



CHARTERED ACCOUNTANTS™
AUSTRALIA + NEW ZEALAND

8 July 2022

Mr Ken Siong
Senior Technical Director
International Ethics Standards Board for Accountants (IESBA)
International Federation of Accountants (IFAC)
529 5th Avenue, 6th Floor
New York, New York 10017 USA

Submission by email: kensiong@ethicsboard.org

Dear Ken

IESBA Strategy Survey 2022.

Chartered Accountants Australia and New Zealand (“**CA ANZ**”) appreciates the opportunity to provide comment on the IESBA’s Strategy Survey 2022 regarding areas of priority and focus for the IESBA during the period 2024-2027.

Our detailed responses to the survey questions are provided in survey instrument which is included as a PDF attachment to this letter.

We commend the IESBA for consulting on the forward strategy and for recognising the complexities which are emerging in the profession such as, responding to developments relating to the reporting and assurance of sustainability information.

We encourage the IESBA and the IAASB to call on their preeminent reputation in standard setting in order to play an integral role in charting the direction for the future of assurance in sustainability reporting.

The **Appendix** provides more information about CA ANZ. Should you have any questions about the matters raised in this submission or wish to discuss them further, please contact Josephine Haste CA, josephine.haste@charteredaccountantsanz.com.

Yours sincerely

Simon Grant FCA
Group Executive
Advocacy and Professional Standing

Appendix

About Chartered Accountants Australia and New Zealand

Chartered Accountants Australia and New Zealand (CA ANZ) represents 131,673 financial professionals, supporting them to make a difference to the businesses, organisations and communities in which they work and live. Chartered Accountants are known as Difference Makers. The depth and breadth of their expertise helps them to see the big picture and chart the best course of action.

CA ANZ promotes the Chartered Accountant (CA) designation and high ethical standards, delivers world-class services and life-long education to members and advocates for the public good. We protect the reputation of the designation by ensuring members continue to comply with a code of ethics, backed by a robust discipline process. We also monitor Chartered Accountants who offer services directly to the public.

Our flagship CA Program, the pathway to becoming a Chartered Accountant, combines rigorous education with mentored practical experience. Ongoing professional development helps members shape business decisions and remain relevant in a changing world.

We actively engage with governments, regulators and standard-setters on behalf of members and the profession to advocate boldly in the public good. Our thought leadership promotes prosperity in Australia and New Zealand.

Our support of the profession extends to affiliations with international accounting organisations.

We are a member of the International Federation of Accountants and are connected globally through Chartered Accountants Worldwide and the Global Accounting Alliance. Chartered Accountants Worldwide brings together members of 15 chartered accounting institutes to create a community of more than 1.8 million Chartered Accountants and students in more than 190 countries. CA ANZ is a founding member of the Global Accounting Alliance which is made up of 10 leading accounting bodies that together promote quality services, share information and collaborate on important international issues.

We have a strategic alliance with the Association of Chartered Certified Accountants. The alliance represents more than 870,000 current and next generation accounting professionals across 179 countries and is one of the largest accounting alliances in the world providing the full range of accounting qualifications.

We employ more than 500 talented people across Australia, New Zealand, Singapore, Malaysia, Hong Kong and the United Kingdom.

IESBA Strategy Survey 2022

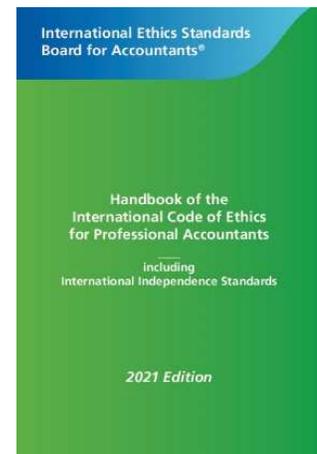


Survey on the IESBA's Future Strategy and Work Plan

About the IESBA

The [International Ethics Standards Board for Accountants](#) (IESBA) is an independent global standard-setting board. The IESBA's mission is to serve the public interest by setting ethics standards, including auditor independence requirements, which seek to raise the bar for ethical conduct and practice for all professional accountants through a robust, globally operable [International Code of Ethics for Professional Accountants \(including International Independence Standards\)](#) (the Code).

The IESBA believes a single set of high-quality ethics standards enhances the quality and consistency of services provided by professional accountants (PAs), thus contributing to public trust and confidence in the accountancy profession. The IESBA sets its standards in the public interest with advice from the IESBA Consultative Advisory Group (CAG) and under the oversight of the Public Interest Oversight Board (PIOB).



About the Survey

This survey seeks views from stakeholders on key environmental trends, developments or issues the IESBA should consider as it begins the process of developing its next Strategy and Work Plan (SWP) for the period 2024 – 2027.

This survey comprises three sections:

[Section A – Demographic information about the respondents](#)

[Section B – Strategic direction and priorities](#)

[Section C – Possible future standards-related projects or initiatives](#)

Respondents are asked to provide views or suggestions in response to the questions in Sections B and C. If a respondent has no response to a particular question, the respondent may skip that question. Respondents' submissions will be made available on the IESBA's website after the close of the survey.

This survey is the first step in the IESBA seeking input from its stakeholders as part of the due process for developing its SWP. Following a full review of the input received, the IESBA will develop a consultation paper on its SWP 2024-2027, including its proposed strategic themes, priorities and work plan.



The IESBA anticipates approving the SWP consultation paper for public comment in Q1 2023. Respondents will have an opportunity to comment on a full description of the IESBA's proposed strategic direction and future work plan when it issues its SWP consultation paper.

Responses to the survey are requested by Friday, July 8, 2022.

Section A: Demographic Information

Personal and organizational information

Your name: Simon Grant

Your Organization (if applicable): Chartered Accountants Australia and New Zealand

Your role: Group Executive – Advocacy and Professional Standing

Email address: Simon.Grant@charteredaccountantsanz.com

Stakeholder Group

Please specify the stakeholder you/your organization represents

- Academia
- Accounting/Audit firm or network
- Audit oversight body
- IFAC member body or other professional accountancy organization
- Investor or analyst
- National standard setter
- Other users of financial statements/Environmental, Social and Governance (ESG) information (e.g., customer, creditor/supplier, lender), please specify: _____
- Preparer of financial statements/ESG information
- Firm (other than an accounting/audit firm) that provides assurance on ESG information
- Public sector
- Regulator
- Those charged with governance
- Other, please specify: _____

Geographical location

Please specify the geographical region where you or your organization is based:

- Global
- Africa-Middle East
- Asia
- Oceania
- Europe
- Latin America
- North America

Section B: Strategic Direction and Priorities

BACKGROUND

In the aftermath of the global financial crisis of 2008-2009, public expectations rose significantly for more robust regulatory supervision and oversight of, and a higher bar of ethical behavior for, financial and corporate professionals alike.

In response to those heightened expectations, the IESBA took steps to significantly strengthen the Code through the release of the revised and restructured Code in 2018. The revisions, amongst other matters, enhanced the conceptual framework for identifying, evaluating and addressing threats to compliance with the fundamental ethical principles and, where applicable, to independence, including the safeguards-related provisions of the Code; strengthened the provisions relating to inducements; introduced a new standard on addressing pressure to breach the fundamental principles; strengthened the independence standard addressing long association of audit firm personnel with an audit client; and introduced a new standard on responding to non-compliance with laws and regulations (NOCLAR). At the same time, the IESBA took decisive action to restructure the Code to enhance its usability and accessibility.

With the revised and restructured Code in place, the IESBA released its current [SWP](#) (2019-2023) in April 2019, setting out three strategic themes:

Working to advance these three strategic themes, the IESBA continued to place a high priority on strengthening the International Independence Standards (IIS). So far, within this strategy period, the IESBA has issued revised standards containing strengthened provisions addressing the permissibility of [non-assurance services](#) (NAS) to audit clients, and [fee-related matters](#). These enhanced

provisions focus particularly on public interest entities (PIEs) in light of stakeholders' heightened expectations regarding independence with respect to the audits of the financial statements of these entities. At the same time, responding to stakeholder concerns about the need to ensure that the appropriate entities are scoped in as PIEs and working closely with the International Auditing and Assurance Standards Board (IAASB), the IESBA also recently finalized an expanded definition of a PIE to include more mandatory categories of entities as PIEs. These projects were supported by the vast majority of stakeholders, recognizing that they addressed a number of important issues in the public interest.

Since the release of the restructured Code in 2018, the IESBA has also worked closely with the International Federation of Accountants (IFAC) to promote adoption and implementation of the Code through various activities including the publication of awareness-raising materials, global webinars and outreach to stakeholders. To coincide with the effective date of the restructured Code and to make the Code even more accessible and easier to navigate, the IESBA launched the eCode in 2019 in collaboration with IFAC. The eCode is now part of the electronic International Standards ([eIS](#)) platform developed by IFAC.

IESBA SWP 2019-2023 STRATEGIC THEMES

Advancing the Code's Relevance and Impact through (i) maintaining a global Code fit for purpose in the evolving environment; and (ii) further raising the

Deepening and Expanding the Code's Influence through increasing global adoption and effective implementation of the Code

Expanding the IESBA's Perspectives and Inputs through proactively engaging and seeking cooperative avenues with stakeholders

As the IESBA begins to contemplate its strategic direction for the new SWP and develops the next cycle's work plan, it will take into account the new organizational structure, governance and processes that will be implemented for both the IESBA and the IAASB over the next few years as a result of the Monitoring Group's (MG) July 2020 recommendations, [Strengthening the International Audit and Ethics Standard-Setting System](#).



The MG recommendations aim to support and enhance the development of high-quality auditing and ethics standards by the two Standard Setting Boards (SSBs) through the achievement of a multi-stakeholder structure, reinforcement of public interest considerations within the standards development process, and enhanced responsiveness to an accelerating pace of change.

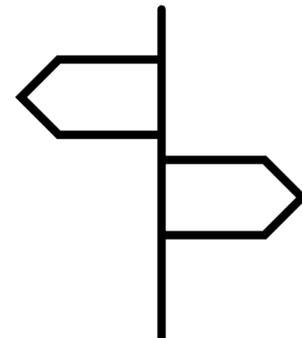
The MG recommendations also reinforce the importance of close coordination between the IESBA and the IAASB on topics within their respective strategic work plans that are of mutual interest. With this in mind, the IESBA is proposing to align the period of its next SWP with that of the IAASB's next SWP, i.e., the four-year period 2024-2027. Within their agreed framework of coordination, the two SSBs will also work closely to identify future projects or work streams that address topics or issues that overlap their standard-setting remits. Such coordination will enable the IESBA and the IAASB to deliver global standards that are consistent with each other and interoperable.

POTENTIAL STRATEGIC FOCUS AREAS

The IESBA will prioritize a range of longer-term and shorter-term projects or initiatives that it believes would best support the strategic themes for its next SWP, balancing factors such as the benefits to the public interest, the pervasiveness of the particular matters, global operability and relevance, the degree of urgency and resources available. During the strategy period, the IESBA will also consider whether any new developments in the external environment, or issues arising from existing work streams or identified by the Public Interest Oversight Board (PIOB) or stakeholders, call for a reassessment of its strategic priorities.

For purposes of this survey, the IESBA is seeking stakeholders' views on the following four broad strategic focus areas that may help guide the IESBA in setting the direction and priorities for its new SWP 2024-2027:

1. [Responding to developments relating to reporting and assurance of sustainability information](#)
2. [Raising the bar of ethical behavior for professional accountants in business](#)
3. [Strengthening independence standards for audit engagements](#)
4. [Promoting timely adoption and effective implementation of the Code](#)



1. Responding to developments relating to reporting and assurance of sustainability information

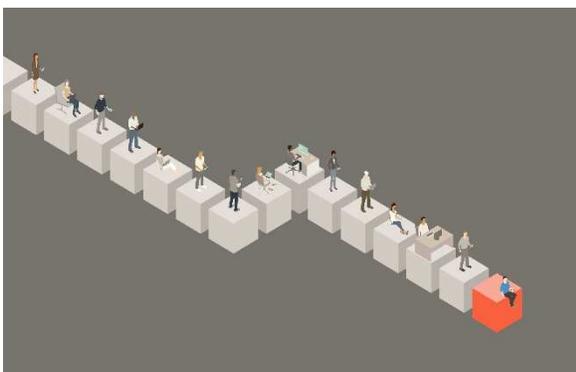
Backdrop

Over the last few years, financial markets have seen an accelerated growth in the disclosure of sustainability information driven largely by a major shift in investors' capital allocation to businesses perceived as more sustainable, viewed through the environmental, social and governance (ESG) prism. Along with the market demand for more sustainability data, there has been an increasing call for assurance to be provided on such information. Regulators in a number of major jurisdictions are prioritizing as a matter of urgency the development of new regulations governing sustainability disclosures and assurance thereon. Further, in November 2021, the IFRS Foundation established the new International Sustainability Standards Board (ISSB) to develop IFRS Sustainability Disclosure Standards. On March 31, 2022, the ISSB issued its first two proposed standards, one setting out [general sustainability-related disclosure requirements](#), and the other specifying [climate-related disclosure requirements](#).

These developments respond to a rapidly evolving landscape where there is a high degree of fragmentation and inconsistency in terms of frameworks and standards for sustainability reporting, levels of assurance provided and who is engaged to provide such assurance.¹ As market demand for sustainability information continues to expand rapidly, there is a pressing public interest need to ensure that such information is reliable and comparable, and therefore subject to assurance.

Role of the Accountancy Profession

The accountancy profession stands to play a major role in the sustainability reporting supply chain and the provision of assurance on sustainability information. The profession brings to this domain its wide and deep competencies in the preparation and presentation of information and the provision of assurance thereon. Most importantly, public trust in the profession in those crucial roles for sustainability is underpinned by the robust and global ethics standards by which it must abide.



Starting with the sustainability reporting supply chain, the IESBA believes it is essential that it gathers a full understanding of the various roles and responsibilities of professional accountants in business (PAIBs) in this supply chain. This understanding will inform a thorough assessment of whether Part 2 of the Code, which sets out provisions specific to PAIBs, remains comprehensive, adequate and fit-for-purpose with regards to sustainability reporting. As a case in point, while the role of a CFO can be expected to draw on a PAIB's skills and expertise in financial reporting or

management accounting, it may also be evolving rapidly into a more dynamic, more complex "mission control" role requiring orchestration, coordination and oversight of the information supply lines across the multi-disciplinary and interconnected ESG ecosystem.

¹ See [The State of Play in Sustainability Assurance](#), a global benchmarking study published in June 2021 by IFAC, AICPA and CIMA.

Turning to the assurance side, the IESBA recognizes that the Code (including the International Independence Standards (IIS) contained in Part 4B²) already applies to accounting firms that perform assurance engagements in accordance with the IAASB's International Standard on Assurance Engagements (ISAE) 3000 (Revised).³ However, the IESBA acknowledges that the major shift towards sustainability reporting and assurance has raised a number of questions regarding the robustness and sufficiency of the IIS in Part 4B. Some of these questions include, for example, whether there is a need to consider the relevance of the PIE concept as it applies to assurance engagements related to sustainability information, the independence provisions that should apply to network firms and other firms participating in such engagements, the meaning of materiality where sustainability regulation or standards require its consideration beyond traditional financial statement materiality, and independence provisions that should apply to external experts involved in sustainability assurance engagements.

Anticipating the need to act promptly, the IESBA established a Sustainability Working Group in Q1 2022 to begin fact finding work on sustainability reporting and assurance. While the IESBA recognizes the need to move with a sense of urgency and will continue to monitor any global regulatory and standard-setting developments in this regard, it also believes the fact-finding work must precede, and will help circumscribe the scope and direct the focus of, any standard-setting work in order to achieve the greatest possible impact. The IESBA envisages that this fact-finding work will be completed within the current strategy period. The IESBA will then determine the timing of any new standard-setting work based on the recommendations of its Sustainability Working Group and in consultation with the IESBA CAG and the PIOB.

At the same time as the Sustainability Working Group earnestly lays the groundwork for the IESBA's standard-setting response in the sustainability area, the IESBA has also commissioned IESBA Staff to develop non-authoritative guidance to highlight the relevance and applicability of the Code in relation to a number of ethics and independence concerns in relation to PAs' involvement in sustainability reporting and assurance. One such concern is the reporting of information that gives a false or misleading impression about how well a business or investment aligns with its sustainability goals ("greenwashing").

More broadly, as the IAASB is prioritizing its own focus on sustainability assurance, the IESBA will coordinate closely with the IAASB on any standard-setting work so that matters of mutual concern to the Boards' stakeholders are addressed promptly and the Boards' standards will be mutually consistent and interoperable. An important area of focus will be to understand the IAASB's approach to developing any new standards addressing sustainability assurance as this might impact the extent and direction of the IESBA's own standard-setting work. Further, the IESBA will prioritize engagement and dialogue with the International Organization of Securities Commissions (IOSCO) and other relevant international bodies as well as regulatory bodies in major jurisdictions, including the EU and major G20 countries, that are developing or actively considering policies or regulations addressing sustainability reporting and assurance.

Beyond assurance, there is also a need to consider the evolving nature and growing extent of the advisory services PAPPs are providing to entities as those entities respond to market pressures for more transparency about their sustainability goals, key performance indicators and accountability metrics.

² Part 4B of the Code addresses independence for assurance engagements other than audits and reviews of financial statements. In January 2020, the IESBA issued revisions to Part 4B to align its provisions with the revised assurance terms and concepts in ISAE 3000 (Revised).

³ ISAE 3000 (Revised), *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*

Involvement of Other Assurance Service Providers

Given the IESBA's expectation that PAs will play a major role in sustainability reporting and assurance, the IESBA envisages that a large part of its standard-setting work under the new SWP will be focused on maintaining the robustness and relevance of the Code's ethics and independence provisions as these apply to PAs. The IESBA, however, recognizes that there is a wide range of professional firms outside of the accountancy profession that are providing assurance services with respect to sustainability information. This diversity of assurance service providers reflects not only the reality that sustainability reporting covers a much wider spectrum of disciplines and topics than financial information, but also the fact that regulations continue to lag behind the natural demand-supply evolution of sustainability reporting and assurance. Further, regulations being developed in some major jurisdictions expressly contemplate that the market for sustainability assurance services will not be limited to providers within the accountancy profession. This is part of a broader trend away from a provider-centered regulatory approach towards a service-centered one.

ISAE 3000 (Revised) is designed to support the performance of assurance engagements by all providers of assurance services including PAs in public practice (PAPPs). Whilst the Code governs PAPPs ethical conduct or independence on assurance engagements, it appears that there are currently no comprehensive or globally accepted standards that govern the ethical conduct or independence of these other assurance service providers, or standards as comprehensive as those in the IESBA Code.⁴ Accordingly, the IESBA recognizes that there is an open question as to whether the public interest will be better served if the scope of the Code — as a body of ethics (including independence) standards that is already globally recognized and trusted — were to be enlarged to cover assurance service providers that are not PAPPs. Underpinning this question, which appears simple but might have complicated ramifications and far-reaching consequences, is a proposition that is difficult to challenge from a public interest perspective, namely that all providers of sustainability assurance services should be held to the same high ethics (including independence) standards, regardless of the profession to which they belong. One ramification for the Code if its scope were to be expanded along those lines is whether its provisions should cover other providers outside of the accountancy profession who supply similar services provided by individual PAIBs or PAPPs, such as tax planning and related services.



In posing the question of whether there would be merit in broadening the scope of the Code, the IESBA is not prejudging what the final answer should be, or how such a scope enlargement might be achieved,⁵ but merely seeking thoughts and reactions from stakeholders as to how compelling this proposition would be from a public interest perspective. The IESBA recognizes that a related fundamental question is how to achieve the authority of binding standards for non-PAs and the associated need for enforcement. In this

⁴ ISAE 3000 (Revised), paragraph 20, requires the practitioner to comply with the provisions of the IESBA Code related to assurance engagements, or other professional requirements, or requirements imposed by law or regulation, that are at least as demanding. However, the Code currently applies only to PAs.

⁵ This survey is not seeking to open a broad discussion on the mechanisms for achieving a scope enlargement for the Code. This is a matter the IESBA would explore more fully as part of a separate work stream if it determined there was sufficient ground and stakeholder support to proceed with developing this notion of scope enlargement in more concrete terms.

regard, the IESBA sees that there would be a clear need for the support of, and complementary action by, the regulatory community.

1. ***What level of importance do you believe the IESBA should place on dedicating strategic focus to responding through standard-setting action to the developments in sustainability reporting and assurance its next strategy period (2024-2027)?*** Please be as specific as possible and explain your reasoning.

We strongly support the IESBA conducting a review of the Code for this purpose. It is important that the Code is subject matter agnostic, i.e., that it can be used for preparing and assuring a variety of subject matters, including sustainability-related information. A principles-based Code with universal applicability achieves this purpose. We do not believe that the Code should specifically refer to or address sustainability reporting and assurance as this is inconsistent with a principles-based approach and may result in further revisions to the Code being required for other subject matters. We welcomed the IESBA's announcement on [13 June](#) regarding the priority placed on sustainability reporting and assurance.

2. ***Do you believe the IESBA should explore the concept of expanding the scope of the Code to cover assurance service providers other than PAPPs? What preconditions would need to be in place and what potential challenges or drawbacks do you foresee if the Code's provisions were scoped to the nature of the assurance services provided as opposed to who is providing the assurance services?***

This is a highly complex matter for the IESBA to consider. We believe it is important for the IESBA to be closely involved in the development of sustainability reporting and assurance standards so that;

- (1) PAs are not disadvantaged by competitors applying less robust standards,
- (2) PAs are not required to comply with a multitude of similar standards increasing their regulatory burden,
- (3) that users are not relying on poor quality reporting due to preparers or assurance providers applying less rigorous or weaker standards, and
- (4) Global comparability in reporting and assurance is achieved through the consistent application of one core set of standards.

The IESBA should act with urgency in this matter as developments and regulation in sustainability reporting and assurance are happening at pace across the globe and local regulators are already enacting legislation to require application of our standards by non accountants. For example, from 1 January 2023 climate reporting entities in New Zealand, have a statutory requirement to prepare climate statements and obtain assurance over their greenhouse gas emissions disclosures. Professions permitted to conduct this work are not limited to PAs, however the assurance engagement must comply with applicable auditing and assurance standards issued by the National Standard Setter. These applicable standards include the Code. A similar approach is adopted in Australia with applicable auditing and assurance standards including a cross-reference to the Code, in effect creating a requirement for the Code to be complied with when applying these Standards by professionals other than PAs.

There are several challenges both known and unknown at this stage including;

- The Code is specifically drafted for PAs and therefore may lack the ability to be more widely applied. Making large changes to the Code may disrupt use of, and compliance with, the Code by PAs.
- Application of the Code is monitored and enforced by the PAs professional association membership. This monitoring and enforcement process will not apply to practitioners who are not members of a professional association or who are members of a professional association other than an accounting professional association.
- PAs providing assurance are required to have a substantial system of quality management designed and implemented, other professionals will not have this requirement.
- Engaging and seeking feedback from a broad spectrum of potential users will be time consuming and potentially unwieldy.

We would welcome working with the IESBA to develop a response to this significant change facing the accounting profession and business community.

3. Are there other matters the IESBA should consider with regards to this strategic focus area?

Our comments are included in answers to questions 1 and 2.

2. Raising the bar of ethical behavior for professional accountants in business

The IESBA sees another potential area of strategic focus is raising the ethical bar for PAIBs beyond issues of sustainability reporting. Over half of the world's PAs are PAIBs working on their own or in organizations other than public accounting practices. PAIBs are a very diverse constituency, and can work as employees or consultants in commerce, industry, education, and the public and not-for-profit sectors. Many are in a position of strategic or functional leadership, or are otherwise well-placed to collaborate with colleagues in other disciplines to help their organizations toward long-term sustainable success.

Given that many PAIBs play a fundamental role in the financial reporting supply chain and facilitate effective governance in organizations, it is in the public interest that the provisions of the Code applicable to PAIBs are appropriate and robust. During the previous strategy period, the IESBA completed a two-phase project that significantly enhanced the Code's provisions relating to the ethical behavior of PAIBs. The enhancements included revisions to the provisions on inducements and the preparation and presentation of information, as well as a new standard on dealing with pressure to breach the fundamental principles.



As part of the current strategy period, the IESBA has introduced new provisions in the Code that promote the role, mindset and behavioral characteristics expected of all PAs when performing their professional activities. The IESBA has also issued for exposure [proposed technology-related revisions](#) to Part 2 of the Code which applies to PAIBs. In addition, the IESBA has a separate [working group](#) that is carrying out fact finding to further understand the broader technology environment, including the ethical implications for PAs of developments such as blockchain, cybersecurity and cloud-based services.

4. Beyond sustainability reporting which is covered under the first strategic focus area above, do you believe the IESBA should dedicate strategic focus on further raising the bar of ethical behavior for PAIBs in its next strategy period (2024-2027)? Please be as specific as possible in terms of specific trends, developments, or issues⁶ and explain your reasoning.

We are supportive of the IESBA dedicating strategic focus to further raising the bar of ethical behaviour for PAIBs. While there are already comprehensive provisions in the Code for PAIBs, there is also a need for these to be regularly revisited to ensure they are consistent with evolving expectations. The recent major IESBA projects have focused on PAPPs, particularly assurance practitioners, therefore it is timely to review the provisions in the Code for PAIBs.

The PAIB's role in preparing external reports is vital to the ongoing trust in the profession and is also fundamentally important to audit quality. The need for quality and accountability in corporate reporting across the entire reporting supply chain is imperative to building trust in the broader financial system.

It may be that the Code requires limited change but what is required is a focus on increasing awareness of the Code within this segment of the profession.

3. Strengthening independence standards for audit engagements

Recurring headlines about collapses of large public companies due to fraud as well as other financial scandals across the globe have continued to draw much public attention to the role of auditors as corporate guardians of public trust and confidence in entities' financial statements. Some of these events have called into question not only the quality of the audits but also the independence of the auditors. In addition, there continues to be heightened regulatory scrutiny not only on aspects of the performance of an audit, such as the exercise of professional skepticism and professional judgment, but also on broader considerations relating to auditor independence and the audit firm multi-disciplinary business model.



As highlighted in the Background subsection above, the IESBA has continued to dedicate strategic effort to addressing aspects of the issues in the current strategy period through its three major inter-related independence-focused projects on NAS, fees, and the definitions of listed entity and PIE. In this regard, the IESBA believes that the revisions to the Code as a result of the [NAS](#) and [Fees](#) projects represent a major public interest contribution towards addressing some of the concerns about the business model of firms.

Within the current strategy period, the IESBA also continues to place high priority on projects that will further enhance auditor independence. These include the [Engagement Team – Group Audits Independence](#) and

⁶ Section C in this survey sets out a few specific matters or concerns that have come to the IESBA's attention as these relate to PAIBs.

[Technology](#) projects. These two projects are ongoing, with Exposure Drafts issued in February 2022. In addition, as a result of its [PIE project](#), the IESBA has committed to undertaking a holistic review of collective investment vehicles and other “non-corporate” legal structures such as mutual funds, private equity funds, pension funds and trusts to assess whether the independence provisions in the Code appropriately cover audits of such vehicles or structures, or whether they need to be clarified and expanded.

The IESBA will also consider the findings of Phase 1 of its [Benchmarking](#) initiative to determine whether there are independence matters that would warrant specific attention from a standard-setting perspective. Phase 1, which was completed in March 2022, compared the IIS as applicable to PIEs to the relevant independence requirements of the US Securities and Exchange Commission (SEC) and the US Public Company Accounting Oversight Board (PCAOB).

Section C also sets out a number of specific topics that the IESBA has identified from previous or current work streams, or which were otherwise brought to its attention. Subject to stakeholder input to this survey, the IESBA may consider prioritizing some of these topics from the perspective of further strengthening the IIS relative to auditor independence.

5. Do you believe the IESBA should continue to dedicate strategic focus on strengthening the IIS for audit engagements in its next strategy period (2024-2027)? If so, what specific developments or issues do you believe the IESBA should focus on beyond the matters outlined above and in Section C? Please be as specific as possible and explain your reasoning.

While there are already comprehensive provisions in the IIS for audit engagements, there is also a need for these to be regularly revisited to make sure they are consistent with evolving expectations.

There have been several significant amendments to the IIS recently (NAS, Fees and PIE definition) – so our preference is to allow PAPPs time to embed these changes before assessing whether the changes have had the desired impact on perceptions around threats to independence. This will allow any further proposed changes to be evidence based, targeted, and justifiable. There is a particular need to minimise changes to the revised non-assurance services provisions to avoid potentially undermining the revised provisions or adversely impacting their adoption or implementation. Implementation support focused on providing clarity and driving consistency in practice to changed aspects of the Code would be well received.

We strongly support globally recognised, evidence-based research for proposing changes to the IIS.

4. Promoting timely adoption and effective implementation of the Code

Prior to the release of the restructured Code in 2018, the Code had been adopted or had been used as a basis for national ethics standards or the ethical codes of professional accountancy organizations (PAOs) in over 120 jurisdictions around the world, including 16 among the G-20. As of January 2022, over 85 jurisdictions have adopted, or committed to adopt, the restructured Code. In addition, the 31 largest international networks of firms that comprise the [Forum of Firms](#) have also aligned their policies and methodologies to conform to the restructured Code for transnational audits.



The IESBA dedicates significant effort to promoting the adoption and effective implementation of the Code, including new revisions to the Code, through various initiatives and activities, an important part of which is stakeholder outreach. Beyond these, the IESBA considers it a high priority to conduct post-implementation reviews (PIRs) of significant revisions to the Code to assess how effectively the implementation of those revisions is meeting the original objectives of the revisions. So far, within this current strategy period, the IESBA has completed Phase 1 of the Long Association PIR. The IESBA plans to initiate the PIRs of the restructured Code and the NOCLAR provisions as well as Phase 2 of the Long Association PIR in the remaining two years of the current strategy period (2022-2023).

As part of the new strategy period, the IESBA expects to prioritize PIRs of the revisions to the Code relating to the NAS, Fees and PIE projects.

6. Do you believe the IESBA should devote strategic focus on promoting timely adoption and effective implementation of the Code in its next strategy period (2024-2027)? Please be as specific as possible and explain your reasoning.

It is important that both the profession and its stakeholders, understand what the requirements in the Code mean, how they build trust in PAs and how they translate to the reliability and consistency of the information presented. The more broadly the Code is adopted and implemented, the greater the likelihood that trust and consistency will be enhanced for professional accountants. Therefore, we support and encourage the efforts of the IESBA in promoting timely adoption and effective implementation of the Code.

7. Are there specific operability issues or concerns with respect to the Code you believe the IESBA should be made aware of?

The most significant challenge affecting the operability of the Code is the magnitude and frequency of amendments. We would encourage the IESBA to resist making further substantive changes to the Code until users have had an opportunity to implement the changes, and the impact of these changes has been reviewed and assessed.

OTHER KEY ENVIRONMENTAL TRENDS OR DEVELOPMENTS

8. Are there key environmental trends or developments, beyond those already noted above, you believe the IESBA should focus on in its next strategy period (2024-2027)? Please be as specific as possible and explain your reasoning.

In informing its strategy we encourage the IESBA to consider the ongoing sustainability and longevity of the accounting profession, particularly the audit profession. Attracting and retaining the best and brightest talent to the profession is imperative for maintaining and enhancing audit quality in the long term. Our members are reporting increasing challenges with respect to attracting and retaining talent, which amongst other factors, can be attributed to the pace and volume of regulatory change. A downturn in the number of skilled and experienced accounting professionals is not in the public interest. There needs to be a balance sought between protecting audit quality via refining the Code and ensuring that the level of regulation does not become burdensome and therefore a deterrent to entry.

Section C: Possible Future Standards-Related Projects or Initiatives

The following table lists topics that the IESBA may consider as potential future projects or initiatives in the 2024-2027 strategy period. The IESBA has identified these topics through various means, including ongoing and recently completed work streams, and the previous strategy consultation process.

When the IESBA reviews these topics as part of the development of the SWP consultation paper, the IESBA will take into account:

- Respondents' input on the strategic direction and priorities for the next strategy period (Section B).
- The level of importance of each topic based on a number of factors.
- Input received from respondents to this Section (Section C).

Please note that this section provides only a high-level overview of each topic noted in the table below. Respondents will have an opportunity to comment on a full description of the IESBA's proposed strategic work plan when it issues the consultation paper in due course.

| | Topic |
|---|--|
| INDEPENDENCE TOPICS – PAPPs | |
| 1. | Independence of external experts |
| 2. | Audit firm – audit client relationship |
| 3. | Business relationships |
| 4. | Definition of “audit client” for PIEs |
| 5. | Matters arising from Quality Management (QM)-related conforming amendments to the Code |
| PAIB-SPECIFIC TOPICS | |
| 6. | Familiarity threat in relation to Part 2 |
| TOPICS ADDRESSING PAs MORE BROADLY | |
| 7. | Professional appointments |
| 8. | Breaches of the Code |
| 9. | Definitions and descriptions of terms |
| OTHER TOPICS | |
| 10. | Non-authoritative material |

IESBA Strategy Survey 2022

The IESBA is seeking respondents' assessment of the level of importance of each of these topics (on a scale of 1-5) and a brief rationale for those that have been assessed as high importance (Rating: 4-5).

Factors for Rating the Topics

When assessing the level of importance, respondents are asked to consider the following factors:

- Public interest benefits
 - The level of public interest in undertaking the project or initiative.
 - The extent to which the action will enhance public trust in the Code and the profession.
 - The extent to which the action will raise the bar on ethical behavior for PAs.
- Relevance
 - Pervasiveness of the matter or issue to the global profession.
 - Relevance of the topic at a global level.
 - Relevance of the topic to the ethical behavior of PAs or independence.
- Urgency
 - The degree of urgency in addressing the issue(s) identified.
 - The extent of the impact on the public interest and the profession if action is not taken or is delayed.
- Achievability
 - Feasibility of achieving an effective outcome within a reasonable timeframe, taking into account the resources required.

Please rate each topic listed below on its level of importance as a priority for the IESBA's SWP 2024-2027 on a scale of 1 to 5 (1 = lowest level of importance). Please refer to the factors for rating the topics above when assessing each topic.

For those topics that you rated either a 4 or 5 (i.e., the highest levels of importance), please provide a brief explanation for your rating.

Independence of External Experts

Under the Code's and the IAASB's definitions of "engagement team," an auditor's external expert is not a member of the engagement team for an audit or other assurance engagement. As such, they are not scoped in for the purposes of the IIS. They are, however, subject to objectivity requirements under ISA 620⁷ in the context of an audit of financial statements.

A potential project on this topic would consider whether external experts used on audit and other assurance the expected increase in involvement of external experts under ISA 540 (Revised)⁸ and sustainability

⁷ International Standard on Auditing (ISA) 620, *Using the Work of an Auditor's Expert*

⁸ ISA 540, *Auditing Accounting Estimates and Related Disclosures*

assurance standards. This matter arose during the IESBA's and IESBA Consultative Advisory Group's (CAG) discussions on the [Engagement Team – Group Audits Independence](#) project. Such a project would require coordination with the IAASB.

How would you rate this topic as a strategic priority on a scale of 1 – 5? 2

If you rate this topic as either 4 or 5 (i.e., high priority), please provide your reasons including any specific areas of focus as well as other relevant information.

We recommend the possible implications from the proposed new definition of “engagement team” in the context of group audits are addressed in the first instance before further expanding the definition of engagement team. Then we would support the IESBA continuing to collaborate with the IAASB to see if any further changes are required to the definition.

Audit Firm – Audit Client Relationship

As part of its [Fees](#) project, the IESBA concluded that the Code should recognize the inherent self-interest threat in the audit client payer model whereby the party responsible for the subject of an examination directly pays the examiner. The IESBA, however, agreed that the inherent risk related to the audit client payer model is part of a broader issue of the “audit firm–audit client” relationship, which was outside the scope of the Fees project.

A potential project on this topic would therefore consider whether the Code should address the inherent threats arising from the client relationship more broadly. It may also address a related matter which is whether it continues to remain appropriate for the Code to use the term “audit client” as opposed to the “audited entity” or “entity subject to audit.” This recognizes that the ultimate beneficial client is not the entity itself but the entity's owners or shareholders.

How would you rate this topic as a strategic priority on a scale of 1 – 5? 1

If you rate this topic as either 4 or 5 (i.e., high priority), please provide your reasons including any specific areas of focus as well as other relevant information.

We would support the Code using the term “audited entity” or “entity subject to audit” as opposed to “audit client” but we do not believe this should be a high priority. It is not evident that a terminology change alone would have a substantive impact on perceptions of auditor independence.

Business Relationships

Section 520 of the Code addresses threats to independence arising from business relationships between an audit firm and an audit client or its management, with the provisions focused on “close business relationships.”

The Code does not define or describe the term “business relationship.” Whilst the concept of “close business relationship” in Section 520 focuses on a “mutuality of interests” such as joint ventures and combining services or products with those of an audit client, there is a view that “business relationship” is a broader concept, i.e., consisting of any commercial arrangement.

A potential project on this topic would therefore consider revisiting Section 520 more comprehensively to deal with threats to independence from a broader business relationship context. This matter was identified as part of the current Technology project but is deemed to be outside the scope of that project.

How would you rate this topic as a strategic priority on a scale of 1 – 5? 1

If you rate this topic as either 4 or 5 (i.e., high priority), please provide your reasons including any specific areas of focus as well as other relevant information.

Providing non-authoritative material to assist understanding of the terms “business relationship” and “close business relationships” is desirable but should not be a high priority.

Definition of Audit Client for PIEs

The extant Code contains only one reference to “listed entity” in the IIS that is separate from its treatment as a PIE. This reference, in extant paragraph R400.20, specifies which related entities are included in the definition of an audit client depending on whether the audit client is a listed entity or not.⁹

As part of the [PIE](#) project, the IESBA agreed to replace the reference to listed entity in extant paragraph R400.20 with the new term “publicly traded entity.” As part of its deliberations, the IESBA also considered whether to replace the reference to listed entity in paragraph R400.20 with PIE, thereby enlarging the scope of the related entities included with the audit client when it is a PIE. However, the IESBA agreed that addressing the relevant issues such as the corporate structures of private equity complexes and sovereign wealth funds as well as the flow of information within those structures were beyond the scope of the PIE project.

A potential work stream on this topic would undertake further research to gain a better understanding of the ramifications of extending the whole universe of related entities for listed entities in extant paragraph R400.20 to apply to all PIE audit clients.

How would you rate this topic as a strategic priority on a scale of 1 – 5? 4

If you rate this topic as either 4 or 5 (i.e., high priority), please provide your reasons including any specific areas of focus as well as other relevant information.

We would support further research to gain a better understanding of the consequences of extending the application of paragraph R400.20 to all PIE audit clients. It is important that this project, if progressed, is in collaboration with the IAASB.

Matters Arising from Quality Management (QM)-Related Conforming Amendments to the Code

There were a number of substantive matters of alignment that arose during the project to develop the [limited conforming amendments to the Code](#) as a result of the finalization of the IAASB’s QM projects. These matters were beyond the scope of the conforming amendments project. This limited scope project, which

⁹ Extant paragraph R400.20 states: “As defined, an audit client that is a listed entity includes all of its related entities. For all other entities, references to an audit client in this Part include related entities over which the client has direct or indirect control.”

was finalized in December 2021, focused on the relevant provisions of the Code that refer to ISQM 1¹⁰ or ISQM 2,¹¹ or terms and concepts used or defined in those two QM standards.

The matters raised include:

- Whether networks can be defined by common requirements or services as opposed to common policies and procedures.
- Whether references to network firm in the Code, including in the definition of “audit team,” should be extended to include “the network,” given that ISQM 1 contemplates that there is the network, other firms in the network, and other structures or organizations within the network.

How would you rate this topic as a strategic priority on a scale of 1 – 5? 4

If you rate this topic as either 4 or 5 (i.e., high priority), please provide your reasons including any specific areas of focus as well as other relevant information.

Consistency between the IAASB standards and the Code should not only be a priority but a rule of engagement.

Familiarity Threat in Relation to Part 2 of the Code

During the Long Association project, it was noted that the extant definition of “familiarity threat” contains a reference to “employing organization.” However, the Code has only a few examples of familiarity threats with respect to PAIBs in the context of their employing organizations.

Currently, extant paragraph 200.6 A1(d) provides two general examples of familiarity threats for a PAIB when undertaking a professional activity; and paragraph 250.11 A3 provides one example of a familiarity threat that might be created when an inducement is being offered or accepted even if the PAIB has concluded there is no actual or perceived intent to improperly influence behavior.

A potential work stream on this topic would consider whether there is a need to provide additional guidance in the Code or in non-authoritative material regarding how PAIBs should address familiarity threats in the context of their work for employing organizations.

How would you rate this topic as a strategic priority on a scale of 1 – 5? 1

If you rate this topic as either 4 or 5 (i.e., high priority), please provide your reasons including any specific areas of focus as well as other relevant information.

Providing non-authoritative material to assist with addressing familiarity threats in the context of PAIBs work for employing organisations is desirable but should not be a high priority.

¹⁰ International Standard on Quality Management (ISQM) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*

¹¹ ISQM 2, *Engagement Quality Reviews*

Professional Appointments

In the context of a change in professional appointment, paragraph R320.6 of the Code requires a proposed PA to take other reasonable steps to obtain information about any possible threats if the PA is unable to communicate with the existing or predecessor accountant. Paragraph 320.5 A1 provides that a proposed PA will usually need the client's permission to initiate discussions with the existing or predecessor accountant.

Paragraph R320.8 deals particularly with changes in audit or review appointments. It provides that if a client fails or refuses to grant the existing or predecessor accountant permission to discuss the client's affairs with the proposed accountant, the existing or predecessor accountant shall disclose this fact to the proposed accountant, who shall carefully consider such failure or refusal when determining whether to accept the appointment.

A potential project on this topic would consider whether the Code should require a proposed PA to decline an appointment if the client fails or refuses to give permission to the existing or predecessor PA to communicate with the proposed PA, unless there are certain exceptional circumstances.

How would you rate this topic as a strategic priority on a scale of 1 – 5? 2

If you rate this topic as either 4 or 5 (i.e., high priority), please provide your reasons including any specific areas of focus as well as other relevant information.

While ethical considerations are important, there are many other factors that contribute to an audit firm's decision to accept/decline an appointment. We would recommend the Board consider non-authoritative material to assist firms with the decision-making process. We have recently developed a guide to assist our members in this area, a copy has been forwarded to IESBA staff.

Breaches of the Code

Extant paragraphs R400.80 to R400.89 and R900.50 to R900.55 of the Code address a breach of a requirement in Parts 4A and 4B, respectively. These provisions require a firm to take certain actions upon concluding that a breach has occurred, such as addressing the consequences of the breach, determining whether to end the audit or assurance engagement, and communicating with those charged with governance. These provisions also provide guidance on matters such as actions a firm might consider to address a breach satisfactorily.

Extant paragraphs R100.8 – 100.8 A1 currently provide a requirement and application guidance to address a breach of any other provisions of the Code. A potential project on this topic would consider other matters some stakeholders have raised, such as:

- In addition to requiring a PA to address the consequences of the breach and determine whether to report it to the relevant parties (paragraph R100.8), whether the Code should address actions to stop the activity that caused the breach.
- Whether there should be any optionality in reporting a breach under paragraph R100.8 (b).
- Whether the conceptual framework in Section 120 should specifically address the disclosure required when a breach occurs and when the professional accountant is unable to end a service.

How would you rate this topic as a strategic priority on a scale of 1 – 5? 3

If you rate this topic as either 4 or 5 (i.e., high priority), please provide your reasons including any specific areas of focus as well as other relevant information.

We encourage the IESBA to consider the consistency within the Code, particularly between breaches of the Code and breaches of laws and regulations. For example, the NOCLAR provisions do not require the PA to report a breach; rather, they provide the PA with the right to report the breach.

We recommend the IESBA avoid introducing rules into a principles-based Code – we are in favour of adopting a similar approach to responding to NOCLAR for what the PA may do to respond to breaches of the Code.

We also note that many PAs will not be in a position to “stop” an activity, for example a trainee accountant.

Definitions and Descriptions of Terms

There are certain differences between the definitions of some terms in the Code and the definitions of the same terms in the IAASB standards. These terms include: financial statements; firm; independence; review engagement; and special purpose financial statements.

In addition, during the Structure of the Code project, the IESBA received a number of suggestions from respondents to reconsider how certain terms are currently defined in the Code, including:

- **Audit team** – Whether the definition of “audit team” should be broadened to include individuals within the firm who may be able to influence the conduct or outcome of an audit by removing references to individuals in a position to **‘directly’** influence the outcome of an engagement. It was argued that such a broadening of the term would better reflect the complexity of organization and influence within audit firms. There was also a view that the change would address the risk that an ability to influence is seen purely as a structural consideration (related to the position of an individual in a firm), instead of driving the assessment through a consideration that captures all those who can influence and are relevant to the engagement.
- **Employee** – Whether the term “employee” should include individuals who may act in the capacity of an employee, such as a contractor of an audit client, instead of only covering actual employees of an audit client.
- **Engagement Period** – Whether it remains appropriate to limit the concept of “engagement period” to the date the audit report is issued as the auditor has further responsibilities under auditing standards, such as addressing the effect on the opinion of matters that come to the auditors’ attention after the conclusion of the audit.
- **Firm** – Whether the term “firm” is too narrowly defined and whether a firm could have non-member employees, as well as clarifying the responsibility of PAs for employees other than PAs.
- **Network Firm** – Whether the concept of a “network firm” should place more focus on the exercise of judgment instead of being circumscribed by a list of examples of situations that might indicate the existence of a network. There is also a view that borders between associations and networks are increasingly diffuse, and there is therefore a need to consider any potential Code implications that might impact the definition of a network firm. It has also been noted that while the definition of

“network firm” is sufficiently broad in the Code, the definition of “firm” is potentially narrow in its references to structures known to exist today and that this might become limiting for the future.

- Professional Accountant – Whether the definition of “professional accountant” should include retired or inactive professional PAs.

The IESBA’s Applicability project addressed the applicability of Part 2 of the Code to PAPPs. As part of this project, there were suggestions as to whether the definitions of a PAPP and a PAIB should be revised. The Code defines a PAPP to be a PA, irrespective of functional classification, in a firm that provides professional services. It has been brought to the IESBA’s attention that there is no clear limitation in the definition of a PAPP to those who actually provide professional services. The extant definition, however, appears to include any PA in a firm that provides professional services. This could be interpreted to include PAs in roles other than providing professional services, such as in finance or IT.

Conversely, the Code defines a PAIB to include any PA employed or engaged in a variety of areas including service. If it is intended that a firm providing professional services is in a “service” industry, then prima facie any PA working in that service organization, including those providing professional services, is also a PAIB.

How would you rate this topic as a strategic priority on a scale of 1 – 5? 4/1

If you rate this topic as either 4 or 5 (i.e., high priority), please provide your reasons including any specific areas of focus as well as other relevant information.

Changes required to increase consistency between the definitions in the IAASB standards and the Code should be a priority. Given our comments about potentially broadening the applicability of the Code to allow professionals other than accountants, access to the Code, it may be important to address these definitions but for reasons other than what has been outlined above.

Non-Authoritative Material (NAM)

Potential work streams would consider developing NAM in relation to the following topics:

Several respondents to the *Alignment of Part 4B of the Code with ISAE 3000 (Revised)* Exposure Draft suggested that users of the Code would benefit from more practical examples of how Part 4B is to be applied, such as:

- Graphical illustrations of the different independence requirements as between a direct and an attestation engagement, in particular where more than one responsible party or party responsible for the subject matter information is involved.
- Practical guidance on determining the nature of the data that represents the underlying subject matter of the assurance engagement
- Practical guidance or case studies on identifying the parties from which independence is required, particularly in new and emerging areas that will assist practitioners to better evaluate and comply with the independence obligations.

In finalizing the [revisions to Part 4B](#), the IESBA also agreed that non-authoritative guidance material to illustrate the application of Part 4B in different situations according to the various parties involved and by type of assurance engagement should be developed in due course.

Relationship Between the Concepts of “Inquiring Mind” and “Professional Skepticism”

As part of the [Role and Mindset](#) project, the IESBA introduced the concept of “having an inquiring mind” as a new element of applying the conceptual framework in the Code. It also provided guidance on what it means to have an inquiring mind. In considering the relationship between having an inquiring mind and exercising professional skepticism in the context of an audit or other assurance engagement, the IESBA made clear that, in addition to having an inquiring mind (which is required for all professional activities), PAs undertaking engagements to which auditing, review and other assurance standards apply are also required to exercise professional skepticism, which includes a critical assessment of evidence.

The IESBA also concluded that further explanation of the relationship and differences between these two concepts should be addressed through NAM rather than in the Code.

Types of Biases

As part of the Role and Mindset project, the IESBA also introduced new application material in the Code to illustrate eight common forms of bias that a PA might encounter, such as availability bias, automation bias, confirmation bias and groupthink. Given the principles-based nature of the Code, there was only a brief description of each type of bias.

There was a suggestion from some respondents to the Exposure Draft as well as from the IESBA discussions that the IESBA should consider developing NAM that provides expanded explanation of those examples of bias as well as other types of biases that may also be relevant to the exercise of professional judgment. There would also be consideration of exploring through NAM how biases affect a PA’s professional judgment and the application of the conceptual framework.

How would you rate this topic as a strategic priority on a scale of 1 – 5? 5

If you rate this topic as either 4 or 5 (i.e., high priority), please provide your reasons including any specific areas of focus as well as other relevant information.

We are supportive of the IESBA producing non-authoritative material to assist consistent application of the Code and to provide explanation for some of the more complex areas of the Code (such as those mentioned above).

Are there specific ethics or independence-related topics not otherwise covered in this Section or this survey that you believe should be given a high priority by the IESBA? If so, please explain and be as specific as possible.

Significant changes have been introduced to the Code in the last 4 years, such as Role and Mindset, NOCLAR, NAS, Fees and PIEs. Changes for technology, sustainability and tax services are coming soon. We strongly recommend the IESBA allow users of the Code a period of stability and that the IESBA’s resources are spent on increasing awareness of the Code and producing materials to support adoption, understanding and implementation of the Code by PAs. Given the prospect that the Code may begin to be used by other professions, the IESBA may wish to consider what more can be done to promote the benefits of the Code to other professions and stakeholders. A key objective may include

that the Code be considered the benchmark for professional ethics across all professions and jurisdictions.