

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

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Wirtschaftsprüferkammer

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?

Germany

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

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?

High Priority: This topic should be a top priority since it is among the most relevant issues for the profession. Developments in technology and innovation are the driving forces for the way business is being conducted – and accordingly processed and recorded – in the future. Robust and up-to-date ethical requirements for the profession need to go hand in hand with these developments.

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

Low Priority: Where it is appropriate and necessary, the Code should take into consideration the aforementioned emerging and newer models of service delivery and thus be aligned accordingly. Interrelations with trends and developments in technology and innovation exist.

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

this topic should or should not be prioritized?

High Priority: Topic seems necessary in order to eliminate differences in application of requirements, especially in relation to EU audit regulation and ISAs. From our view IESBA Code of Ethics requirements should not go beyond the EU audit regulation. The latter has been carried out after many years of extensive and thorough discussion and consultation.

Cooperation with IAASB is required.

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

No Priority. From our point of view the topic is far too complex to incorporate it into the principles-based IESBA Code of Ethics.

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

Low Priority: Reputation of the profession seem to have somewhat suffered from involvement of professionals in Base Erosion and Profit Shifting (BEPS) transactions. Especially the development of robust guidance as to fundamental principles and tax advice seem sensible. Additionally optimized marketing of the Code as the ethical rulebook may help restore reputation of the profession. However, new rules are not necessary in this context.

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

No Priority: Materiality is a concept from audit and assurance standards under the governance of IAASB. The IESBA Code should primarily look at significance.

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

No Priority: Though we believe that a frequent and transparent dialogue between PAs and TCWG is to be promoted, we do not think that this subject falls within the IESBA mandate. It is primarily a subject for national legislation on company law.

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

No Priority: Whilst a requirement to document is warranted where it comes to independence standards, and whilst documentation should be encouraged for specific situations like those already addressed in the extant Code, a general documentation requirement with regard to the Code and its fundamental principles would be contradictory to the overall approach of a principles based Code.

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

No Priority: We do not see a need to address this topic further in Part C of the Code.

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 Priority

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

No Priority

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

High Priority: Assessment of whether the comprehensive restructuring project achieved its objectives (increase usability and understandability of the Code) is required.

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

No Priority: We do not believe this to be within the IESBA mandate.

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.

Fostering the reputation of the profession in general!

The audit profession in general still seems to suffer from a loss of credibility. The value of the audit has not been made sufficiently clear. The IFAC Standard Setting Process also seems to suffer from the influence of the profession that is perceived as being too strong. On the other hand we are concerned that IESBA might be pressured too heavily by regulators who seem to increasingly influence the IESBA's work.

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

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

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 deem the aforementioned activities as helpful. However, they should also be shaped in a form to foster the reputation of the profession in general as described above (cf. page 13).

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 Comments

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 Comments

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.

Apart from the five matters we ranked on page 13, there are no other matters that should be addressed by the IESBA and we would urgently ask the IESBA to refrain from carrying out further changes of the Code of Ethics. We hear from our members that it has become increasingly difficult to keep up with the pace of changes which the Code has undergone over the last couple of years. The profession does urgently need time to digest the changes in order to carry out corresponding implementation measures within their firms. The same is true for IFAC's member organizations as most of them need to translate the changes in a first step before being able to display efforts as to how to implement the changes in their respective national laws. Particularly the latter process is usually time-consuming since it requires an involvement of the relevant stakeholders and is usually subject to an approval process by an oversight authority.

8. (untitled)

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

Yes