

July 7, 2023

The International Ethics Standards Board for Accountants
529 5th Avenue
New York
New York 10017

RESPONSE TO EXPOSURE DRAFTS – Consultation Paper: Proposed IESBA Strategy and Work Plan, 2024 – 2027 towards a more Sustainable Future: Advancing the Centrality of Ethics

Strategic Drivers, Themes and Actions

1. Do you agree with the IESBA's *Proposed Strategic Drivers* (see pp. 9-13)?
Response: Yes, we agree with the IESBA's *Proposed Strategic Drivers* described in the document.
2. Do you agree with the IESBA's *Proposed Strategic Themes and Proposed Strategic Actions* (see pp.13-18)?
Response: We agree with the IESBA's *Proposed Strategic Themes and Proposed Strategic Actions* as described in paragraphs 13-18 of the document.
We believe that the Strategic Drivers are consistent and comprehensive with the Themes and the Strategic Actions will ensure their realization.

Proposed Work Plan for 2024 – 2027

3. Do you support the IESBA considering the topics set out in Table B as potential work streams (see pp. 22-24)?
If so, please also share your views on any specific issues or questions you believe the IESBA should consider under these topics.
If not, please explain your reasons.
Response: Yes, we support the topics as listed in Table B and we do believe that IESBA should consider those areas.
On the additions to the items in Table B, IESBA should consider the impact of Human Resource Mobility on Professional Accountants in terms of the confidentiality of information that they have gathered on organizations.
4. Do you believe the IESBA should accelerate or defer any particular ongoing, potential or pre-committed work stream(s) set out in Tables A, B and C? Please explain your reasons.
Response: We believe in the planned timing of those projects. We agree with the project and the work plan.
We don't think any of them should be deferred or accelerated to avoid undue pressure on anyone. We have no problem with the projects as planned. Nothing comes to mind that makes us think that any of them should be accelerated or deferred. Also, given the demand for resources, we are comfortable with the work plan.

5. Are there other topics the IESBA should consider as potential new work streams? If so, please indicate whether these topics are more important than the topics identified in Table B (see pp.22-24), and the needs and interests that would be served by undertaking work on such topic(s).

Response: We think that the Board considers the impact of Human Resource Mobility in the workplace on ethics and confidentiality. We do not think that this workstream is necessarily more important than any of the topics identified in Table B, but we think that it is a relevant matter for the Board to consider given the trend and increase in mobility among professionals, both professionals in practice and professional accountants in business and see if there is any standard that can be developed to address it.

Additional Information

6. The IESBA's proposed Strategy and Work Plan emphasizes the importance of close coordination with its sister Board, the IAASB. Do you have views or suggestions as to how coordination between the IESBA and IAASB could be enhanced to better serve the public interest?

Response: With the workstream, we already see that there will be alignment in outcomes between the expectation of the IESBA code and the IAASB standards. We don't have anything to add to that because we already think that the workstream is working to align the definition of terms and description of terms between the Code and the IESBA's standard. We already have an alignment in terms of the expected outcome of the implementation of both the Codes and the Standards.

We have no further areas to suggest.

7. Do you have comments on any other matters addressed in this Consultation Paper or any significant matters not covered that you believe the IESBA should consider in finalizing the SWP 2024 – 2027?

Response: No further comment other than as stated in our response to (5) above.

Please do not hesitate to contact us if you need further clarifications.

Yours faithfully,



PROF AHMED M. KUMSHE
REGISTRAR/CHIEF EXECUTIVE