

IESBA Strategy and Work Plan 2024 – 2027**SWP – Reference Material – NVivo Respondent Summary Analysis****Introductory and Other Comments****1. Monitoring Group****International Forum of Independent Audit Regulators (IFIAR)**

The International Forum of Independent Audit Regulators (IFIAR) appreciates the opportunity to comment on the International Ethics Standards Board for Accountants (IESBA) request for input on its proposed strategy and work plan, 2024-2027. As an international organisation of independent audit oversight regulators that share the goal of serving the public interest and enhancing investor protection, IFIAR is committed to improving audit quality globally through the promotion of high-quality auditing and professional standards, as well as other pronouncements and statements.

IFIAR's objectives are as follows:

- Sharing knowledge of the audit market environment and practical experience of independent audit regulatory activity, with a focus on inspections of auditors and audit firms.
- Promoting collaboration and consistency in regulatory activity.
- Initiating and leading dialogue with other policymakers and organisations that have an interest in audit quality.
- Forming common and consistent views or positions on matters of importance to its members, while taking into account the legal mandates and missions of individual members.

The comments we provide in this letter reflect the views expressed by many, but not necessarily all, of the members of IFIAR. However, the comments are not intended to include, or reflect, all of the views that might be provided by individual members on behalf of their respective organisations.

Where we did not comment on certain specific matters this should not be interpreted as either approval or disapproval by IFIAR.

International Organization of Securities Commissions (IOSCO)

The International Organization of Securities Commissions' (IOSCO) Committee on Issuer Accounting, Audit and Disclosure (Committee 1 or we) appreciates the opportunity to comment on the International Ethics Standards Board for Accountants' (the IESBA or the Board) *Proposed Strategy and Work Plan for 2024-2027* (the Paper). As an international organization of securities regulators representing the public interest, IOSCO is committed to enhancing the integrity of international markets through the promotion of high-quality accounting, auditing and professional standards, and other pronouncements and statements.

Members of Committee 1 seek to further IOSCO's mission through thoughtful consideration of accounting, disclosure and auditing concerns, and pursuit of improved global financial reporting. Unless otherwise noted, the comments we have provided herein reflect a general consensus among the members of Committee 1 and are not intended to include all of the comments that might be provided by individual securities regulator members on behalf of their respective jurisdictions.

Overall Comments

We commend the Board's dedication and efforts to implement the Monitoring Group's (MG) Recommendations in order to strengthen the independence and accountability of international ethics, including independence, standard-setting and related governance. We encourage the Board to remain transparent in its communication regarding the progress made and potential challenges faced by the Board in implementing the MG Recommendations.

2. Regulators and Audit Oversight Authorities

Committee of European Auditing Oversight Bodies (CEAOB)

The CEAOB (Committee of European Auditing Oversight Bodies) appreciates the opportunity to comment on the IESBA consultation paper (CP) on "Proposed IESBA Strategy and Work Plan, 2024-2027" issued in April 2023. As the organisation representing the audit regulators of the European Union (EU) and the European Economic Area (EEA), the CEAOB encourages and supports continuing improvement of professional standards for the audit profession.

The content of this letter has been prepared by the International Auditing Standards Subgroup and adopted by the CEAOB. The comments raised in the letter reflect matters agreed within the CEAOB. It is not intended, however, to include all comments that might be provided by the individual regulators that are members of the CEAOB and their respective jurisdictions.

As audit regulators, the CEAOB members' mandates encompass oversight of the independence and the other ethical rules that apply to statutory auditors, based on the requirements applicable in their respective jurisdictions.

The IESBA Code of Ethics ("Code") is used in several European jurisdictions, but not all of them. The CEAOB clearly sees a benefit in enhancing the Code, as it constitutes a basis for benchmarks at international level. Moreover, a number of international audit firms and networks have voluntarily committed to complying with the Code.

Independent Regulatory Board for Auditors (IRBA)

COMMENTS ON THE PROPOSED IESBA STRATEGY AND WORK PLAN, 2024-2027

The Independent Regulatory Board for Auditors (IRBA) is both the audit regulator and national audit and ethics standard-setter in South Africa. Its statutory objectives include the protection of the public by regulating audits performed by registered auditors, and the promotion of investment and employment in the Republic. Our statutory Committee for Auditor Ethics (CFAE) is responsible for prescribing standards of professional competence, ethics and conduct for registered auditors.

We adopted Parts 1, 3, 4A and 4B of the IESBA International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) and incorporated these into the IRBA Code of Professional Conduct for Registered Auditors (Revised April 2023), including Independence Standards (IRBA Code), together with certain local adaptations and amendments. The IRBA Code is applicable to all registered auditors in South Africa and, with its Rules Regarding Improper Conduct, provides the basis for disciplinary action against them.

We appreciate this opportunity to comment on the IESBA Proposed Strategy and Work Plan for 2024-2027. Our comments are set out under the following sections:

A. Overall Comments; and

B. Specific Questions.

If you require further clarity on any of our comments, please email us at ldupreez@irba.co.za.

A. OVERALL COMMENTS

1. We would like to congratulate the IESBA on the establishment of the International Foundation for Ethics and Audit. This marks a significant step in strengthening the independence of standard setting for audit, assurance and ethics, and is crucial in the actioning of the Monitoring Group reforms.
2. In setting a strategy at the workstream level, the Public Interest Framework of the Monitoring Group recommendations should remain the primary focus. These include standards that are comprehensive, scalable, clear, implementable, globally operable and enforceable.
3. The IESBA's agility when it comes to sustainability is admirable. We hope that the setting of ethical standards, in step with the reporting and assurance standards, will leave a small or no window of preparer or regulatory confusion.
4. We note the IESBA embrace the concept of some professionally agnostic elements of the IESBA Code. The IESBA has promoted the concept and is rapidly developing material under this profession agnostic banner. We do not yet understand what the IESBA has done to identify and understand all the impacts of this approach on the traditional users of the IESBA Code, such as audit regulators, national standard setters and public accountants.
5. The IRBA strategy, which is focused on restoring confidence, addresses how the reporting ecosystem can be strengthened and what can be learnt from recent audit failures. Its overall objective is to work on addressing the identified issues through standard setting and regulatory initiatives.
6. The IESBA may wish to consider the recently released [IFIAR Survey of Inspection Findings 2022](#). In addition, it could be helpful to peruse our recently published [2022 Public Inspections Report on Audit Quality](#) and the IRBA's first-ever [Annual Enforcement Report 2022](#). These reports highlight a number of findings related to unethical conduct, including, but not limited to, breaches of independence; non-compliance with laws and regulations (NOCLAR); dishonesty; failure to exercise due care and skill; and poor professional conduct.
7. Furthermore, the IRBA Board recently approved the IRBA Rule on Enhanced Auditor Reporting for the Audit of Financial Statements of Public Interest Entities (EAR Rule). Among others, the EAR Rule requires that for audits of annual financial statements of public interest entities (PIEs), as defined in the IRBA Code, the audit firm shall disclose in the independent auditor's report – where the disclosure has not been made by the preparer in the annual financial statements or the annual report – the fee-related matters noted in paragraph R410.31 of the Code.
8. We recognise the need for timely standard setting. We, however, also reiterate the concern we raised in our response to the IESBA Proposed Strategy and Work Plan questionnaire that the board's overall vision for the IESBA Code in the longer term is unclear. We continue to see developments, additions and more provisions in the Code that are increasing its length and complexity, and an example is the board's current consideration to add a "Part 5" for Sustainability Assurance Engagements. Despite the recent restructuring, the new provisions are complex, and the Code has not become easier to use. The need for timely standard setting, therefore, has to be balanced with the need for the time required for adoption and implementation. As such, the opportunity to comment on the proposed strategy and work plan allows us to contribute towards finding this balance.

9. In relation to the proposed Post Implementation Reviews, we appreciate the need to learn how the changes in the Code are being applied. As the IESBA considers how best to manage a full work plan, consideration should be given to whether some of these reviews can be combined and when it would be suitable for stakeholders to participate.

National Association of State Boards of Accountancy (NASBA)

The National Association of State Boards of Accountancy (NASBA) appreciates the opportunity to comment on the IESBA Consultation Paper on the *Proposed IESBA Strategy and Work Plan, 2024 - 2027* (Consultation Paper). NASBA's mission is to enhance the effectiveness and advance the common interests of Boards of Accountancy (State Boards) that regulate all Certified Public Accountants (CPAs) and their firms in the United States and its territories, which includes all audit, attest and other services provided by CPAs. State Boards are charged by law with protecting the public.

In furtherance of that objective, NASBA offers the following comments on the Consultation Paper.

General Comments Related to the IESBA Vision

While we agree with the majority of the Vision as stated on page 7 of the Consultation Paper, we remain concerned about the concept of not limiting the use of the standards to the accountancy profession as expressed in items 4 and 5. We support initiatives that are in the public interest if they are executed by qualified practitioners and are enforceable. We are concerned whether practitioners outside of the accountancy profession would have the requisite skills and would be subject to the same oversight as the accountancy profession. We commented on this issue in our comment letter dated July 7, 2022 on the IESBA Strategic Survey 2022. We are including the following excerpt of our comments in this letter for further consideration.

“When considering the current and ongoing projects regarding sustainability reporting, a primary concern is understanding the individuals or organizations that can provide the attestation services.

The public accounting and auditing profession in the United States has professional standards, systems of quality management, and independence requirements in place to position CPAs and CPA firms to provide attestation services. Such professional standards typically result from extensive due process procedures which include broad distribution of the standards and framework for public comment. We believe permitting non-CPAs who are not subject to standards resulting from such public due process procedures to provide attestation services is not in the public interest.

When considering whether to expand the scope of the Code to cover assurance service providers other than PAPPs, the question of enforcement and discipline also comes into play. What authority, if any, would regulators have to exert discipline? In addition, for United States jurisdictions, when you introduce non-CPAs using ISO standards which are not fully aligned with IAASB/IESBA standards, there will likely be inconsistencies related to independence, quality management and regulatory discipline.

For United States jurisdictions, virtually none of the State Boards allow non-CPAs to perform attestation services or issue reports under the United States professional standards governing the public accounting and auditing profession. Further, as noted above, the SEC has not yet stated if non-CPAs will be allowed to provide sustainability reports (noting the large bulk is and can expected to be related to public companies).

If non-PAPPs are permitted to perform attestation services and issue attestation reports, we believe regulations must be developed to build the intellectual infrastructure, including independence requirements, quality management systems and oversight consistent with the professional standards governing the public accounting

and auditing profession. Ample time will be needed to appropriately train both PAPPs and non-PAPPs regardless of whether the IESBA Code has an expanded reach.”

United Kingdom Financial Reporting Council (UKFRC)

The Financial Reporting Council (FRC) welcomes the opportunity to comment upon the IESBA’s consultation paper on its Strategy and Work Plan (SWP) for 2024-27. The FRC has a strong interest in ensuring that the IESBA Code supports the global integrity of the accountancy and audit professions. The FRC does not mandate the International Independence Standards (IIS) for UK audit and assurance providers, and instead issues its own *Ethical Standard*. However, this is intended to be as least as stringent as the requirements included within the IESBA Code with respect to auditor independence. Additionally, professional accounting bodies in the UK adopt the Code as the basis of their codes of professional ethics. In consequence, the FRC strongly supports the IESBA’s strategic vision to ensure that its ethical standards are a cornerstone for ethical behaviour to the accounting profession and beyond.

We have two general observations to make about the proposed SWP. Firstly, as the consultation document notes in paragraph 27, the IESBA has been engaged in a period of considerable change, with several enhancements having been introduced to the Code. In our view, it is strategically important for the IESBA to now focus on ensuring that change is satisfactorily embedded in the ethical practices of accountants. There is a risk that an excess of additional projects could serve to distract from the proper implementation of new requirements as well as a thorough appraisal of their effectiveness. It is also essential that the IESBA’s resources are not diverted away from projects that will meet the urgent needs of practitioners, investors, regulators, and the wider community of public interest. From this perspective, it is especially important to ensure adequate resources are earmarked with respect to the IESBA’s ongoing work streams relating to sustainability.

Secondly, the IESBA should also take care to ensure that sufficient time and resource is devoted to the widening of its stakeholder universe. The consultation correctly identifies that quality imperatives and the need for global acceptance and global operability of its standards are key strategic drivers. The proposals to seek input from a wider and more diverse set of stakeholders is welcome. This is particularly important with respect to the development of high-quality ethics and independence standards for sustainability and assurance reporting. However, the IESBA should not underestimate the time and effort that this will require.

4. National Auditing Standard Setters

Accounting Professional & Ethics Standards Board (APESB)

Accounting Professional & Ethical Standards Board Limited (APESB) welcomes the opportunity to comment on the IESBA’S *Proposed Strategy and Work Plan, 2024-2027* (SWP).

APESB is governed by an independent board of directors whose primary objective is to develop and issue, in the public interest, high-quality professional and ethical pronouncements. These pronouncements apply to the membership of the three major Australian professional accounting bodies (CPA Australia, Chartered Accountants Australia and New Zealand and the Institute of Public Accountants). In Australia, APESB issues APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)*, which includes the Australian auditor independence requirements, as well as a range of professional and ethical standards that address non-assurance services.

Overall comments

APESB is supportive of the IESBA's proposed SWP, particularly the focus on ethics standards for sustainability reporting and assurance. We welcome the IESBA's plan to continue proactive engagement with all stakeholders in developing professionally agnostic and framework-neutral ethics and independence standards for sustainability.

We also support the IESBA's proposed work stream focusing on professional accountants in business. Given that most professional accountants in Australia work in business, commercial and public sector roles, the development of resources tailored for them would be highly beneficial.

While we support the IESBA's proposed SWP, APESB is concerned about the need to address firm leadership and cultural issues that have emerged from recent significant ethical failures in large firms in Australia and a few other G20 Jurisdictions (e.g., exam cheating – KPMG Australia, EY USA, PwC Canada and breaches of confidentiality – PwC Australia).

The matter is not explicitly addressed in the proposed IESBA's SWP for 2024-27. We believe that such a project should be a focus for the IESBA as the potential ramifications of these ethical failures are detrimental to the long-standing public trust accorded to the accounting profession.

In Australia, the recent ethical failures by PwC have sparked the Australian Federal Government to undertake two inquiries focusing on the management of conflict of interests by consulting services providers and on the structures of large accounting firms.

An interim report released for the consulting services inquiry questions the corporate culture of PwC and whether the firm's leaders know right from wrong.

This is a difficult position for the accounting profession in Australia and casts doubt on whether the professional and ethical standards are fit for purpose, effective, and appropriately monitored and enforced.

APESB strongly encourages the IESBA to undertake a project to determine the validity and effectiveness of the IESBA Code on matters such as firm leadership and culture. The project should also consider whether thought leadership activities or guidance materials are required to supplement the provisions in the IESBA Code.

APESB's key recommendations are noted below, and Appendix A provides APESB's response to the IESBA's specific questions in the Consultation Paper.

Recommendations

APESB's key recommendations for the IESBA's consideration are:

- consider undertaking a project on the validity and effectiveness of the IESBA Code on matters such as firm leadership and culture;
- undertake a critical analysis of the drivers for delays in countries adopting amendments to the IESBA Code;
- development of application materials and resources to assist jurisdictions in implementing the Code at a faster pace
- consider developing resources that help professional accountants in business to understand their professional and ethical responsibilities;
- promote adoption of the IESBA eCode by facilitating its adoption by different jurisdictions;
- increase awareness of the Code requirements for non-assurance services and assess the effectiveness of monitoring and enforcement of ethical requirements; and

- consider a pre-determined pathway of releasing amending standards to allow more time for stakeholders to adopt and implement new amending standards.

Concluding comments

We trust that you will find these comments useful in your final deliberations. Should you require additional information, please contact APESB's Principal, Jacinta Hanrahan, at Jacinta.Hanrahan@apesb.org.au.

New Zealand Auditing & Assurance Standard Board (XRB)

The IESBA's Proposed Strategy and Work Plan 2024-2027

Thank you for the opportunity to comment on the Proposed IESBA Strategy and Work Plan 2024-2027. We submit the feedback from the New Zealand External Reporting Board (XRB).

The XRB is a Crown Entity responsible for developing and issuing climate, accounting, auditing and assurance standards (including professional and ethical standards in New Zealand). The XRB enables high-quality, credible and integrated reporting by providing robust frameworks and standards that are internationally credible, while being relevant to Aotearoa, New Zealand. This ensures reporting and assurance in New Zealand promotes trust, confidence, transparency and accountability.

The XRB's mandate is to develop ethical standards for assurance practitioners. Our consideration of the IESBA's Proposed Strategy and Work Plan 2024-2027 is therefore informed in this context.

The XRB agrees with, and supports, the IESBA's proposed strategy for 2024-2027 as outlined in section II of the consultation paper.

While supportive of the strategic direction, we recognise that there are significant challenges ahead for the IESBA in achieving its strategy. It is critical that the IESBA is, and is seen to be, an independent standard setter, transparent and operating free from bias. We consider this to be particularly important in the context of developing profession agnostic, globally accepted standards for ethics and independence requirements for those preparing or assuring sustainability information.

Comparing ethical requirements across professions is not an easy task, and it is not possible to make a statement that one profession's requirements are better or worse than another. However, it is in the public interest that there is a level playing field and a clear understanding by users of either what those requirements are or how they differ if there are multi-disciplinary practitioners providing assurance. To meet the challenge of globally accepted profession agnostic standards we encourage the IESBA to:

- Clearly articulate what profession agnostic ethical standards mean in the context of the IESBA's mandate, which is limited to professional accountants and to clarify who it expects to apply these standards beyond the profession. If the intent is for other professionals to use these standards, we encourage the IESBA to consider if and how other professionals will see themselves in the standard or whether this standard is creating barriers to entry, which would not be in the public interest.
- take an inclusive approach that recognises and respects other professions' requirements in order to overcome challenges related to gaining acceptance and adoption by other professionals.
- think broadly and recognise those standard setters who set ethics standards for other professions operating in this space. The XRB have been developing a standard for assurance (including ethics requirements) over mandatory GHG emissions disclosures, taking care to take an inclusive approach that

can learn from others, recognising that assurance practitioners in this area is broader than professional accountants.

- explore what can be learnt from other established assurance practices (which have associated ethics requirements) and collaborate with a far broader range of stakeholders and not only financial markets regulators to gain wider acceptance. For standards to be globally accepted they should not deter other participants in the market. The IESBA needs to be curious to learn about the ethics and independence standards of these other assurance practitioners, taking an inclusive approach, to ensure they can see themselves in the standards.
- ensure its due process is profession agnostic, including non-accountants in the membership of the board and task forces and in broad consultation from the project proposal stage.

These actions are important because global support for the IAASB's assurance standard on sustainability, that links to the IESBA's ethics standards, will depend on the IESBA's ability to develop an ethics standard for sustainability that is truly profession agnostic.

We encourage the IESBA to develop performance-based metrics against which the success of its proposed strategic actions can be measured. For example, how will the IESBA assess whether it is progressing and completing projects in a timely manner?

Our responses to specific questions in the CP are set out in Appendix A. Should you have any queries concerning our submission please contact either myself at the address details provided below or Misha Pieters (misha.pieters@xrb.govt.nz).

5. Accounting Firms

BDO International Limited (BDO)

BDO International Limited (BDO) is pleased to have the opportunity to comment on the International Ethics Standards Board for Accountants' (IESBA or Board) Consultation Paper (CP) in respect of the **Proposed IESBA Strategy and Work Plan (SWP), 2024 -2027** (the CP).

Overall, BDO is supportive of the proposed SWP and we have presented our responses to each of the specific questions below.

Deloitte Touche Tohmatsu Limited (DTTL)

Deloitte Global is pleased to have the opportunity to provide comments on the *Proposed IESBA Strategy and Work Plan, 2024-2027*, as described in the Consultation Paper issued in April by the International Ethics Standards Board for Accountants ("IESBA" or "Board").

We support the IESBA's mission 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").

Deloitte Global also supports the IESBA's vision to achieve global recognition and acceptance of the ethics (including independence) standards as a cornerstone to ethical behavior in business and organizations. We support the efforts by the Board to understand and respond to environmental and operational drivers that impact the market, in particular the demand for assurance on sustainability information. We recognize that IESBA is uniquely placed as a global standard setter, and believe it is appropriate and in the public interest for

the IESBA to focus, in particular, on setting ethics and independence standards related to sustainability, including assurance engagements.

However, Deloitte Global urges the Board to look beyond its current focus on standard-setting to provide a period of stability for the International Independence Standards for audit engagements, which have gone through many amendments over recent years. Firms and organizations have undertaken a significant effort to implement the Non-Assurance Services and Fees standards and are currently in the process of implementing the standard on Engagement Teams and Group Audits, with other standards becoming effective soon thereafter. There is a risk that continuing at this swift pace of global standard setting may affect the ability of the profession to effectively absorb, implement, and execute multiple new or updated standards – too much change all at once significantly increases the complexity of implementation efforts and the risk that intended quality outcomes are not consistently accomplished, which is not in the public interest. We recommend that the Board considers these capacity constraints when determining the future workplan and ensures any future standard-setting efforts are mindful of the effort required to amend and adapt policies, as well as implement systems solutions to maintain compliance. A consideration of longer transition periods in certain instances would also support these efforts.

Furthermore, any future standard setting activity of the Board should be guided by the outcomes of post-implementation reviews and evidence that the existing provisions of the Code are not effective in meeting the Code's objective. Deloitte Global urges the IESBA to devote the necessary time and resources for these critical activities.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms, and their related entities (collectively, the “Deloitte organization”). DTTL (also referred to as “Deloitte Global”) and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte Touche Tohmatsu Limited is a private company limited by guarantee incorporated in England & Wales under company number 07271800, and its registered office is Hill House, 1 Little New Street, London, EC4a, 3TR, United Kingdom.

Finally, historically the Code has been built on a principles-based approach. It is noted that over the past several years the Code has moved toward more of a rules-based framework, notably in the International Independence Standards. When undertaking future initiatives, we urge the Board to bear in mind the merits of a principles-based Code, especially when striving for a Code with global operability and broad adoption.

In addition to these overall comments, we have provided our responses below to the specific questions posed in the Consultation Paper for the Board's consideration.

As noted in our response to the Strategy and Workplan Survey, Deloitte Global considers that a more substantial share of the Board's activities should be directed at seeking wider understanding, adoption and effective implementation of the Board's standards, including through implementation reviews and proactive engagement with all key stakeholders. In particular, promoting wider adoption of the Code is especially important as global consistency is in the public interest.

Ernst & Young Global Limited (EY)

Ernst & Young Global Limited, the central coordinating entity of the Ernst & Young organization, welcomes the opportunity to offer its views on the Consultation Paper, *Strategy and Work Plan, 2024 - 2027* (the “SWP”), issued by the International Ethics Standards Board for Accountants (the “IESBA” or the “Board”).

We welcome the opportunity to contribute to the further development of the IESBA Code of Ethics for Professional Accountants (the “Code”) and we continue to support robust ethics standards that will reinforce the integrity and objectivity of auditors worldwide. We fully support the IESBA’s efforts to ensure that the Code stays relevant, applicable, and responsive to an ever-changing environment.

We are supportive of the IESBA’s vision of making the standards of the Code available for use by other professions whose members perform the same types of professional activities or services as professional accountants. In fact, we are seeing an increase in requirements from legislative and regulatory bodies for assurance procedures where the legislator or regulatory body is allowing for alternative independent providers for the audit or assurance service, for example in the EU Digital Services Act or the EU Green Bond verification performed by an external reviewer. With expanding the use of the Code’s ethics (including independence) standards beyond the accountancy profession, the IESBA will enter into new territory that will present many new challenges and require increased efforts to promote adoption and implementation by legislators and regulators, as well as non-PAs who likely will not be familiar with the Code’s conceptual framework and how to effectively apply it. We also support the IESBA’s efforts to proactively and timely engage with the relevant stakeholders, such as the recent roundtables on sustainability and use of experts, and we are particularly supportive of the efforts that the Board will undertake to advance the Code’s relevance and impact, deepen and expand the Code’s influence, and expand the Board’s perspectives and inputs, in particular from investors and the corporate governance community.

Seven specific questions were identified on which the Board requested stakeholders to comment, and we have organized our response accordingly. Our comments are set out below.

Grant Thornton International Limited (GTIL)

To the members of the International Ethics Standards Board for Accountants:

Grant Thornton International Ltd. (GTIL) appreciates the opportunity to comment on the consultation paper, PROPOSED IESBA STRATEGY AND WORK PLAN, 2024 – 2027, approved for publication by the International Ethics Standards Board for Accountants (the IESBA or the Board).

GTIL is an umbrella organisation that does not provide services to clients. Services are delivered by GTIL member firms around the world. Representative GTIL member firms have contributed to and collaborated on this comment letter with the public interest as their overriding concern.

KPMG IFRG Limited (KPMG)

We appreciate the opportunity to comment on the above Consultation Paper issued by the International Ethics Standards Board for Accountants (IESBA or the Board). We have consulted with, and this letter represents the views of, the KPMG global organization.

We are aligned with the Board on the need to keep ethical and independence standards strong and robust in order for the Code to be a cornerstone to ethical behavior. We consider it of utmost importance, to that aim, that the Board carefully weigh the impact of taking on multiple projects in the strategy period that are rooted in exploration and without critical need, in lieu of prioritizing post-implementation reviews (PIRs). PIRs and development of non-authoritative material that help professional accountants successfully implement new

standards support the Board's vision to achieve global acceptance and adoption of the Code, serving the public interest.

We believe the Board's focus should primarily be on topics and projects that are of highest priority and/or address an emerging urgent issue (e.g., sustainability reporting). Ongoing projects and work streams being carried forward into the new strategy period are significant undertakings, specifically related to sustainability. We believe these sizeable projects will consume the Board in 2024 and beyond and will require substantial effort by practitioners to implement. Allowing time for professional accountants and national standard setters to adopt and implement the significant changes to the Code will facilitate effective adoption and implementation of such standards.

Additionally, we suggest the IESBA consider a mechanism to address unintended consequences that may arise from revisions to the Code. Such a mechanism is needed in the short term while newly effective standards await post-implementation review. Without such, the window between standard issuance and post-implementation review may need to be tightened, especially when issues are identified before a standard's effective date. The IESBA should also consider leaving capacity in its Strategy and Work Plan to accommodate any emerging topic or issue that needs standard setting in short order.

The appendix to this letter provides our responses to the specific questions posed in the Consultation Paper.

Please contact Karen Bjune at kbjune@kpmg.com if you have questions on any of the points raised in this letter. We would be happy to discuss our views with you.

Meyers Norris Penny (MNP LLP)

Thank you for the opportunity to comment on the above-noted Strategy and Work Plan (the "**SWP**") for 2024-2027.

We commend the IESBA's commitment to develop timely and fit-for-purpose ethics and independence standards that guide ethical behaviour and play an important part in safeguarding public trust in the profession. However, we are sensitive to the rapid pace of change to the IESBA Code (the "**Code**") over the past few years which has made global adoption of these changes challenging for standard setters. We also recommend that changes to the Code continue to follow a principles-based approach rather than being overly prescriptive to ensure the Code maintains its broad applicability to the 130 jurisdictions who have adopted it or use it. Further, we encourage the IESBA to remain cognizant that a "one-size-fits-all" approach may not be suitable for different types of entities across all jurisdictions, such as public companies that operate in the mid-market, smaller private companies and Indigenous communities. When developing standards, the IESBA should allow for a tailored approach based on a specific jurisdiction's environment so that new standards are fit-for-purpose and effectively adopted.

Overall, with a few exceptions, we support the IESBA's SWP and concur that it focuses on the key priorities most relevant to the profession. We strongly support the IESBA prioritizing the development of *Sustainability Reporting and Assurance* standards, which is an area undergoing considerable evolution, as well as the focus on the *Use of Experts* project given the interconnectedness of these topics. However, we question whether the project on *Collective Investment Vehicles, Pension Funds and Investment Company Complex* warrants such a high priority given other projects which may have more significance to Professional Accountants ("**PAs**") and given the diversity in structure, governance, size and regulatory environment of such entities jurisdiction-by-jurisdiction. Finally, as described further below, we believe there are topics in the SWP (i.e., *Role of CFOs and Other Senior PAIBs* and *Audit Firm-Audit Client Relationship*) that may be better addressed through the development of non-authoritative guidance or other resources rather than inclusion in the Code.

We provide our responses below to certain of the IESBA's specific questions related to the SWP.

MNP LLP is one of Canada's largest chartered professional accountancy and business advisory firm. Our clients include small to mid-size owner-managed businesses in agriculture, agribusiness, retail and manufacturing as well as credit unions, co-operatives, Indigenous communities and businesses, medical and legal professionals, not-for-profit organizations, municipalities and other public sector entities. In addition, our client base includes a sizable contingent of publicly-traded companies.

We appreciate the opportunity to provide feedback on the SWP and look forward to reviewing the IESBA's deliberations and responses to comments received. We would be pleased to offer our assistance to the IESBA in further exploring the issues raised in our response or in finding alternative solutions.

Moore Global Limited Network (MGNL)

We welcome the opportunity to comment on this Consultation Paper.

Moore Global is a leading mid-tier network with over 34,000 people in 522 offices across 112 countries. All our member firms comply with the IESBA International Code of Ethics for Professional Accountants (including International Independence Standards). The proposed strategy and work plan, therefore, affect all Moore Global people and member firms.

We have gathered input from our network member firms across the globe. This includes both professional accountants that perform assurance work and those that only perform non-assurance services. These professional accountants have vast knowledge and experience in the ethics space.

PricewaterhouseCoopers International Limited (PWC)

We appreciate and thank you for the opportunity to comment on the IESBA's Proposed Strategy and Work Plan 2024-2027 ("SWP").

Overall, we commend the Board on a well thought through and comprehensive document which will serve as a good basis for the Board's continued endeavours and focus over the next few years.

This is a critical period over the next couple of years in terms of the development of ethical and independence standards for sustainability reporting and assurance thereon and we fully support the Board in prioritising this aspect of its work and in dedicating key resources to this. Coordination with the IAASB will be particularly important to ensure consistency and to avoid any gaps or implementation challenges.

We also agree that Ethics is an increasingly important first line of defence in ensuring high quality corporate reporting (financial and sustainability) and the Board's initiatives in this area are important.

We have provided some comments in response to the questions asked in the Consultation document in the appendix.

Contact

We would be happy to discuss our views with you. If you have any questions regarding this letter, please contact me at samuel.l.burke@pwc.com.

RSM International (RSM)

RSM International Limited, a worldwide network of independent audit, tax, and consulting services firms focused on serving the middle market, appreciates the opportunity to comment on the IESBA's proposed Strategy and Work Plan 2024 – 2027.

We are broadly supportive of the proposed strategy and plan. In recent years, the IESBA has made significant changes to its Code of Ethics, particularly with respect to the International Independence Standards. While it is important that the IESBA continues to assess whether its standards should be updated, we think it is important that significant effort be put to ensuring application of the IESBA rules and global implementation and operability of the rules. The IESBA Code is a good framework to use to respond to the evolving landscape and we recommend that the IESBA consider developing non-authoritative materials to help PAs apply the IESBA Code rather than developing new requirements.

We have responded to the specific questions below. If you have any questions relating to our response, please contact me at peter.oastler@rsm.global.

7. Member Bodies and Other Professional Organizations

Accountancy Europe (AE)

Accountancy Europe is pleased to provide you with its comments on the IESBA's Proposed Strategy and Work Plan for 2024-2027.

We welcome the IESBA's dynamic approach to its strategy and workplan that aims to bring in agility and flexibility.

Sustainability reporting and assurance should be given the highest priority by all stakeholders including the IESBA. It is critically important that the IESBA receives high quality input and feedback to its relevant projects from a wide range of stakeholders.

Significant revisions have been made to the Code, particularly in Part 4-A, with recent projects such as NAS, Fees and PIE definition. It will be very beneficial if the IESBA stands back and assesses the adoption and implementation of these revisions before embarking on new projects.

We strongly support IESBA's commitment to work closely with national standard-setters and the International Federation of Accountants (IFAC) with a focus on supporting jurisdictions adopt or use the latest additions and revisions to the Code. This should also include having a mindset throughout the projects to strike the balance between meeting the demands from stakeholders (for example, regulators) in addressing public interest issues and ensuring that the project scope is focused on "need to have changes" that improve the quality and maintain the principles-based nature of the Code.

Accountancy Europe is committed to collaborate with the IESBA in its efforts for responding to public interest issues.

We thank you for the opportunity to comment on this very important piece. For further information on this letter, please contact Harun Saki at harun@accountancyeurope.eu.

About Accountancy Europe

Accountancy Europe unites 50 professional organisations from 35 countries that represent close to **1 million** professional accountants, auditors and advisors. They make numbers work for people. Accountancy Europe translates their daily experience to inform the public policy debate in Europe and beyond.

Accountancy Europe is in the EU Transparency Register (No 4713568401-18).

American Institute of Certified Public Accountants Professional Ethics Executive Committee (AICPA)

The AICPA Professional Ethics Executive Committee (PEEC) respectfully submits the following comments to IESBA on its *Proposed Strategy and Work Plan 2024-2027 consultation paper* (the SWP).

The AICPA is the world's largest member association representing the CPA profession, with 431,000+ members in 130 countries and territories, representing many areas of practice, including business and industry, public practice, government, education, and consulting.

The AICPA sets ethical standards for its members and U.S. auditing standards for private companies, nonprofit organizations, and federal, state, and local governments; provides educational materials to its members; develops and grades the Uniform CPA Examination; monitors and enforces compliance with the profession's technical and ethical standards; offers specialized credentials; builds the pipeline of future talent; and drives professional competency development to advance the vitality, relevance and quality of the profession.

Through PEEC, the AICPA devotes significant resources to ethics activities, including evaluating existing standards, proposing new standards, and interpreting and enforcing those standards.

PEEC has the following comments regarding the SWP.

Association of Italian Audit Firms (Assirevi)

Assirevi is the association of the Italian audit firms. Its member firms represent the vast majority of the audit firms licensed to audit companies listed on the Italian stock exchange and other public interest entities in Italy, under the supervision of CONSOB (*Commissione Nazionale per le Società e la Borsa*).

Assirevi promotes technical research in the field of auditing and accounting and publishes technical guidelines for the benefit of its members. It collaborates with CONSOB, the Italian accounting profession and other bodies in developing auditing and accounting standards.

1. Assirevi is pleased to submit its comments on the Consultation Paper "*Proposed IESBA Strategy and Work Plan, 2024-2027*" issued by IESBA in April 2023, as detailed in the enclosed document.
2. Should you have any queries, please do not hesitate to contact us.

Association of Chartered Certified Accountants (ACCA)

ACCA (the Association of Chartered Certified Accountants) is the global body for professional accountants.

We're a thriving global community of **241,000** members and **542,000** future members based in **178** countries and regions, who work across a wide range of sectors and industries. We uphold the highest professional and ethical values.

We offer everyone everywhere the opportunity to experience a rewarding career in accountancy, finance and management. Our qualifications and learning opportunities develop strategic business leaders, forward-thinking professionals with the financial, business and digital expertise essential for the creation of sustainable organisations and flourishing societies.

Since 1904, being a force for public good has been embedded in our purpose. We believe that accountancy is a cornerstone profession of society and is vital in helping economies, organisations and individuals to grow and prosper. It does this by creating robust trusted financial and business management, combating corruption, ensuring organisations are managed ethically, driving sustainability, and providing rewarding career opportunities.

And through our cutting-edge research, we lead the profession by answering today's questions and preparing for the future. We're a not-for-profit organisation.

Find out more at accaglobal.com

Further information about ACCA's comments on the matters discussed here can be requested from:

Mike Suffield	Antonis Diolas
Director, Policy & Insights	Head of Audit and Assurance
mike.suffield@accaglobal.com	antonis.diolas@accaglobal.com

GENERAL COMMENTS:

ACCA welcomes the IESBA's Proposed Strategy and Work Plan 2024 – 2027 and commends the IESBA for its continuous work in updating the Code, such as for example, its recent revisions in relation to Technology, recognising the current landscape of the accountancy profession and the importance of having a Code of Ethics that remains relevant.

We are also very pleased that following the IESBA's public commitment to readying global ethics (including independent standards) to respond timely to developments regarding sustainability, the sustainability work stream was established with two projects already ongoing.

As we noted in our response to the IAASB's Strategy and Work Plan 2024-2027, which is clearly relevant to the IESBA's Strategy and Work Plan 2024-2027, notwithstanding the strong progress, our stakeholders are highlighting the need for a balanced approach between a stable platform and being responsive to public interest demands, to allow sufficient time for due process and implementation.

Botswana Institute of Chartered Accountants (BICA)

Introduction

The Botswana Institute of Chartered Accountants ("BICA") is a statutory body established by Accountants Act, 2010 for the regulation of the accountancy profession in Botswana. The Institute's mission is to protect public interest through promoting the accountancy profession, supporting accountants, facilitating quality professional accountancy services through the monitoring and regulation of professional accountants.

The Institute appreciates the opportunity to contribute towards the Consultation Paper, *Proposed IESBA Strategy and Work Plan, 2024 - 2027*. We have provided our comments to each specific question as per the Consultation Paper. Should you wish to have further engagements please do not hesitate to contact the undersigned.

Chartered Accountants Australia and New Zealand (CA ANZ)

IESBA Proposed Strategy and Work Plan 2024-2027

Chartered Accountants Australia and New Zealand ("CA ANZ") appreciates the opportunity to provide comment on the International Ethics Standards Board for Accountants' ("IESBA's") Proposed Strategy and Work Plan regarding areas of priority and focus for the IESBA during the period 2024- 2027 ("SWP").

CA ANZ is generally supportive of the IESBA's SWP. While a SWP is a critical tool to inform the work of the IESBA going forward, it is important that the IESBA has the flexibility within this SWP to be responsive to unforeseen issues which may impact the profession. We observed the SWP has an extensive agenda for the period which includes complex new projects, such as sustainability assurance, and several post implementation reviews of equally challenging topics such as Non-Compliance with Laws and Regulations (“**NOCLAR**”), Long Association, Non-Assurance Services (“**NAS**”) and Fees. We encourage the IESBA to balance the expectations of stakeholders with the board's limited recourses.

The SWP follows a period of significant and substantial change to the Code of Ethics for Professional Accountants (including Independence Standards) (“**the Code**”) and in turn other applicable standards promulgated by domestic standard setters. As discussed in our [response to Question 5 in the IESBA Strategy Survey \(2022\)](#), time is now needed to allow Professional Accounting Organisations (“**PAOs**”) and Professional Accountants (“**PAs**”) to digest and embed these changes. Implementation support through outreach activities and the publication of useful and practical non-authoritative material (“**NAM**”) focused on providing clarity and driving consistency, would be well received.

In **Appendix 1** we have responded to each of the IESBA's consultation questions. **Appendix 2** 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

Appendix 2

[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.

The Chamber of Auditors of the Czech Republic (CACR)

We are pleased to respond to the International Ethics Standards Board for Accountants (IESBA) Consultation paper - The IESBA's Proposed Strategy and Work Plan for 2024 – 2027.

Below you can find our answers on the Board's questions.

Certified Professional Accountants Australia (CPAA)

Proposed IESBA Strategy and Work Plan, 2024-2027

CPA Australia is Australia's leading professional accounting body and one of the largest in the world. We represent the diverse interests of more than 173,000 members in over 100 countries and regions. We make this submission in response to the Proposed IESBA Strategy and Work Plan 2024-2027 on behalf of our members and in the broader public interest.

Overall, CPA Australia is broadly supportive of the IESBA's Proposed Strategy and Work Plan 2024-2027 and provide the following responses to the questions from the consultation paper.

Chartered Professional Accountants Canada Public Trust Committee PA Canada (CPAC)

I am writing on behalf of the Public Trust Committee (PTC) of the Canadian Chartered Professional Accountant profession in response to your request to comment on the *Proposed IESBA Strategy and Work Plan, 2024-2027: Towards a More Sustainable Future: Advancing the Centrality of Ethics ("the SWP")*.

Canada's accounting profession is regulated by provincial CPA bodies and is comprised of more than 220,000 members both at home and abroad. The provincial CPA regulatory bodies are statutorily responsible for their respective codes of conduct including the independence standards. CPA Canada is a member of IFAC, represents the profession nationally and internationally, and supports the setting of accounting, auditing and assurance standards for business, not-for-profit organizations, and government. The provincial CPA regulatory bodies and CPA Canada collaborate through the PTC to recommend policies and strategies to uphold the public's confidence and trust in the profession.

One of the responsibilities of the PTC is to monitor international developments with respect to the International Ethics Standards Board for Accountants (IESBA) Code of Ethics ("the Code") and develop responses to consultations on behalf of the Canadian CPA profession.

Thank you for the opportunity to provide our comments on the SWP. We commend the IESBA for its efforts in developing this Consultation Paper and for consulting broadly with stakeholders to inform the development of the Proposed Strategy and Work Plan.

Our views

Overall, the PTC is generally supportive of the SWP recognizing that it is ambitious considering the commitment made by the IESBA regarding the development of timely ethics standards for sustainability reporting and assurance. We were pleased to note some potential work streams under consideration that aligned with our assessment of them as valid strategic priorities in the IESBA Strategy Survey 2022 and others for which we had made related observations in responding to Exposure Drafts.

In developing the Consultation Paper, we appreciate that care has been taken by the IESBA to assess the proposed actions as well as to consider overall capacity and resources in addition to recognizing the need for considering emerging issues that may require actions not already contemplated within the SWP. We have provided our observations and questions related to this in our responses to the request for comments.

Please find below our responses to the questions identified for input from respondents as outlined in the Consultation Paper:

Hong Kong Institute of Certified Public Accountants (HKICPA)

The Hong Kong Institute of Certified Public Accountants (HKICPA) is the only statutory body in Hong Kong that sets auditing and assurance standards, ethical standards, financial reporting standards as well as sustainability disclosure standards for professional accountants in Hong Kong. We welcome the opportunity to provide our comments on the captioned IESBA Consultation Paper (CP).

Irish Auditing and Accounting Supervisory Authority (IAASA)

The Irish Auditing and Accounting Supervisory Authority (IAASA) appreciates the opportunity to comment on IESBA's consultation on its Proposed Strategy and Work Plan, 2024-2027 (CP).

In Ireland, the IESBA Code forms the basis for the Ethical Standard for Auditors (Ireland) issued by IAASA as well the code of ethics of each of the prescribed accountancy bodies. IAASA clearly sees an interest in enhancing the content of the IESBA Code, as it constitutes the basis for the ethical requirements with which auditors and accountants in Ireland are required to comply.

Ikatan Akuran Indonesia (IAI)

The Institute of Indonesian Chartered Accountants or Ikatan Akuntan Indonesia (IAI) is the recognized professional accountancy organization for all professional accountants in Indonesia.

IAI emphasizes the importance of ethical conduct among its members, upholding integrity, and ethical behavior to maintain public trust in the accounting profession by establishing Dewan Kode Etik or Ethics Board of IAI (DKE-IAI).

DKE IAI is pleased to submit our input on the proposed IESBA strategy and work plan for 2024-2027. We appreciate the efforts of the IESBA to solicit input from many parties on this consultation paper.

We broadly agree with the proposed strategy of IESBA to developing timely ethics standards for sustainability reporting and assurance to meet the increasing needs of investors, customers, workers, government agencies, and other stakeholders for sustainability information.

We recognize the key global trends faced by professional accountants, business leaders, chief financial officers, and finance functions. This can be illustrated by the growing market demand for continuous financial information, which requires CFOs to expand their focus not only on financial information but also on non-financial information. With an expanded role, CFOs must be able to provide trust and confidence in organizational governance, data quality and reporting, and provide ethical leadership and a constructive challenge mindset.

It is highly appreciated that Sections 1 and 2 of the Code be further enhanced to support Professional Accountants in Business (PAIB) in addressing ethical issues and challenges, as well as issues that arise in a sustainable economy.

We agree that this is a priority given the recent publication of the International Sustainability Standards Board's S1 and S2 standards, as well as other jurisdictional developments, and the work being done by the International Auditing and Assurance Standards Board (IAASB) on the development of International Standards on Assurance Engagements 5000.

We strongly agree with the IESBA's proposed program of work to align the definitions of terms used in the Code with those in the IAASB. Considering that many users apply the IAASB standards and the Code simultaneously, it is necessary to align terms and definitions to eliminate ambiguity, increase the interoperability of the IESBA and IAASB standards, and facilitate the adoption and implementation of the two standards.

Our detailed comments on IESB strategy and work plan for 2024 – 2027's questions are as follows:

Institute of Chartered Accountants in England and Wales (ICAEW)

ICAEW very much welcomes the publication of IESBA's draft strategy and Work Plan for 2024-2027 and is grateful for the opportunity to provide its views. This response should be considered in connection with ICAEW's response to IESBA's previous consultation and draft strategy survey in June 2022.

For questions on this response, please contact the ICAEW Ethics team at representations@icaew.com, quoting ICAEW REP 66/23.

ICAEW is a world-leading professional body established under a Royal Charter to serve the public interest. In pursuit of its vision of a world of strong economies, ICAEW works with governments, regulators and businesses and it leads, connects, supports and regulates more than 166,000 chartered accountant members in over 146 countries. ICAEW members work in all types of private and public organisations, including public practice firms, and are trained to provide clarity and rigour and apply the highest professional, technical and ethical standards.

Institute of Chartered Accountants of Nigeria (ICAN)

Please do not hesitate to contact us if you need further clarifications.

Institute of Chartered Accountants of Scotland (ICAS)

Introduction

ICAS is a professional body for more than 23,600 world class businesspeople who work in the UK and in more than 80 countries around the world. Our members have all achieved the internationally recognised and respected CA qualification (Chartered Accountant). We are an educator, examiner, regulator, and thought leader.

Over half of our working membership work in business; the others work in accountancy practices ranging from the Big Four in the City to the small practitioner in rural areas of the country.

We currently have over 4,400 students striving to become the next generation of CAs under the tutelage of our expert staff and members. We regulate our members and their firms. We represent our members on a wide range of issues in accountancy, finance and business and seek to influence policy in the UK and globally, always acting in the public interest.

ICAS was created by Royal Charter in 1854. The ICAS Charter requires its Boards to act primarily in the public interest, and our responses to consultations are therefore intended to place the public interest first. Our Charter also requires us to represent our members' views and to protect their interests, but in the rare cases where these are at odds with the public interest, it is the public interest which must be paramount.

The ICAS Ethics Board has considered the IESBA Consultation Paper: ‘Proposed IESBA Strategy and Work Plan 2024 - 2027’ and I am pleased to forward its comments.

Any enquiries should be addressed to Ann Buttery, ICAS Head of Ethics.

Key Points

Overall, we are generally supportive of IESBA’s proposals outlined in the above Consultation Paper.

We agree with IESBA that it should primarily be focusing on progressing and completing on-going projects in a timely manner, particularly its sustainability work streams and, in addition, seeking to enhance the level of input from the wider stakeholder community; promoting further adoption of the Code; and undertaking post-implementation reviews.

We believe that, other than in relation to sustainability matters and completion of other existing projects, IESBA should have a ‘slow down’ period for now in terms of creating new provisions to the Code.

Sustainability

Whilst we note IESBA’s intention that its sustainability workstreams will cover the whole spectrum of sustainability matters, in order to be clear to users that this is the case we suggest that the new provisions within the Code would benefit from examples covering a range of sustainability-related matters i.e. across the full Environmental, Social and Governance (ESG) spectrum. This would mean capturing not just climate related matters within the “E”, but other environmental matters such as nature and biodiversity, as well as social and governance elements of the “S” and the “G”.

Technology

We agree that IESBA should continue its ongoing monitoring function of technology developments (particularly given the speed of change in this area, and for example the concerns around privacy and the use of data by AI), but also other emerging issues or developments other than those related to sustainability and technology.

We do however note that there currently appears to be no plans to carry out a Post-Implementation Review of the technology related revisions to the Code (effective from December 2024) in the period 2024-2027 and suggest that, given the speed of change in relation to AI, it might be better to schedule this earlier.

Extending the Code to others

We further note that if IESBA is successful in extending the Code to others providing assurance services on sustainability, then perhaps this approach could also be considered to ensure a level playing field for other areas. For example, the requirements of the Code might also be extended to others providing tax planning services e.g. lawyers etc. We do however appreciate that there would be a need to involve other bodies to achieve this particular goal – IESBA would in the first instance need to develop a strategy for gaining regulatory support around the globe.

Institut der Wirtschaftsprüfer (IDW)

We would like to thank you for the opportunity to provide the IESBA with our comments on the “Consultation Paper of April 2023: Proposed IESBA Strategy and Work Plan, 2024 – 2027”, hereinafter referred to as “the Consultation Paper”.

In Appendix 1 to this letter, we respond to the individual questions posed in the Explanatory Memorandum of the Consultation Paper. We have a few general issues that we would like to address in this letter below.

The IDW supports the IESBA taking the initiative in addressing ethical aspects associated with emerging developments in sustainability reporting and related assurance. However, because many jurisdictions are at the start of their sustainability reporting journey, and the IESBA is tasked with developing ethical requirements at a global level, we suggest the IESBA address the entire sustainability related eco-system of the profession. In particular, we would support the IESBA including consideration of all those involved in the *preparation* of publicly reported sustainability information. The quality, including the integrity, of the preparation of publicly reported sustainability information is a key public interest issue in the absence of legally required assurance engagements. As the IESBA is aware, assurance on sustainability-related information is currently not required in many parts of the world. We therefore would like to propose to the IESBA not to focus its work in this area solely on assurance at this point in time.

We also support the IESBA taking stock of the nature and extent to which the IESBA Code is adopted or implemented worldwide before taking on further new projects. Both gathering information as to which versions of the Code are being applied in which jurisdictions and assessing whether the aims of changes made are being achieved (post-implementation reviews, PIRs) will be invaluable in determining future initiatives to foster global acceptance and uptake of the Code and identifying where revisions to the Code or implementation support should be targeted. PIRs and such a stock-take would also help determine whether in fact further changes to the Code are desirable, which would also assist the IESBA in seeking a stable platform, which the IESBA acknowledges many have called for following a period of unprecedented pace of change. This has recently been challenging for auditors in particular.

The IESBA has completed phase one of its benchmarking exercise (with the US SEC/PCAOB independence framework for auditors). On this basis alone, it seems impossible to achieve a global balance in drafting Table B. A preference seems to be given to issues identified from a single jurisdiction which appears to be – if the impression is correct – unfortunate. We would like to ask the IESBA to complete its benchmarking exercise and then reflect the findings in terms of determining the relative urgency of potential new projects.

Finally, we note that paragraph 54 of the Consultation Paper refers to an anticipated revision of the due process to optimize efficiency. In the absence of further insights as to possible impact on capacity, we have not taken this factor into account in providing our responses.

We would be pleased to provide you with further information if you have any additional questions about our response and would be pleased to be able to discuss our views with you.

Institute of Singapore Chartered Accountants (ISCA)

For this CP, the Institute of Singapore Chartered Accountants (ISCA) sought views from its members through a one-month public consultation and discussed the CP with members of the ISCA Ethics Committee.

Japanese Institute of Certified Public Accountants (JICPA)

The Japanese Institute of Certified Public Accountants (JICPA) appreciates this opportunity to comment on the International Ethics Standards Board for Accountants (IESBA) Consultation Paper, *Proposed Strategy and Work Plan 2024-2027*.

Korean Institute of Certified Public Accountants (KICPA)

We, at the Korean Institute of Certified Public Accountants (KICPA), strongly support the International Ethics Standards Board for Accountants (IESBA) for its commitment to developing high-quality professional ethics standards to raise the bar for ethical conduct expected from professional accountants and to serve the public interest.

Pan-African Federation of Accountants (PAFA)

PREFACE

The Pan-African Federation of Accountants (“PAFA”, “we” and “our”), welcomes the International Ethics Standards Board for Accountants (IESBA)’s publication of The IESBA’s Proposed Strategy and Work Plan for 2024–2027, and the opportunity to comment thereon.

PAFA represents Africa’s professional accountants, and our objective is to accelerate the development and strengthen the voice of the accountancy profession within the continent and worldwide. In its unique regional capacity to work with Professional Accountancy Organisations and present a unified position for the profession, PAFA hereby presents its responses to the Exposure Draft.

We detail our responses to specific questions in the appendix to the letter below. We hope that our comments will positively contribute to the IESBA future’s deliberations. Should you have further concerns regarding our comments, please do not hesitate PAFA Director: Technical Excellence Ms Lebogang Senne on lebogangs@pafa.org.za

Pennsylvania Institute of Certified Public Accountants (PICPA)

The Professional Ethics Committee (the committee) of the Pennsylvania Institute of Certified Public Accountants (PICPA) appreciates the opportunity to provide comments to the International Ethics Standards Board for Accountants (IESBA) regarding the proposed IESBA strategy and work plan for 2024 – 2027, *Towards a More Sustainable Future: Advancing the Centrality of Ethics*. The PICPA is an association of more than 18,000 members working to improve the profession and better serve the public interest. Founded in 1897, the PICPA is the second-oldest CPA organization in the United States. Membership includes practitioners in public accounting, education, government, and industry.

The committee is a cross section of our membership, with practitioners from large, regional, and small public accounting firms, members serving in business and industry, and accounting educators.

South African Institute of Chartered Accountants (SAICA)

The South African Institute of Chartered Accountants (SAICA) welcomes the opportunity to make submissions to IESBA on the *Consultation Paper, The Proposed IESBA Strategy and Work Plan, 2024 - 2027*.

SAICA is South Africa’s pre-eminent accountancy body which is widely recognised as one of the world’s leading accounting institutes. The Institute provides a wide range of support services to more than 52 000 members who are chartered accountants [CAs(SA)] and associates [AGAs(SA)] who hold positions as chief executive officers, managing directors, board members, business owners, Chief Financial Officers, auditors, tax practitioners and leaders in their spheres of business operation.

SAICA adopted the IESBA’s International Code of Ethics for Professional Accountants (including International Independence Standards) (the Code) in November 2018 as the SAICA Code of Professional Conduct (the SAICA Code), with certain additional national requirements.

SAICA has consulted its membership in response to the Consultation Paper. Members who provided input into the process included academics, professional accountants in public practice and professional accountants in business who have vast knowledge and experience in the Ethics space.

Following our consultations with our members, material concerns, reservations and proposals have been raised in relation to the Consultation Paper for the attention of IESBA. These are included in the **annexure A** to this letter:

We would appreciate the opportunity to engage further and to discuss the raised issues if required. Please do not hesitate to contact Viola Sigauke at violas@saica.co.za.

Wirtschaftsprüferkammer (WPK)

The Wirtschaftsprüferkammer (WPK) is pleased to take the opportunity to comment on the Consultation Paper on the IESBA's Proposed Strategy and Work Plan for 2024-2027 (CP). We would like to highlight some general comments first and provide you with our specific responses to the individual questions of the CP subsequently.

General

Comments

The WPK welcomes the proposed approach to attach the highest priority to the Sustainability Project since sustainability without any doubt is one of the most urgent issues for the profession at the moment. When adopting the ethical standards to sustainability reporting and assurance, the IESBA should first check to which extent the existing principles-based provisions of the Code are appropriate and sufficient to adequately cover the topic of sustainability from an ethical perspective and, in a second step, consider changes of the principles only, if deemed absolutely necessary. As the IESBA outlined, further close coordination with the IAASB in order to ensure the harmonization of terminology is of essential importance especially in the light of the fact that the IAASB accelerated its timeline for issuing the respective auditing standard ISSA 5000.

The WPK is principally in favor of the extension of the ethical rules for sustainability assurance to service providers outside the profession in order to ensure a high quality and to avoid possible competitive disadvantages for the audit profession. Since the IESBA rules do not directly bind such other service providers, the main question is how to oblige other service providers to follow these rules. A close cooperation with the responsible global regulators and oversight bodies as well as key jurisdictional bodies seems to be crucial in order to achieve this goal.

Another question that may arise in this context is how IESBA could make such other services providers participate in covering the cost of the standard-setting.

As far as the other proposed projects are concerned, the WPK suggests to defer them as far as necessary to focus the available resources on the Sustainability Project. Since significant and extensive revisions have been made to the Code over the previous years and thereby the bar of ethics has been immensely risen, we are convinced that the latest version of the principles-based Code provides a profound and sufficient basis covering the current needs of the profession with the exception of sustainability reporting and assurance. The WPK believes that it is in the broader public interest to lower the pace of standard-setting and to focus on developing non-authoritative material (NAM) as well as on how the IESBA pronouncements have been adopted and implemented in the respective jurisdictions. This will help the profession as a whole and small and medium practices (SMPs), in particular, to adopt and implement the new or revised standards.

3. Individuals and Others

European Federation of Accountants and Auditors for Small and Medium Entities (EFAA)

EFAA appreciates the opportunity to provide our comments to the [IESBA Strategy and Work Plan, 2024 - 2027 Consultation Paper](#).

The European Federation of Accountants and Auditors for SMEs (EFAA) represents accountants and auditors providing professional services primarily to SMEs both within the European Union and Europe as a whole.

Constituents are mainly small practitioners (SMPs), including a significant number of sole practitioners. EFAA's members, therefore, are SMEs themselves, and provide a range of professional services (e.g., audit, accounting, bookkeeping, tax, and business advice) to SMEs. EFAA currently represents 15 national accounting, auditing, and tax advisor organisations with more than 380,000 individual members.

GENERAL COMMENTS

EFAA is concerned to ensure that policy, regulation, and professional standards are scalable and **both** proportionate to the capacities of SMPs and their SMEs clients **and** tailored to the needs and characteristics of SMPs and SMEs. We strongly prefer a 'Think Small First' approach, developing straightforward regulation and professional standards, including for ethics, for SMEs and SMPs and then scaling up to suit larger, more complex engagements, companies, and accountancy practices.

Previously we [responded](#) to the IESBA Strategy Survey 2022 (see our response) and participated in the Paris and New York [IESBA 2023 Global Roundtables on Sustainability](#). This response is based on our survey response and interventions at the roundtables while being shaped by what we heard from other survey respondents and event participants.

International Federation for Accountants Public Accountants in Business Advisory Group (IFAC PAIBAG)

Introduction

The [IFAC Professional Accountants in Business \(PAIB\) Advisory Group](#) is pleased to offer its high-level input on the proposed IESBA strategy and work plan for 2024 – 2027.

Professional accountants in business comprise a significant part of the profession working in commerce, industry, financial services, education, and the public and not-for-profit sectors. The PAIB Advisory Group focuses on ensuring these accountants meet the future needs of organizations. We explore key global trends in the context of the issues facing business leaders, chief financial officers and finance functions, internal audit functions, risk managers and analysts, those in broader commercial roles in procurement and supply chain management, as well as boards and their audit committees.

We have focused our response on the questions and topics most relevant from a PAIB perspective.

Munarriz CE

I appreciate the opportunity to comment on "Proposed IESBA Strategy and Work Plan 2024-2027". My comments are included in the following pages.

All opinions and points of view outlined in this document are my own and they do not necessarily represent the views of any company, employer, organisation or committee.

If you have any questions, please contact me at cristian_munarriz@yahoo.com.ar.

International Federation for Accountants Small and Medium Practices Advisory Group (IFAC SMPAG)

INTRODUCTION

The IFAC SMP Advisory Group (SMPAG) is pleased to respond to the IESBA Proposed Strategy and Work Plan for 2024-2027.

The SMPAG is charged with identifying and representing the needs of its constituents and, where applicable, to consider relevant issues pertaining to small- and medium-sized entities (SMEs). The constituents of the SMPAG are small- and medium-sized practices (SMPs) who provide accounting, auditing, assurance, and business advisory services principally, but not exclusively, to clients who are SMEs. Members and Technical Advisers serving the SMPAG are drawn from IFAC member organizations representing 25 countries from all regions of the world.

GENERAL COMMENTS

Overall, the SMPAG generally supports the IESBA's Proposed Strategy and Work Plan for 2024-2027. A key point, which is highlighted throughout our response, is the need for the IESBA to be far more sensitive to the volume and number of changes going forward. SMPs and Professional Accountancy Organizations (PAOs) are continuing to struggle with the implementation and adoption of new and revised standards because of the pace of change. Specific challenges for SMPs include updating manuals and processes, providing staff training and monitoring and control of new changes. Practitioners are being overwhelmed by the changes, which should not be viewed in isolation, as they are also dealing with changes to other international standards and local regulations and legislation, together with all the daily issues that come from managing their practices. PAOs are also finding it challenging to support education and training on a timely basis. Ultimately, there may be a decrease in full adoption rates due to the pace of change and complexity of recently issued changes and we therefore agree that this should be a strategic focus of the IESBA.

The SMPAG is supportive of an approach that minimizes revisions to the Code, which should only be made when essential. Non-authoritative guidance should be issued where possible in response to emerging issues. Where any revisions to the Code are made, scalability and the impact on SMPs should be carefully considered.

We have outlined our responses to the questions (in bold) below.

CONCLUDING COMMENTS

We hope that the IESBA finds this letter useful. We are committed to helping the Board in whatever way we can in its strategy and work plan for 2024-2027.

Please do not hesitate to contact me should you wish to discuss matters raised in this submission.

Sincerely,