

2. (untitled)

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

Professional accountant in public practice

Please provide the following contact information:

First Name

Robert

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Dohrer

Job Title/Role

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Organization Name (if applicable)

RSM International Limited

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?

The development of technology has had, and will continue to have a significant influence on professional accountants and accounting firms' practices. In addition, there are significant changes in the regulations with which they need to comply including the EU's General Data Protection Regulation (GDPR). With new technology and innovation many of the Code's fundamental principles may need to be redefined in the context of evolving technological environments. As such, we believe that this is a key area for the board to explore with a view to providing guidance to help professional accountants in this area.

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

We have no further comments on this area.

B.3 Do you have any specific comments on this topic and, in particular, why

this topic should or should not be prioritized?

We believe that this is one of the key areas as we note that, in some cases, the codes of national regulatory bodies provide a different definition of PIEs than the definition used in the IESBA code. For example, the definition of a PIE differs between the IESBA Code and the European Commission's Statutory Audit Directive and Audit Regulation and the UK (and European) Ethical Standard's definition of a listed entity excludes entities whose listed securities are not in substance freely transferable or cannot be traded freely by the public or the entity.

Given the jurisdictional differences, we suggest the Board when possible provide requirements and guidance directed to specific types of entities meeting the IESBA definition of a PIE rather than more broadly to PIEs in general. We believe this would assist professional accountants in applying the Code more consistently.

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

We have no further comments on this area.

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

We have no further comments on this area.

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

We have no further comments on this area.

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

We have no further comments on this area.

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

We are supportive of the Board providing further useful guidance for professional accountants in this area.

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

We have no further comments on this area.

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?

We have no further comments on this area.

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

We have no further comments on this area.

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

We have no further comments on this area.

B.13 Do you have any specific comments on this topic and, in particular, why

this topic should or should not be prioritized?

We have no further comments on this area.

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.

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

1. B.3 Concepts of “public interest entity” and “listed entity”
2. B.1 Trends and developments in technology and innovation
3. B.8 Documentation
4. B.11 Definitions and descriptions of terms
5. B.6 Materiality
6. B.4 Collective investment vehicles

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 have no further comments on this area.

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.

We have no further comments on this area.

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.

We have no further comments on this area.

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.

We have no further comments on this area.

8. (untitled)

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

Yes