, SRA, VKA; **PAIBs:** Individual 14, Individual 16; **Other:** Anonymous 4

⁷⁸ **Investor:** FUND; **FoF:** HLB; **Other PAPPs:** Individual 1, Individual 8, Individual 23, QUES, R&S; **IFAC MBs:** IMA, SAICA; **Academic:** AUT

Common Themes among Respondents

77. Many⁷⁹ respondents rated this as no/low priority.
78. Some⁸⁰ identified this as a priority, or noted that guidance is needed.
79. Some⁸¹ identified the need for clarified definitions of certain terms, including: “family member,” “familiarity,” “employee,” “trivial and inconsequential.”
80. A few⁸² stated that “familiarity” must be explored.

B.10 – Breach of the Code

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest ⁸³ priority (rated 1 or 2)	10	18%	3	11%
High ⁸⁴ priority (rated 3-4)	15	31%	9	33%
Priority ⁸⁵ (rated 5-6)	26	51%	15	56%
Total	51	100%	27	100%

81. Five regulators rated this high priority or priority.
82. Two NSS rated the issue as priority.
83. Only one FoF included this issue in its top six, as a priority.
84. Six IFAC MBs rated this in their top six, including two as high priority, four as priority.

Common Themes among Respondents

85. Several respondents⁸⁶ indicated that the issue should be a priority, adding that guidance is needed to help PAs assess breaches.

⁷⁹ **Regulator:** FRC; **NSS:** IRBA; **FoF:** PKF, PwC; **IFAC MBs:** ACCA, FAR, HKICPA, ICAEW, IDW, WPK; **Others:** AE, ASSIREVI, EFAA, SMPC

⁸⁰ **FoF:** HLB; **Other PAPP:** BDRS; **PAIB:** Individual 7; **IFAC MB:** MIA

⁸¹ **Regulator:** SAIAL; **NSS:** INTOSAI; **FoF:** PKF; **Academic:** ANSA

⁸² **Regulator:** SSX; **IFAC MB:** ACCA

⁸³ **PAPPs:** KAJ, KA, SGC, Individual 8, Deloitte-Austria, FTH, VHR; **PAIBs:** HSBC, Individual 7; **Other:** Anonymous 5

⁸⁴ **Regulators:** FRC, SAC, SAIAL, SLAASMB; **Investor:** FUND; **CorpGov:** SHRF; **PAPPs:** AXIS, BDRS, Individual 1, Individual 9, Individual 19, M&M; **PAIB:** Individual 24; **IFAC MB:** FAR; **Other:** Individual 11

⁸⁵ **Regulator:** FAOA; **NSS:** APESB, INTOSAI; **FoF:** PKF; **Other PAPPs:** ACA, AGA, QUES, TPS, ROOP, AKB, BSC, RCB, VS, Individual 17; **PAIBs:** SHELL, DNS, HMT, MAR, WOL, Individual 12, Individual 25; **IFAC MBs:** IDW, ACCA, ICAS, NBA; **Academic:** Individual 6

⁸⁶ **Regulators:** FRC, SAIAL; **Investor:** FUND; **PAIB:** EN; **IFAC MBs:** ACCA, FAR, ICAS

86. Some other respondents⁸⁷ indicated that this issue should not be a priority and could be addressed, if needed, at a later time.
87. There was support from several⁸⁸ on developing guidance to address breaches and their root cause.
88. Some⁸⁹ highlighted the need to eliminate the optionality on reporting a breach.
89. Some⁹⁰ responded to the question about being explicit in the Code about stopping a breach, with one questioning, rhetorically, whether there is need to amend the Code to say that the PA should stop the breach.
90. A few⁹¹ commented that breaches are regulatory matters and not a matter for the Code.
91. A few⁹² commented on keeping the optionality of reporting a breach to a professional body or regulator. One added reporting should be optional only for non-PIEs.

B.11 – Definitions and Descriptions of Terms

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest ⁹³ priority (rated 1 or 2)	6	18%	4	20%
High ⁹⁴ priority (rated 3-4)	12	38%	9	45%
Priority ⁹⁵ (rated 5-6)	14	44%	7	35%
Total	32	100%	20	100%

92. Three regulators rated this issue as a priority with one at high priority level and two at the priority level.
93. No NSS rated this as a priority issue.
94. Three in the FoF rated this a priority, as did nine others in public practice.
95. Eight IFAC MBs rated this a priority, including two at the highest level.

⁸⁷ **NSS:** NZAuASB; **FoF:** CROWE, PwC; **IFAC MBs:** HKICPA, SAICA; **Other:** EFAA

⁸⁸ **Regulators:** FAOA, SAC, SLAASMB, SSX; **NSS:** APESB; **FoF:** PKF; **Other PAPPs:** Individual 1, VHR; **IFAC MB:** ICAEW

⁸⁹ **NSS:** INTOSAI, **FoF:** HLB, PKF; **Other PAPP:** Individual 1; **PAIB:** Individual 7

⁹⁰ **FoF:** DTT, **Other PAPP:** NGK; **Others:** AE, ASSIREVI

⁹¹ **NSS:** IRBA; **IFAC MBs:** ICAEW, SAICA

⁹² **Regulator:** SSX; **IFAC MB:** FAR; **Other:** ASSIREVI

⁹³ **PAPPs:** DWE, Individual 8; **IFAC MBs:** CzCA, IDW; **Others:** SMPC, WAMAcO

⁹⁴ **Regulator:** FRC; **FoF:** DTT, RSM; **Other PAPPs:** TKS; **PAIBs:** Individual 16, Individual 14, Individual 7; **IFAC MBs:** FAR, CPAC, ICAEW, NBA; **Academic:** ANSA

⁹⁵ **Regulators:** FAOA, SSX; **FoF:** EY; **Other PAPPs:** AXIS, BSC, FTH, KAJ, SGC, Individual 9; **IFAC MBs:** JICPA, HKICPA, ICAIn; **Other:** Individual 2, Anonymous 2

Common Themes among Respondents

96. More than half⁹⁶ (53%) of the respondents that wrote comments on this issue made the point that the meaning of terms should be aligned among the SSBs overseen by the PIOB. That said, several added that this should be done “where possible.”
97. Respondents were mixed as to whether this should be prioritized as a project, with the same number saying it should⁹⁷ vs. it should not.⁹⁸ A few said it should be “medium term”⁹⁹ and a few¹⁰⁰ said this should not be a separate standard-setting project.
98. A few¹⁰¹ commented that definitions should focus on the substance of meanings, rather than detailed definitions. For example, a few¹⁰² mentioned that the definition of “employee” should focus on business flow, not necessarily how the individual is engaged (e.g., sub-contractor).
99. A few¹⁰³ expressed concern about the concept of “engagement period,” suggesting that the period cannot be left open beyond the report date. Another¹⁰⁴ suggested it must be left open until all obligations and liabilities in the financial statements end.

B.12 – Post-implementation Review of the Restructured Code

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest ¹⁰⁵ priority (rated 1 or 2)	17	35%	14	47%
High ¹⁰⁶ priority (rated 3-4)	11	23%	4	13%
Priority ¹⁰⁷ (rated 5-6)	20	42%	12	40%
Total	48	100%	30	100%

100. Two regulators rated this in their top six priorities.

⁹⁶ **Regulators:** FRC, SSX; **NSS:** APESB, NZAuASB; **FoF:** CROWE, DTT, EY, PKF, PwC; **Other PAPPs:** Deloitte-Austria, NGK; **PAIB:** EN; **IFAC MBs:** ACCA, CPAC, FAR, ICAIn, IDW, IMA, MIA, NBA; **Others:** AE, SMPC

⁹⁷ **Regulator:** FRC; **FoF:** HLB; **Other PAPP:** AGA; **PAIB:** Individual 7; **IFAC MBs:** FAR, ICAS, JICPA, NBA; **Other:** SMPC

⁹⁸ **NSS:** APESB; **Investor:** FUND; **FoF:** PKF, PwC; **IFAC MBs:** ACCA, SAICA; **Others:** ASSIREVI, EFAA, Individual 2

⁹⁹ **FoF:** CROWE; **IFAC MB:** HKICPA

¹⁰⁰ **NSS:** IRBA; **FoF:** DTT

¹⁰¹ **PAPP:** NGK; **IFAC MB:** ICAEW

¹⁰² **Regulator:** SSX, **IFAC MB:** IMA

¹⁰³ **FoF:** PwC; **Other PAPP:** VHR

¹⁰⁴ **Regulator:** SSX

¹⁰⁵ **Regulator:** SLAASMB; **FoF:** DTT, **Other PAPPs:** ATF, RATS; **PAIB:** Individual 16; **IFAC MBs:** CNCC, CSOEC, IMA, IDW, ICAS, ACCA, INAln; **Others:** AE, SMPC, EFAA, Anonymous 3 Individual 11

¹⁰⁶ **FoF:** EY, Kreston, KPMG; **Other PAPPs:** FTH, R&S, Individual 23, SRC; **PAIB:** DNS; **IFAC MBs:** ICAEW, WPK, JICPA

¹⁰⁷ **Regulator:** SAC; **NSS:** APESB, IRBA; **Investor:** L&T; **FoF:** PKF; **Other PAPPs:** DPB, SSA, TRL, BDRS, KAR, KAJ, SRA; **PAIBs:** Individual 7, Individual 25, EN, GIRNER; **IFAC MBs:** CPAC, ICPAU; **Other:** Individual 2, Anonymous 5

101. Two NSS put this in their top six priorities, though both rated this as their sixth priority.
102. Five members of the FoF rated this in their top five priorities.
103. Eleven IFAC MBs assessed this as a top six priority.

Common Themes among Respondents

104. With few exceptions, a substantial number of respondents¹⁰⁸ supported an initiative on this topic for the IESBA in the coming strategic term.
105. That said, there are differences of opinion on how long after full implementation of the new Code the post-implementation review should take place. Suggestions¹⁰⁹ included: 2-3 years, 2-5 years, 3-5 years, beyond 5 years, “not too quick.”
106. A few¹¹⁰ cited particular areas for post-implementation review, rather than the full Code, including: long association, NOCLAR, NAS, breaches.

B.13 – Meaning of Public Interest in the Global Context

Relative Rankings

Ranking	# Responses	Percentage	Excluding PAs in public practice	
			#	%
Highest ¹¹¹ priority (rated 1 or 2)	16	30%	8	27%
High ¹¹² priority (rated 3-4)	18	35%	14	46%
Priority ¹¹³ (rated 5-6)	18	35%	8	27%
Total	52	100%	30	100%

107. One regulator rated this as its highest priority, and one NSS as a high priority.
108. No investors or users of financial statements included this issue as a priority.
109. Ten of the twenty IFAC MBs rated this issue among their priorities.

¹⁰⁸ **Regulators:** FRC, SAC, SLAASMB; **NSS:** INTOSAI, IRBA; **FoF:** DTT, EY, HLB, Kreston, PKF; **Other PAPPs:** Individual 5, NGK; **IFAC MBs:** ACCA, CNCC, CSOEC, CPAC, FAR, ICAEW, ICAS, IDW, ICAIn, IMA, JICPA, MIA, SAICA, WPK; **PAIBs:** EN, Individual 7; **Others:** AE, ASSIREVI, EFAA, SMPC

¹⁰⁹ **Regulator** FRC; **NSS:** IRBA; **FoF:** CROWE, HLB; **IFAC MBs:** ACCA, ICAEW, HKICPA

¹¹⁰ **NSS:** APESB, NZAuASB; **FoF:** DTT

¹¹¹ **Regulator:** FRC; **FoF:** Kreston; **Other PAPPs:** M&M, TATA, VHR, Individual 11, Individual 23, ATF, RATS; **PAIBs:** ABTS, WOL, SHELL; **IFAC MBs:** ICAEW, ICPAU, NBA; **Other:** WAMAcO

¹¹² **CorpGov:** SHRF; **NSS:** INTOSAI; **FoF:** PwC, EY; **Other PAPP:** Individual 5; **PAIBs:** MAR, Individual 7, Individual 18; **IFAC MBs:** SAICA, HKICPA, JICPA, CzCA, ICAS; **Academic:** AUT; **Others:** Individual 2, Anonymous 1, Anonymous 5

¹¹³ **PAPPs:** AMK, BDRS, Deloitte-Austria, Individual 15, Individual 17, AGA, BSC, DWE, TRL, Individual 20; **PAIBs:** DNS, HSBC, Individual 24; **IFAC MBs:** IMA, KICPA; **Academics:** ASNA, MOTI; **Other:** SMPC

Common Themes among Respondents

110. Many¹¹⁴ respondents commented that this issue should be a priority, or they supported the proposal but did not specifically say “priority.” A few¹¹⁵ said that individual PAs do not understand the concept and it is not entirely clear in the Code. A few¹¹⁶ suggested that the Board define it in terms of integrity. There was also a suggestion that the term be defined but not too rigidly to maintain its relevance, combined with guidance.
111. Several respondents¹¹⁷ commented that this issue should be a “low” or “no” priority. Some¹¹⁸ preferred guidance materials or case studies. A few¹¹⁹ were of the view that it is not sufficiently relevant for IESBA to justify a project. Some¹²⁰ cited the difficulty in defining the term given different cultures and long-standing statutes.
112. Some commenters¹²¹ said that a project on the topic is not one for the IESBA to do on its own. Another point shared¹²² was that it would be difficult to come to a clear common view on a judgmental question.
113. A few¹²³ suggested that it might be best to write a discussion paper on the topic and invite comment.

Other Comments Raised within Section B

114. A number of respondents provided additional comments in the context of Section B for the Board's further consideration, including the following:
- That a substantial share of the Board's activities should be directed at seeking wider adoption and implementation of its standards and increasing outreach with key stakeholders.¹²⁴
 - Considering how the Board can support and complement IFAC activities directed at protecting and enhancing the reputation of the profession and its key services, including its valuable role in promoting sustainable growth and combating fraud and corruption.¹²⁵
 - The need to be careful that the Board's activities respond to global rather than national needs or the needs of a limited number of jurisdictions.¹²⁶

¹¹⁴ **Regulator** FRC; **NSS**: NZAuASB; **CorpGov**: SHRF; **FoF**: HLB, EY, PwC; **IFAC MBs**: HKICPA, ICAS, IMA, ICAIn, MIA, JICPA; **Other**: SMPC

¹¹⁵ **Regulator** SAC; **IFAC MBs**: ICAEW, ICAS

¹¹⁶ **PAIBs**: Individual 7, SHELL

¹¹⁷ **NSS**: APESB; **FoF**: DTT, PKF; **IFAC MBs**: ACCA, CNCC, CSOEC, FAR, WPK; **Others**: ASSIREVI, EFAA

¹¹⁸ **NSS**: IRBA; **FoF**: PKF; **IFAC MBs**: ACCA, SAICA

¹¹⁹ **IFAC MBs**: CNCC, CSOEC, IDW

¹²⁰ **FoF**: PwC; **IFAC MBs**: ICAIn, MIA; **Others**: EN, SMPC

¹²¹ **Regulator**: SSX, **PAIB**: Individual 2; **FoF**: PwC; **Others**: AE, SMPC

¹²² **FoF**: PwC; **IFAC MB**: KICPA

¹²³ **FoF**: CROWE; **Other**: SMPC

¹²⁴ **FoF**: DTT

¹²⁵ **IFAC MB**: WPK; **Other**: EFAA

¹²⁶ **IFAC MB**: IDW

- As a strategic consideration, articulating clearly the Board's "purpose" and "vision," recognizing the purpose of standard setting in the area of ethical behavior, together with the development of a supporting framework and operating principles. It was felt that this would assist the Board in achieving a common understanding, internally and externally, of the Board's role and objectives as a standard setter, and in making decisions about new work streams.¹²⁷

IV. Summary of Responses on Section C

115. The survey listed the following various A&I initiatives, among potentially others, the Board would consider prioritizing, particularly with respect to the restructured Code:

- Developing and executing a robust communication strategy.
- Pursuing a proactive stakeholder outreach agenda, including consideration of stakeholder feedback on the implementation of the restructured Code.
- Tracking and reporting on the progress of global adoption of the Code.
- Commissioning the development of appropriate staff publications in support of A&I.
- Pursuing cooperation opportunities with key stakeholders, including national standard setters (NSS), regulators and firms.
- Speaking out on ethics-related developments that have the potential to lead to greater divergence in standards, and seeking to influence debates towards greater international convergence.

116. Many respondents expressed support for these activities or initiatives.¹²⁸ Some¹²⁹ emphasized the importance of prioritizing outreach efforts, particularly regarding the newly restructured Code. Among those, a few were of the view that the focus of outreach activities should be on national authorities and IFAC MBs, particularly within the G20 and other major jurisdictions, to help them better understand the Code's requirements, to consider ethical rules set at the regional or local level, and to seek to understand why some jurisdictions do not adopt the Code.

117. Some¹³⁰ emphasized the importance of working towards greater international convergence. In this regard, there was support for tracking and reporting the progress in global adoption of the Code, and for more effective engagement with regulators to help facilitate understanding of views and needs. A few¹³¹ suggested that there is a need for research into why jurisdictions might not have adopted the Code or the latest version of the Code. There was a view that it is unlikely that those jurisdictions that have their own independence requirements at present would replace them with the Code. Accordingly, it was suggested that discussions with regulators in such jurisdictions should focus on their supporting the independence requirements in the Code for application to international divisions of domestic audits.

¹²⁷ **FoF:** PwC

¹²⁸ **NSS:** APESB; **CorpGov:** SHRF; **FoF:** BDO, Crowe, DTT, EY, KPMG, PwC; **IFAC MBs:** HKICPA, IDW, MIA, SAICA, WPK; **Other:** EFAA

¹²⁹ **Regulator:** FRC; **FoF:** DTT, EY; **PAIB:** NZOAG; **IFAC MB:** CPAC; **Other:** AE

¹³⁰ **FoF:** EY, KPMG; **IFAC MBs:** ICAEW, IDW, **Other:** SMPC

¹³¹ **IFAC MBs:** ICAEW, IDW; **Other:** SMPC

118. There were a few views¹³² that A&I guidance should focus on helping SMPs, and that the Board should proactively seek input from SMPs and SMEs, including through innovative ways such as micro surveys and focus groups.
119. Suggestions received for specific A&I activities included:
- Establishing a separate section on the IESBA website for A&I material and other useful tools, and webcasts on specific sections of the restructured Code.¹³³
 - More general communication on implementation matters, such as what other countries are doing with respect to A&I and what implementation guidance they are providing.¹³⁴
 - Proactively assessing, through an evaluation framework, whether changes to the Code are needed or whether the specific issues can be addressed through the principles, perhaps with additional guidance provided.¹³⁵
 - Further research to identify and understand the structure, presentation and content of ethical codes issued by other bodies and consider whether there are lessons to be learnt.¹³⁶
 - Releasing fact sheets, multimedia content and learning material alongside amendments to the Code.¹³⁷
 - Monitoring whether the Code remains suitable and acceptable for global application as opposed to being perceived as overly focused on the circumstances or needs of particular jurisdictions or stakeholders.¹³⁸
120. A respondent¹³⁹ was of the view that developing implementation support material is not within the Board's remit as a standard setter.

Matter for Consideration

2. Taking into account respondents' input, CAG Representatives are asked whether specific refinements need to be made to the strategy or related activities for A&I.

V. Summary of Responses on Section D

121. A number of specific comments were received on the various pre-existing commitments that were noted in the survey. These are summarized in Appendix C for the Board's consideration.

¹³² **FoF:** DTT; **Other:** EFAA

¹³³ **NSS:** APESB

¹³⁴ **IFAC MB:** SAICA

¹³⁵ **IFAC MB:** CPAC

¹³⁶ **Regulator:** FRC

¹³⁷ **NSS:** IRBA

¹³⁸ **Other:** SMPC

¹³⁹ **IFAC MB:** IDW

122. In addition, some more general comments were noted, including the following:

- Coordination with the IAASB as being essential and therefore needing to be prioritized.¹⁴⁰
- Not considering new standard-setting projects when the Board has so many pre-existing commitments to deliver.¹⁴¹
- Focusing post implementation reviews on the SMP/SME impact.¹⁴²

Matter for Consideration

3. CAG Representatives are asked to note the comments received on this section of the survey.

VI. Summary of Responses on Section E

123. Respondents were invited to indicate whether there are any other strategic matters they believe the Board should consider.

124. A variety of thoughts were expressed, including the following:

- Considering developing professional and ethical standards addressing specialized services not specifically addressed by the Code, for example, valuation services, forensic accounting, tax services, etc.¹⁴³
- Managing the rate of change to the Code to ensure stability for the users of the Code and those that regulate the accountancy profession, including considering a longer pause in new changes to the restructured Code.¹⁴⁴
- Making evidence-based decisions about new work streams where there is a real problem to solve or a need to make real and impactful improvements, and undertaking future standard-setting projects only after appropriate post-implementation reviews.¹⁴⁵
- Establishing only one set of independence standards for all assurance engagements on the grounds that there is no good reason to distinguish between audits and reviews on the one hand, and other assurance engagements on the other.¹⁴⁶
- Doing more to meet the needs of jurisdictions with sophisticated markets.¹⁴⁷
- Undertaking a project on enablers, i.e., the underlying characteristics such a “moral courage” that enable professional accountants to comply with the fundamental principles.¹⁴⁸

¹⁴⁰ **FoF:** Crowe, KPMG, PwC

¹⁴¹ **FoF:** DTT, HLB

¹⁴² **Other:** EFAA

¹⁴³ **NSS:** APESB

¹⁴⁴ **IFAC MBs:** CPAC, IDW, WPK; Other: EFAA

¹⁴⁵ **NSS:** IRBA; **FoF:** DTT

¹⁴⁶ **NSS:** NZAuASB.

¹⁴⁷ **Regulator:** FRC

¹⁴⁸ **IFAC MB:** ICAS

- Focusing on “stock-taking” activities to understand difficulties in practical application, or measures not delivering intended effectiveness and unintended consequences.¹⁴⁹

Matter for Consideration

4. CAG Representatives are asked to consider the input received and whether any of the suggestions from the respondents should be taken into account in formulating the future strategy.

¹⁴⁹ IFAC MB: IDW

Appendix A

List of Survey Respondents

#	Abbr.	Organization
REGULATORY AND AUDIT OVERSIGHT BODIES		
1.	FAOA	Federal Audit Oversight Authority (Switzerland)
2.	FRC	Financial Reporting Council (UK)
3.	SSX	Shenzhen Stock Exchange (China)
4.	SAC	Singapore Accountancy Commission
5.	SAIAL	Supreme Audit Institution of Albania
6.	SLAASMB	Sri Lanka Accounting and Auditing Standards Monitoring Board
INVESTORS		
7.	L&T	Larsen & Toubro (India)
8.	FUND	Fundacion ALL (Colombia)
9.	Individual 10	Umang Ghelani (India)
CORPORATE GOVERNANCE		
10.	SCHRF	Shroff Associates (India)
USERS OF FINANCIAL STATEMENTS		
11.	RELIG	Religare Finvest (India)
NATIONAL STANDARD SETTERS		
12.	APESB	Accounting Professional & Ethical Standards Board (Australia)
13.	INTOSAI	International Organization of Supreme Audit Institutions
14.	IRBA	Independent Regulatory Board for Auditors – Committee for Auditor Ethics (SA)
15.	NZAuASB	New Zealand Auditing and Assurance Standards Board
PAIBs – PREPARERS		
16.	ABTS	Asa Bhanu Technical Services, Ltd. (India)
17.	CITEC	Citec (India)
18.	DNS	DNS Associates (India)
19.	GIRNER	Girner Software Private Ltd. (India)
20.	GEN	Genpact India
21.	HMT	HMT Machine Tools Ltd. (India)
22.	Individual 16	Karthik Vasudevan (India)

#	Abbr.	Organization
23.	Individual 21	Shyam Sunder (India)
24.	Individual 24	Sagar Reddy (India)
25.	MAR	Margolis (South Africa)
26.	SHELL	Shell (India)
27.	WOL	Whitefields Overseas Ltd. (International)
PAIBs – OTHER		
28.	DA	Dhruva Advisors (India)
29.	EN	Epstein Nach LLC (USA)
30.	HSBC	HSBC Internal Audit (Hong Kong)
31.	Individual 7	Nahari Kousik (India)
32.	Individual 12	Samir Khisti (India)
33.	Individual 14	Varun Nair (India)
34.	Individual 18	Akshay Puri (India)
35.	Individual 25	Shruti Bhuwalka (India)
36.	NZOAG	New Zealand Office of the Auditor General
IFAC MEMBER BODIES¹⁵⁰		
37.	ACCA	Association of Chartered Certified Accountants (International)
38.	CPAC	CPA Canada – Public Trust Committee
39.	CzCA	Chamber of Auditors of Czech Republic
40.	CNCC / CSOEC	Compagnie Nationale des Commissaires aux Comptes and Conseil Supérieur de l'Ordre des Experts-Comptables (France)
41.	FAR	FAR (Sweden)
42.	HKICPA	Hong Kong Institute of CPAs
43.	ICAEW	Institute of Chartered Accountants in England and Wales (International)
44.	ICAI	Institute of Chartered Accountants of India
45.	ICAS	Institute of Chartered Accountants in Scotland (UK)
46.	ICPAU	Institute of Certified Public Accountants of Uganda
47.	IDW	Institut der Wirtschaftsprüfer (Germany)
48.	IMA	Institute of Management Accountants (International)

¹⁵⁰ Certain IFAC MBs hold the dual role of ethics standard setter in their jurisdictions.

#	Abbr.	Organization
49.	JICPA	Japanese Institute of CPAs
50.	KICPA	Korean Institute of Certified Public Accountants (South Korea)
51.	MIA	Malaysian Institute of Accountants
52.	NBA	Nederlandse Beroepsorganisatie van Accountants (Netherlands)
53.	SAICA	South African Institute of Chartered Accountants
54.	WPK	Wirtschaftsprüferkammer (Germany)
PROFESSIONAL ACCOUNTANTS IN PUBLIC PRACTICE (INCLUDING FIRMS¹⁵¹)		
55.	AAS	AA Siddiqui & Co. (India)
56.	ACA	AC Ankola & Associates (India)
57.	AGA	Ankush Garg & Associates (India)
58.	AKB	Anupam K. Bansal & Co. (India)
59.	AMK	Adiwise MK (India)
60.	ARIF	Mariya Arif & Co, Chartered Accountants (India)
61.	ATF	AT Folowosele (Nigeria)
62.	AXIS	Axis Auditing & Accounting (UAE)
63.	BDO*	BDO International Ltd
64.	BDRS	BDRS & Associates LLP (India)
65.	BSC	Bobby Sakariah & Co. (India)
66.	CROWE*	Crowe Horwath International
67.	DPB	DP Burad & Associates (India)
68.	DTT*	Deloitte Touche Tohmatsu (International)
69.	Deloitte-Austria	Deloitte (Austria)
70.	DWE	Dweik & Co. (Jordan)
71.	EYG*	Ernst & Young Global (International)
72.	FTH	FH Gulf (Saudi Arabia)
73.	HLB*	HLB International
74.	Individual 1	Geoff Andrews (The Bahamas)

¹⁵¹ FoF members are indicated with a *. The FoF is an association of international networks of accounting firms that perform transnational audits. Member of the FoF have committed to adhere to and promote the consistent application of high-quality audit practices worldwide, and to have policies and methodologies that conform to the Code and national codes of ethics.

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#	Abbr.	Organization
75.	Individual 3	CA R Rasiappan (India)
76.	Individual 5	Vijay Krishnan (International)
77.	Individual 8	Shivendra Andley (India)
78.	Individual 9	Ankit Jain (India)
79.	Individual 13	Abdul Kuddus Arbi (India)
80.	Individual 15	Prachi Tarika (India)
81.	Individual 17	Sagar Gambhir (India)
82.	Individual 19	Tushar Fafat (India)
83.	Individual 20	Ankita Chug (India)
84.	Individual 23	Elize Eloff (South Africa)
85.	KA	Khurdia & Associates (India)
86.	KAJ	Kaushik A. Joshi & Co. (India)
87.	KAR	Karmarkar & Co. (India)
88.	KPMG*	KPMG IFRG Ltd (International)
89.	Kreston*	Kreston International
90.	M&M	Mittal & Mittal (India)
91.	NGK	NGK & Associates (India)
92.	PG	Palkesh Gupta & Associates (India)
93.	PH	Pramod Hegde (India)
94.	PJM	P J Major, Chartered Accountants (New Zealand)
95.	PKF*	PFK International Limited
96.	PwC*	PwC (International)
97.	QUAL	Quality, CPAs (Palestine)
98.	QUES	Questus, Inc. (South Africa)
99.	R&S	Rathi & Shah (India)
100.	RATS	Reyada for Audit & Tax Services (Palestine)
101.	RCB	R.C. Bansal & Company (India)
102.	RGT	RG Tolani (India)
103.	RMUS	R M U S & Co. (India)
104.	ROOP	V S Roop & Associates (India)

#	Abbr.	Organization
105.	RSM*	RSM International
106.	SGC	S Gandhi & Co. (India)
107.	SRA	Singla Rahul & Associates (India)
108.	SRB	S.R. Batliboi & Co. (India)
109.	SRC	Shah Ravi & Co. (India)
110.	SSA	Shah Sangoi & Associates (India)
111.	TATA	Tata Projects Ltd. (India)
112.	TKS	TKS & Associates (India)
113.	TPS	TPS Consulting (India)
114.	TRL	TRL Narasimhan & Co (India)
115.	VHR	VHR&Co. Chartered Accountants (India)
116.	VKA	V K Asthna & Co. (India)
117.	VS	Vibhor Sharma (India)
ACADEMIA		
118.	ANSA	ANSA India Private Limited (India)
119.	AUT	Auckland University of Technology (New Zealand)
120.	Individual 6	Lavdeep Goyal (India)
121.	MOTI	Motivate Consulting and Training (UAE)
INDIVIDUALS & OTHERS		
122.	AE	Accountancy Europe (Regional)
123.	ASSIREVI	Associazione Italiana Revisori Contabili (Italy)
124.	EFAA	European Federation of Accountants and Auditors (Regional)
125.	SMPC	IFAC Small and Medium Practices Committee (International)
126.	Individual 2	Penny Egan (CEO, Cancer Council Tasmania) (Australia)
127.	Individual 4	Pranathari Haran (India)
128.	Individual 11	Rohit Kocher (India)
129.	WAMAcO	Wael Atawi (Sweden)
130.	Anonymous 1	Anonymous (International)
131.	Anonymous 2	Anonymous (New Zealand)
132.	Anonymous 3	Anonymous (International)

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#	Abbr.	Organization
133.	Anonymous 4	Anonymous (Belgium)
134.	Anonymous 5	Anonymous (India)

Appendix B

Geographic Background of Respondents

#	Country/Region	# Respondents
1.	International	19
2.	Regional	2
3.	Albania	1
4.	Australia	2
5.	Austria	1
6.	The Bahamas	1
7.	Belgium	1
8.	Canada	1
9.	China (mainland)	1
10.	Colombia	1
11.	Czech Republic	1
12.	France	1
13.	Germany	2
14.	Hong Kong SAR	2
15.	India	67
16.	Italy	1
17.	Japan	1
18.	Jordan	1
19.	Malaysia	1
20.	The Netherlands	1
21.	New Zealand	5
22.	Nigeria	1
23.	Palestine	2
24.	Saudi Arabia	1
25.	Singapore	1
26.	Sri Lanka	1
27.	South Africa	5
28.	South Korea	1

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#	Country/Region	# Respondents
29.	Sweden	2
30.	Switzerland	1
31.	United Arab Emirates	2
32.	Uganda	1
33.	UK	2
34.	USA	1
TOTAL		134

Appendix C

Summary of Respondents' Comments on Pre-existing Commitments

Pre-existing Commitment	Comments or Suggestions
NAS	<ul style="list-style-type: none"> Addressing specific NAS prevalent in many network firms, for example, transfer pricing services.¹⁵² Any Board initiative should be guided by the post-implementation reviews and evidence that the current provisions are not effective.¹⁵³ Addressing significant differences between the Code and the EU audit legislation.¹⁵⁴ Allowing sufficient time for implementation of the recent changes related to management responsibilities and the upcoming changes related to safeguards before embarking on a new project.¹⁵⁵ Considering whether additional NAS should be addressed, particularly those that are emerging or becoming more common as technology develops and innovations take place (e.g. provision of cyber security services and data analysis).¹⁵⁶ Rather than conducting further benchmarking, developing an analysis of the ethical issues, considerations and possible solutions, which could then be discussed with relevant stakeholders. In this regard, proposed initiatives B1 and B2 would be highly relevant and these should be aligned, including in terms of timing.¹⁵⁷
Fee-related Matters	<ul style="list-style-type: none"> There is a general need for additional guidance on fee-related matters to assist firms of varying size and which are at different stages in the business growth cycle.¹⁵⁸ No project should be pursued unless there is credible evidence that the fee matters result in significant threats to compliance with the fundamental principles.¹⁵⁹

¹⁵² **FoF:** BDO

¹⁵³ **FoF:** DTT

¹⁵⁴ **Regulator:** FRC

¹⁵⁵ **FoF:** KPMG

¹⁵⁶ **FoF:** PKF

¹⁵⁷ **FoF:** PwC

¹⁵⁸ **NSS:** APESB

¹⁵⁹ **FoF:** BDO, DTT, EY; **Other:** SMPC

Pre-existing Commitment	Comments or Suggestions
	<ul style="list-style-type: none"> • It is unlikely the Board would be able to obtain sufficient evidence to allow it to formulate a specific project in this area.¹⁶⁰ • Considering other factors that may have an impact on fees-related issues, e.g., the maturity of the profession in a jurisdiction, the sophistication of investors, the regulatory environment, whether there are governance processes mandated by law or regulation, etc.¹⁶¹ • In considering a response to issues (real or perceived) related to NAS and/or fees as well as the role of TCWG, taking a more holistic approach to consider the effect in totality of the various aspects and the impact they may have in addressing the issue.¹⁶² • Truly focusing on threats to independence and compliance with the fundamental principles vs. firm structures and commercial arrangements that have no or little bearing on independence, such as “the provision of audit services by a firm that also has a significant non-audit services business.”¹⁶³ • Reconsidering the commitment to look at fee-related issues or at least reviewing the proposed approach as the academic research that the Board commissioned did not identify any particular issues or concerns; but accepting that that some stakeholders have concerns about the ratio of NAS to audit fees, and therefore there may be merit in providing guidance in that area.¹⁶⁴ • The need to be mindful that requirements and perhaps even guidance could conflict with legislation, such as US anti-trust laws.¹⁶⁵
Long association post-implementation review	<ul style="list-style-type: none"> • Directing a significant amount of effort at seeking to understand the impacts of the long association provisions and planning what the Board’s response should be if jurisdictions have not responded in a way the Board expects by the time the “jurisdictional provision” no longer applies in 2023.¹⁶⁶ • Linking the final position to empirical evidence that audit quality is improved based on specific cooling-off periods.¹⁶⁷

¹⁶⁰ **FoF:** PwC; **IFAC MB:** ICAS

¹⁶¹ **FoF:** KPMG

¹⁶² **FoF:** KPMG

¹⁶³ **FoF:** PKF, PwC

¹⁶⁴ **FoF:** PwC

¹⁶⁵ **FoF:** PwC

¹⁶⁶ **FoF:** DTT

¹⁶⁷ **NSS:** APESB

Pre-existing Commitment	Comments or Suggestions
Professional skepticism	<ul style="list-style-type: none"> The importance for the Board to work with the IAASB on this topic, and the need to limit the Board's focus to ethical considerations.¹⁶⁸ The topic is part of a wider issue of ethical attributes that may be needed to comply with the fundamental principles.¹⁶⁹ Professional skepticism is a concept that applies to all PAs but accepting that there are difficulties in broadening the concept without managing the impact this might have on audits.¹⁷⁰
e-Code	<ul style="list-style-type: none"> Support for prioritizing an e-Code and its rollout.¹⁷¹ Including each Basis for Conclusion in an Appendix to the Code, or hyperlinked from each amended section or standard, to aid the reader with interpretation of the Code.¹⁷² The e-Code is primarily a matter for IFAC and IESBA staff, rather than the IESBA.¹⁷³ The need to continue to provide printed and PDF versions of the Code for translation and other reasons, even if the e-Code is developed and regarded as the official version.¹⁷⁴

¹⁶⁸ **Regulator:** FRC

¹⁶⁹ **IFAC MB:** ICAEW

¹⁷⁰ **IFAC MB:** NBA

¹⁷¹ **NSS:** INTOSAI; **FoF:** BDO, EY, KPMG; **IFAC MBs:** CPAC, FAR

¹⁷² **FoF:** DTT

¹⁷³ **IFAC MB:** ICAEW

¹⁷⁴ **IFAC MB:** JICPA