

**Meeting:** IESBA

**Meeting Location:** Lisbon, Portugal

**Meeting Date:** September 16-19, 2025

## Agenda Item

# 9

### Post-Implementation Review (PIR) of Non-Compliance with Laws and Regulations (NOCLAR) and the Restructured Code

#### Objective

1. To consider the proposed objectives, scope and approach for the PIRs of the NOCLAR pronouncement and Restructured Code.

#### Activities since June 2025

2. At its June 2025 meeting, during the discussion of its Work Plan 2025-2026, the IESBA agreed to commence work in the [third quarter of 2025](#) on the PIRs of the NOCLAR pronouncement and the Restructured Code.
3. Since then, among other activities, Staff has:
  - Reviewed the methodologies of past PIRs conducted the IESBA and other standard setters.
  - Met with the IFAC Staff to understand the adoption landscape of NOCLAR and the Restructured Code.
  - Reviewed the 2018-2020 Requests for Information to jurisdictional standard setters regarding the A&I status on NOCLAR and the Restructured Code in their jurisdictions.
  - Developed the proposed objectives, scope and approach for the PIRs.

#### Coordination with IAASB

4. Staff also met with the IAASB's Program and Senior Director and the IAASB project team progressing the PIR on ISA 540, *Accounting Estimates and Related Disclosures*. There was agreement to taking a coordinated approach to both IESBA and IAASB PIRs and to developing a general framework for undertaking PIRs across both the IESBA and IAASB going forward.

#### Matter for IESBA Consideration

5. IESBA members are asked to share feedback and views on the proposed project plan for conducting the PIRs on NOCLAR and the Restructured Code (**Agenda Item 9-A**).

#### Material Presented

Agenda Item 9-A      Proposed Objectives, Scope and Approach