

**IESBA Sustainability****Question 3 - Agree****Regulators and Oversight Authorities, incl. Monitoring Group members****BAOA - Botswana Accountancy Oversight Authority**

Yes, we support the definition as it clearly identifies the type of information that is relevant for reporting sustainability information.

**NASBA - National Association of State Boards of Accountancy (US)**

NASBA supports the definition of “sustainability information” in Chapter 2 of the Exposure Draft, believing it is not too narrow and leaves room for interpretation by the practitioner.

**UKFRC - United Kingdom Financial Reporting Council**

Yes.

**Public Sector Organizations****AGNZ - Office of the Auditor General of New Zealand**

The definition of “sustainability information” seems reasonable.

**UNCTAD ARL - UNCTAD’s Latin America Regional Alliance**

I do support - 75% of respondents

**UNCTAD ARP - UNCTAD African Regional Partnership**

100% of the respondents support the proposed definition for ‘sustainability information’ as it covers the collection, classification, recording, measurement, maintenance, and approval of sustainability information (under proposed revised Parts 1 to 3 of the Code); the preparation or presentation of that information in the form of sustainability reports, statements or other disclosures (also under proposed revised Parts 1 to 3 of the Code); and the issue of an opinion on those disclosures (under new Part 5 of the Code). The definition also covers all non-financial information that should be used to collate the sustainability reports as proposed by the IESBA.

**Independent National Standard Setter****APESB - Accounting Professional & Ethical Standards Board (Australia)**

APESB support the definition of “sustainability information” in Chapter 2 of the Sustainability ED, and agree that a broad definition is needed to ensure the scope of the ethical framework will be consistent with the applicable reporting or assurance framework adopted.

**Professional Accounting Organizations (PAOs)****AE - Accountancy Europe**

Yes, we support the proposed broad and generic definition of “sustainability information” which is necessary for the Code to be framework neutral. We understand that subparagraph (b) of the definition scopes in terms and definitions used in laws and

regulations or by other standard setters, such as the IAASB's definition in the ISSA 5000 Exposure Draft.

### **AIC - Asociacion Interamericana de Contabilidad (Inter-American Accounting Association)**

We fully support the definition of this new term. That will be frequently used in reports prepared by reporting entities, and by professionals providing assurance on financial statements and other sustainability reporting. Particularly in accordance with: the requirements of the new International Financial Reporting Standards on Sustainability (IFRS S1 and IFRS S2), already in force and others to be issued in the future. However, as the IESBA it states in its ED that the standards already issued and to be issue others and published, for example, the standards developed or under development by the IAASB, the ISSB, the Global Reporting Initiative (GRI), and the European Financial Reporting Advisory Group (EFRAG). It is superlatively important that the new document once published as the new International Ethics Code for Assurance and Sustainability (including International Independence Standards) (IESSA) contains the scope of the term sustainability reporting in a definition of its own that will avoid misinterpretation of its meaning.

Although the broadness of the definition proposed in the ED. We believe that this characteristic of a broad and not limited definition will allow its congruent application with other standards, especially the IFRS Sustainability and the International Assurance Engagement Standard, in process of development by IAASB, and other pronouncements already in force and future, so that it would have a universal application in the use of "sustainability information".

### **BICA - Botswana Institute of Chartered Accountants**

The support for the definition of "sustainability information" in Chapter 2 of the ED is crucial as it provides clarity and a common understanding of the information covered under sustainability assurance engagements.

### **ICPAU - Institute of Certified Public Accountants of Uganda**

As per the survey results in Appendix 2, we are supportive of the proposed definition of sustainability information in the ED. We believe that this definition is comprehensive enough for all relevant sustainability matters and, recognizes that there are many frameworks/criteria that may be applied to sustainability assurance engagements. The principles-based approach used in the definition makes the definition scalable and thus applicable to different entities.

### **IICA - Institute of Indonesia Chartered Accountants**

Yes, with a focus on environmental aspects so that it is in line with the sustainability standards issued by the ISSB.

### **MICPA - Malaysian Institute of Certifice Public Accountants**

We are supportive of the definition of "sustainability information".

### **NBA - Royal Netherlands Institute of Chartered Accountants**

We agree with the reaction of Accountancy Europe dated May 10, 2024.

## **PAFA - The Pan-African Federation of Accountants**

We support the definition of 'sustainability information' in Chapter 2 of the ED. It effectively encompasses global sustainability concerns and allows for flexibility by referencing information defined by law, regulation, and frameworks, accommodating both the double materiality concept and jurisdictional variations.

## **Other Assurance Providers and Accreditation Bodies (non-PAs)**

### **AccountAbility**

We support the definition of "sustainability information" proposed by the IESBA as well-considered and comprehensive. This definition helps ensure consistency and clarity in the application of standards related to sustainability reporting and assurance. The definition's broad and inclusive nature, encompassing ESG factors as well as other relevant economic factors, reflects an understanding of the evolving nature of sustainability reporting. Moreover, its alignment with terms used in other standards and regulations enhances interoperability and avoids confusion. Overall, the proposed definition appears to be a thoughtful approach to addressing the complexities of sustainability information within the context of ethics and standards.

## **Accounting Firms and Sole Practitioners**

### **BDO - BDO International Limited**

BDO agrees with no further comments.

### **EY - Ernst & Young Global Limited**

We agree with the proposed definition of Sustainability Information and support a broad definition so as to encompass various types of sustainability information as well as different reporting and assurance standards. We believe the discussion on the definition of Sustainability Information included in paragraphs 24 through 26 of the EM is helpful, in particular the need for the Code's definition to be broad and generic in order to be interoperable with various reporting and assurance standards, and also given the diversity in how this term is (or will be) defined in various regulations and standards, and how future cultural and legal developments might impact the type of information that is considered for purposes sustainability reporting. Therefore, we suggest that the discussion in paragraphs 24 through 26 is included in the IESBA's Basis for Conclusion.

### **MU - Muhammad Umar - Mo Chartered Accountants**

The applicability of sustainability information to include sustainability assurance and sustainability reporting follows the method of financials statement assurance and reporting. We agree with the IESBA's proposed definition of "sustainability information" be intentionally broad and sufficiently generic to be perennial and interoperable with various reporting and assurance standards.

### **PP - Pitcher Partners Advisors Proprietary Limited**

Yes. The definition is sufficiently broad to encompass foreseeable "sustainability information".

## **Academia and Research Institutes**

## **NNN - Nada Naufal Director at the American University of Beirut**

With the recent (early 2024) significant global convergence in sustainability disclosure standards, mainly ISSB's IFRS 1 and IFRS 2 complemented by the GRI (Global Reporting Initiative) and the incorporation of TCFD's (Climate-Related Financial Disclosures) recommendations, there is a shift towards managing and disclosing Environmental, Social and Governance (ESG) data (aka sustainability data) with the same rigor and controls as financial data; it might be worth considering the EUs 'double-materiality' concept which goes beyond traditional 'materiality' considerations.

As we know it, double-materiality involves evaluating both the impact of ESG issues on a company's operations and how the company's actions can affect ESG issues. This concept is becoming increasingly significant in accounting as it expands reporting requirements to encompass both financial (financial materiality) and non-financial data (impact materiality). With the new approach of Integrated Reporting, ESG considerations are now being factored into asset valuation methods. For example, a company may assess risks related to ESG factors in financial reporting, affecting the company's financial performance. Moreover, double-materiality will influence how companies evaluate the value of their assets and liabilities. This integration will have an impact I believe across the domains of accounting, ethics and assurance.

Considering these developments, the mere mentioning of ESG and double-materiality in the report might be something to consider as they become an important subset of sustainability reporting.

### **Question 3 - Agree With Comments**

#### **Regulators and Oversight Authorities, incl. Monitoring Group members**

##### **ESMA - European Securities and Market Authority**

ESMA understands that, prior to issuing its proposals, IESBA has coordinated with the IAASB on a number of subjects. We also concur with the fact that developing framework-neutral ethics requirements implies maintaining neutrality not only from jurisdictional initiatives, but also to some extent from the IAASB's international sustainability assurance standard. Nevertheless, ESMA would recommend maintaining consistency between the IAASB's approach to define sustainability information and sustainability matters in the proposed ISSA 5000 and the proposed IESBA approach to define sustainability information. In our view, eliminating unnecessary divergence between IESBA's and the IAASB's standards would not undermine their neutrality, but rather improve their interoperability.

##### **IOSCO - International Organization of Securities Commissions**

We continue to encourage the IESBA to closely coordinate with the International Auditing and Assurance Standards Board (IAASB) (collectively the Boards) to address topics of mutual importance. Specifically, we encourage the Boards to closely coordinate their work towards convergence and consistency of definitions, terms and key concepts used by both Boards in their respective sustainability-related proposed standards, such as that of "sustainability information", to promote interoperability, especially for non-professional accountants who might be using the Boards' standards for the first time.

## **IRBA - Independent Regulatory Board for Auditors**

Overall response: Yes, subject to one comment for your consideration below.

We encourage continued cooperation between the IAASB and the IESBA with respect to the definition of sustainability information to facilitate interoperability and ease of application.

## **PAABZ - The Public Accountants and Auditors Board of Zimbabwe**

The PAAB supports the IESBA's definition as it clear and sufficient and also for the fact that the definition incorporates ESG factors and scopes in the definition in the IAASB's proposed ISSA 5000 standard making the necessary alignment between the two Boards' proposed terms. We however recommend that the IESBA also consider the definition of sustainability information in IFRS S1 for more alignment and consistent application of the term. The coverage, extent and scope of the term "sustainability information" is clear in that it encompasses sustainability reporting and sustainability assurance.

## **SGX - Singapore Exchange Limited**

Yes, with comments.

The inclusion of "Economic" in limb (a)(i) in the disjunctive sense, may connote the inclusion of information that are purely financial in nature, which goes against the ambit of the definition to only capture sustainability-related information. Purely economic or financial information should not be captured in the definition of "sustainability information".

Suggest to make clear that limb (a)(i) and (ii) are references to single and double materiality respectively. If not, to clarify if the terms "single and double materiality" will be mentioned elsewhere in the standards.

## **Investors and Other Users**

### **IAIP - Indian Association of Investment Professionals (CFA Society India)**

Materiality in relation to sustainability information

The determination of materiality involves the exercise of professional judgment and is impacted by both quantitative and qualitative factors. It is also affected by perceptions of the sustainability information needs of users.

We would suggest that there is a need to have a conceptual framework and guidelines to determine the materiality.

Sustainability standards is fairly new and evolving fast. There is no globally accepted or a golden standard which means that reporting by corporates can adopt different set of disclosure standards (SASB, GRI, ISSB etc.). This makes the assurance job more important and challenging to determine if the choice of metrics disclosed are material or disclosed in full.

It would be helpful to have a set of guidelines how assurance provider validate this rather keeping it to the subjectivity of the assurance provider

## **Preparers and Those Charged With Governance**

### **ICFOA - International CFO Alliance**

We support the definition proposed for sustainability information, however, encourage the Board to continuously engage with other standard setters and regulators to ensure alignment on definitions and terms to ensure connectivity in understanding and concepts which will benefit the public interest through its consistency.

## **Public Sector Organizations**

### **GAO - US Government Accountability Office**

The proposed definition of “sustainability information” in the ED differs from the definition the International Auditing and Assurance Standards Board (IAASB) proposed in its exposure draft, Proposed International Standard on Sustainability Assurance 5000, General Requirements for Sustainability Assurance Engagements and Proposed Conforming and Consequential Amendments to Other IAASB Standards.

We believe that defining the same term differently in different standards may lead to inconsistent application, particularly for sustainability assurance practitioners who are not professional accountants.

## **Independent National Standard Setter**

### **NZAuASB - New-Zealand Auditing & Assurance Standard Board**

We support the definition included in the glossary. We consider that it is important that the definition is broader than economic, social and governance factors commonly known as ESG. We believe that there could be confusion in the market due to sustainability information being defined differently in these proposals and in ISSA 5000.

We urge the IESBA to work with the IAASB to align the definitions or to consider using a different term in these proposals such as sustainability related information to differentiate the two and highlight the different scope in each standard.

## **Professional Accounting Organizations (PAOs)**

### **ACCA - Association of Chartered Certified Accountants**

We broadly support the definition of sustainability information in ED-IESSA. We are mindful that the definition of "sustainability information" provided in Chapter 2 of the Exposure Draft (ED) should be broad enough to align with the definitions used in sustainability reporting and assurance standards, enabling the ED-IESSA to be framework neutral. This includes, the ED-ISSA 5000 developed by the IAASB, and the reporting standards developed by the International Sustainability Standard Board (ISSB), the Global Reporting Initiative (GRI), and the European Financial Reporting Advisory Group (EFRAG).

In the case of ED-ISSA 5000, we recognise that the IAASB and IESBA have followed different timelines in the development of their respective EDs (ISSA 5000 and IESSA), given that both the ED-ISSA 5000 and ED-IESSA are ‘live documents’ and subject to further change post consultation. It is important to ensure that both boards continue to collaborate effectively to ensure that consistency between their respective definitions of ‘sustainability information’ is achieved, whilst acknowledging that ED-IESSA is profession agnostic and non-PAs may not be familiar with some of the terminology.

### **CAANZ - Chartered Accountants Australia and New Zealand**

We broadly support the definition of “sustainability information” in the ED. However, we note that sustainability information is a very broad term which is commonly used to describe all sustainability-related information relevant to an entity, some of which could be outside the scope of the sustainability assurance engagement, and therefore this term could cause confusion.

Furthermore, we note the proposed definition of sustainability information in the ED is different to that in the IAASB’s ED-ISSA 5000 which we are concerned could cause confusion. We encourage the IESBA to work with the IAASB to fully align the definitions.

### **CAI - Chartered Accountants of Ireland**

While the Code’s definition of “sustainability information” differs from ISSA 5000, we don’t believe it is currently inconsistent. However, as ISSA 5000 is currently not finalised, we would encourage the IESBA to revisit alignment on glossary terms to avoid confusing inconsistencies.

The Code offers two definitions of sustainability information within one, without clarifying which should be applied. Sustainability information is defined in (a) and (b), with the potential that (b) could be a different definition to (a) if a law, regulation or relevant reporting or assurance framework includes a definition inconsistent with (a). The Code would be clearer if it included “or” between (a) and (b), rather than at the end of (a) (ii). It currently reads as if (b) sustainability information can be any of the three options presented. It should be clear to users that they can apply (a) or (b), but they are not expected to apply both.

ISSA 5000, General Requirements for Sustainability Assurance Engagements (Paragraph 4), includes clarification that “sustainability information” is to be read as the information that is subject to the assurance engagement in instances where the assurance engagement does not cover the entirety of the sustainability information as defined by the ISSA. We recommend the IESBA consider a similar clarification, except that they, given the broader scope and use of the term within the Code, refer to information that is subject to the reporting and/or assurance engagement.

### **CFAR - Chamber of Financial Auditors of Romania**

We do consider that the definition should be reformulated as “Information about the impacts, risks and opportunities” as a common formulation, instead of “Information about the opportunities, risks or impacts”.

### **CNCC-CNOEC - Compagnie Nationale des Commissaires aux Comptes**

We note that the IESBA’s definition of “sustainability information” is not the same as the IAASB’s. There seems to be a confusion between the two boards around the notion of “subject matter information.”

Here again, both definitions should be aligned. It is not understandable for a third party or even for a professional accountant why the definition of sustainability information should be different for ethics and for auditing purposes.

### **CPAA - CPA Australia**

CPA Australia generally supports the definition of “sustainability information” in Chapter 2 of the ED.

However, we note that the proposed definition:

- differs from the definition that the International Auditing and Assurance Standards Board (IAASB) has included in its Exposure Draft for ISSA 5000 General Requirements for Sustainability Assurance Engagements. This difference has the potential to create confusion amongst those using both sets of standards; and
- highlights the need to reconsider the definition of public interest entity (refer to the response to Question 9 below).

### **CPAC - Chartered Professional Accountants Canada Public Trust Committee**

We generally agree with the proposed definition of “sustainability information” because it is broad and will capture a wide range of sustainability-related information beyond just environmental issues to include social, governance and other sustainability factors. This inclusivity supports the relevance and application of the standards for a wide range of environmental, social, and governance (ESG) and other sustainability factors that organizations report on.

However, the PTC is of the view that it will be clearer and improve enforceability of the IESSA if the order of subparagraphs a) and b) in the proposed definition is reversed, to reflect those definitions in law, regulation or relevant reporting or assurance frameworks are the first step in determining whether information meets the definition of “sustainability information”. We think that this definition might be simpler for practitioners to apply conceptually by first looking at whether the information is defined as sustainability information under law, regulation or relevant reporting or assurance framework. If it is not, the practitioner would then consider whether a reasonable and informed third party might expect the information to be captured as sustainability information based the practitioner’s evaluation of the factors in proposed subparagraph a).

The PTC also observes that the Explanatory Memorandum is very clear in explaining that, “regardless of how “sustainability information” is defined in law, regulation or relevant frameworks, or whether a different term is used, it will be deemed to be “sustainability information””. We encourage the IESBA to include this clarifying language as application material in Section 5100 of the final standard, and in any NAM developed in support of the definition. Consistent with our earlier remarks, the PTC notes that this is another area that will benefit from additional guidance, examples, and training, particularly due to the evolving nature of sustainability information.

### **EFAA - European Federation of Accountants and Auditors for SMEs**

We support the definition of “sustainability information”.

We believe it is vital that the IESBA and the IAASB work closely together to ensure consistency of definitions and where there is any divergence of opinion that the IESBA one prevails since the Code is the overarching standard.

We note that the definition starts with “Information about the opportunities, risks or impacts” and wonder whether this is better formulated as “Information about the impacts, risks and opportunities” since this is the more common formulation. We also suggest that

in place of or as well as “governance”, that the definition includes “business conduct” as this term is widely used and more readily understood by laypersons.

We welcome reference to “voluntary disclosure” as this will encompass information prepared in accordance with the SME sustainability reporting standard for voluntary use by non-listed SMEs (VSME) under development by EFRAG (for the European Commission).

### **HKICPA - Hong Kong Institute of Certified Public Accountants**

We acknowledge that the intentionally broad definition of “sustainability information” aims to encompass both sustainability assurance and sustainability reporting. However, we believe that it would be helpful for the IESBA to include examples of the types of information that lie outside the scope of the definition in order to assist practitioners in effectively implementing the ED-IESSA. An example could be where the client embeds hyperlinks within the sustainability report which direct readers to the entity’s website with various sustainability policies and related information (i.e. the sustainability policies may or may not be related to the information being assured). It would be helpful for the IESBA to clarify what would meet the definition of “sustainability information” in this case.

### **ICAEW - Institute of Chartered Accountants in England and Wales**

We appreciate (and welcome) the fact that the proposed definition of “sustainability information” is intentionally broad and sufficiently generic to be perennial and interoperable with various reporting and assurance standards (including proposed ISSA 5000). In particular, we consider that it will be important to ensure that this definition continues to align fully with the definition used by ISSB.

However, we did note the absence of “dependencies” from the proposed definition. Given the nature of sustainability information, we consider that it would be helpful to include this in the definition.

As we highlight in our response to Question 9 below, we consider that the definition of “Sustainability Information” and the definition of PIEs for the purposes of Sustainability Assurance Engagements” should both be kept under review and that IESBA should champion the evolution of these definitions to reflect the increasing importance and focus on non-financial information.

### **ICAS - The Institute of Chartered Accountants of Scotland**

We support the IESBA’s definition of ‘sustainability information’ however we believe it would be more helpful to users if the IESBA and International Auditing and Assurance Standards Board (IAASB) used the same definition.

### **IFAC - International Federation of Accountants**

We broadly support the definition of sustainability information in Chapter 2 of the ED and recognize that it captures the global aspect of sustainability well. We identify that including references to scope determined by other authorities in subsection (b) means that the proposed definition is not definitive, however, we note the reference to information defined by law, regulation and frameworks allows for inclusion of both the double materiality concept (e.g., required under the European Sustainability Reporting Standards) and divergence from this as may be applicable depending upon jurisdiction.

We note that the IAASB released a definition for ‘sustainability information’ within their exposure draft for ISSA 5000, and this could be subject to change based upon the comments received through their consultation. We strongly encourage consistency between the final IESBA and IAASB definitions, so it is presumed the definition in this ED will adopt changes that have resulted from the feedback the IAASB have received. It is important that the IESBA and the IAASB continue to work together to ensure consistency in this area.

#### **IPA - Institute of Public Accountants (Australia)**

IPA supports having a definition for “sustainability information” to facilitate a consistent application of the IESSA by all users. The proposed definition in IESSA appears reasonable. IPA encourages IESBA to continue working with related international standard-setters with the view to ensuring the definition used in IESSA is broadly consistent with definitions used by those standard-setters.

#### **IWP - Institut Österreichischer Wirtschaftsprüferinnen**

From a ESRS perspective, we miss risk or opportunities arising from a sustainability matter to be reflected in the definition. Also, we wonder whether such disclosures as for example required under the EU Taxonomy Disclosure Delegated Act (Disclosures Delegated Act (EU) 2021/2178) would be covered by the definition.

#### **JICPA - Japanese Institute of Certified Public Accountants**

We support the definition of “sustainability information” in Chapter 2 of the ED.

However, we suggest the IESBA provide guidance on how to consider the definition of “Sustainability information (a) Information about the opportunities, risks or impacts of (ii) An entity’s activities, services or products on the economy, the environment or the public” to clarify what sustainability information falls under the definition set out in the Code in applying the definition in practice.

#### **KICPA - Korean Institute of Certified Public Accountants**

The KICPA understands that the IAASB has considered defining the sustainability information focusing on ESG (Environmental, Social and Governance) information, the key focus area for market stakeholders, since the release of the ISSA 5000 ED. The KICPA proposes that the definition of sustainability information in the Code should be aligned with the ISSA 5000.

#### **MIA-MALTA - The Malta Institute of Accountants**

Overall, as an Institute we agree with the definition of “sustainability information” in Chapter 2 of the ED. However, we recommend that practical examples are included as these would further aid the understanding of such definitions.

#### **NYSSCPA - New York State Society of CPAs**

We applaud the IESBA’s and IAASB’s coordination efforts on this project. That said, we believe that further alignment is necessary in terms of how the complementary sets of sustainability assurance standards deal with definitions of terms and foundational concepts, including the definition of sustainability information.

## **SAICA - South African Institute of Chartered Accountants**

SAICA supports the definition however, we note that part (a) of the definition is not necessary and could be removed. Part (b) and the supporting examples should be sufficient to define “sustainability information” and enable alignment with related reporting and assurance frameworks.

Furthermore, the proposed definition of "sustainability information" is broad and SAICA recommends that additional application guidance is required as to what information is included and what information should be excluded. There is need to keep this definition under review to ensure alignment with that of the IAASB (ISSA 5000) and the related reporting frameworks.

## **SOCPA - Saudi Organization for Chartered and Professional Accountants**

The IESBA's definition of "sustainability information" seems well-considered. It has clarity, comprehensiveness, flexibility and, more importantly, alignment with other existing frameworks.

SOCPA, however, believes it would be more informative if the second part of the definition which provides a non-exhaustive list additionally includes “described in the entity’s governance structure, board composition and mechanisms for promoting transparency and accountability” as a bullet point.

## **WPK - Wirtschaftsprüferkammer (Germany)**

We agree with the IESBA's approach to use a broad and generic definition of “sustainability information” which is necessary for Part 5 of the Code to be framework-neutral. We understand that subparagraph (b) of the definition scopes in terms and definitions used in laws and regulations or by other standard setters, such as the IAASB's definition in the ISSA 5000 Exposure Draft. However, we strongly encourage the IESBA to continue to closely coordinate with the IAASB to ensure alignment on key definitions and terms to the highest extent possible.

## **Other Assurance Providers and Accreditation Bodies (non-PAs)**

### **JAB - Japan Accreditation Board**

In related to the definition of sustainability, we believe that the definition in IESSA is appropriate. IESSA's definition can understand very clearly. We also hope the definitions of ISSA 5000 can achieve consistency as much as possible with regard to points.

## **Accounting Firms and Sole Practitioners**

### **GTIL - Grant Thornton International Limited**

The proposed IESBA definition of ‘sustainability information’ encompasses the IAASB’s definition of ‘sustainability matters’ and ‘sustainability information’ in subparagraph (b) of the definition.

We believe having inconsistent terminology in the standards will lead to a misunderstanding on what is considered sustainability information, potentially leading to misapplication of the requirements. Furthermore, as we have seen with other standards, not aligning terminology can lead to unintended consequences.

Therefore, we strongly encourage the two boards to coordinate further to promote consistency.

#### **KMPG - KPMG IFRG Limited**

We understand the IESBA's intent in defining "sustainability information" broadly, in order to further the aim of the IESSA to be profession-agnostic and framework-neutral. However, we see the benefit to the public interest of having a definition that more closely aligns to the definition used in ISSA 5000, which itself is designed to be a global baseline for the performance of SAEs with the aim to be framework neutral.

We also support inclusion of the term "sustainability matters" along with its definition. The alignment to the ISSA 5000 definition of sustainability information and addition of "sustainability matters" not only provides a more cohesive global baseline but also aligns the terms "underlying subject matter" and "subject matter information" which are embedded across the ISAE 3000 suite of standards and the IESBA Code Part 4B and are well understood by many stakeholders. Use of a different definition that picks up a broader set of information for Part 5 purposes could have unintended consequences and may be problematic, particularly at the early stages of sustainability assurance when not all the "sustainability information" that is reported by an entity may be subject to assurance. Therefore, we support close coordination by the IESBA and IAASB, with the aim of aligning terms and concepts.

If the current definition is maintained, the operability of the IESSA's definition with the major assurance frameworks currently in use should be further explained in the proposed implementation guide.

#### **MAZARS - Mazars Group**

We agree that the term "sustainability information" should be defined for the purposes of applying IESSA for sustainability assurance engagements and relevant parts of the extant Code for sustainability reporting.

While we appreciate the need for the IESBA Code to be framework neutral, it is imperative that definitions used in international standards are aligned to avoid confusion and unnecessary complexity. Therefore, we urge the IESBA and IAASB to work together to develop a suitable definition of sustainability information that may be used in both IESBA ethical standards and IAASB assurance standards.

#### **PKF - PKF Global**

PKF Global Response: We generally support the definition of "sustainability information", with the recommendation that the IESBA reconsiders the wording "...opportunities, risks or impacts". While we acknowledge that this wording is consistent with many sustainability reporting frameworks we believe there is a risk that the wording "...opportunities, risks or impacts" could be overly restrictive, as it doesn't leave the possibility that some sustainability reporting frameworks may require disclosure of sustainability information which is not based exclusively on the concepts of opportunities, risks or impacts.

#### **RSM - RSM International Limited**

We support the definition of ‘sustainability information’ in Chapter 2 of the ED, subject to the comments below. We highly encourage the IESBA to work with the IAASB to come to a consensus on the definitions in the IAASB’s ISSA 5000 and IESSA.

Per paragraph 26 of the EM, the IESBA combined the IAASB’s definition of ‘sustainability matters’ and ‘sustainability information’ into IESBA’s definition of ‘sustainability information’. Respondents to the ISSA 5000 exposure draft (ED-5000) believed ‘sustainability matters’ should only refer to ‘environmental, social or governance matters’ (i.e. ESG matters) as that has become a synonymous term with sustainability, which makes it more commonly understandable. Agenda Item 3-B from the IAASB’s March 2024 meeting, Sustainability Assurance—Sustainability Matters, Sustainability Information and Disclosures, included the following summary of responses to ED-5000 related to the definition of ‘sustainability matters’:

Respondents across stakeholder groups indicated a lack of clarity about the reference to ‘economic’ as one of the core sustainability matters in the definition. It was noted that ‘economic’ is a broad term that could be confusing because any sustainability topic that relates to the usage or creation of resources will have an economic impact, and ‘economic’ may be interpreted as relating to financial information or the financial statements. These respondents suggested deleting the reference to ‘economic’ in the definition or otherwise providing application material to explain it.

During the meeting, the IAASB approved the recommended revision. Accordingly, we recommend that:

The IESBA consider separating the terms to be consistent with the IAASB, since there is a purpose for having the separate terms in an assurance engagement.

The IESBA remove ‘economic’ and ‘other’ from the definition of ‘sustainability information’ to be consistent with the revisions made by the IAASB.

### **Academia and Research Institutes**

#### **AFAANZ - The Auditing and Assurance Standards Committee of the Accounting and Finance Association of Australia and New Zealand**

Yes, with comments.

In principle, we support the definition of “sustainability information” in Chapter 2 of the ED. Paragraph (a) provides a broad definition to assist in identifying which information is relevant and therefore subject to reporting requirements with para b referring to other rules and regulations that may impact the definition of “sustainability information”. In the case of paragraph (b), using IFRS S1, General Requirements for Disclosure of Sustainability-related Financial Information as one example, there is a need to ensure that the definition and language ultimately used is “future-proof” given further changes to the sustainability landscape that will occur. IFRS S1 focusses on the reporting and disclosure of financial risks arising from sustainability actions and predominantly suits investors. As such, the eventual definition of “sustainability information” has to be necessarily broader to suit the informational needs of a widely varied set of stakeholders.

We also find that the non-exhaustive examples in italics below para (b) useful in assisting users in identifying the existence of “sustainability information”. We would suggest that

the IESBA consider the suitability of incorporating the following matters into its deliberations around “sustainability information”:

- There is no explicit requirement for reporters to report on the actual consumption of sustainability resources annually; and
- There is no explicit requirement for reporters to report whether the consumption of sustainability resources annually is sustainable.

### **DIRC - Deakin University Integrated Reporting Centre**

We partially support the definition of “sustainability information” in Chapter 2 of the ED as it includes risks and opportunities of economic and other sustainability factors (as well as environmental and social factors and governance in relation to them) on certain business information (about an entity’s activities, services or products).

The proposed IESBA standard achieves most of what we recommended to the IAASB. However, we have some suggestions in relation to the manner in which IESBA is proposing to define ‘sustainability information’.

We believe that the definition would be improved by:

- adding ‘strategic objectives’ before ‘opportunities’ in the first line of the definition of sustainability information. This is because the risks, opportunities and impacts arise because of pursuing the strategic objectives;
- adding ‘business model’ before ‘activities’ in I and ii. This is because ‘business model’ is a well understood business term that is also used in some reporting frameworks and standards encompasses the inputs to (the organisation’s resources and relationships), activities of, and outputs (products and services) and outcomes (for the organisation’s resources and relationships and stakeholders) from pursuing an organisation’s strategic objectives as it strives to realise its purpose.
- Adding to the examples of sustainability information, information about the key activities comprising the key business processes making up the business model, including the Board’s governance process, the CEO’s strategic management process, the materiality determination process, the stakeholder relationship management process, the risk management process and the reporting process.

In this way and viewed through the lens of financial materiality, the definition of ‘sustainability information’ will cover all aspects of the organisation’s business and its enterprise value (net present value of its future cash flows) which is the way in which the IFRS Foundation explains the concept of ‘sustainability’ and from that, the definition of ‘sustainability-related financial’ (material to the net present value of the entity’s future cash flows). ‘The business’ is a sustainability matter and a holistic description of the business is sustainability information.

There is a trend towards a more integrated approach to assurance which includes assurance practitioners assuring the description of an organisation’s business, with over 20,000 entities around the world expected to have the description of their business in corporate reports independently assured. The 700 largest companies in Brazil are subject to an ‘opt in’ mandate from the securities regulator to prepare integrated reports and have them independently assured; companies in Spain, Italy and France must have a partial

description of their business independently assured under the assurance mandate attached to Article 19(a) of the CSRD. Voluntary instances of integrated reporting assurance are known to exist in the Netherlands, India, Australia and Sri Lanka.

This number will increase further as jurisdictions introduce assurance mandates in relation to disclosures under IFRS Sustainability Disclosure Standards S1 and S2, which became effective internationally on 1 January 2024. This is because the standards require a description of the organisation's governance, strategy and risk management in relation to climate and other sustainability metrics and associated disclosures.

Australia is a relevant example, and the mandate is not being limited to disclosing the partial description of the business. The mandate requires assurance of these partial business descriptions, starting with limited assurance and progressing to reasonable assurance by 2030.

This is a relevant matter for IESBA and its ethics and independence standard for accountants in numerous sections of the standards – for example, the use of external experts and the use of the practitioner's own experts, and conflicts of interest. In such forms of assurance, the assurance team will need expertise in business matters that go beyond that required to plan a financial statements audit. This is because the description of the business – its governance, strategy, business model and risk management - is central sustainability matter for this report subject to assurance. This differs to the expertise required in sustainability topic areas such as climate.

The knowledge, skills, experience and assurance procedures required to make such evaluations and obtain relevant evidence are quite different to those required for assuring quantitative metrics and associated narratives, which typically relate to measurement rather than evaluation assurance procedures.

In our view, the proposed ISSA 5000 provides suitable standards for assurance practitioners in relation to assuring metrics and associated disclosures. However, the guidance and examples in the proposed ISSA 5000 relate almost exclusively to the measurement of metrics as compared to guidance and examples related to evaluating qualitative disclosures such as the description of an organisation's business required by certain sustainability reporting mechanisms, frameworks and standards. All of the procedure-specific examples in the proposed ISSA 5000 relate to metrics and associated disclosures.

This gap comes from the very definition of 'sustainability matters' in the proposed ISSA 5000, where the business is not a sustainability matter, and a description of the business is not sustainability information. Under the proposed ISSA 5000, the business is an aspect of a sustainability matter. The reality is that the description of the business is not an aspect of a topic. It is the topic in numerous forms of reporting, including integrated reports. Aspects of the business include the various sustainability risks and opportunities that arise because of the business.

We submitted to the IAASB that we believe that a solution can be achieved by adding examples and making a relatively simple change to the definition of 'sustainability matters' in ISSA 5000. This would clarify that all matters relating to enterprise value, a whole-of-

business financial concept, and the focus of IFRS Sustainability Disclosure Standards, are sustainability matters under ISSA 5000.

Proposed revised definition of ‘sustainability information’

On this basis, the definition of ‘sustainability information’ will be, with changes underlined:

- a) Information about the strategic objectives, opportunities, risks or impacts of:
- i. Economic, environmental, social, governance or other sustainability factors on an entity’s business model (including its activities, services or products); or
  - ii. An entity’s business model (activities, services or products) on the economy, the environment or the public; or
  - iii. Information defined by law, regulation or the relevant reporting or assurance framework as “sustainability information” or equivalent terms or descriptions.

*Sustainability information includes information that may be:*

- *Expressed in financial or non-financial terms.*
- *Historical or forward-looking.*
- *Prepared for internal purposes or for mandatory or voluntary disclosure.*
- *A description of the entity’s business model, comprising inputs (resources and relationships), activities, outputs (products and services) and outcomes (for the resources and relationships and key stakeholders), and including the key business processes making up the business model.*
- *Obtained from an entity or its value chain.*
- *Related to the quantitative or qualitative evaluation of an entity’s past or expected performance over the short, medium or long term.*
- *Described in an entity’s policies, plans, goals, commitments or representations.*

## **NSU - Nova Southeastern University (Florida)**

Question 3 opinions in favor:

- Yes, I support the definition of “sustainability information”. I believe it is important to include a standard definition for sustainability reporting purposes that includes what type of information is truly relevant. Based on my research of the Internal Revenue code, when stating a definition or stating what a rule contains, it is also important to always add the terminology that the definition could include other items. Additionally, some codes in the Internal Revenue Code list out what the code is not or does not include. This could also be a suggestion for the sustainability information definition to include examples of what would not be included under this term. Additionally, it is helpful to add examples to be clearer, but it is not fully necessary.
- I support the definition of “sustainability information” in Chapter 2 of the Exposure Draft in the context of addressing sustainability assurance and sustainability reporting as it determines the relevant information needed to apply the IESSA and the standards located within the extant Code to sustainability reporting. In addition, by maintaining a broad and generic definition of the term, application of the term is kept flexible so that the definition may be interoperable with various reporting and assurance standards.

- I do support the definition of “sustainability information” for many reasons listed within the text. I think the first idea that stood out to me was the parallel with “historical financial information” which ties into the question answered above. I believe that consistency is imperative to gain the stakeholders support and allow for a streamline process when implementing the proposals. I also think the multi-part definition is key in providing an all-encompassing definition for future amendments to become more specific. ESG is a hot topic within the accounting world, but I think it is important to allow for various changes in the future. Environment, social, and governance will continue to change and encompass more items as it becomes more apparent to organizations and stakeholders. There may be updates or additional topics that begin to fall under sustainability, so the umbrella definition was important to ensure there will be little difficulty updating the proposals in the future. From an accounting perspective it is important to have flexibility in different situations as there may be different methods used to account for additions that will fall under this definition.
- Yes, I do support the definition of “sustainability information” as described in Chapter 2 of the Exposure Draft. It is thorough and includes a detailed description of what types of information would be considered “sustainability information.” Although it is quite comprehensive, I would suggest including examples of “an entity’s activities, services or products on the economy, the environment, or the public” i.e., examples of what falls under each category to provide clarity for individuals who have limited knowledge in sustainability reporting. Examples might include under economic: defined benefit plan obligations, value generated, government-provided financial assistance, and procurement practices. Environmental examples, which are basically straight forward, might include: waste, biodiversity, greenhouse gas emissions, and energy and water consumption. An example of social, that might often be overlooked by someone with limited knowledge of sustainability would be occupational health and safety. This would also ensure a better understanding of sustainability information as the reporting of sustainability information can be highly subjective.
- I support the definition of sustainability information mostly because of how it aligned with ISSA 5000. The IESSA is responsive to the public interest considering the public interest framework characteristics, particularly coherence with the overall body of the IESBA’s standards and implementability and enforceability.

Question 3 opinions opposed:

- With the definition so broad and generic, the sustainability auditor must have special training on how to identify correctly information that must be considered sustainability information in the context of the IESSA definition. Companies may deem certain internal information not part of sustainability that should have been part of the sustainability information. Vagueness opens up arbitrariness and numerous unnecessary interpretations, especially for companies that want to play around with rules. The organization can unstretched the definition by being more specific— industry-specific, sector-specific, etc.
- The first item that I must disagree with is your definition of “sustainability information”. I agree that it needs to be kept to a broad sense, but I feel that you fail to truly define the term which may leave room for misunderstanding. In the practice of assurance, I feel that everything must be defined clearly and concise to avoid confusion.

- Does the “Social” factors sufficiently suggest the inclusion of Wars and other broader Political instability factors or is it recommendable to mention also Political instability as a factor? I would advocate for the second one. Political instability is a long time known to lower economic growth and the productivity rates, raise investments risks and lead to higher inflation. Political instability also affects in both ways, moving industries with high pollution potential to another country to avoid its effects in the country of origin might generate a political conflict, not to mention the ethical implications. Regarding item (b) of the definition although “Obtained from an entity or its value chain” might include the subjects to obtain information, like auditors, the company itself or third parties, including the expert consultation, I would like to suggest to go deeper and explicitly mention that most of ESG reporting needs to be based on expert opinions that might be requested to third party entities, especially in new investments projects or capital growth in foreign countries or domestic specific industries like exploration; for example, we will need an expert report about the historic weather for the zone since it may affect the days of operation, the amount to invest in human resource’s health insurance and protection expenses. Surely all these details have been traditionally considered in an investment, what is new here is the urge to explicitly mention them in an ESG report that would imply to adhere to the established standards hence expert consultation in these aspects is expected to be preferred, highly valued and demanded.
- The IESBA proposal breaks down the definition of sustainability information in two components: a) Information about the opportunities, risks or impacts of: i) Economic, environmental, social, governance or other sustainability factors on an entity’s activities, services, or products; or ii) An entity’s activities, services or products on the economy, the environment or the public; or b) Information defined by law, regulation or the relevant reporting or assurance framework as “sustainability information” or equivalent terms or descriptions. In my opinion, the first component in Subparagraph (a) should end in (i); I find the statement included in (ii) as repetitive, redundant, and lacking added value. Instead, subparagraph (a) should be supplemented with the purpose of “sustainability” itself to reinforce the fact that sustainability information must meet the needs of the present without compromising the needs of the future generations to come. Subparagraph (b) is meant to include additional definitions set by law and other standard setters. I find this component too generic. While the memorandum explicitly clarifies this proposed definition is intentionally broad and generic, this broadness may turn into a disadvantage when it comes to its functionality and applicability. Subparagraph (b) should be more specific as to which regulatory bodies, boards, or standard setter can deemed information as sustainable, including equivalent terms and descriptions.
- No, the definition of sustainability information doesn’t seem to coincide with the true meaning of sustainability. The definition created is more to help the IESSA with its standards and rules, but it does not fully meet the terms of sustainability. The definition seems to be interpreted differently in every manner. When it comes to specific terms in a particular area, the definition should always be cut and to the point so no one will misconstrue its true meaning.

## Others

## IBA - The International Bar Association

We recognise and broadly support IESBA's intention for the definition of 'sustainability information' to be sufficiently broad and generic to apply to evolving sustainability reporting and assurance frameworks. However, it is equally important that the definition is clear, and does not risk covering all types of information – particularly because the definition is central to the scope of IESSA.

In our view, Part (a) of the draft definition is unclear in multiple respects:

- 'opportunities, risks .... of .... factors on an entity's activities, services or products' does not make sense. Are these 'opportunities' opportunities for the entity? Are these 'risks' risks that could adversely impact the entity's activities, services or products?
- the reference to 'entity's activities, services or products' may be too narrow to cover the impacts of factors on, for example, the entity's reputation, or financial prospects.
- the definition does not apply different concepts equally e.g. it considers the impact of social factors on a business to be 'sustainability information' but the impact of the business on social factors is not included in the definition.

In our view, the ISSA 5000 draft definition is clearer, while also being broad and accommodating double materiality. IESBA should consider using the ISSA 5000 definition in place of part (a) of the IESSA definition. As noted above, coordination with IAASB will be important to maximise consistency of terminology.

We support the inclusion of Part (b) of the definition to align with the framework-neutral approach of IESSA.

We support Part 2 of the definition as it provides examples of what constitutes sustainability information. However, for clarity, we suggest that rather than 'Sustainability information includes information that may be: ...' it would be more appropriate to frame this part as 'Sustainability information may include information that is: ...'

## Question 3 - Disagree

### Investors and Other Users

#### DIR - Daiwa Institute of Research Ltd

No. Alignment of the definitions of "sustainability matters" and "sustainability information" with IAASB (ISSA 5000 ED) should be considered.

### Professional Accounting Organizations (PAOs)

#### AICPA - American Institute of Certified Public Accountants Professional Ethics Executive Committee

Overall response: No.

Detailed comments: PEEC does not support the proposed definition of "sustainability information" as it may be too broad and is inconsistent with the definitions proposed by IAASB.

Too broad

The explanatory memorandum notes that the definition is intentionally broad to be interoperable with various reporting and assurance frameworks. It also indicates that the proposal uses terminology that all SAPs should be able to understand. The breadth of the proposal could cause confusion and inconsistent application among sustainability assurance practitioners. This broad definition could also cover engagements that IESBA and the IAASB did not intend to be sustainability assurance engagements. We have received questions about whether cybersecurity assurance engagements or Sarbanes-Oxley Act (SOX) 404 engagements would be scoped in, for example, given the subject matter of these engagements.

As explained in the BBC article “How ‘ESG’ came to mean everything and nothing,” the term ESG has “morphed into an umbrella catchphrase with little concrete meaning.” It seems that IESBA’s proposed definition may unintentionally capture almost anything the entity reports and has assured, and we do not believe this is the board’s intention. It’s important that the determination of what is considered a sustainability assurance engagement is consistent among practitioners because this will drive the practitioner to consider whether part 5 or part 4B independence requirements will apply. To help with consistency, we recommend that IESBA refine item (a) of the definition of sustainability information so that its parameters are clearer or remove item (a) and allow the applicable reporting framework to guide the SAP.

#### Coordination with the IAASB

The exposure draft explanatory memorandum explains that the definitions the IAASB uses serve a different purpose than those proposed by IESBA, and that IESBA’s definition of “sustainability information” encompasses the IAASB’s definition of “sustainability matters” and “sustainability information” although this is not explicitly stated in the proposed definition or application guidance. These inconsistencies will cause confusion in practice as sustainability assurance practitioners will likely believe that there is a meaningful difference between how each standard setter defines these terms when that is not the intention.

Regardless of whether IESBA decides to include the definition for sustainability information in the code, IESBA should coordinate further with the IAASB to more clearly understand the types of engagements the IAASB intends to be performed under ISSA 5000, and to ensure that each board’s respective standards are clear, consistent, and operable with one another.

#### **IDW - Institute der Wirtschaftsprüfer (Germany)**

No. The proposed definition of sustainability information is seriously flawed. The definition is not a stand-alone definition as it references scope determined by other authorities in subsection (b) that can alter the meaning of the term and is therefore ambiguous.

Furthermore, the meaning ascribed to the term essentially corresponds to sustainability matters from ED ISSA 5000 rather than to sustainability information as defined in ED ISSA 5000, which will clearly be unacceptable.

We urge the IESBA and IAASB to coordinate in this regard in finalizing their respective projects.

#### **MIA-Malaysian - Malaysian Institute of Accountants**

We have concerns that the definition of “sustainability information” may be too broad. There is a risk that many assurance engagements would be incorrectly classified as “sustainability assurance” and unintentionally fall within the purview of Part 5 of the Code as a result of the application of paragraph 5400.3a. Of particular concern is part (a)(ii) of the definition where information about “an entity’s activities, services or products on the economy, the environment or the public” is also considered sustainability information and may therefore, incorrectly scope in engagements which are not “sustainability assurance”.

Therefore, we believe to the extent practicable, that the Code and the IAASB standards share common definitions to avoid the likelihood of the above scenario. To address this, we suggest that a common definition be adopted across both the Code and the ISSA 5000, which acknowledges the key role of the applicable criteria (reporting framework) in determining the information to be reported and addressing the concern described above, may be revised as follows:

#### Sustainability Information

Information about environmental, social, governance or other sustainability factors defined by law, regulation or other relevant reporting framework (the applicable criteria) as “sustainability information”. Depending on the applicable criteria, such matters may address:

- i) The impacts on the entity’s strategy, business model, or performance;
- ii) The impacts of the entity’s activities, products and services on the environment, society, and economy; or
- iii) The entity’s sustainability policies, plans, goals and targets.

Sustainability information results from measuring or evaluating sustainability subject matters against criteria. Sustainability information may be referred to using equivalent terms and may also be more specifically defined by law, regulation or the relevant reporting framework.

#### **Accounting Firms and Sole Practitioners**

##### **DTTL - Deloitte Touch Tohmatsu Limited**

Deloitte Global does not support the definition of "sustainability information" in the IESSA. We believe the definition should align with, and not be broader in scope than, the definition of “sustainability information” in ISSA 5000 for both standards to operate and be applied consistently. While we understand the IESBA’s objective is for the IESSA to be framework-neutral, the Board should focus on alignment with the ISSA 5000 as a primary objective and we urge IESBA to continue to work with IAASB to do so.

##### **MOORE - Moore Global Network Limited**

No, we do not support the definition of “sustainability information” in Chapter 2 of the ED. We believe that it is too broad and that only paragraph (b) of the definition is necessary as this will directly align the definition to the reporting and assurance frameworks.

##### **PwC - PricewaterhouseCoopers International Limited**

Overall response: No, with comments below

We consider the definition of “sustainability information” to be too broad. There is a risk that many assurance engagements would be incorrectly classified as “sustainability assurance” and therefore unintentionally fall within the purview of Part 5 of the Code as a result of the use of this defined term in the application of paragraph 5400.3a. The most problematic aspect of the definition of sustainability information is part (a)(ii) of the definition where information about “an entity’s activities, services or products on the economy, the environment or the public” is considered sustainability information.

We believe that it is in the public interest for the Code and the IAASB standards to have common definitions. This would improve clarity, reduce the risk of confusion and result in more consistent application. We accept that the Code has been drafted to apply to a broader population than just professional accountants (PAs), however we believe that alignment is possible. This may require compromise by both Boards.

We suggest that a common definition that could be adopted across both proposals, which acknowledges the key role of the applicable criteria (reporting framework) in determining the information to be reported and addresses the concern described above, may be as follows (replacing the current proposal in the ED):

#### “Sustainability Information

Information about environmental, social, governance or other sustainability factors defined by law, regulation or other relevant reporting framework (the applicable criteria) as “sustainability information”. Depending on the applicable criteria, such matters may address:

- (i) The impacts on the entity’s strategy, business model, or performance;
- (ii) The impacts of the entity’s activities, products and services on the environment, society, and economy; or
- (iii) The entity’s sustainability policies, plans, goals and targets.

Sustainability information results from measuring or evaluating sustainability subject matters against criteria. Sustainability information may be referred to using equivalent terms and may also be more specifically defined by law, regulation or the relevant reporting framework.”

### **Question 3 - No Specific Comment**

#### **Regulators and Oversight Authorities, incl. Monitoring Group members**

ACRA - Accounting and Corporate Regulatory Authority (Singapore)

CEAOB - Committee of European Auditing Oversight Bodies

IAASA - Irish Auditing & Accounting Supervisory Authority

IFIAR - International Forum of Independent Audit Regulators

#### **Investors and Other Users**

Ceres Accelerator

MSCI - Morgan Stanley Capital International

NBIM - Norges Bank Investment Management

**SAAJ - The Securities Analysts Association of Japan**

**Preparers and Those Charged With Governance**

Asma Jan Muhammad

BD - Bruno Dirringer

**Professional Accounting Organizations (PAOs)**

CBPS-CFC-IBRACON

FACPCE - Federación Argentina de Consejos Profesionales de Ciencias Económicas

GAA - Global Accounting Alliance

INCP - National Institute of Public Accountants of Colombia

ISCA - Institute of Singapore Chartered Accountants

PICPA - Pennsylvania Institute of Certified Public Accountants

**Other Assurance Providers and Accreditation Bodies (non-PAs)**

IAF - International Accreditation Forum

**Accounting Firms and Sole Practitioners**

Assirevi - Association of Italian Audit Firms

BKTI - Baker Tilly International

**Academia and Research Institutes**

NRS - Professor Nicole Ratzinger-Sakel

**Others**

IIA - The Institute of Internal Auditors