

Role of CFOs Workstream

Alignment to the SMART Framework

I. Executive Summary

The application of the SMART Framework has strengthened the design, management, and progress of Phase 1 of the Role of CFOs workstream. Its main impact has been to help the Project Team apply discipline to the scope of the workstream, the strategy for evidence gathering, the targeting of stakeholders, the processing of feedback, and the identification of areas requiring further analysis.

This discipline is important given the sensitivity of the workstream. Some stakeholders have questioned whether the workstream expands beyond the IESBA's remit, if there is a predetermination toward changes to the Code, or an unnecessary focus on CFOs who are not professional accountants (PAs). Applying the SMART Framework helped the Project Team manage these risks by keeping the workstream anchored in the approved [Terms of Reference](#), maintaining the focus on PAs in business (PAIBs) serving as CFOs or equivalent senior finance leaders (in short "CFOs"), and using evidence from the broader CFO ecosystem to understand the context in which those PAIBs operate.

The SMART Framework also helped reduce the risk of moving prematurely into solution design. The workstream has consistently been framed as a Phase 1 information-gathering and assessment exercise, not a standard-setting project. This shaped the design of the pulse and extended surveys, the segmentation of CFO and other stakeholder groups, and the structure of outreach activities around the Phase 1 objectives. It also assisted the Project Team in assessing emerging findings against a range of responses, including no further action, awareness-raising, non-authoritative material, collaboration with PAOs or other relevant bodies, or further Code-related analysis if supported by the evidence.

The Framework strengthened the credibility of the evidence-gathering process by encouraging the Project Team to use multiple evidence channels rather than relying on a single source of input. These channels included pulse and extended surveys, academic research, desktop research, focus group meetings, global roundtables, JSS engagement, and other targeted outreach. This approach enabled the Project Team to test whether emerging themes are recurring across jurisdictions, sectors, stakeholder groups, and professional backgrounds, or whether they are more context-specific.

SMART also sharpened stakeholder targeting. The Project Team distinguished between CFO-focused outreach and broader stakeholder engagement, rather than treating the CFO ecosystem as a single audience. This distinction improved the quality of the evidence gathered. CFOs were able to speak directly about their role expansion, pressures, ethical judgment, and practical challenges in peer-to-peer discussions. Other stakeholders provided perspectives on governance expectations, regulatory frameworks, investor confidence, PAO responsibilities, and the broader ecosystem in which CFOs operate.

Applying SMART also enabled the outreach process to become more cumulative. Feedback from each engagement was not treated as an isolated data point. The workstream treated outreach activities as a connected evidence-building process in which learnings from engagement activities helped to synthesize the facilitation of latter engagements. It also informed IESBA updates and planning for the remaining

activities. Post-event summaries were provided to participants within 48 hours which helped reinforce the two-way engagement, validate emerging themes, and maintain continuity across the workstream.

At this stage, the strongest impact of the SMART Framework was the Simplification, Mobilization, Responsiveness, and Targeted Action pillars. These pillars helped the Project Team maintain a disciplined scope, broaden participation beyond the IESBA's usual channels, organize stakeholder input more systematically, and focus further work on the evidence needed to support the IESBA's consideration of possible next steps.

The Adoption pillar is less directly applicable because there is not yet a final output for adoption, implementation, or uptake. However, it still prompted the Project Team to consider whether emerging findings will likely support any practical and proportionate future action for the IESBA. This includes assessing whether the evidence may indicate a need for Code enhancement, non-authoritative material, awareness-raising, collaboration with PAOs, or other targeted initiatives.

Overall, SMART improved the quality, discipline and transparency of the Phase 1 process. Its value has not been to determine the substantive outcome of the workstream, but to help ensure that the Project Team is gathering, testing, and analyzing evidence in a way that is proportionate, responsive to stakeholder input, and appropriately focused on the IESBA's mandate.

The next phase will consider the full evidence base and develop recommendations for the September 2026 IESBA meeting, including the relevance and value of any proposed actions for the key stakeholder groups identified under SMART.¹

¹ Auditors, Preparers, Smaller Practices, Investors & Other Users

II. Detailed Assessment Against the SMART Pillars

This assessment reflects the current **Phase 1 information-gathering stage** of the Role of CFOs workstream. Accordingly, the SMART pillars have been applied to the design of the information gathering and progress to date.

A. Simplification

At this stage, the strategic focus under this pillar has been clearly framing the workstream as a Phase 1 information-gathering and assessment exercise. The approved [Terms of Reference](#) (ToR) provide the main anchor for the objectives, scope, phased approach, and deliverables. The Project Team translated this into surveys, outreach materials, briefing notes, agendas, and quarterly Board updates. In practice, the workstream remained focused on understanding the evolving CFO role, identifying related ethics issues and challenges, and considering whether Parts 1 and 2 of the Code remain fit for purpose, rather than moving prematurely into solution design. The Simplification pillar positively impacted the workstream through focus on consistent messaging across mediums and enabling a cumulative effect for future communications.

What has been done?

- The ToR provides the core reference point for the objectives, focus, and expected deliverables.
- Survey instruments and supporting materials were developed in line with the workstream's objectives.
- Outreach decks, briefing notes, agendas, breakout group questions, and Board updates were framed around the Phase 1 mandate.
- A reporting architecture has started to take shape linking outreach, research, survey findings, and eventual reporting.

What is not yet applicable?

- More formalized end-stage output structures will likely become more relevant closer to the final report and recommendations for the September 2026 IESBA meeting.
- Final-stage usability testing and more polished external materials are premature at this point.

Challenges

- Maintaining concise and disciplined messaging across multiple issues, stakeholder groups, and jurisdictions.
- Avoiding language that could imply a predetermined conclusion or recommendation.

Possible improvements

- Use shorter summaries, plainer language, and less jargon in materials intended for non-technical or non-professional accountant (PA) audiences.
- Apply a more standard opening description and set of key messages across papers, decks, and outreach materials.

B. Mobilization

At this stage, the strategic focus under this pillar has been to build a sufficiently broad and credible evidence base while also raising awareness of the workstream's purpose. Outreach has therefore been central to the activities undertaken. The Project Team has mobilized stakeholders through pulse and extended surveys, stakeholder lists, invitation materials, focus group meetings in London, global roundtables in Milan, New York, Nairobi, and Hong Kong, and additional planned outreach across jurisdictions and forums.

The team also differentiated its engagement across stakeholder groups, including CFOs and equivalent senior finance leaders, PAOs, regulators, firms, academics, investors, and standard-setting bodies. The Mobilization pillar positively impacted the workstream by assisting the Project Team to identify sufficient target channels across jurisdictions, sectors, and stakeholder groups. Many of the stakeholders that the Project Team engaged with come from outside the normal channels utilized by the IESBA, broadening reach and raising awareness of the IESBA's activities.

What has been done?

- Pulse and extended surveys were designed and launched to gather evidence from CFOs and other stakeholders.
- Outreach activities were undertaken in London, Milan, New York, Nairobi, and Hong Kong SAR.
- Stakeholder lists were developed and outreach segmented by type of CFO and other stakeholder groups.
- Agendas, briefing notes, breakout group structures, and logistical materials were prepared for in-person and virtual outreaches.
- Tailored invitation letters, outreach messages, thank-you notes, and briefing materials were used to promote participation and reinforce engagement.
- Commissioned academic research and literature review to widen the evidence base.

What is not yet applicable?

- More formal performance indicators and broader visibility analytics are not yet fully developed.
- Partner enablement materials have not yet been developed at this stage.

Challenges

- Ensuring sufficient breadth across jurisdictions, sectors, and stakeholder groups.
- Avoiding overreliance on stakeholders who are easiest to reach, especially PAO-connected or listed-company networks.
- Keeping messages consistent across different outreach formats and audiences.

Possible improvements

- Track participation and visibility more systematically as the workstream moves towards the final report and recommendations for the September 2026 IESBA meeting.
- Introduce a simple mobilization monitor showing stakeholder type, jurisdiction, sector, and status of outreach.

C. Adoption

This is the least straightforward pillar to apply to the current stage because the workstream is still in an information-gathering phase. Its relevance lies instead in whether the workstream is producing sufficiently robust evidence to help the IESBA to assess whether Parts 1 and 2 of the extant Code adequately address the ethical responsibilities of professional accountants in business (PAIBs) in CFO roles, whether further enhancement may need to be considered, and whether non-authoritative material (NAM) or other initiatives may be warranted. It also includes gathering information on non-PAs in CFO or equivalent senior finance roles.

What has been done?

- Priority jurisdictions and stakeholder groups were mapped, in a practical sense, to support broad coverage and feedback across regions.
- Surveys, outreach, and early analysis have started to identify recurring ethics issues and challenges arising in the evolving CFO role.
- Emerging themes have begun to be tested against Parts 1 and 2 of the extant Code (including relevant recent IESBA projects, including sustainability, tax planning, technology, and role and mindset).
- Information is being gathered on how non-PA CFOs address ethical expectations to support comparison across PA and non-PA populations.
- Indications are being captured on whether NAM, awareness-raising, or other initiatives may prove more relevant than Code enhancements.

What is not yet applicable?

- Implementation toolkits, adoption support packages, and case studies of successful uptake are not yet applicable in Phase 1.
- Adoption progress monitoring is not yet relevant because there is no agreed final output.

Challenges

- Applying this pillar meaningfully to an exploratory workstream rather than a standard-setting project.
- Distinguishing between issues that may point to possible Code enhancement, awareness or operability challenges, and broader governance or regulatory matters.

Possible improvements

- Clarify, in future SMART application materials, how this pillar should be adapted for workstreams in an information-gathering phase.
- Use a simple internal classification of emerging issues, for example potential Code issue, an awareness issue, an operability issue, a governance issue, or outside scope.
- Consider how communication materials might better explain the practical value of the Code as a tool for addressing real-time ethical challenges.

D. Responsiveness

At this stage, the strategic focus under this pillar was to ensure that evidence and stakeholder input are captured, synthesized, and reflected in a disciplined way throughout Phase 1. The Project Team used multiple channels for this, including desktop research, surveys, global roundtables, focus group meetings, follow-up discussions, and internal synthesis. Findings from the outreach and survey responses have been synthesized and used in IESBA updates, SAC and JSS meetings and internal planning. The most significant impact on the workstream from the Responsiveness pillar was the provision of real-time feedback and a summary of key themes discussed to participants within 48 hours of each outreach activity.

What has been done?

- Multiple formal and informal feedback mechanisms were used, including surveys, roundtables, focus group meetings, and follow-up discussions.
- Outreach activities were supported by clear communication of the workstream's objectives, status, and purpose.
- After each outreach activity, participants were provided with a summary of the themes discussed.
- Early findings were synthesized for Board updates, internal planning discussions, and related preparation.
- Overlap with related IESBA workstreams was identified where relevant.
- Significant issues were monitored and escalated as required.
- Key messages were checked for consistency across Board papers, minutes, briefing notes, and communication materials.

What is not yet applicable?

- A mature public “What We Heard / What We Changed” style feedback loop will more likely be relevant at a later stage once the evidence base and outputs are more consolidated.
- More visible external reporting on how feedback has shaped the workstream remains premature at this point.

Challenges

- Capturing and comparing input consistently across different outreach formats and jurisdictions.
- Separating broad patterns from issues that are more context specific.
- Ensuring that the record of what has been heard is systematic enough to support June and September 2026 reporting.

Possible improvements

- Introduce more formal feedback mechanisms, such as post-event surveys and targeted follow-up discussions where appropriate.
- Maintain a light central feedback register to record source, issue, theme, and possible implications.

E. Targeted Action

At this stage, the strategic focus under this pillar was to direct effort toward the evidence gaps most relevant to the workstream's objectives and eventual Phase 1 reporting. The Project Team segmented the CFO population, identified priority stakeholder groups, and used outreach planning to broaden the evidence base beyond a single type of CFO or jurisdiction. There was also a conscious effort to distinguish between CFO-focused outreach and broader stakeholder outreach. The Targeted Action pillar positively impacted the workstream by strengthening its design, focusing on evidence gaps, and tailoring CFO and other stakeholder outreach. However, further work is required to ensure sufficient balance across sectors, role types, jurisdictions, and professional backgrounds, particularly among non-PA CFOs.

What has been done?

- The CFO population was segmented, and different stakeholder categories were used in outreach planning.
- Selected jurisdictions and outreach channels were prioritized for roundtables, surveys, and focus group meetings.
- A distinction was maintained between CFO-focused outreach and broader stakeholder outreach.
- Emerging evidence was used to inform subsequent outreach planning and to identify where further evidence is still needed.

What is not yet applicable?

- A fully mature jurisdiction and stakeholder matrix is still being developed.
- Annualized review cycles and dashboard-style oversight will more likely become relevant if the workstream progresses to a later phase.

Challenges

- Ensuring sufficient evidence from underrepresented sectors, jurisdictions, and stakeholder groups, especially non-PA CFOs.
- Obtaining a clear picture of the role and prevalence of non-PAs in CFO positions.
- Balancing targeted outreach with practical constraints, including resources, access, timing, and available networks.

Possible improvements

- Maintain a light jurisdiction and stakeholder matrix showing current coverage, key gaps, and priority next steps.
- Tie outreach prioritization more explicitly to the evidence needed for the June and September 2026 reporting.
- Use subsequent opportunities to test whether the remaining gaps by sector, role type, jurisdiction, and PA versus non-PA perspective are narrowed.