

2. (untitled)

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

Representative of an IFAC member body

Please provide the following contact information:

First Name

Edward

Last Name

Manley

Job Title/Role

Chair, Committee on Ethics

Email Address

manleye@lixilamericas.com

Organization Name (if applicable)

Institute of Management Accountants (IMA)

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:

IMA is a global organization

OR if international, please indicate by ticking the box:

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?

We would support making this topic a priority. Technology is a disruptive force and its impacts need to be fully understood and evaluated relative to the way individuals and organizations interact.

Having said that, technology is only a tool, and the underlying ethics remain the same. Relative to PAs, we believe providing strategic, financial or operational advice to clients is inconsistent with auditor independence. We also believe there are ethical implications from newer types of services such as cyber-security advisory services or data analytics that firms may provide to clients.

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

We would support making this topic a priority, as the decision making around models of service delivery

appear to be more complex, and disrupted by technology. There is an expanded view of the stakeholders involved and building trust is very important. We also believe there are possible threats to auditor independence.

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

No comment.

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

No comment.

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

We would support making this topic a priority. The integrity and credibility of the accountant are critical standards to maintain. Any potential challenges to those standards should be explored. Taxes are an integral part of the accounting profession, both of PAIBs and PAs. For PAs, again, independence in this area is potentially threatened.

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

We would support further clarity and consistency on this topic, although we wouldn't consider it a top priority.

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

The main point that resonates with us here is that those charged with governance should strive for high levels of strong communications so as to bring about greater transparency.

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

No comment.

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

We would support any clarifications of familiarity threats that make it easier for PAIBs to understand and apply. The points that resonate with us include the long associations and gift acceptance relative to decision making.

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?

No comment.

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

We would support further clarity and consistency in this area. In reviewing the bullets above, we would focus on the first - the definition of employee, which may be too limited – and the fourth. The fourth bullet references more of a focus on judgment in decision making as opposed to referencing a specific list of examples, which we would support.

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

We would support making this a priority, in fact the top priority before taking on new projects. It is always desirable to reassess and regroup.

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

We would support making this a priority. As you note, it has been difficult to define the concept, and becomes even more complex in a global context. It is difficult to hold accountants across the globe to an expectation that may not be clear and easy to understand.

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.

No comment.

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.1 Trends and developments in technology and innovation
3. B.5 Tax planning and related services
4. B.2 Emerging or newer models of service delivery
5. B.13 Meaning of public interest in the global context
6. B.9 Familiarity threat in relation to extant Part C

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.

No comment.

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.

No comment.

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.

No comment.

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.

No comment.

8. (untitled)

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

Yes