

2. (untitled)

1. From which perspective are you providing this feedback? [* Required where indicated]

Other, please specify:: Accountancy Europe

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2. In which country or jurisdiction do you or your organization work or serve? (If international, please indicate so; if a region of the world, please indicate which region)

If country, please select country?

OR if a region of the world, please indicate which region:

OR if international, please indicate by ticking the box:

International

3. (untitled)

B.1 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

B.2 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

B.3 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

We agree that this topic should be prioritized. The regulatory environment has moved from listed/non-listed entities to PIE/non-PIE ones and IESBA needs to assess what this means for the International Code of Ethics.

B.4 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

We do not think that CIVs are a topical issue for IESBA. The regulatory requirements of these structures are different from jurisdiction to jurisdiction, it will therefore be complicated to be addressed properly in an international Code.

B.5 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

This topic is high on the agenda in the European Union. Discussions are taking place at the European Commission's level for the moment on different measures. IESBA should follow the debate, promote the existing fundamental principles in light of that debate and consider whether in this respect the issuance of further guidance is warranted. We do, however, believe that current requirements within the Code are sufficiently addressing the issue.

B.6 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

We agree that it will be useful for IESBA to look at the concept of materiality, and the one of significance. IESBA should look at whether clarification is needed in terms of how these concepts are currently used. The meaning of each of these concepts should be clear and their respective use should be consistent throughout the Code. Where materiality is identified as a concept to be kept in the Code - for instance in the independence section where materiality is a quantitative criterion with respect to financial interests in a client – the definition should be aligned with the one used by the IAASB. However, we do not think that IESBA should develop its own definition of materiality.

B.7 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

We acknowledge that communication with those charged with governance is important given the good impact it has on audit quality. It should be encouraged and promoted as best practice, in particular in those situations where TCWG are independent from management.

Nevertheless, given the diversity of legal frameworks around the world, we do not believe that it is up to IESBA to address this topic further in its International Code of Ethics.

B.8 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

In the independence section, there are some requirements to document. Documentation is an important means used by the auditors to demonstrate how professional judgement has been exercised. In this respect, the requirement to document is acceptable in terms of independence standards.

Furthermore, documentation plays an important role in the PA's own interest and, where applicable, should therefore be encouraged. IESBA should, however, not introduce new documentation requirements such requirements may not be in line with a principle based Code and will not be applicable to the compliance with the fundamental principles (for instance integrity) as these do not provide room for documentation.

B.9 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

The restructured Code covers this matter sufficiently; hence there is no need for an additional guidance in the Code on this issue.

4. (untitled)

B.10 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

See our comment from previous comment letter on structure of the Code (phase 1) and in particular our

response to question 3: "[...] Regarding R100.4, which corresponds to 100.10 of the extant Code, we question the move of this paragraph to the Introduction of the Code. It should be included in section 110 as it is a requirement for professional accountants. In addition, this is a good opportunity to introduce a reference to actions to stop the breach. Today, the professional accountant is required to address the consequences of the breach and determine whether to report the breach, but no specific action must be taken to stop the activity that causes the breach."

When commenting on the structure of the Code (phase 1), we identified a need to adapt R100.4 and to include a reference to actions to stop the breach as it was evident that this was missing. We thought that it was a good opportunity to adapt the text in a meaningful way. Except of this adaptation, we do not think that this deserves a wider project for IESBA.

B.11 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

The alignment with the other standard-setting boards – and in particular with the IAASB – in terms of terminology would be useful. We refer to our comment on materiality in this regard.

B.12 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

This strategic objective is very sensible and should be done in a couple of years after effective implementation date.

B.13 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

We agree it may be a subject matter for wider public – for instance for all standard-setting boards, and potentially with other stakeholders – but not for the IESBA board on its own.

Are there any trends, developments or issues not otherwise covered in this section that you would rank in your top six priorities? If so, please explain why.

We consider that none of these projects are urgent. We support IESBA for doing a pause to allow proper adoption and implementation of the restructured Code.

Please rank your top six priorities among items B.1 to B.13 above (1 being highest and 6 being lowest).

1. B.12 Post-implementation review of the restructured Code
2. B.3 Concepts of “public interest entity” and “listed entity”
3. B.1 Trends and developments in technology and innovation
4. B.2 Emerging or newer models of service delivery
5. B.6 Materiality
6. B.5 Tax planning and related services

5. (untitled)

C.1 Do you have any comments on any of the above activities or initiatives? In particular, do you believe any of them should not be a strategic priority for the IESBA and, if so, why? Please be as specific as possible.

We encourage IESBA to increase its outreach efforts and to consider the ethical rules set at regional or local level - in the European Union for instance. We are concerned that, for some countries, it will be challenging to implement the IESBA Code due to alternative provisions they need to comply with. It is very

important that IESBA ensures consistency between the existing requirements and the restructured Code.

C.2 Are there any specific activities or initiatives you believe the IESBA should undertake to promote further adoption and more effective implementation of the Code? If so, please explain why.

6. (untitled)

D.1 Are there any particular matters you believe the IESBA should consider in relation to any one of these pre-existing commitments? Please be as specific as possible and explain your reasoning.

7. (untitled)

Section E: Any Other Strategic Matters

E.1 Are there any other matters of strategic importance not covered elsewhere in this survey or your earlier responses that you believe the IESBA should consider as it positions the Code for 2025? Please be as specific as possible.

8. (untitled)

3. Please confirm that you have completed all your responses?

Yes