



IESBA ROLE OF CFOs INITIATIVE

PHASE ONE FINAL REPORT

SEPTEMBER 2026

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I. EXECUTIVE SUMMARY

IESBA DECISIONS REQUESTED:

Recommendation 1: Conclude Phase 1 and not commence a standard-setting project for CFO-specific amendments to the Code.

Recommendation 2: Approve a focused Phase 2 initiative to develop, co-design, pilot, evaluate, and refine implementation materials supporting PAIB CFOs' application of Parts 1 and 2 of the Code with complementary resources for those who support or oversee them.

Recommendation 3: Refer relevant Phase 1 evidence to existing IESBA workstreams.

1. Chief Financial Officers (CFOs) and equivalent senior finance leaders (hereinafter referred to as CFOs)¹ occupy a central position in organizational decision-making. Their judgments influence the integrity of financial and sustainability information, the effectiveness of internal controls, compliance, capital allocation, and the use of organizational resources. When the ethical dimension of a decision is recognized late, or the CFO lacks sufficient information, expertise, or a credible route to challenge and escalate, the consequences can extend to and negatively impact employing organizations, boards, investors, creditors, employees, and other stakeholders. These elements provide the public-interest rationale for the IESBA's Role of CFOs initiative.
2. Phase 1 of this initiative examined how the evolving and expanding responsibilities that CFOs now assume shape their ethical decision-making and whether the related ethical challenges they face reveal any substantive gaps in Parts 1 or 2 or the Glossary of the IESBA's [International Code of Ethics for Professional Accountants \(including International Independence Standards\)](#) (the Code).² The Project Team (PT) assessed evidence from surveys, stakeholder outreach, input from the Stakeholder Advisory Council (SAC) and the IAASB³-IESBA User Advisory Group (UAG), academic research, a detailed analysis of the Code, and a high-level review of European Union (EU) and United States (US) regulatory and accountability regimes. This accumulation of evidence supports the three recommendations set out above.
3. The evidence clearly demonstrates that stewardship, reporting, and controls remain central to the CFO role. However, many CFOs now assume additional organizational responsibilities, including strategy, technology and artificial intelligence (AI), sustainability, data, risk, and operations. These responsibilities place CFO judgment across a wider range of decisions, often involving uncertainty, external input, commercial pressure, and competing organizational interests. The resultant ethical issues that CFOs face now arise in more complex and fast-moving settings, increasing the importance of timely recognition, professional judgment consistent with the fundamental principle of objectivity, and effective challenge.

¹ The PT addressed the most senior finance leader within organizations' finance function and the ethical responsibilities of that role, which could be a CFO, Finance Director, Controller, Chief Administrative Officer (CAO), or some other title. Whilst the role of CFO (or equivalent senior finance role) might not exist separately within a smaller organization, it could form part of the CEO's role. These CFOs are able to exert significant influence over, and make decisions regarding the acquisition, deployment and control of the employing organization's human, financial, technological, physical and intangible resources.

² References to the Code in this report refer to the [Handbook of International Code of Ethics for Professional Accountants \(including International Independence Standards\) 2025 Edition Volume 1](#) including Revisions to the Code Relating to Sustainability Reporting and Using the Work of an External Expert standard, which both become effective December 15, 2026.

³ International Auditing and Assurance Standards Board (IAASB)

4. Within the issues and evidence examined, Phase 1 evidence establishes clear conclusions on the Code. The fundamental principles, conceptual framework, and relevant Part 2 provisions substantively address the recurring ethical issues identified for professional accountants in business (PAIB) CFOs. The PT found no missing principle or requirement that would justify CFO-specific amendments or a separate CFO section in the Code. The evidence to date also does not establish a sufficient basis to extend the Code's scope to cover non-PAIB CFOs or commence a separate non-PAIB CFO initiative.
5. However, Phase 1 evidence demonstrates a clear need for awareness-raising and implementation material that supports practical recognition and use of the Code, as it is not always directly visible to PAIB CFOs or applied early enough when a matter is initially framed as a commercial, legal, technical, or operational decision. The findings therefore support a proportionate Phase 2 initiative to develop, co-design, pilot, evaluate, and refine implementation materials supporting PAIB CFOs' application of Parts 1 and 2 of the Code, with complementary resources for those who support or oversee them, including those charged with governance. Scenario-based support can make the ethical dimension of a decision visible earlier, connect the facts to the relevant Code provisions, and help PAIB CFOs determine when to challenge, consult, or escalate on an ethical issue. Recommendation 2 therefore directs Phase 2 towards practical use of the Code and evaluation of whether the material(s) proposed to be developed will improve recognition and application of relevant provisions of the Code.
6. The CFO's potential public-interest influence is not dependent on whether the individual is a PAIB. CFOs influence the same information, disclosures, controls, compliance decisions, resource allocation, and other organizational decisions irrespective of their professional status. However, applicable professional or organizational ethics requirements, support, and accountability mechanisms may differ depending on professional affiliation and the applicable professional, legal, regulatory, and organizational requirements. Accordingly, Recommendation 2 seeks the IESBA's view on whether the piloting and evaluation of IESBA materials developed in Phase 2 should be extended to non-PAIB CFOs.
7. Phase 1 evidence highlights several ethical issues and considerations relevant to other IESBA workstreams on technology, sustainability, accounting firm culture and governance, using the work of an external expert, non-compliance with laws and regulations (NOCLAR®), post-implementation reviews (PIRs), Code simplification, and tax planning. Accordingly, Recommendation 3 is to compile and refer this evidence to existing IESBA workstreams for consideration within their approved scopes.
8. The evidence supporting the above potential public interest implications is summarized below:

Evidence and Report Source	Potential Risk	Public Interest Implication
The CFO's sphere of influence has widened: 122/182 survey respondents reported increased risk, compliance, or control responsibilities; 96/182 sustainability; 83/182 technology, data or AI; and 77/182 external-stakeholder responsibilities.	A wider remit spreads CFO judgment across more decisions involving reporting, controls, capital, risk, and external communication, sometimes without corresponding specialist capacity or independent challenge.	Decisions made without sufficient information, expertise, or challenge may affect information relied on by boards, investors, creditors, government agencies, employees, and other stakeholders, and may

Evidence and Report Source	Potential Risk	Public Interest Implication
Outreach consistently identified role expansion.		affect organizational resilience and public trust.
Ethical issues are not always recognized or framed as such: Only 54/154 CFO survey respondents reported an ethical challenge; some described issues as business pressure or judgment. Only 26/153 selected the IESBA Code directly as a source of guidance. Outreach participants, however, recognized ethical dimensions more readily when presented with practical scenarios.	An issue framed as commercial, legal, technical, or operational may not engage structured ethical thinking or analysis until positions have hardened and opportunities for consultation, challenge, or escalation have narrowed.	Delayed recognition can allow reporting, disclosure, investment, or operational decisions to proceed without timely or appropriate application of the fundamental principles and conceptual framework potentially leading to adverse consequences for the employing organization or stakeholders.
Pressure and governance conditions affect the CFO's ability to act: Surveys, outreach, and academic research identified reporting and financing pressure, dominant leadership, role conflicts, retaliation risk, weak whistleblowing, and limited board access.	Self-interest, advocacy, and intimidation threats may impair compliance with the fundamental principles, while ineffective challenges or escalation can leave the CFO dependent on the person or body creating the pressure.	The consequences may include misleading information, unaddressed non-compliance, impaired controls, harm to investors or other stakeholders, and reduced confidence in organizational governance.
Information integrity and user consequences: Outreach and UAG input highlighted estimates, liquidity, fundraising, sustainability claims, alternative performance measures, market disclosure and capital allocation as areas where information integrity may be at particular risk	Commercial objectives, incentives or narrow technical compliance may influence assumptions, timing, selection, and presentation so that information creates an incomplete or misleading overall impression.	CFO judgments and explanations can affect capital allocation, investor confidence, remuneration outcomes, market integrity, and public trust.
Technology, competence and reliance on the work of external experts or others: 83/182 CFO survey respondents reported increased technology, data, or AI oversight. Outreach identified opaque outputs, automation bias, data quality, sustainability	A CFO may approve, rely on, or communicate an output without sufficient understanding of its underlying data, assumptions, controls, limitations, or expert judgments, while delegation obscures	Unreliable or insufficiently challenged outputs can affect reporting integrity, controls, investment decisions, sustainability claims, and stakeholder confidence in the information used.

Evidence and Report Source	Potential Risk	Public Interest Implication
capability, and reliance on the work of others and experts.	continuing human accountability.	

II. FORMAT OF THE REPORT

9. The remainder of the main body of the report consists of the following sections:

- [Recommendations for the IESBA's Consideration.](#)
- [How the Evidence Supports the Terms of Reference Objectives.](#)
- [Key Findings and Implications.](#)
- [Evidentiary Limitations.](#)

III. RECOMMENDATIONS FOR THE IESBA'S CONSIDERATION

10. Phase 1 was established as an exploratory, information-gathering exercise to examine how the evolving responsibilities and decision-making environment of CFOs are shaping ethical decision-making, and whether Parts 1 and 2 and the Glossary of the Code remain clear, relevant and practical for PAIB CFOs.

11. The PT's objectives set out in its [Terms of Reference](#) (ToR) approved by the IESBA at its September 2025 meeting, include, under paragraph 6(a), to:

“Gather information on the evolving role of CFOs (or equivalent senior finance roles) within the private or public sector, to identify and understand the ethics issues and challenges faced by individuals in those roles.”

12. The PT has established that while core stewardship, reporting, and control responsibilities remain central to the CFO role, many CFO roles have significantly broadened and are distinctly more complex. Most of the ethical issues the PT has identified in Phase 1 that CFOs now face are not necessarily new (in principle); however, the velocity, complexity, and cross-functional/cross-jurisdictional context in which CFOs exercise professional judgment have changed. The following three recommendations and [Section IV](#) demonstrate how the remaining ToR objectives have been addressed and translate the Phase 1 evidence into proportionate action under proposed Phase 2.

Recommendation 1 – Conclude Phase 1 and not commence a standard setting project for CFO-specific amendments to the Code

13. The IESBA is requested to agree to conclude Phase 1 and not commence a standard-setting project for CFO-specific amendments to the Code. The Board is also requested to agree that Phase 1 evidence does not establish a basis, at this point in time, to extend the Code's scope to cover non-PAIB CFOs, or a separate non-PAIB CFO initiative. The evidence, however, clearly establishes a need to develop and test targeted implementation material as part of the PT's proposed Phase 2 initiative (refer to Recommendation 2).

Basis for the Conclusion on No Amendments to the Code

14. The PT's objective in paragraph 6(b) of the ToR is to:

“Review the extant provisions in Parts 1 and 2 of the Code and consider whether the Code needs further enhancement to address these ethics issues, taking into account the revisions to the Code already made under recent projects, including the Role and Mindset, Technology, Tax Planning, Sustainability, and Using the Work of an External Expert projects.”

15. The PT's detailed analysis of Parts 1 and 2 and the Glossary of the Code in Appendices Four-A and B, together with the triangulated Phase 1 evidence in Appendix One, do not identify a recurring or substantive gap that necessitates CFO-specific amendments to the Code. The fundamental principles and conceptual framework apply across the professional activities undertaken by PAIB CFOs, including financial, non-financial, and the new activities relevant to the evolved CFO role. Relevant Part 2 provisions substantively address the recurring ethical challenges identified through Phase 1, including in relation to conflicts of interest, preparation and presentation of information, acting with sufficient expertise, financial interests and incentives, inducements, NOCLAR, pressure, tax planning, and using the work of an external expert.⁴ No evidence channel identified a missing principle or requirement that the PT considers warrants CFO-specific provisions or a CFO-specific section in the Code. Further, the jurisdictional assessment in Appendix Seven cautions against a title-based response because accountability for equivalent senior finance functions arises through materially different professional, legal, regulatory, and organizational mechanisms.
16. The principal question identified by the PT is whether the Code's definition of “professional activity” remains sufficiently broad to address the expanded CFO role. The definition refers to “*an activity requiring professional skills undertaken by a professional accountant or a sustainability assurance practitioner, including accounting, auditing, sustainability reporting or assurance, tax, consulting, and financial management.*” The PT believes the reference to an “*activity requiring professional skills*” encompasses the professional responsibilities now undertaken by CFOs, including in areas such as strategy, technology and AI, risk, and data governance. The illustrative activities in the definition are not exhaustive. However, expanding that list to capture the range of activities within the evolving CFO remit would be an effort difficult to maintain and could inadvertently narrow the definition's functional reach. Phase 1 therefore does not indicate a need to revise the definition of professional activity. This could be reconsidered if Phase 2 identifies a recurring activity that the existing definition does not adequately address.
17. The Code analysis also identified circumstances in which existing provisions are substantively relevant to PAIB CFOs but do not expressly address the examples of ethical issues identified through the Phase 1 evidence. Examples include paragraph 120.13 A1 on the relationship between organizational culture and ethical values, paragraph 200.6 A2 on threats associated with the use of technology, and paragraph 270.3 A2 on pressure that might threaten compliance with the fundamental principles. These findings do not demonstrate a deficiency in the Code but rather point to an implementation and application issue. They support the targeted scenario-based implementation work proposed in Phase 2 (refer to Recommendation 2).
18. Survey and outreach evidence is consistent with the above conclusions. Among other stakeholders who answered the relevant survey question, a majority considered the Code sufficient and practical, while others considered it partially sufficient and sought clearer support for application. The corresponding CFO question had a small response base and should be treated as illustrative rather

⁴ References in this report to ‘external expert’ and Section 290 of the Code are to the IESBA-approved revisions addressing Using the Work of an External Expert, which become effective on December 15, 2026.

than determinative. Outreach participants generally identified practical difficulties with the Code related to recognizing, navigating, and applying existing ethical requirements and application material in the Code, rather than recurring matters that the Code could not address. Feedback from Jurisdictional Standard Setters (JSS) supported the view that the Code's principles-based foundation remains sound.

Basis for the Conclusion on Non-PAIB CFOs

19. The PT's objective in paragraph 6(d) of the ToR is to:

“Collect information and feedback from stakeholders about non-PAs who undertake CFO roles to inform any future IESBA workstream, including on exploring extending the impact of the Code to all preparers of financial and sustainability information.”

20. Phase 1 evidence confirms that CFO roles are held by both PAIBs and individuals from outside the accountancy profession. The survey results indicate that approximately 50% of respondents are PAIB CFOs. However, non-PAIB CFO participation in roundtable outreach was limited. While Phase 1 establishes the diversity of the CFO population, it does not provide a sufficient basis for recommending a dedicated initiative focused on non-PAIB CFOs.
21. There is, however, a clear public-interest dimension. CFOs influence the same information, controls, compliance decisions, resource allocation, and other organizational decisions irrespective of their professional status. CFOs, regardless of designation, may be subject to company policies, law, regulation, governance duties, and sector requirements. PAIB CFOs are additionally subject to the Code, or local equivalent, and may have access to ethics-related continuing professional development (CPD) and advice and are subject to professional accountancy organization (PAO) monitoring and discipline. In contrast, non-PAIB CFOs may be subject to ethical standards issued by another profession, which may or may not provide the same level of rigor as the provisions applicable to PAIB CFOs under the Code or an adopted or incorporated local equivalent. Further, non-PAIB CFOs may or may not have access to CPD or be subject to oversight and monitoring.
22. Some stakeholders, and many CFOs, described an “uneven playing field” between PAIB and non-PAIB CFOs with respect to professional ethics and, in addition, support access (such as an ethics hotline) and accountability mechanisms. Some investor participants said that professional status and the availability of professional ethics support and accountability mechanisms may inform their assessment of governance risk, capital allocation, and market confidence. A few PAIB CFO participants described using the Code as an external reference when explaining to a Chief Executive Officer (CEO) or board why a proposed action could not be taken, or when an alternative action was more appropriate. A representative from an international standard setter noted that their effective standard-setting is structured around an ethical foundation and mindset per the Code; without it, their standards would be written differently to address this market gap.
23. The resulting Phase 1 observations therefore identify differences in terms of expectations of non-PAIB CFOs adhering to professional ethics through formal standards, institutional support and accountability, rather than comparative ethical conduct. The qualitative observations identify possible public-interest implications and demonstrate why the PT believes further testing is warranted. This remaining evidence gap supports potential further targeted engagement with non-PAIB CFOs in Phase 2 (refer Recommendation 2, *Engagement with Non-PAIB CFOs*).

Recommendation 2 – Approve a focused Phase 2 initiative to develop, co-design, pilot, evaluate, and refine implementation materials supporting PAIB CFOs’ application of Parts 1 and 2 of the Code with complementary resources for those who support or oversee them.

24. The IESBA is requested to approve a focused Phase 2 initiative to develop, co-design, pilot, evaluate, and refine implementation materials for PAIB CFOs and for those who support or oversee them, including those charged with governance. The Phase 2 initiative would incorporate the following design features:
- (a) *Initial Implementation Material* – Develop implementation material on the four themes and integrated approach described in paragraphs 25 to 32;
 - (b) *Collaborative Delivery – Co-design, Piloting, and Evaluation* – The initial design, piloting, and evaluation of IESBA implementation materials should be conducted with PAIB CFOs, PAOs, JSS, regulators, boards, audit committees, and other governance actors as set out in paragraphs 33 to 38;
 - (c) *Engagement with Non-PAIB CFOs* – The PT requests the IESBA’s views on whether to extend the piloting and evaluation in (b) to non-PAIB CFOs as set out in paragraphs 39 to 41;
 - (d) *Targeted Jurisdictional Analysis* – Further jurisdictional analysis would only be necessary if a defined implementation material or policy question requires it as described in paragraphs 42 to 46; and
 - (e) *Phase 2 Recommendations to Return to the IESBA* – Phase 2 findings and recommendations should return to the IESBA for final decisions as set out in paragraph 47.

Initial Implementation Material

25. The PT’s objective in paragraph 6(c) of the ToR is to:
- “Consider whether the IESBA should commission non-authoritative material (NAM) or pursue other initiatives to raise awareness of and emphasize key provisions in the extant Code, relevant to the evolving role of CFOs and related ethics issues and challenges.”*
26. The strongest signal across Phase 1 evidence bases is that the Code is not always the direct or immediate reference point when PAIB CFOs face complex, time-compressed ethical decisions. This may be because a national or PAO code uses or otherwise incorporates the Code, organizational policies are more accessible, or the issue is initially framed as commercial, legal, or technical. This is not a conclusion that the Code lacks influence or relevance, but that its principles and relevant provisions need to be made more accessible to apply in the ethical decision settings described by stakeholders.
27. The surveys support preferences including the scenario-triggered recognition which was observed in outreach, and the repeated requests for digital tools, case studies, peer discussions, and board material to provide a coherent basis for focused implementation material. Academic research on the gradual lack of sight of ethical obligations,⁵ incentives, power, and normalization also support

⁵ Called “ethical fading” in the academic research referred to in Appendix Six. Throughout this report, ethical obligations refer to the responsibility to comply with the fundamental principles and apply the conceptual framework in accordance with the Code.

implementation material that starts with decision triggers and identifying threats to compliance with the fundamental principles.

28. Phase 1 therefore points to a clear need for scenario-based implementation support and better awareness of, and access to, the Code. Such support could help such PAIB CFOs recognize ethical issues earlier, apply the conceptual framework in complex or high-pressure situations, use the work of others and, where applicable, external experts appropriately, communicate challenges, and escalate concerns.
29. Based on stakeholder feedback and preferences, the material should use practical scenarios, red flags, decision prompts, and escalation questions linked directly to Code provisions, including those addressing pressure, conflicts of interest, preparation or presentation of information, incentives, use of the work of others and, where applicable, external experts, technology, sustainability information, tax planning, and NOCLAR. Some materials could be specific to PAIB CFOs as a group, with scenarios addressing role conflicts, authority, and governance access. Broader PAIB-applicable material could use CFO-based scenarios to illustrate ethical issues that apply more widely, relating to, for example, preparation and presentation of information, pressure, or technology.
30. The IESBA could complement PAIB CFO and general PAIB material with short awareness resources for those charged with governance, CEOs, controllers, legal teams, and other relevant stakeholders. These resources could explain how incentives, authority, access to information, direct access to the board or audit committee, quality of challenge, and speak-up protections can affect a PAIB CFO's ability to identify, evaluate, and address threats to compliance with the fundamental principles.
31. The PT recommends that for Phase 2, a limited number of scenarios be developed that integrate the following four evidence-supported themes where practicable:
 - *CFO's strategic participation, stewardship and role conflicts.* Scenarios could demonstrate that while strategic involvement is not inherently inconsistent with a PAIB CFO's responsibility to comply with the fundamental principles and apply the conceptual framework, it may create advocacy, self-review, self-interest, or intimidation threats resulting from potential conflicts of interest. This would address the expanded or evolved role while also highlighting that the foundational traditional stewardship function remains critical. The material could also address performance incentives, optimistic forecasts, and pressure to prioritize short-term financial outcomes. It should reinforce the continuing importance of stewardship, information integrity, and professional judgment consistent with the fundamental principle of objectivity.
 - *Technology, AI, professional competence, and reliance on internal or external experts.* Scenarios could address automation bias, data quality, opaque or unreliable outputs, explainability, controls, capability limits, and use of the work performed by others (whether internal or external to the employing organization) and, where applicable, the work of external experts, where the CFO approves, relies on, or communicates information they may not be able to reproduce or verify independently. The material should focus on identifying limits, obtaining appropriate expertise, challenging assumptions, and retaining accountability. Such development should be coordinated with IESBA's Technology workstream and any relevant external expert-related implementation activity.
 - *Pressure, challenge and escalation, including interaction with boards and audit committees.* Scenarios could address explicit or implicit pressure from CEOs, boards, controlling owners, investors, or political actors, together with reporting lines, authority, access to information, retaliation risk, and credible escalation destinations. Supporting material for boards and audit

committees could explain PAIB CFOs' responsibilities to comply with the fundamental principles and apply the conceptual framework and conditions that support effective challenge. It should not create or imply additional governance requirements.

- *Preparation and presentation of financial and non-financial information.* This is relevant well beyond CFOs, but CFO scenarios could demonstrate the application of Section 220 in the Code⁶ to estimates, forecasts, alternative performance measures, sustainability information, and internal decision material. A fundraising or equity-raising scenario could test pressure to present weaknesses selectively when organizational survival or transaction success is at stake. More generally, it could address situations in which information is technically compliant with an applicable reporting framework but omits relevant context, relies on unsupported assumptions, or creates a misleading impression. This could be coordinated with the IESBA's Adoption and Implementation Working Group (A&I WG), as its action plan includes a work item to address such scenarios in a sustainability context.
32. The above four themes need not result in separate products. An integrated scenario could, for example, involve a CFO relying on an AI-generated forecast with unsupported assumptions, pressure to use that forecast in investor communications, and uncertainty about escalating the matter to the audit committee. Combining related issues would better represent the complex decision-making environment described by stakeholders, reduce duplication with other IESBA materials, and allow Phase 2 to test the package on a proportionate basis.

Collaborative Delivery – Co-design, Piloting, and Evaluation

33. The PT's objective in paragraph 6(e) of the ToR is to:
- "Raise awareness of the Workstream's objectives through outreach activities."*
34. Phase 1 indicates limited direct visibility of the Code by CFOs and low awareness of recent amendments relevant to PAIBs, including sustainability, tax planning, technology, and the use of external experts. Awareness raising and effective implementation therefore depend on collaboration with the International Federation of Accountants (IFAC), PAOs, JSS, relevant regulators, governance institutes, and audit committee networks.
35. While the IESBA must retain responsibility for the Code, including the fundamental principles, conceptual framework, and interpretation of its provisions, coordination with the above identified bodies will help raise awareness of the evolved CFO role, related ethical challenges, and requirements and application material in the Code relevant to PAIB CFOs. This could be achieved through a partner-led delivery model to address local legal and governance routes, whistleblowing protections, regulatory requirements, professional obligations, and relevant sector examples, while preserving the distinction between the Code and jurisdiction-specific law or regulation.
36. The PT should co-design draft resources with a select group of PAIB CFOs, PAOs, JSS, regulators, and for those who support or oversee PAIB CFOs. Such engagement could help the IESBA identify where global material requires localization and signal to PAOs, JSS and other adopters or users of the material the need to incorporate accurate references to local duties, whistleblowing protections, and regulatory requirements when adopting or using it locally.
37. Piloting would involve a wider group of PAIB CFOs, IFAC, PAOs, JSS, regulators, boards, audit committees, investors, and other stakeholders. This group could pilot the material against a small number of realistic scenarios and explain how they identified the ethical issue, which provisions of

⁶ Section 220, *Preparation and Presentation of Information*

the Code they considered, what action they would take, and whether they would need to challenge or escalate.

38. Evaluation should assess whether the material improves early recognition of ethical issues, helps users to apply the Code, supports practical ethical decision-making and escalation, is fit-for-purpose for the intended audience, and uses an accessible format and delivery route. It should also identify any unclear wording, missing considerations, and unintended interpretations. Where feasible, later evaluation could consider reach and reported use.

Engagement with Non-PAIB CFOs

39. As noted in Recommendation 1 (paragraphs 19 to 23), the Phase 1 work identified potential public-interest implications with respect to non-PAIB CFOs, demonstrating why further testing may be warranted. Further engagement with non-PAIB CFOs through piloting and evaluating IESBA implementation materials could help the Board determine whether ethical challenges are adequately addressed under other professional or organizational frameworks, and whether existing professional, legal, regulatory, and organizational support and accountability mechanisms are sufficient in practice. It could also improve the IESBA's understanding of where responsibility sits among regulators, employers, governance bodies, and professional organizations and whether voluntary use of the IESBA material could be useful for CFOs from outside the accountancy profession.
40. Selected regulators could also provide evidence about local accountability routes and the potential usefulness of voluntary material. Their participation would help the IESBA understand whether differences in professional, legal, and regulatory support and accountability mechanisms warrant further work. The PT could seek the views of regulators, PAOs, JSS, governance bodies, CFO associations, and other relevant market participants with respect to whether they see a recurring issue not adequately addressed by the applicable requirements or mechanisms, how it relates to their responsibilities, what contribution the IESBA materials could make, and the likely benefits and resource implications of direct engagement with non-PAIB CFOs.
41. The PT therefore requests IESBA's views on whether to extend the piloting and evaluation of IESBA materials to non-PAIB CFOs, taking into consideration resources, feasibility of obtaining representative participation across jurisdictions and sectors, and whether such IESBA activity might create confusion about the Code's scope.

Targeted Jurisdictional Analysis

42. The high-level review of EU-level measures and US federal public-issuer framework in Appendix Seven noted materially different accountability routes. Within those frameworks, accountability can attach through an undertaking, governing body, delegated function, named officer, signatory, professional status, or individual conduct. The absence of a licensed or statutorily defined CFO office does not necessarily indicate an absence of accountability. A named-officer certification requirement does not establish that the CFO has the authority, information, organizational support, or escalation routes needed to meet legal responsibilities and, for PAIB CFOs, responsibilities under the Code. As noted in Recommendation 1, professional or organizational ethics requirements differ for non-PAIB CFOs, while the Code remains relevant to PAIB CFOs.
43. For Phase 2, further jurisdictional analysis should only occur if it is needed to establish the local baseline to ensure that the scenario, implementation message, or policy premise is accurate. Relevant questions include who holds a reporting or certification duty; what routes exist for challenge, consultation or escalation; whether confidentiality or whistleblowing rules constrain available actions; how professional obligations interact with company, securities or sector requirements; and which body receives a report or concern. The assessment need not extend beyond local facts that

could change the ethical issue, applicable Code provisions, available responses, escalation route, or reporting obligations.

44. Each assessment should begin with a defined question, intended user, jurisdictional scope, and output. It should use the evidential source hierarchy applied in Phase 1, state the status and date of the authorities relied on, and be validated by appropriately qualified PAOs, regulators, JSS, or local legal experts. Jurisdictions should be selected based on intended users, delivery partners, and identified legal dependencies. The IESBA should retain responsibility for interpreting the Code, while the relevant stakeholder validates the local legal and institutional context. The output should be limited to what the implementation material requires, such as a short jurisdictional note, localized scenario, or validation record.
45. The jurisdictional work would support the collaborative delivery model by providing evidence and validation where local law could change the content of a Phase 2 deliverable and provide context for applying the Code. Its scope excludes jurisdiction rankings, assessments of enforcement quality, inferences about ethical conduct from regulatory design, and recommendations to license the CFO title.
46. This approach would complete the analytical sequence begun in Phase 1 and support the implementation and localization work described above.

Phase 2 Recommendations to Return to the IESBA

47. Phase 2 should return to the IESBA with user-evaluation findings, resource implications, and a recommendation on whether to finalize the material, expand it, refer it to another IESBA workstream, or discontinue it. Standard setting could be reconsidered as part of Phase 2 recommendations if new evidence identifies such a need during the Phase 2 activities.

Recommendation 3 – Refer relevant Phase 1 evidence to existing IESBA workstreams

48. The IESBA is requested to agree that relevant Phase 1 evidence be compiled and referred to existing IESBA workstreams for consideration within their approved scopes. The relevance and strength of the evidence vary by topic, and each relevant workstream should determine whether the evidence affects work that is already underway.
49. Phase 1 evidence highlights several ethical issues and considerations relevant to the following IESBA workstreams:
 - **Technology and AI** – Technology and AI were consistently raised across evidence channels as a prominent context in which ethical challenges arose. Stakeholders also raised questions about the extent of challenge expected from CFOs when AI models or technology systems fall outside their technical expertise.
 - **Sustainability and Adoption and Implementation.** The evidence frequently cited sustainability information as a source of ethical challenges, including pressure around selective metrics, value-chain data, targets, and transition narratives. CFOs may also be asked to approve or oversee information produced outside finance and supported by experts whose methods they cannot reproduce independently. As noted under Recommendation 2 (paragraph 31), the A&I WG's action plan includes similar scenarios in a sustainability context. The Phase 1 evidence could inform CFO-focused scenarios involving information integrity, pressure, professional competence and due care, using the work of others, and using the work of an external expert.

- **NOCLAR PIR:** Stakeholders described circumstances in which CFOs may identify or suspect NOCLAR through responsibilities related to, for example, financial reporting, controls, tax, sanctions, anti-money laundering, or sustainability. The ethical challenges may relate to the reliability of available information, the CFO's authority to investigate, access to the board or audit committee, confidentiality, possible retaliation, and the relationship between internal escalation and local reporting requirements. This evidence may be relevant to the NOCLAR PIR work, particularly in considering how senior PAIBs recognize and respond to suspected non-compliance within complex governance structures.
 - **Using the Work of an External Expert:** The expansion of the CFO role has increased reliance on external experts in areas such as valuation, technology, sustainability, tax, cybersecurity, and legal or regulatory matters. Stakeholders raised questions about how a CFO determines which provisions apply when using such work, evaluates an external expert's competence, capabilities and objectivity where Section 290 applies, defines the scope of the work, challenges key assumptions, and determines whether the resulting information is suitable for the decision being made. Reliance on an expert may support the CFO's judgment, while the CFO's responsibility for the related professional activity remains relevant.
 - **Firm Culture and Governance (FCG)** – While not in an accounting firm context, the evidence consistently pointed to the importance of ethical culture and robust governance mechanisms to enable CFOs to identify, evaluate, and address threats to compliance with the fundamental principles. CFOs may hold senior authority while remaining dependent on the CEO, board, or controlling owners for information, resources, and protection when raising concerns. These observations may provide contextual evidence about external pressures and governance interfaces relevant to the FCG workstream. The FCG project team should determine whether and how that evidence is relevant within its approved firm-focused scope.
 - **SMART (Simplification, Mobilization, Adoption, Responsiveness, Targeted Action) Framework: Use of the Code Simplification Project** – Stakeholders often noted concerns about accessibility of the Code and the difficulty of connecting its principles with ethical decisions arising in fast-moving or complex circumstances. Suggested responses included digital access, short scenarios, and links between practical issues and relevant Code provisions. PAIB CFOs may access the Code through PAO codes that adopt or align with it, making coordination with PAOs important for accessibility and implementation. This evidence may help the SMART Framework and Code Simplification activities consider how users find, recognize, and apply relevant material.
 - **Tax Planning** – Tax planning appeared within broader examples involving pressure, professional judgment, incomplete information, and the presentation of information to boards or authorities. The evidence is most relevant to implementation activities illustrating how PAIB CFOs oversee tax decisions and apply their wider ethical obligations.
50. The relevant evidence should therefore be shared with the workstreams identified above. Referral would not expand an approved scope or determine whether the receiving workstream should develop non-authoritative material (NAM) or take another action.

IV. HOW THE EVIDENCE SUPPORTS THE TERMS OF REFERENCE OBJECTIVES

51. The following table separately demonstrates how the PT addressed each ToR objective or how the objectives could be furthered through the proposed Phase 2 workstream, the evidentiary boundary attached to the conclusion, and the resulting recommendation to the IESBA:

ToR Objective	How the PT Addressed it	Conclusion and Recommendations
Gather information on the evolving CFO role and related ethics issues and challenges.	Triangulated the 2025 pulse survey, two 2026 extended surveys, global and regional CFO and stakeholder outreach, SAC and UAG input, an independent academic review, detailed Code analysis, and high-level jurisdictional regulatory assessment. Identified continuing stewardship responsibilities alongside a wider and more complex decision perimeter, with recurring issues involving recognition of Code provisions, pressure, conflicts, professional competence, technology, information integrity, governance access, and escalation.	Objective addressed in Phase 1. The evidence records recurring themes and informs the three recommendations.
Review Parts 1 and 2 and the Glossary and consider whether the Code needs enhancement.	Performed a detailed provision-by-provision analysis, taking account of relevant recent revisions to the Code. Tested the Code against the expanded CFO role and resultant ethical challenges identified in the evidence from outreach and the jurisdictional accountability review.	Objective addressed in Phase 1. No recurring substantive gap or basis for a global CFO definition was established, thus supporting Recommendation 1. Any recurring gap identified in Phase 2 would return to the IESBA for a decision.
Consider non-authoritative material (NAM) or other initiatives to raise awareness of relevant Code provisions.	Identified four priority topics for implementation materials, preferred scenario-based formats, relevant audiences, and links to existing IESBA materials and workstreams.	Objective to be furthered in Phase 2. Supports Recommendations 1, 2 and 3: (a) Focused Phase 2 initiative to develop, co-design, pilot, evaluate, and refine implementation materials, using integrated scenarios, existing material, and delivery partners, and (b) referral of Phase 1 evidence to other IESBA Workstreams.
Collect information on non-PAIB CFOs to inform possible future work, including extending the Code's impact.	Obtained directional survey information and limited direct outreach evidence; assessed differences among professional, legal, regulatory, and organizational mechanisms. Phase 1 evidence identifies a public-interest dimension, making potential further	Objective addressed in Phase 1 with respect to extending the Code's impact. Direct non-PAIB CFO Phase 1 evidence remains insufficient, at this time, to support extending the Code's formal scope or commencing a separate non-PAIB CFO initiative.

ToR Objective	How the PT Addressed it	Conclusion and Recommendations
	stakeholder engagement relevant to assessing possible voluntary use of implementation materials beyond the PAIB population.	Phase 2 contemplates and proposes IESBA consideration of whether to extend piloting and evaluation of IESBA implementation materials to non-PAIB CFOs. Any recurring ethical gap identified through engagement with regulators, PAOs, JSS, investors, governance bodies and other market participants should be returned to the IESBA for consideration.
Raise awareness of the workstream's objectives through outreach.	Engaged CFOs, PAOs, regulators, JSS, investors, governance actors, advisory groups, and other stakeholders across multiple regions, and identified potential partners for co-design, piloting for localization and delivery and evaluation.	Objective partially addressed during Phase 1. Recommendation 2 provides proportionate continuation via co-designing, piloting and evaluating IESBA implementation materials. Recommendation 3 allows for referral of relevant evidence to existing IESBA workstreams.

V. KEY FINDINGS AND IMPLICATIONS

Stewardship Remains the Anchor While the Decision Perimeter has Widened

52. Stewardship remains central to the CFO role. Core responsibilities for reporting integrity, controls, liquidity, capital discipline, and other aspects of stewardship remain central to the CFO role. However, many CFOs are now also expected to influence some or all of strategy, enterprise risk, operational resilience, technology investment, sustainability information, data governance, human resource matters, and external communication. The evidence indicates an accumulation of responsibilities rather than a replacement of stewardship. The combination varies significantly by entity size, ownership structure, sector, jurisdiction, governance model, and professional background.
53. The economic and strategic lenses help explain the expansion of the role. Volatile financing conditions, complex and opaque supply chains, digital transformation, sustainability commitments, cyber threats, and pressure for faster resource allocation increase demand for integrated, financially grounded judgment. The CFO's involvement does not always arise because the CFO owns these additional underlying functions; it often arises because the decisions affecting those functions have material implications for reporting, controls, capital, liquidity, risk, disclosure, or enterprise value.
54. The geopolitical lens reinforces this point. Sanctions, trade restrictions, tariffs, currency volatility, supply-chain disruption, and regulatory divergence can rapidly impact financial and non-financial assumptions. CFOs may need to translate those developments into forecasts, valuations, going-concern assessments, working capital decisions, disclosures, and scenario planning. The ethical

challenge often concerns the appropriate exercise of professional judgment and discretion when the quality, transparency, or completeness of the information may be uncertain.

55. Role expansion is not always uniform. Large, listed entities often have experts and mature governance arrangements to face intense market scrutiny and complex regulatory requirements and reporting. Small- and medium-sized enterprises (SMEs), founder-led, or growth-stage organizations may concentrate more functions in one individual and provide fewer checks and balances. Public-sector CFOs may face political influence, public money responsibilities, and service-delivery trade-offs. Not-for-profit CFOs may need to balance mission outcomes, legislative requirements (for registered charities), donor expectations, and financial sustainability. Fractional or virtual CFOs may face multi-client conflicts, confidentiality issues, and ambiguity over executive accountability.
56. The evidence therefore does not support defining a single global CFO role or related provisions in the Code. The situation is similar in many jurisdictions where the term “CFO” is not legislatively defined. However, the evidence supports a functional approach to determining the Code’s relevance. This approach considers an individual’s actual responsibilities, decision-making authority, and organizational influence, together with whether the activities performed fall within the Code’s definition of professional activities, rather than relying on a job title or professional status.

The Central Application Challenge is Ethical Recognition

57. Roundtable and focus group meeting participants rarely described the most difficult issues as simple choices between compliance and misconduct. They described incomplete or evolving facts, conflicting legal or regulatory expectations, ambiguous data, pressure to support a preferred outcome, and situations in which several defensible options had different consequences for investors, employees, the public, or other stakeholders. Identifying the line between what is legally defensible, technically acceptable or commercially expedient, and what is ethically appropriate was a recurring challenge raised.
58. The extended CFO survey results indicate that about one-third of respondents reported an ethical challenge occurring during the preceding 5 years. That structured response should be read together with qualitative evidence. Open-text responses referred to matters such as reporting pressure, provisions, liquidity language, procurement, tax, whistleblowing, political influence, sustainability, AI, data, cybersecurity and data privacy. Some survey respondents described such matters as related to business pressure or professional judgment rather than ethical issues. The relatively low rate of self-reported ethical challenges raised a recognition question, which the PT explored through outreach and concrete scenarios.
59. Outreach also demonstrated that participants identified ethical dimensions more readily when practical scenarios were presented. This supports the conclusion that the practical challenge often arises before the Code’s conceptual framework is consciously engaged, if at all. When a matter remains framed as technical, legal, operational, commercial, or technological, positions may harden and opportunities to obtain advice, challenge assumptions, document judgments, or escalate may narrow.
60. The analysis of Parts 1 and 2 and the Glossary of the Code in Appendices Four-A and Four-B illustrates that for PAIB CFOs, the recurring ethical issues identified through Phase 1 fall within the substantive reach of the fundamental principles, conceptual framework, and relevant provisions in Part 2. This analysis does not identify recurring ethical issues that warrant new specific principles, requirements, or a new CFO Section in the Code.

Pressure, Incentives and Organizational Environment can Amplify Threats

61. Pressure was the most consistent cross-cutting theme across evidence bases. It can come from CEOs, boards, founders, controlling shareholders, other investors, lenders, governments and regulators, internal targets, job security, or the CFO's own financial or other self-interests. It may be explicit, such as a request to inappropriately alter information, or implicit, such as the expectation that finance will find a technically supportable route for a preferred result. Time pressure was also consistently raised, which can reduce the time to think, obtain facts, consult experts, challenge assumptions, or consider alternatives.
62. The ability of a CFO to identify, evaluate, and address threats to compliance with the fundamental principles in the Code can be influenced by access to information, authority, direct access to the board or audit committee, the quality of challenge from controllers and other functions, and whether concerns can be raised without retaliation. This indicates that formal governance arrangements may not be sufficient when their practical operation isolates the CFO or treats finance primarily as an execution function.
63. The incentive lens indicates that ethical outcomes cannot be assessed only at the level of individual character. Equity compensation, bonuses, debt covenants, financing needs, analyst expectations, promotion prospects, job security, and transaction outcomes can create self-interest and intimidation threats. Academic research links CFO compensation and power to earnings management, especially when incentive horizons are short and governance is weak.
64. Role concentration can intensify these pressures. A CFO who is simultaneously a financial steward, strategic partner, operational executive, technology sponsor, and/or transaction leader may be expected to advocate for a course of action and then evaluate its financial or reporting effects. This can create self-review, advocacy, and intimidation threats. The risk is greater where the controller, chief accounting officer (CAO), internal audit, legal function or audit committee do not provide effective challenge.
65. The evidence does not suggest that broader CFO involvement across organizational functions is problematical from an ethics perspective. However, it does support attention to role design, separation of responsibilities, oversight, challenge, and escalation. The Code and governance mechanisms outside it address these matters in part.
66. Role expansion does not mean that CFOs must be knowledgeable in sustainability, AI, cybersecurity, data science, tax, or other areas brought within the finance perimeter. The ethical issue arises when a CFO is expected to approve, rely on, or communicate outputs without sufficient understanding of the data, assumptions, controls, limitations or expert judgments on which the CFO depends. Delegation may be necessary, but it does not remove the CFO's responsibility to take appropriate steps when using the work of others. Where the work is that of an external expert, the relevant Code provisions address, among other matters, evaluation of the external expert's competence, capabilities, and objectivity and the appropriate use of that work for the intended purpose.

Information Integrity now Extends Beyond Conventional Financial Reporting

67. CFOs remain central to judgments about estimates, provisions, impairments, liquidity, forecasts, alternative performance measures, and market communication. Comparable judgments about data quality, assumptions, measurement uncertainty, controls, and disclosure increasingly arise in sustainability information, transition claims, scenario analysis, cyber incident effects, AI-generated forecasts, and other non-financial information that may influence capital allocation, remuneration, or public trust.

68. The UAG discussion on June 25, 2026 added a more specific investor and user perspective subsequent to the PT's presentation of its preliminary findings at the June 2026 IESBA meeting. UAG members identified forward-looking estimates, goodwill and projected cost savings or revenue gains from mergers and acquisitions, impairments, restructuring charges, tax strategy, legal provisions, capital allocation, and alternative performance measures as areas in which CFO judgment and explanation can affect capital allocation and confidence. They emphasized the importance of materiality, plain-language explanations, follow-up reporting, and transparency when the definition or calculation of a performance measure changes or disclosures affect remuneration outcomes, including where performance measures influence variable compensation.
69. The potential implication is that when CFOs are preparing or presenting forward-looking or scenario-based information, they should test more than technical compliance, and consider the overall impression created, explain any uncertainty and changes consistently, address links between selected measures and incentives, and determine whether users receive enough information to understand subsequent outcomes. The distinction between ethical application and the requirements of financial reporting, sustainability reporting, or securities law should be preserved. For example, financial and sustainability reporting frameworks allow preparer discretion and judgment, and the ethical requirements complement this by requiring the appropriate exercise of professional judgment and the use of discretion in a manner that is not intended to mislead.⁷

The Code Remains Relevant but is not Always Used as a Live Decision Resource

70. In the extended CFO survey, respondents cited internal organizational policies, professional body codes, legislative or compliance frameworks, and personal judgment or peer consultation as sources of ethical guidance used more frequently than the Code itself. This does not establish that the Code has limited influence because national or PAO codes generally adopt or otherwise use it. However, it does indicate that the Code is not always directly visible or used as a regular reference point when CFOs make time-sensitive decisions. During outreach, a few participants described the Code, or the applicable local code, as an external reference point that supported a challenge to a CEO, board member, or controlling owner, for example, when resisting pressure over reporting judgments, forecasts, or disclosures. This qualitative evidence supports practical utility; however, it does not establish how often PAIB CFOs used the Code or that they always achieve better outcomes in such situations.
71. Therefore, any practical support from the IESBA should make existing obligations easier to recognize and navigate, for example through concise, digitally accessible and searchable material. Concise scenarios, decision-making prompts, red flags, escalation questions, and direct links to relevant provisions would be responsive to the evidence.

Professional Membership is Ethical Infrastructure but not a Guarantee

72. The survey evidence continues to show a mixed professional population. Across the pulse and extended CFO surveys, 148 of 299 respondents (49.5%) who answered the professional-status question identified themselves as PAIBs. This is an indicative feature of the respondent population, rather than an estimate of the global CFO population. Outreach also suggests significant variation in professional membership proportions across different jurisdictions; however, the evidence gathered to date does not support jurisdiction-level estimates of these proportions.

⁷ Refer paragraphs R220.4 and R220.5 of the Code

73. PAO membership can provide an external principles-based framework, ethics-related CPD, access to advice, a basis for challenge, and disciplinary accountability. These features can support recognition of ethical issues and a structured response. Some non-PAIB CFO participants in the Milan outreach recognized the potential benefits of this ethical infrastructure. However, the strength of that infrastructure varies across PAOs, and membership in itself does not automatically mean superior ethical conduct; however, it does increase the likelihood of ethical conduct. This professional infrastructure also differs from internal company policies or legal or regulatory requirements: the Code provides a global baseline that is a comprehensive, principles-based framework for ethical conduct, while organizational policies and legal or regulatory requirements serve different purposes and vary by entity and jurisdiction.
74. CFOs who are not PAO members may nevertheless be subject to company, securities, employment, governance, sector or other professional obligations. The relevant distinction is therefore the source, scope and enforceability of accountability, rather than an assumption that one group has ethical obligations and another does not. The evidence instead points to differences across the CFO population in the sources of ethics support, obligations and oversight, as well as potentially differences in enforcement of such obligations, which some PAIB and non-PAIB CFOs have recognized. Some participants also called for more consistent ethical expectations across the CFO population. These sources of support and accountability should not be presented as interchangeable. Company policies may be narrower and internally enforced, while legislation and regulation often address specified conduct, entities or sectors; it is unlikely that company policies and laws and regulations reproduce the Code's full principles-based framework, robust provisions, and professional accountability. Some participants, including PAOs and regulatory bodies, highlighted the professional accountability applicable to PAIB CFOs, including the potential for disciplinary, financial and reputational consequences where misconduct occurs, with a few participants noting differences in such accountability for non-PAIB CFOs. These observations contributed to the public interest considerations outlined in paragraph 8.

Jurisdiction Changes the Route of Accountability but not the Relevance of Fundamental Ethical Principles

75. A jurisdictional lens identifies several routes through which CFOs may be held accountable. Some regimes impose certification requirements on the CFO or principal financial officer. Others place formal responsibility on the board or governing bodies and rely on delegation, internal controls, audit committees, and management processes. Sector-specific regulation and professional requirements may impose additional obligations. These routes should be distinguished because responsibility imposed on an entity or governing body does not automatically create personal legal responsibility for the CFO.
76. The absence of a licensed or statutorily defined CFO office does not indicate an absence of conduct accountability. Responsibility may arise from an individual's function, delegated authority, governing-body membership, signatory status, professional status, or conduct. A named-officer certification requirement establishes a formal legal obligation. Still, it does not establish whether the individual has sufficient authority, information, organizational support, or awareness of relevant ethical requirements to discharge that obligation effectively. Where the CFO is a PAIB, the CFO is required to comply with the fundamental principles and apply the conceptual framework alongside adhering to the applicable jurisdictional legal and institutional framework.

77. The implementation implication concerns the delineation between the global ethical framework and jurisdiction-specific application. Global material should explain the relevant Code provisions, threats to compliance with the fundamental principles, decision processes, and escalation considerations. Where a scenario depends on local reporting duties, confidentiality requirements, whistleblowing protections, governance routes, or regulatory contacts, then PAOs or other appropriately qualified jurisdictional partners should validate and explain that specific local context. Any such validation should be limited to the legal context in the proposed material and should not become a general mapping exercise.
78. The Phase 1 high-level review of the EU-level framework and the US federal public-issuer framework provides two illustrations of how accountability may attach to an undertaking, governing body, named or designated officer, regulated function, signatory, or individual conduct. The EU framework review did not examine Member State transposition of EU Directives, national company law, or enforcement arrangements. The US framework review did not extend beyond the federal public-issuer framework. These illustrations do not establish the prevalence of any CFO model, the effectiveness of governance arrangements, the practical enforcement of the relevant obligations, or the relative ethical conduct of CFOs.
79. Surveys, outreach, and academic evidence identify the ethical issues and practical pressures that implementation material may need to address. The jurisdictional assessment serves a different purpose: it tests whether a proposed scenario or implementation message depends on local legal or institutional assumptions. Further jurisdictional analysis would be triggered where those assumptions could materially affect the individual's responsibilities, available action, escalation route, or reporting obligations.
80. Phase 2 should focus on application, targeted testing, and collaboration. In summary, the findings support an implementation package that helps PAIB CFOs recognize ethical dimensions earlier and apply existing provisions in realistic decision settings. Targeted collaboration is also relevant where another stakeholder influences the information, authority, challenge, or escalation available to the CFO. The IESBA should retain responsibility for the Code and its global principles-based framework, while appropriately qualified partners could validate the local legal, regulatory, and governance context.

VI. EVIDENTIARY LIMITATIONS

81. Phase 1 provides sufficient evidence for the three recommendations in this report. However, its design limited conclusions to the recommendations made due to the following factors:
 - The evidence identifies recurring themes but could not determine how common or severe they are globally, compare their prevalence across jurisdictions, or establish cause and effect. The surveys used non-probability samples, with varying outcomes in stakeholder engagement (i.e., CFOs versus other stakeholders), completion rates, and geographic coverage.
 - Direct evidence from non-PAIB CFOs was limited, in part as some organizations hosting the outreach events were PAOs, which naturally resulted in greater representation of PAIBs. Phase 1 therefore cannot, at this time, compare the effectiveness of professional, legal, regulatory, and organizational ethical frameworks or safeguards, assess whether PAIB and non-PAIB CFOs achieve consistent ethical outcomes, or support extending the Code's scope. PAO membership may provide professional standards, training, guidance, and disciplinary accountability, but ethical conduct also depends on the individual, the organization and its ethical culture, and the wider governance and regulatory environment. The confidential handling of ethical issues within organizations further limits direct comparison.

- The EU and US framework review was undertaken to illustrate different regulatory approaches. It does not map CFO regulation globally, provide a legal opinion on personal CFO liability, or assess how requirements are enforced in practice. Records of national implementation or enforcement action do not necessarily establish whether the requirements operate effectively or improve ethical outcomes.
- The academic literature is concentrated on financial reporting, earnings management and US public companies. Empirical evidence is more limited in areas such as AI, sustainability reporting, the public and not-for-profit sectors, and non-PAIB or fractional CFO roles. These gaps support further research but do not, on their own, indicate a need for revisions to the Code.

APPENDIX ONE: EVIDENCE TRIANGULATION AND DECISIONS TRACEABILITY

This appendix explains the work undertaken by the PT and the analytical path from evidence to findings to recommendations. The evidence channels were designed to answer different questions: surveys provided directional breadth; outreach explained how issues arise in practice; academic research identified established mechanisms and research gaps; the Code analysis tested its substantive coverage; and the jurisdictional assessment separated professional ethics from legal and governance accountability. No source was treated as conclusive on its own.

The PT first defined the decision question, then gathered evidence for breadth, context, mechanism, and legal setting. It assessed convergence, counterevidence, and source limitations; separated Code coverage from operational application and the wider enabling environment; and linked each judgment to a proportionate recommendation.

Evidence was weighed judgmentally by its directness to the question, source design, specificity, consistency with other channels, and acknowledged limitations. The descriptors below assess support within the stated scope and are not statistical confidence ratings. Convergence can strengthen a directional conclusion; however, it cannot make a non-probability sample representative or turn qualitative evidence into a prevalence measure.

A. Evidence Architecture and Weighting

Channels	Work undertaken and coverage	Question addressed	Analytical contribution and weight	Principal limitation
2025 CFO pulse survey	July-August 2025 baseline survey, which identified early questions concerning professional status, ethical challenges, and sources of guidance. It then informed the design of the extended 2026 surveys.	Which issues required deeper testing in Phase 1?	Scoping and continuity evidence which shaped later work and tested whether broad themes persisted, rather than determining conclusions on their own.	Different and geographically concentrated respondent profiles. Results were not pooled with the 2026 surveys and carry limited weight in conclusions.
2026 CFO survey	257 submissions, including 118 complete and 139 partial.	How do CFOs describe role evolution,	Directional evidence from people performing the CFO role.	Non-probability sample, uneven geography, self-reporting, and

Channels	Work undertaken and coverage	Question addressed	Analytical contribution and weight	Principal limitation
	Respondents from 40 jurisdictions included CFOs and equivalent senior finance roles, PAIBs, individuals progressing towards PAO membership, and non-PAIBs.	ethical recognition, applicable frameworks, guidance sources, readiness and support needs?	Greatest weight was placed on question-level results with transparent denominators and on patterns that also appeared in other channels.	significant partial completion. It cannot establish global prevalence, causation, or comparative conduct.
2026 other-stakeholder survey	142 submissions, including 25 complete and 117 partial. Respondents included PAOs, regulators, standard setters, governance bodies, investors and organizational leaders (53 of 97 answering the category question represented PAOs).	Are CFO role changes and ethical issues observable externally, and what support or accountability do other actors consider relevant?	External corroboration and a governance perspective. Directly aligned questions to the CFO survey were compared side by side; differently worded questions were treated as complementary rather than combined.	Small question-level bases, high partial completion and PAO institutional concentration. High Code familiarity and PAO representation limit wider generalization.
Stakeholder outreach	Separate CFO and other-stakeholder in-person sessions across London, Milan, New York, Nairobi, and Hong Kong SAR; virtual India and Latin America discussions; and JSS, PAIBAG ⁸ , IPSASB ⁹ , SAC and UAG input.	How do pressure, uncertainty, role conflict, competence, information, and escalation arise in real decisions, and does this context change their form?	Mechanism and contextual evidence. Recurring themes were used to interpret survey results, identify implementation scenario content, and test the practical boundary between the IESBA's mandate and the wider ecosystem.	Participants were deliberately selected for their relevance or expertise. Coverage was uneven, so the outreach cannot support reliable prevalence estimates.

⁸ IFAC Professional Accountants in Business Advisory Group

⁹ International Public Sector Accounting Standards Board

Channels	Work undertaken and coverage	Question addressed	Analytical contribution and weight	Principal limitation
Academic research and literature review	Commissioned review led by Dr. Mukesh Garg, focused mainly on 2015-2025 peer-reviewed research, earlier seminal studies and selected practitioner evidence for emerging areas.	Which mechanisms and outcomes are supported by existing research, and where is the evidence thin?	Independent analytical challenge and mechanism evidence on incentives, power, governance, ethical normalization and role expansion. Established empirical work received more weight than emerging practitioner literature.	Literature is somewhat concentrated in financial reporting and US public-company settings. Direct empirical evidence on AI, sustainability, non-PA, public-sector, not-for-profit, and fractional CFOs is limited.
Analysis of Parts 1 and 2 and the Glossary in the Code	Section-by-section mapping of recurring issues against the fundamental principles, conceptual framework, relevant Part 2 provisions and defined terms, including recent sustainability, technology, tax planning, and expert-related material.	Does an issue identified in the CFO context fall outside the substantive reach of provisions effective at the report date or the identified IESBA-approved revisions?	Primary coverage test for Recommendation 1 on whether the Code remains fit-for-purpose. It distinguishes substantive coverage from visibility, navigation, adoption, enforcement, and practical use.	An internal mapping can establish where provisions address an issue. However, it cannot prove awareness, effective application, or the absence of every latent gap.
EU and US jurisdictional assessment	High-level review of EU-level instruments and the US federal public-issuer framework, checked through July 30, 2026, including reporting, controls, market conduct, sustainability, technology, and selected sector rules.	How is accountability allocated by entity, body, title, function, designation, or conduct in two materially different frameworks?	Legal and institutional context, which tests whether a universal title-based response is supportable and identifies variables for localized scenarios.	Illustrative rather than global. It excludes EU Member State law, US state law, many sectors and most private, public-sector, not-for-profit, and fractional settings. It does not constitute legal advice.

Channels	Work undertaken and coverage	Question addressed	Analytical contribution and weight	Principal limitation
Advisory and user input	JSS discussions, SAC input, and the June 2026 UAG discussion provided standard-setter, public-sector, investor, and other user perspectives after the initial evidence-gathering stages.	Whether PT's developing findings make sense to actors concerned with adoption, governance, market information, and public-interest outcomes?	Challenge and refinement. This input sharpened the distinction between Code adequacy and implementation, added information-integrity examples, and identified the importance of governance access and local delivery.	Advisory input was targeted rather than representative. It provides expert perspective and challenge, not independent validation or population evidence.

B. Five-Layer Synthesis

The following triangulation produces a five-layer diagnosis. This structure avoids treating every practical problem as a drafting gap and makes clear where an IESBA response can operate directly, through implementation support, or through collaboration.

Analytical layer	Question	Evidence Synthesis	Judgment	Decision Response
1. Substantive coverage of the Code	Do Parts 1 and 2 and the Glossary of the Code address the recurring issues identified in the CFO context?	The Code mapping tested the identified issues within the fundamental principles, conceptual framework, and provisions on conflicts, preparation and presentation of information, professional competence, incentives, NOCLAR, pressure, tax planning, technology, and experts. Surveys and outreach showed little need or	Phase 1 found no recurring substantive gap that warrants immediate CFO-specific revisions to the Code. This is a bounded conclusion about the identified issues, not proof that no gap exists or that the Code is applied effectively.	Recommendation 1. Reopen the scope question if Phase 2 testing identifies a recurring issue that cannot be addressed under extant provisions or produces a materially different evidence base on the Code's coverage.

Analytical layer	Question	Evidence Synthesis	Judgment	Decision Response
		demand for new principles, although direct CFO evidence on the Code's sufficiency was limited.		
2. Practical Use of the Code	Are relevant principles recognized, accessed and applied early enough in a live ethical decision?	Only 26 of 153 CFO respondents selected the Code as a direct guidance source. Outreach scenarios made ethical dimensions more visible and respondents favored practical examples. Academic research identifies mechanisms of ethical normalization.	The evidence supports an application hypothesis: the ethical dimension can remain obscured while a matter is framed as commercial, legal, technical, operational, or technological. Its prevalence and the effectiveness of proposed tools remain untested.	Recommendations 2 and 3. Build scenarios, triggers, and escalation prompts; share relevant evidence with other IESBA workstreams; and test recognition, application, and decision quality rather than measuring distribution alone.
3. Governance and organizational conditions	Can a PAIB CFO obtain information, challenge, consult, and escalate within the surrounding governance and legal setting?	Outreach, stakeholder evidence, academic research, and the jurisdictional assessment show that authority, incentives, board access, expert support, retaliation risk, professional infrastructure, and legal routes affect how ethical judgment is exercised.	IESBA can clarify a PAIB CFO's ethical responsibility. It cannot determine corporate governance design, whistleblowing protection, legal accountability, or adoption or enforcement.	Recommendation 2. Provide practical material for those who shape the PAIB CFO's environment, localize delivery through bodies with the relevant mandate and consider the merit of testing materials' suitability outside the PAIB environment. Undertake jurisdictional analysis only for defined implementation use cases.
4. Interaction with existing	Which identified issues should be	Technology, sustainability information, NOCLAR, use of	Existing workstreams are the appropriate route for	Recommendation 3: Refer relevant Phase 1 evidence to existing IESBA

Analytical layer	Question	Evidence Synthesis	Judgment	Decision Response
IESBA workstreams	addressed through existing IESBA activities rather than through parallel CFO-specific material?	external experts, organizational culture and governance, Code accessibility and tax planning overlap with approved or existing IESBA workstreams. The strength and relevance of the CFO evidence differ by topic. Referral would allow the responsible workstream to determine whether and how the evidence should affect its work.	overlapping evidence, subject to their approved scopes.	workstreams for consideration within their approved scopes. Phase 2 should coordinate with those workstreams when a proposed scenario overlaps with existing or planned material.
5. Reach beyond PAIB CFOs	What can Phase 1 conclude about CFOs who are not PAIBs, and what further evidence is needed?	Similar public-interest risks arise across the CFO population, while the applicable professional, legal, regulatory and organizational mechanisms differ. Direct evidence from non-PAIB CFOs was limited. Phase 1 did not establish comparative ethical conduct or whether existing mechanisms provide equivalent coverage or accountability.	Phase 1 supports stakeholder engagement but not direct non-PAIB CFO testing without a further Board decision	Recommendations 1 and 2: Do not commence a separate standard-setting initiative concerning non-PAIB CFOs at this stage. Engage investors, governance actors, regulators, PAOs, and JSS in Phase 2. Return to the Board before any direct testing with non-PAIB CFOs.

C. Finding-by-finding Triangulation

Each synthesis below records the direct signal, evidence, material counterweight, and decision consequence. Evidence limitations remain part of the findings.

Principal Finding and Assessment	Evidence by Channel	Triangulation, Qualification, and Decision Consequence
1. Stewardship Remains the Anchor While the Decision Perimeter has Widened. Assessment: convergent directional evidence; no global prevalence finding.	CFO survey: 122/182 reported increased responsibility for risk, compliance, or controls; 96/182 sustainability; 83/182 technology, data, or AI; 82/182 culture or ethical leadership; and 77/182 external stakeholders. Other stakeholder survey: Results were closely aligned for risk (44/70), sustainability (36/70), and technology, data, or AI (34/70), providing an external perspective on the CFO role expansion. Outreach and literature: All outreach streams retained stewardship as the anchor while describing variable strategic and cross-functional influences. The academic review reports a similar expansion, but notes evidence gaps in emerging areas. Legal context: The EU and US legislative framework review found no uniform legal CFO office and different routes by function, designation, body membership, and conduct.	Convergence: Direct respondents, external stakeholders, outreach, and literature point in the same direction. Qualification: The surveys are self-selected, and some categories, including risk and controls, may already be traditional CFO responsibilities. The evidence shows accumulation and variation, not a single new global model. Decision (Recommendations 1 and 2): Retain a functional approach covering CFOs and equivalent senior finance leaders. Phase 1 does not support title-based provisions or CFO-specific amendments to the code. Phase 2 scenarios should retain stewardship and information integrity as central responsibilities while addressing the wider settings in which those responsibilities are exercised.
2. The Central Application Challenge Is Ethical Recognition.	CFO survey: 54/154 respondents reported an ethical challenge in the previous five years. Open text included reporting, liquidity, procurement, tax, sustainability, AI, data, cyber, and privacy matters; some were described	Convergence: The survey's language, scenario response, and behavioral literature support the possibility that framing affects recognition.

Principal Finding and Assessment	Evidence by Channel	Triangulation, Qualification, and Decision Consequence
Assessment: qualified evidence supporting a testable application hypothesis.	as pressure, judgment, or compliance rather than an ethical dilemma. Outreach: Scenario discussions, particularly in Milan, elicited ethical dimensions that abstract questions did not readily identify. India participants also described limited recent use of the Code. Academic and Code analysis: Research on ethical normalization provides a plausible mechanism. The conceptual framework requires identifying threats before they can be evaluated and addressed.	Qualification: Neither survey measured delayed recognition directly, the outreach exercise was not experimental, and the report does not establish frequency or causation. Decision (Recommendations 1 and 2): Treat early-recognition support as a Phase 2 intervention for testing. Use decision triggers and threat-recognition prompts, and measure whether they change issue identification and action.
3. Pressure, Incentives and the Organizational Environment Can Amplify Threats. Assessment: strong thematic convergence on mechanisms; no prevalence or causal estimate.	Survey evidence: Open-text responses described pressure around reporting, provisions, liquidity, tax, political influence, and whistleblowing. Of 153 CFO respondents, 77 considered themselves only somewhat equipped and 18 not well equipped, a support signal rather than a competence measure. Outreach: Across locations, participants described explicit and implicit pressure, time compression, dominant owners or leadership, role concentration, board access, retaliation risk, and the value of controllers, legal, internal audit, and audit committees. Academic and Code analysis: Research associates compensation, power, and weak governance with aggressive reporting in defined settings. Existing Code	Convergence: Qualitative evidence and established financial-reporting research identify compatible individual and organizational mechanisms. Qualification: Associations do not establish causation, and academic evidence is concentrated in public company reporting. Formal governance structures may operate differently in practice. Decision (Recommendations 1 and 2): Develop PAIB CFO and board or audit committee material on access, challenge, escalation, retaliation risk, and role separation. Test the material under time and incentive pressure. Provide enabling material for those who shape the PAIB CFO's environment and localize delivery through bodies with the

Principal Finding and Assessment	Evidence by Channel	Triangulation, Qualification, and Decision Consequence
	provisions address conflicts, incentives, inducements, and pressure.	relevant mandate. Test the materials' usability outside the PAIB infrastructure.
4. Technology, professional competence and reliance on the work of others and external experts. Assessment: convergent but emerging evidence.	Survey evidence: CFO and other stakeholder results align on increased sustainability, technology, data, or AI responsibility. Other stakeholders were divided on whether role expansion creates new ethical challenges: 25/71 said yes, 7/71 somewhat, and 31/71 no. Outreach: Participants raised data quality, explainability, bias, human review, greenwashing, value-chain data, expert competence, limitations, and the risk of treating delegation as a transfer of responsibility. Academic and Code analysis: The literature is comparatively thin in emerging areas. Sections 112, 113, 230, and 290 of the Code, along with the conceptual framework and technology-related revisions, address objectivity, professional competence, reliance, judgment, and the use of external experts.	Convergence: The evidence supports new contexts for familiar ethical questions, rather than a case for a new principle. Counterweight: Stakeholders did not agree that role expansion creates wholly new categories of ethical challenges, and empirical research lags practice. Decision (Recommendations 2 and 3): Use scenarios on inputs, assumptions, controls, human review, expert competence, limitations and explanation. Retain the existing principles and test practical application. Refer evidence to other IESBA workstreams where appropriate.
5. Information Integrity now Extends Beyond Conventional Financial Reporting. Assessment: convergent evidence within defined decision contexts.	Surveys and outreach: Role-expansion results and open-text responses identify sustainability information, AI outputs, data governance, and external communication. Outreach added forecasts, liquidity, transition claims, cyber effects, and alternative performance measures.	Convergence: The CFO's information role is observable across financial, forward-looking, and selected non-financial settings. Qualification: The evidence does not establish prevalence. Decision (Recommendations 2 and 3): Develop scenarios on uncertainty or when the definition or calculation of a

Principal Finding and Assessment	Evidence by Channel	Triangulation, Qualification, and Decision Consequence
	User perspective: UAG members identified estimates, synergies, impairments, restructuring, tax strategy, legal provisions, capital allocation, and performance measures, emphasizing materiality, plain language, follow-up, and remuneration links. Code and literature: The Code's provisions on information preparation and presentation, objectivity, incentives, and competence apply across professional activities. Literature supports broader influence on information but is strongest in financial reporting.	performance measure changes, incentive links, expert reliance, with direct Code signposting.
6. No Recurring Issue Identified in the CFO Context Falls Outside the Substantive Reach of Parts 1 and 2 or the Glossary in the Code. Assessment: strong mapping; empirical confirmation is limited.	Code analysis: The section-by-section review mapped the issues raised to the fundamental principles, conceptual framework, and provisions on conflicts, information, expertise, incentives, inducements, NOCLAR, pressure, tax planning, technology, and experts. Survey evidence: 19/23 CFO respondents considered the Code sufficient and practical. Among 63 other stakeholders, 33 considered it sufficient and 16 partially sufficient. The CFO base is relatively small, and the stakeholder base is PAO-heavy and familiar with the Code. Outreach, academic evidence, and JSS: Participants generally favored principles plus practical application	Judgment: The mapping supports a conclusion regarding the substantive coverage of the identified issues. It does not prove universal fit, effective use, or the absence of an issue that the evidence program failed to surface. Decision (Recommendation 1): Phase 1 does not provide an evidence base for immediate CFO-specific amendments through this workstream. Preserve an explicit route back to the IESBA if Phase 2 identifies a recurring unmapped issue or public interest risk.

Principal Finding and Assessment	Evidence by Channel	Triangulation, Qualification, and Decision Consequence
	material. The literature identifies ethical mechanisms but was not designed to test the Code's adequacy. JSS input supported the view that the Code remains fit for purpose for the expanded CFO role.	
7. The Code Remains Relevant but Is Not Always Used as a Live Decision Resource. Assessment: direct survey signal, subject to an indirect-influence caveat.	CFO survey: 26/153 respondents selected the Code directly as a guidance source. Respondents also selected internal policies (88/153) and professional-body codes (78/153). In a separate question, 41/178 identified the Code as an applicable framework. Support preferences: 104/137 CFO respondents and 35/57 other stakeholders selected case studies or practical examples. 72/137 CFO respondents and 25/57 stakeholders selected board or audit committee material. Outreach: India participants described limited recent reference to the Code; New York, Nairobi, Hong Kong and London/Milan participants requested searchable access; several locations favored short, realistic, and locally relevant material.	Judgment: Direct visibility appears limited for part of the sample. National and PAO codes may incorporate the Code, so direct citation understates indirect reach. Qualification: A preference for a format is not evidence that the format changes decisions. Decision (Recommendations 2 and 3): Provide concise scenario-based support, digital signposting, and direct links to provisions. Evaluate recognition and application outcomes rather than downloads or distribution.
8. Professional Membership Is Ethical Infrastructure but Not a Guarantee. Assessment: evidence supports the role of	CFO survey: 106/178 respondents were PAIBs, 14 were progressing towards PAO membership, and 58 were non-PAIBs. Of 152 responses, 64 said membership significantly affects ethical issue identification, 19 somewhat, and 59 were unsure.	Judgment: PAO membership may supply ethical infrastructure and a signaling mechanism. The evidence does not estimate global membership, compare actual conduct, or establish causation.

Principal Finding and Assessment	Evidence by Channel	Triangulation, Qualification, and Decision Consequence
professional support and accountability; it does not establish differences in ethical conduct.	Other stakeholder survey: 47/70 said membership contributes meaningfully to confidence in ethical conduct, and 9 said its importance depends on context. Outreach, literature, and jurisdictional review: Participants associated membership with CPD, advice, shared standards, and disciplinary mechanisms. The academic review identifies limited evidence on non-PAIB CFOs. The jurisdictional review shows other legal and governance accountability routes.	Qualification: The other stakeholder survey respondent base is institutionally concentrated in PAOs. Decision (Recommendations 1 and 2): Use PAOs as implementation partners while distinguishing professional, organizational and legal accountability. Consider assessing possible voluntary use beyond the PAIB population through stakeholder engagement and return to the Board before any direct testing with non-PAIB CFOs. Wider voluntary reach does not extend the Code's formal application.
9. Jurisdiction Changes the Route of Accountability but Not the Relevance of Ethical Principles. Assessment: strong within the defined EU and US scope; not intended as a global conclusion.	Jurisdictional assessment: EU-level measures generally address the undertaking, governing body, designated person, defined operator, or conduct, rather than through a single generally applicable CFO-specific framework. The US federal public-issuer framework more often names the principal financial officer or CFO for specified signatures, certifications, and recovery rules. Advisory and outreach evidence: JSS input prompted separating Code adequacy from adoption, implementation, and enforcement. Regional discussions illustrated variation in governance, professional affiliation, whistleblowing protection, and accountability.	Judgment: The EU and US legislative framework review demonstrates different routes in two mature frameworks and cautions against treating licensing, title, or certification as a complete ethical model. Qualification: It does not provide a global classification or cover Member States, US states, private companies, the public sector, or most sector-specific laws. Decision (Recommendation 2): The PT considered three threshold alternatives: undertaking no further jurisdictional analysis; expanding the work into a broader comparative or global mapping exercise; or undertaking targeted jurisdictional analysis only where local legal, regulatory, or governance context is necessary for a defined Phase 2 deliverable. The PT recommends the third approach. Phase 2 should apply the Phase 1 analytical model only when local

Principal Finding and Assessment	Evidence by Channel	Triangulation, Qualification, and Decision Consequence
		context could materially change a defined deliverable. Each assessment should state its question, sources, date, scope, and validation. The output should remain implementation context and should not provide legal advice or jurisdiction rankings.

APPENDIX TWO: SCOPE AND METHODOLOGY

Purpose and scope

1. The IESBA approved the Role of CFOs workstream's ToR in September 2025. The objectives set out in the ToR include understanding how CFO and equivalent senior finance roles are evolving, identifying related ethics issues and challenges, assessing whether Parts 1 and 2 of the Code remain fit-for-purpose for the evolved role, understanding relevant regulatory and investor expectations, considering the position of CFOs who are not PAIBs, and determining whether guidance or other initiatives are warranted.
2. For this workstream, CFO is used functionally to mean the most senior finance leader with authority over financial governance, reporting, control systems, capital management, or comparable responsibilities, regardless of formal title.¹⁰ The workstream does not seek to define the CFO role for the Code. In smaller entities, the function may be combined with the CEO, controller, finance director, or another role.
3. The Code applies directly to PAIBs. Evidence about non-PAIB CFOs, boards, CEOs, legal teams, technology and sustainability experts, investors, regulators and other participants is relevant because PAIB CFOs operate within mixed decision-making systems. That evidence informs context and implementation.
4. Phase 1 was exploratory and evidence led. It did not begin with any assumption of widespread misconduct by CFOs, a predetermined need to revise the Code, or a policy objective that all CFOs should be PAIBs.

Evidence program

5. The survey program comprised the July-August 2025 CFO pulse survey and the 2026 extended surveys for CFOs and other stakeholders, with results updated through July 31, 2026.
6. The PT commissioned [Dr. Mukesh Garg](#), Associate Professor in the Department of Accounting (Monash University, Melbourne), to undertake a structured research and literature review. The review gave greater weight to peer-reviewed research, using selected practitioner evidence to address emerging areas where academic publication lags. The review covered reporting misconduct, power and incentives, behavioral ethics, governance, sustainability, AI, cyber risk, geopolitics, public and not-for-profit settings, fractional CFOs and professional affiliation.
7. The PT's stakeholder engagement program included CFO-only and other-stakeholder in-person sessions across London, Milan, New York, Nairobi, and Hong Kong SAR, followed by similar virtual sessions for India, Latin America, the UAG, and experts or advisory discussions. CFO-only sessions supported candid discussion of pressure and role conflict. The separate other stakeholder sessions provided investor, regulator, PAO, governance, accounting firm, standard-setter, and academic perspectives.

¹⁰ As per the ToR: "The PT will address the most senior finance leader within organizations' finance function and the ethical responsibilities of that role, which could be a CFO, Finance Director, Controller, Chief Administrative Officer (CAO), or some other title. Whilst the role of CFO (or equivalent senior finance role) might not exist separately within a smaller organization, it could form part of the CEO's role. These CFOs are able to exert significant influence over, and make decisions regarding, the acquisition, deployment and control of the employing organization's human, financial, technological, physical and intangible resources."

8. The technical analysis included a section-by-section review of Parts 1 and 2 and the Glossary of the Code, including recent provisions on technology, sustainability, tax planning, and the use of external experts. The test was whether the recurring issues highlighted through the above evidence channels could be addressed in substance with the extant Code, not merely whether the Code could be made more readily accessible or easier to navigate.
9. The jurisdictional analysis uses a source hierarchy of legislation, regulations, stock-exchange rules, and official governance codes, which are treated as primary sources. The high-level review of the EU and USA measures was selected because it illustrates materially different accountability routes, rather than because it covers every finance-adjacent legal topic.

APPENDIX THREE-A: STAKEHOLDER OUTREACH ANALYSIS

Engagement design and evidential role

1. The PT's stakeholder outreach was designed to obtain two complementary perspectives. CFOs and equivalent senior finance leaders were invited to describe how the evolving CFO role affects their responsibilities, pressures, and ethical challenges in practice. Separate discussions with regulators, investors, PAOs, accounting firms, standard setters, governance experts, and other stakeholders provided an external perspective on the conduct, capability and accountability expected of senior finance leaders.
2. This separation proved important. CFO participants generally described ethical issues from inside the decision-making process, including competing objectives, incomplete information, pressure, isolation, and the difficulty of recognizing an ethical issue while events are unfolding. Other stakeholders placed greater emphasis on governance arrangements, competence, market consequences, professional accountability, enforcement, and the conditions that enable or constrain ethical conduct.
3. The roundtables and focus group meetings were qualitative and were not designed to establish prevalence or rank jurisdictions. Participation varies by location, sector, organizational size, ownership structure, and professional background. The evidence is therefore used to identify recurring themes, test the findings from the surveys and other research, and identify contextual factors relevant to any response by IESBA.
4. Appendix Three-B provides a bounded deep-dive analysis of the Hong Kong SAR sessions. It illustrates how the PT assessed CFO and other-stakeholder perspectives together and is not intended as a jurisdictional comparison.

Cross-cutting findings

5. Participants consistently described a broader CFO role built on, rather than replacing financial stewardship. CFOs now also increasingly contribute to strategy, capital allocation, risk, resilience, sustainability, technology, data governance, investor communications, and organizational leadership. The breadth of responsibility is greater when the CFO also acts as COO, or in some instances CEO, or covers functions that would be separated in larger organizations.
6. The most difficult ethical challenges faced by CFOs were generally described as grey-area judgments. Examples included valuation and forecasting, market disclosures, liquidity, alternative performance measures, sustainability estimates and reporting, AI outputs, data confidentiality, procurement, related party transactions, tax, cross-border requirements, political influence, and escalation within organizations. The ethical question was often embedded in or obscured by decisions that also had legitimate commercial, legal, or operational objectives.
7. Pressure was identified as being pervasive but varied in source and form. It included direct requests to change information, implicit expectations to find a defensible route to a preferred result, time pressure, target and financing pressure, investor or controlling-owner influence, political direction, and pressure arising from the CFO's own incentives, prior advocacy, or fear of losing their role.
8. Organizational culture and governance were cited as affecting whether a challenge was deemed possible. Participants described the value of direct board or audit committee access, trusted controllers and teams, effective legal and internal audit functions, confidential advice, and protected speak-up arrangements. Participants also described situations in which dominant

leadership, weak escalation, retaliation risk, or lack of independent support may make formal policies ineffective.

9. Technology and sustainability were raised as contexts that intensify familiar ethical issues. AI can create concerns involving data quality, explainability, bias, human review, and overreliance. Automation bias is particularly relevant where a generated output is given undue weight despite contradictory information or human judgment. Sustainability information can create pressure around selective metrics, value-chain data, targets, and transition narratives. Participants did not generally identify a need for separate ethical principles but repeatedly requested support for practical application. Use of experts was viewed as becoming increasingly necessary, especially in emerging areas requiring competencies such as technology, valuations, and sustainability. While the general view is that CFOs do not need to become technical experts in every field, the concern is whether they can assess experts' competence and objectivity, understand methods and limitations, challenge assumptions, explain the basis of decisions, and avoid treating expert input as a transfer of professional responsibility.
10. Participants repeatedly requested concise, realistic support from IESBA. Suggested formats included case studies, decision prompts, red flags, digital accessibility, board questions, CPD discussions, peer forums, and escalation guidance. CFOs viewed long or generic publications as less likely to be used because of the fast-moving ethical decisions they need to make.

Implications for IESBA

11. Taken together, the outreach points to substantial consistency in the underlying ethical challenges across regions, alongside meaningful differences in how those challenges arise. Commercial pressure, conflicts, competence, technology, organizational culture, and escalation appeared repeatedly. Ownership structures, regulatory maturity, professional affiliation, public-sector responsibilities, corruption exposure, market structure, and enforcement conditions affected their form and intensity.
12. The evidence therefore does not support treating the regional discussions as jurisdictional unique models of the CFO role. Their greater value is in showing how common ethical principles operate within different institutional environments. This supports globally applicable implementation material that can accommodate contextual variation through case study scenarios and decision prompts.
13. The CFO and other stakeholder sessions were also broadly aligned on the continued relevance of a principle-based ethical framework in the Code. Other stakeholders placed greater emphasis on accountability, enforcement, governance and market consequences. At the same time, CFOs gave more prominence to time pressure, uncertainty, competing responsibilities and the difficulty of recognizing ethical issues in real time. These perspectives are complementary, suggesting that ethical conduct depends on both individual judgment and an environment that allows that judgment to be exercised.
14. The outreach also identifies a boundary for the IESBA's response. Some environmental conditions affecting CFO conduct arise from corporate law, governance systems, enforcement, ownership structures, whistleblowing protections, professional-body arrangements, and broader organizational culture.¹¹ The IESBA cannot determine or influence those conditions through the Code; however, it can clarify the ethical responsibilities of PAIBs operating within them and make

¹¹ Paragraph 120.13 A1 of the Code recognizes that effective application of the conceptual framework by a professional accountant is enhanced when the importance of ethical values that align with the fundamental principles and other provisions set out in the Code is promoted through the internal culture of the accountant's organization.

those responsibilities easier to recognize and apply.¹² The wider evidence also points to roles for PAOs, regulators, employers, boards, investors, and educators in strengthening the environment in which ethical conduct occurs.

Europe: London and Milan

15. London focus group meetings on March 3, 5 and 6, 2026, hosted by the FRC¹³, ACCA¹⁴ and ICAEW¹⁵ and the Milan roundtable on March 4, 2026, hosted by Deloitte, provided the principal European outreach stream. London participants described the CFO as often acting as a co-pilot to the CEO. They emphasized ethical challenges around judgment in narrative reporting, valuations, investor expectations, and the tension between short-term pressure and long-term resilience. They also noted that volatility, tariffs, supply-chain complexity and disruption, and regulatory uncertainty can compress decision time. At the same time, CPD and ethical reflection can be difficult to manage under workload and time pressure.
16. London meetings added important insights concerning professional infrastructure. Participants described professional membership as a source of credibility, ethical grounding, and potential support when pressure arises. Other stakeholders also raised concerns about uneven consequences: PAIB CFOs may be subject to investigation and disciplinary mechanisms, whereas others in comparable senior finance roles may not face similar mechanisms. PAO participants highlighted the different emphasis placed on the Code when it is used for enforcement, which relies on the robust drafting of the Code's provisions, compared to when members seek practical assistance with a live ethical problem, which requires clear and accessible explanations of the Code's provisions.
17. The London sessions also highlighted the importance of organizational culture, trusted teams, and confidential support. CFO participants described professional isolation and the value of peer networks, while other stakeholders emphasized practical tools for recognizing dilemmas during periods of financial stress. A couple of CFO participants noted their experience with team members that are not PAIBs may present additional risks. Together, the discussions suggest that ethical support needs to be readily available before a matter has developed into an enforcement or compliance issue.
18. The Milan roundtable participants emphasized that stewardship remains central but is exercised in a more demanding technological, regulatory, and commercial setting. The sessions were particularly important to the PT's finding on ethical recognition. When practical AI and other scenarios were introduced, participants could identify the ethical dimensions that were not evident when questions were asked abstractly. While this does not prove widespread non-recognition of ethical challenges by CFOs, it strongly indicates to the IESBA that scenario-based implementation guidance may make the Code's conceptual framework more operational.
19. Other stakeholders in Milan also questioned where CFO-specific ethical responsibility extends within the wider C-suite or governance responsibilities. They highlighted variations in governance frameworks, professional affiliation, implementation, and enforcement. Participants also pointed to regulatory differences across industries, such as the highly regulated financial services industry, while other industries are not subject to the same regulatory rigor. The discussion reinforces the

¹² For example, paragraph 120.13 A3 of the Code states that professional accountants are expected to encourage and promote an ethics-based culture in their organization, taking into account their position and seniority.

¹³ United Kingdom Financial Reporting Council

¹⁴ Association of Chartered Certified Accountants

¹⁵ Institute of Chartered Accountants in England and Wales

need for any IESBA response to be anchored in PAIB responsibilities while recognizing that many ethical outcomes depend on actors outside the finance function.

North America: New York

20. CFO and other stakeholder participants at the New York roundtables (from the US and Canada) on March 13, 2026, described senior finance leaders increasingly assuming responsibilities for technology, AI, data, risk, human resources, and broader enterprise leadership, including combined CFO and COO roles.
21. CFO participants emphasized the difficulty of identifying ethical issues in a fast-moving environment. Technology and AI were identified as major drivers of ethical issues, particularly input quality, output reliability, use of organizational data, and the need to preserve human judgment and an inquiring mind.
22. Other stakeholders largely supported the continued principles-based foundation of the Code and expressed greater interest in practical and situationally relevant educational material rather than additional prescriptive requirements. Participants specifically identified digital navigation, searchable access, and short video case studies as ways to help senior finance leaders locate relevant provisions when an issue arises. Participants also suggested engaging general counsels and chief legal officers, reflecting the interaction between ethical, legal, and governance judgments within organizations.
23. The distinctive contribution from New York is therefore the interaction between professional ethics and the wider corporate decision infrastructure, as senior finance leaders often operate alongside legal, technology, risk and governance experts. Effective ethical decision-making therefore depends in part on how those functions interact and whether the CFO can explain the basis of professional ethical obligations to executives and boards.

Africa: Nairobi

24. The Nairobi roundtables hosted by PAFA¹⁶ on April 16, 2026, also included CFO and other stakeholder perspectives from several countries within the continent. CFO participants described increasing responsibility across sustainability, technology, data governance, and AI, together with workload and organizational pressure. The discussion emphasized the difficulty of balancing organizational objectives, regulatory expectations, and professional integrity where facts and responsibilities are complex.
25. Other stakeholders brought particular attention to public-sector and wider institutional settings. Finance leadership can combine financial reporting with strategy, operations, technology, procurement, stakeholder management, and administrative responsibilities. Participants also raised questions about individuals from professional backgrounds outside accountancy using the CFO title and the implications for role clarity and accountability.
26. Participants highlighted unique pressures, including examples of corruption and threats made against the CFO and their family, all posing significant challenges on the ability to respond ethically under immense pressure. Nairobi also gave prominence to the conditions required for escalation. Participants discussed limited whistleblowing protections and the difficulty of operationalizing ethical requirements where organizational pressure is high. This regional contribution therefore reinforces the importance of implementation support that accounts for circumstances in which formal escalation mechanisms may provide limited practical protection.

¹⁶ Pan African Federation of Accountants

Asia: Hong Kong SAR

27. The Hong Kong SAR roundtables hosted by HKICPA¹⁷ on May 12, 2026, included CFOs across listed, private, family-controlled, and other organizational settings, as well as other stakeholders. Participants described the CFO as an important organizational “compass”, expected to bring independent and credible judgment to strategy, sustainability, technology, reporting, investor communications, and resource allocation.
28. The CFO discussion highlighted the accountability associated with this influence regardless of professional background. Participants also identified a potential difference between PAIB CFOs, who are subject to a professional ethical and disciplinary framework, and other senior finance leaders from outside the accountancy profession. Practical support, executive summaries, industry-relevant examples, real-world cases, and short-form communication were seen as ways to reach a broader audience.
29. Hong Kong SAR provided particularly detailed evidence on capability and capacity. Other stakeholders questioned whether CFOs possess sufficient expertise to oversee rapidly developing areas such as AI, cybersecurity, sustainability, and people management. This brought reliance on experts, delegation, supervision, and accountability directly into the ethical analysis.
30. Regulatory and investor perspectives connected the quality of finance leadership with the ability to close the books, maintain internal controls, identify suspicious transactions, engage with audit committees, and provide timely market disclosures. They also indicated that perceived weaknesses in finance leadership's competence or ethical grounding can influence investment-risk assessments.
31. Ownership and power dynamics were another distinctive feature. Participants highlighted ethical challenges that can arise in start-ups or rapid-growth companies and the resulting pressure to secure required funding. Participants also referred to CEOs, boards, founders, family owners, and controlling shareholders as possible sources of pressure, particularly where governance arrangements, whistleblowing mechanisms, or minority-investor protections are less effective. The discussion also raised a longer-term concern that automation could reduce development opportunities through which future finance leaders acquire an inquiring mind and professional judgment.

CFO Board India (Virtual)

32. The CFO Board India discussion on June 1, 2026, provided a detailed perspective on the interaction between an evolving governance environment and the practical decisions faced by CFOs. Participants noted substantial developments in India's corporate governance and regulatory framework, while continuing to identify ethical challenges associated with related-party transactions, uneven enforcement, checklist-oriented compliance, greenwashing, and board effectiveness.
33. Participants described difficulty keeping pace with changing regulations, sanctions, geopolitics, technology, and sustainability requirements. Cross-border operations can expose CFOs to multiple legal and regulatory regimes, creating circumstances in which a matter may be overlooked despite an intention to comply. Participants also highlighted the problem of hindsight, where a judgment may later be assessed using information or expectations that were not reasonably available, or that were not sought, when the original decision was made.

¹⁷ Hong Kong Institute of Certified Public Accountants

34. The India discussion reinforced the distinction between legal compliance and ethical judgment. Participants referred to public interest, environmental, employee, and wider stakeholder consequences that may require consideration beyond formal compliance. Participants identified financial reporting judgments involving impairment, recoverability, and forward-looking assumptions as areas where excessive optimism and management judgment can create ethical pressure.
35. This session also added specific perspectives on insider information, social-media scrutiny, greenwashing, and the reliability of sustainability information. Competence and capacity were recurring concerns, particularly for newer CFOs assuming responsibilities outside their current expertise. Participants requested locally relevant case studies, ethics-focused CPD, and confidential mechanisms to obtain advice or test difficult judgments with experienced peers.
36. Awareness of the Code also emerged where some participants indicated that they had not referred to the Code since obtaining professional qualification or were unfamiliar with more recent Code developments. This reinforces the distinction between formal exposure to an ethical code and its practical availability as a decision-making resource throughout a senior finance leader's career.

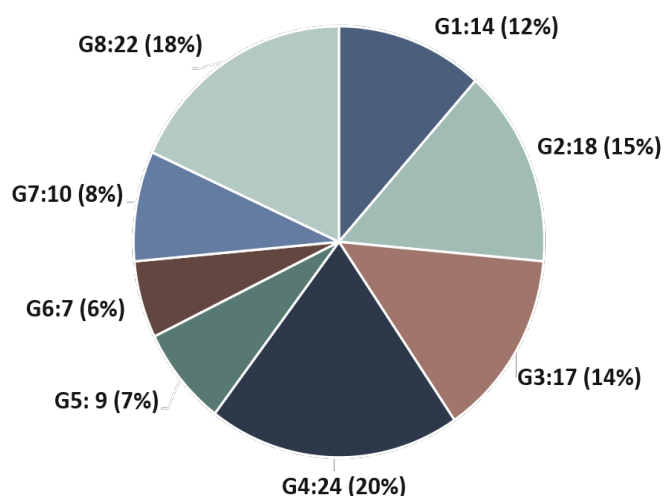
Latin America (Virtual)

37. The Latin America roundtable on June 2, 2026, included CFO and other stakeholder perspectives. Participants described the CFO role expanding into supply chains, risk, internal controls, technology, sustainability, human capital, governance, and broader enterprise leadership. It highlighted that multinational structures could add complexity through decentralized decision-making and multiple reporting lines, leaving the CFO responsible for managing competing pressures without complete visibility across operations.
38. The region added particular insight into corruption, anti-money laundering, cash-intensive businesses, supplier due diligence, and personal accountability. CFO participants described the difficulty of conducting adequate due diligence across large supplier networks, particularly in emerging markets. Other input referred to the pressure arising in tourism and cash-based businesses, including regulatory reporting obligations and personal-safety considerations.
39. Technology was again prominent with participants describing pressure to reduce finance-team capacity through AI while remaining concerned about the reliability of output. Other stakeholders connected this with the need to preserve critical thinking and an inquiring mind among younger finance professionals.
40. Latin American participants also emphasized the integrity of organizational communications, particularly when seeking financing or explaining performance to investors and boards. This highlights that conflicts of interest, advocacy, and loss of objectivity can arise when the CFO is expected to promote organizational performance while maintaining transparent reporting of uncertainty and risk.
41. The discussions gave further support to peer networks and confidential advice as components of ethical infrastructure. CFOs and other stakeholders referred to trusted peers, legal counsel, professional networks, employer channels, and professional codes as possible sources of support. Participants requested local and regional examples, short guidance, FAQs, webinars, workshops, and digital tools. Participants also identified translation and timely local implementation of the Code as necessary if global ethical material is to be used effectively in Spanish-speaking jurisdictions.

Figure 1: Total Roundtable Outreach Participants by Location

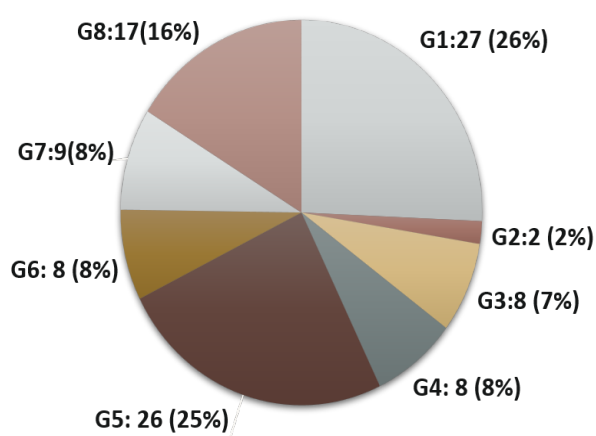
Location	CFOs / equivalent senior finance leaders	Other stakeholders	Total
 London and Milan	47	25	72
 New York	26	27	53
 Nairobi in-person and Africa virtual	18	36	54
 Hong Kong SAR	10	9	19
 Latin America (virtual)	9	8	17
 CFO India (virtual)	11	-	11
 Total	121	105	226

Figure 2: Profile of Roundtable Attendees – CFOs



STAKEHOLDER GROUP	TOTAL
Group 1: Listed company CFOs (public issuers)	14
Group 2: Large private company CFOs (including PE-owned)	18
Group 3: SME and growth-stage CFOs (including scale-ups)	17
Group 4: Financial services CFOs (banks, insurers, asset managers)	24
Group 5: Public sector CFOs (government, agencies, public bodies)	9
Group 6: State-owned enterprise and quasi-government CFOs	7
Group 7: Group CFOs in multinationals and complex corporate groups	10
Group 8: Not for profit	22
TOTAL	121

Figure 3: Profile of Roundtable Attendees – Other Stakeholders



STAKEHOLDER GROUP	TOTAL
Group 1 - Regulators and oversight authorities	27
Group 2 - Investors and other users	2
Group 3 - Those charged with governance	8
Group 4 - Professional accountancy organizations	8
Group 5 - Independent JSS and International Standard Setting Boards	26
Group 6 - Accounting firms	8
Group 7 - Academia and Think Tank	9
Group 8 – Others	17
TOTAL	105

Advisory, standard-setter and user perspectives

42. The IESBA-JSS Liaison Group discussions in November 2025 and May 2026 supported the continued relevance of the principles-based nature of the Code while stressing differences in PAIB coverage by PAOs, ethics CPD, enforcement, professional oversight, and local governance. JSS input also emphasized the value of a direct route from the CFO to the board, audit committee, or finance committee when pressure comes from the CEO or management. This input led directly to the PT's jurisdictional accountability work and the separation of the Code's adequacy from its adoption, reach, and enforcement.
43. IFAC PAIBAG input on January 12, 2026, reinforced that ethical issues sit within a wider governance and leadership system and that company codes are not equivalently robust as a professional ethical framework. IPSASB input on December 4, 2025, added elements on public-sector corruption, political influence, public accountability, and the possibility that finance leadership is not subject to professional qualifications or PAO membership requirements. SAC input and related stakeholder input helped test the workstream's public-interest framing and communication imperatives.
44. The IAASB-IESBA UAG investor and other user discussion on June 25, 2026, sharpened the market-usefulness analysis. Participants identified forward-looking estimates, goodwill and expected synergies, impairment, restructuring charges, tax strategy, legal provisions, and alternative performance measures as areas where CFO judgment and explanations can materially affect capital allocation and confidence. UAG members emphasized the importance of materiality, plain-language explanations, follow-up reporting and transparency when definitions change or disclosures affect remuneration outcomes, including where performance measures influence variable compensation. Members also agreed that users do not usually assess the CFO in isolation as trust depends on the management team, board accountability, CEO-CFO relationship, governance checks and balances, and overall leadership quality and dynamics. This evidence supports scenario content on information integrity, incentives, and governance oversight.

Outreach limitation

45. The principal limitation is stakeholder selection and coverage. Participants were not randomly selected, and some sectors and jurisdictions were more represented than others. Most CFO participants were PAIBs, who, due to their professional training, were more well-versed in the Code's ethical responsibilities, compared to non-PAIB CFOs. This may have skewed the level and quality of contextual insight on the impact of a robust ethical framework. The analysis therefore identifies recurring themes rather than their prevalence across the CFO population. The frequency with which an issue was raised should not be interpreted as indicating its relative significance. The outreach is therefore strongest as evidence of recurring themes and implementation needs.
46. Appendix Three-B provides a deeper analysis of the Hong Kong SAR sessions. It is subject to the same limitations and should not be interpreted as representative of Hong Kong SAR, Asia or the wider CFO population.

APPENDIX THREE-B: HONG KONG SAR ROUNDTABLE DEEP-DIVE ANALYSIS

Purpose and selection approach

47. This appendix provides a within-location analysis of the separate CFO and other-stakeholder roundtables held in Hong Kong SAR on May 12, 2026. It supplements the global outreach analysis in Appendix Three-A by showing how the two perspectives were assessed and how the PT moved from participant observations to implications for the IESBA.
48. Only one location was examined at this level of detail because the purpose of the exercise was explanatory and exploratory rather than comparative. Appendix Three-A already reports the cross-cutting findings and contextual contributions from the full global outreach program. Repeating the same analysis for each location would add substantial volume without increasing the analysis's qualitative value. It could also imply a ranking of jurisdictions or regional ethical risk that the engagement design does not support.
49. Hong Kong SAR was selected because it offered a strong combination of features for a paired analysis. The CFO session included experience from listed, private, start-up, family-controlled, financial services, technology, real estate, education, and not-for-profit settings. The other-stakeholder session included regulatory, investor, professional-body, governance, and regional perspectives. Together, the sessions addressed most of the issues that recurred across the global outreach program, including role expansion, information integrity, capability, technology and AI, sustainability, governance, professional affiliation, and use of the Code.
50. The selection was methodological rather than evaluative. Hong Kong SAR is not presented as representative of Asia, as a higher-risk jurisdiction, or a model to generalize globally.

Analytical method and limitations

51. The analysis was based on the transcripts of both sessions and was conducted at group level. Participant names and organizations are not used because the purpose is to identify mechanisms and implementation needs rather than attribute views to individuals, or their organizations, and the sessions were conducted under the Chatham House rule. Illustrative examples are paraphrased to preserve context while eliminating the risk that a participant or organization can be identified.
52. Facilitator explanations, examples from other jurisdictions, and statements about the PT's emerging views were used only to understand the questions asked of participants. They were not treated as evidence from Hong Kong SAR. Where an issue arose in response to a prompt, the analysis treats it as a response to a prompted scenario rather than evidence that participants raised the issue spontaneously.
53. The sessions were group discussions undertaken with a clear and definitive purpose. The analysis does not use the number of speakers supporting a point as a measure of prevalence or significance. It does not establish causation, test the accuracy of individual accounts, or support comparisons between Hong Kong SAR and other jurisdictions. This analysis therefore illuminates and tests the cross-cutting findings in Appendix Three-A, not to create a separate evidential claim about the Hong Kong SAR CFO population.

Detailed analysis of the CFO session

Role expansion and the continuing stewardship core

54. CFO participants described role expansion as an accumulation of responsibilities rather than a clean transition from financial stewardship to strategy. Across listed, private, start-up, financial-services, technology, real estate, education and not-for-profit settings, participants referred to strategy, financing, sustainability, data, technology and AI, operations, resource allocation, and external communication as functions of the evolved CFO role. The route into that broader role varied, with some moving from financial controller positions and others operating in organizations with limited scale or expert capacity, resulting in several functions falling to one finance leader. The underlying reporting, liquidity, control, and stewardship accountabilities remained. The ethical exposure therefore arises partly from simultaneous obligations: the CFO may help shape a transaction, narrative, or target and later be expected to test, report, or explain it objectively.
55. The session also demonstrated why the functional definition used in this report is necessary. Participants did not describe one uniform CFO job. In some larger organizations, the CFO was removed from monthly close mechanics and relied on a financial controller or accounting team for technical execution. In smaller organizations, the senior finance leader remained much closer to operational controls and could also carry legal, technology, risk, or administrative responsibilities. The relevant ethical question is therefore how responsibility and challenge are distributed across the senior finance team. A title-based analysis could miss the individual who prepares or controls the information. In contrast, a CFO-only analysis could overlook the controller or chief accounting role that supplies technical discipline when the CFO is more closely associated with strategy.

Commercial pressure and the point at which an ethical issue is recognized

56. The clearest participant example concerned an equity case during a period when a start-up was under severe financing pressure. Materiality, candor, due-diligence expectations, and the need for organizational survival all entered the decision-making process. The participant reported that the board ultimately supported a more technically correct presentation but described the path as difficult and acknowledged the temptation to soften the story when the organization was close to failure. In another participant example, material information was withheld from disclosure merely because the investors did not explicitly ask for it whereas the Code requires consideration of whether the information when taken as a whole is misleading. The significance lies in the decision mechanism. A survival objective can make selective presentation appear commercially necessary before the matter is consciously tested against integrity and the obligation to prepare or present information fairly and to exercise professional judgment and discretion appropriately.
57. Another participant described tension over whether public sustainability messaging could state that a carbon target was on track when travel patterns and underlying data made that conclusion uncertain. This example exposes a recurring boundary problem: a technically defensible qualification may still leave the overall impression more favorable than the evidence supports. The ethical analysis cannot stop at whether an individual sentence is literally supportable. It must consider the information as a whole, the intended audience's expectations, potential omissions, and the pressure created when senior executives prefer a predetermined characterization.
58. Participants also discussed property valuations, financing models, investor questions, and the extent of information placed in data rooms. Their comments showed that technical accounting concepts can both discipline and narrow the discussion. Materiality, compliance with reporting standards, and responsiveness to questions are necessary, but they do not resolve whether the

overall communication is neutral, complete enough for its purpose, and free from misleading information. This matters because CFOs may experience the decision as one about accounting treatment, transaction process, or investor relations. The ethical dimension often becomes visible only when the likely effect on the user of the information is examined alongside the technical requirement.

59. The examples were not uniformly framed by participants as ethical dilemmas at the outset. Several were initially described as business decisions, disclosure judgments, resource-allocation questions, or practical compromises. The risk identified in the session is delayed ethical recognition, rather than an absence of relevant ethical principles. Once the ethical lens was made explicit, participants could identify integrity, transparency, fairness, accountability, and the need to challenge. Implementation support should therefore help the CFO identify the trigger point at which an apparently commercial or technical decision should be tested against the Code, before positions harden and organizational consequences make challenge more difficult.

Capability, delegation and reliance on others

60. Participants were open about the limits of personal expertise as the role extended into law, geopolitics, sustainability, technology and AI, and other specialist areas. One described telling the board when an answer was unknown, setting out a preliminary view, and convening the relevant advisers. Another emphasized that specialists within the team could possess deeper subject knowledge than the CFO, while the CFO's responsibility is to understand the basis of their recommendation, test alternatives, and connect the decision to core controls such as segregation of duties. This suggests that professional competence and due care in a senior role should not be interpreted as being a subject matter expert in every subject.
61. The finance team emerged as both a source of information and an ethical safeguard. A participant described a junior team member identifying questionable expense claims by a senior executive, then gathering evidence and escalating the concern through finance leadership. Overseas leadership's prompt action reinforced the value of speaking up and strengthened trust within the team. The example illustrates a chain of conditions and a supportive ethical culture that made escalation effective: the employee noticed the anomaly, believed it could be raised, received support from finance leadership, and saw decisive action from those with authority.
62. Technology sharpened the accountability question. Participants discussed data integrity, opaque outputs, and AI-assisted decisions, but a deeper concern was how future finance professionals will develop judgment if entry-level analytical and control work is automated. One participant asked where the next generation would learn the consequences of a recommendation once traditional learning routes contract. This concern links competence, supervision, and ethical sensitivity over time. If automation removes the tasks through which staff learn to interrogate evidence and detect anomalies, organizations will need deliberate alternatives to build judgment, including supervised review, exposure to difficult cases, and clear responsibility for challenging automated outputs.

Governance support, challenge and escalation

63. Participants associated the ability to challenge with access and institutional support effectively. They referred to open conversations with the board or chair, balanced board composition, backing from head office, and a trusted finance team. These conditions did not remove pressure, but they made it possible to present adverse information and test management's preferred position. The session therefore supports a distinction between the CFO's personal obligation to act ethically and the organization's capacity and willingness to receive and manage challenges. While the

Code addresses the conduct of a PAIB, whether consultation and escalation work in practice depends on effective reporting lines, the board's responsiveness, and the availability of an authority able to act independently of the person creating the pressure.

64. When asked whether they had ever considered resignation because an ethical conflict was sufficiently serious, three participants indicated that they had. This shows that escalation can reach the boundary between staying to influence change and leaving to avoid association with the conduct. Useful implementation support would help the CFO assess the seriousness of the matter, available internal and external routes, documentation, legal or professional advice, the consequences of continued association, and any responsibility that remains after departure.

Professional identity and use of the Code

65. Participants attributed some value to professional training, CPD obligations, and the prospect of disciplinary accountability. They stressed that ethical and capable CFOs can come from banking, risk, technology, or other backgrounds, and that an accountancy qualification does not in itself establish good conduct. The session supports the view that professional affiliation can supply an ethical framework, education, advice and accountability that an individual may draw upon. However, it should not be used as a proxy for ethical behavior, nor does the evidence establish that non-PAIB CFOs are less ethical.
66. Participants described relying on professional judgment, experience, internal policies, legislation, peers, and an internal sense of what was right when faced with ethical challenges. Some believed they had absorbed the Code's fundamental principles through training and practice; others acknowledged that confidence in their own judgment could lead them to overlook the need for structured ethical analysis. This highlights a potential weakness in over-reliance on internalized knowledge. Experience can speed pattern recognition, but it can also normalize familiar practices and obscure threats created by self-interest, advocacy, association with a preferred outcome, or pressure from senior colleagues.
67. Participants favored reminders and support that could be used during live decisions, including short scenarios, current cases, peer discussion, and dissemination from professional bodies. Their comments do not support reducing the Code to simplified provisions or answers. Several of the examples involved competing responsibilities and incomplete facts, where a checklist alone would be inadequate. The stronger implication is a layered approach: a brief prompt recognition, a scenario showing how the issue develops, a clear route to the relevant Part 2 provisions in the Code, and access to consultation when available safeguards cannot reduce the threat to an acceptable level.

Detailed analysis of the other-stakeholder session

External expectations and the continuing importance of finance infrastructure

68. Other stakeholders examined the CFO role through regulatory, investor, professional-body, and governance lenses. They reaffirmed that CFOs now contribute to strategy, sustainability, technology, and enterprise decision-making, but repeatedly returned to the importance of a reliable underlying finance function. A regulator referred to examples of listed entities that could not publish results because they could not close the books, sometimes alongside suspicious transactions auditors identified. The concern raised was whether the organization had senior finance leadership with sufficient accounting capability, operational control, and authority to support timely, credible reporting.

69. This external perspective qualifies any narrative that presents the strategic CFO as having moved beyond traditional finance. Stakeholders viewed reporting, controls, and market disclosure as the platform on which the expanded role depends. Weaknesses in that platform can create consequences for investors and public trust even when the CFO is effective in strategy or financing. The session therefore suggests that role expansion may require stronger technical counterweights, rather than shifting attention away from the stewardship core.

Capability gaps and organizational design

70. Stakeholders identified potential capability gaps in sustainability, AI, cybersecurity, and people leadership. Sustainability was a recurring example because responsibility is shifting toward the finance function as standards, financial effects, and assurance expectations become more prominent. In contrast, finance and sustainability teams may lack a shared technical language. Participants questioned whether finance leaders were ready to take over the work and whether specialist teams understood the reporting and assurance consequences. The resulting risk is distributed across interfaces: neither function may possess the complete picture, yet the CFO may be expected to sign, explain, or defend the output.
71. Smaller and founder-led companies were associated with a concentration of responsibilities under one CFO due to limited resources. An example involved a CFO also overseeing internal audit, an arrangement acknowledged as inconsistent with best practice but sometimes accepted during organizational development. This exposes a genuine trade-off between immediate capability and structural independence. Combined roles can create self-interest, self-review, and intimidation threats that can become more serious as the organization scales. Implementation material could help identify the safeguards, reporting alternatives, and transition points needed when ideal separation of duties is not immediately available.
72. People leadership was raised as an ethical capability in its own right. The senior finance leader shapes what the team notices, what can be questioned, and whether information reaches the board without distortion. Ethical leadership therefore includes the ability to create an effective finance function, allocate responsibilities clearly, and maintain channels through which staff can raise concerns. Stakeholders also noted that the CFO may assume broader leadership during a CEO transition. Temporary expansion can create the same competence, capacity and role-boundary questions as a formally combined role.

Ethical risk observed from outside the CFO role

73. Stakeholders described pressure as often being indirect. In family-controlled or founder-led settings, a preferred outcome may be communicated through requests to calibrate sensitive disclosures rather than explicit instructions to misstate information. The ethical risk arises because a target can influence assumptions and judgments without any overt direction to manipulate the result. A technically elaborate process may then conceal an advocacy threat resulting from a predetermined outcome.
74. Another example concerned selecting an assurance provider because that provider had previously designed the system to be assured. The finance leader in the example reportedly presented the prior involvement as a benefit and did not recognize the independence or self-review concern. This example shows how efficiency, familiarity, and technical knowledge can be treated as sufficient selection criteria while an ethical threat remains unseen. This illustrates an implementation need around recognition: prompts that require the decision-maker to identify prior relationships, competing roles, incentives, and users' reasonable perceptions before evaluating whether safeguards are available.

75. Stakeholders also discussed partial or delayed disclosure, related-party transactions, and loans with uncertain commercial rationale as creating potential ethical challenges. Their concern was the cumulative effect of individual judgments that may each appear supportable in isolation. The ethical analysis must consider whether the pattern of selection, timing, and emphasis produces misleading information.

Power, monitoring and credible escalation

76. Investors and governance participants placed more weight than the CFO group on monitoring and the power structure around the role. They noted that a CFO may report to, be paid by, or depend upon the person whose preferred outcome is being challenged. In that setting, telling the individual to speak up will be ineffective unless an independent recipient has the authority and willingness to act. Participants referred to audit committee relationships, board oversight, and regulatory expectations as possible counterweights. A regulator referred to listing-rule expectations that the audit committee includes relevant financial expertise. The implication for the IESBA is that escalation guidance should identify the destination and conditions for effective challenge, not merely advise the CFO to communicate concerns.
77. Whistleblowing systems were discussed as evidence of whether organizational ethics operate in practice. Stakeholders described failures involving weak confidentiality, inadequate protection against retaliation, and reporting lines that did not give employees confidence to raise concerns. They distinguished a published policy from a functioning mechanism. This is relevant to the CFO in two ways. The CFO may need a credible route for personal escalation, and the finance function may be a channel through which concerns transactions, reporting, or controls first emerge. IESBA materials for boards and audit committees could explain how the CFO's professional obligations interact with oversight, access and protection, without creating governance requirements beyond the IESBA's mandate.
78. The investor perspective also tested visible credentials against actual conduct. Codes, training records, and professional designations were useful but insufficient when company behavior, control failures, or controversies suggested policies were not implemented. They described reviewing track record, culture, controls, and how reporting mechanisms operated, with adverse findings affecting internal valuation or investment decisions. This is an important discipline for this report: formal infrastructure matters because it can support conduct and accountability, but the evidential question is whether it changes decisions and behavior. The same investor described recurring dialogue between investors and auditors that exposed limited mutual understanding of audit scope, going concern, and other finance concepts. Governance support therefore depends on the financial literacy of those expected to challenge, not only the existence of a committee, policy or professional designation.

Professional accountability, Code awareness and delivery

79. Stakeholders saw professional accountancy membership as one possible source of structured education, ethical obligations, CPD, and discipline. They also identified uneven coverage because CFOs may come from other professional or commercial backgrounds and because organizational titles do not determine whether the Code applies. Several participants explored role-based onboarding or baseline training for senior finance leaders, while recognizing that such requirements may come from regulators, boards, institutes of directors, or employers rather than the IESBA.

80. Limited recent engagement with the Code was acknowledged within the stakeholder group as well as attributed to CFOs. Participants warned that mandatory ethics courses can become box-ticking exercises, especially for senior leaders who might be overconfident in their own judgment. They favored current cases, local examples, short digital formats, and ethics embedded within technical learning. At the same time, an investor observed that effective study sessions may be described differently across cultures and may not appear under the label of training. Delivery therefore needs to be tested for use and effect rather than measured only by course completion or whether a participant reports having read the full Code.
81. Stakeholders emphasized collaboration and reuse. PAOs, regulators and other bodies already produce guidance, videos, campaigns and technical learning. The case for the IESBA involvement is strongest where it can connect those materials to the Code's ethical framework, fill gaps that recur across jurisdictions, and make effective content easier to share. The model would need safeguards against inconsistent interpretation and a process for evaluating whether materials improve recognition and response.

Technology, governance and human accountability

82. The other stakeholder discussion on AI ranged from data security and staff capability to automated workflows, segregation of duties, and disclosure of use. The most consistent ethical concern was the persistence of human accountability. Participants did not regard a machine-generated output as displacing the responsibility of the person who approves, communicates, or relies on it. They also questioned whether automated agents could reproduce control separations designed for humans. This aligns with the IESBA's recent technology-related revisions to the Code and suggests that application support could map accountability across the full process: data inputs, system design, access, model limitations, review, override, communication, and final authorization.
83. The session debated whether AI use should be disclosed; with no settled view attained. This matters because CFOs need a principled way to assess when the nature or extent of reliance affects the credibility of information, users' expectations, or the ability to assign responsibility. That assessment links technology governance to integrity, objectivity, competence, and professional behavior.

Implications for this report

84. The Hong Kong SAR roundtable deep dive analysis strengthens this report's finding on the need for application guidance. It demonstrates, within one paired setting, how matters can be framed as commercial or technical before being consciously framed as an ethical issue relevant to the Code's existing fundamental principles and Part 2 provisions. It does not identify a recurring issue that requires a new ethical principle or a CFO-specific section of the Code. Whereas a stakeholder perceives that the Code does not address an emerging matter, it should be tested against existing requirements and application material before inferring a gap in the Code.

APPENDIX FOUR-A: ANALYSIS OF PARTS 1 AND 2 OF THE CODE

The following tables set out the PT's analysis of Parts 1 and 2 of the Code¹⁸ which was based on the following parameters:

- **Column 1 – Paragraph number** – Relevant paragraph number from the Code.
- **Column 2 – Text** – Corresponding text for the relevant paragraph number from the Code.
- **Column 3 – IESBA Staff Analysis** – PT's analysis of the Code's requirements and application material against the expanded and evolved CFO role. It identifies the PT's view on whether the provision remains fit for purpose for PAIB CFOs.
- **Column 4 – Any Gap (Y/N) or NAM** – Following the PT's analysis in Column 3, it highlights whether a revision to the provision is required to address the expanded and evolved CFO role and areas of potential NAM.

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
SECTION 100			
COMPLYING WITH THE CODE			
Introduction			
100.1	A distinguishing mark of the accountancy profession is its acceptance of the responsibility to act in the public interest.	Remains relevant to PAIB CFOs (hereinafter referred to as CFOs in this appendix) irrespective of activities undertaken.	No
100.2	Confidence in the accountancy profession is a reason why businesses, governments and other organizations involve professional accountants in a broad range of areas, including financial, non-financial and corporate reporting, assurance and other professional activities. Accountants understand and	Remains relevant to CFOs, regardless of the activities undertaken.	No

¹⁸ The current draft of the 2026 IESBA Handbook was used for the purposes of this analysis as it contains relevant revisions to Parts 1 and 2 and the Glossary of the Code resulting from the [International Ethics Standards for Sustainability Assurance \(including International Independence Standards\) and related revisions to the Code](#) issued in January 2025 with an effective date of December 15, 2026.

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	acknowledge that such confidence is based on the skills and values that accountants bring to the professional activities they undertake, including: (a) Adherence to ethical principles and professional standards; (b) Use of business acumen; (c) Application of expertise on technical and other matters; and (d) Exercise of professional judgment. The application of these skills and values enables accountants to provide advice or other output that meets the purpose for which it was provided, and which can be relied upon by the intended users of such output.		
100.3	The Code sets out high quality standards of ethical behavior expected of professional accountants for adoption by professional accountancy organizations which are members of the International Federation of Accountants (IFAC), or for use by such members as a basis for their codes of ethics. The Code may also be used or adopted by those responsible for setting ethics (including independence) standards for professional accountants in particular sectors or jurisdictions and by firms in developing their ethics and independence policies.	Remains relevant to CFOs irrespective of activities undertaken.	No
100.4	The Code establishes five fundamental principles to be complied with by all professional accountants. It also includes a conceptual framework that sets out the approach to be taken to identify, evaluate and address threats to compliance with those fundamental principles and, for audits and other assurance engagements, threats to independence. The Code also applies the fundamental principles and the conceptual framework to a range of facts and circumstances that accountants might encounter, whether in business or in public practice.	Remains relevant to CFOs irrespective of activities undertaken.	No
Requirements and Application Material			
100.5 A1	The requirements in the Code, designated with the letter “R,” impose obligations.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
100.5 A2	Application material, designated with the letter “A,” provides context, explanations, suggestions for actions or matters to consider, illustrations and other guidance relevant to a proper understanding of the Code. In particular, the application material is intended to help a professional accountant to understand how to apply the conceptual framework to a particular set of circumstances and to understand and comply with a specific requirement. While such application material does not of itself impose a requirement, consideration of the material is necessary to the proper application of the requirements of the Code, including application of the conceptual framework.	Remains relevant to CFOs irrespective of activities undertaken.	No
R100.6	A professional accountant shall comply with the Code.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
100.6 A1	Upholding the fundamental principles and compliance with the specific requirements of the Code enable professional accountants to meet their responsibility to act in the public interest.	Requirement remains relevant to CFOs, regardless of the activities undertaken.	No
100.6 A2	Complying with the Code includes giving appropriate regard to the aim and intent of the specific requirements.	Remains relevant to CFOs irrespective of activities undertaken.	No
100.6 A3	Compliance with the requirements of the Code does not mean that professional accountants will have always met their responsibility to act in the public interest. There might be unusual or exceptional circumstances in which an accountant believes that complying with a requirement or requirements of the Code might not be in the public interest or would lead to a disproportionate outcome. In those circumstances, the accountant is encouraged to consult with an appropriate body such as a professional or regulatory body.	Remains relevant to CFOs irrespective of activities undertaken.	No
100.6 A4	In acting in the public interest, a professional accountant considers not only the preferences or requirements of an individual client or employing organization, but also the interests of other stakeholders when performing professional activities.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
R100.7	If there are circumstances where laws or regulations preclude a professional accountant from complying with certain parts of the Code, those laws and regulations prevail, and the accountant shall comply with all other parts of the Code.	Requirement remains relevant to CFOs, regardless of the activities undertaken.	No
100.7 A1	The principle of professional behavior requires a professional accountant to comply with relevant laws and regulations. Some jurisdictions might have provisions that differ from or go beyond those set out in the Code. Accountants in those jurisdictions need to be aware of those differences and comply with the more stringent provisions unless prohibited by law or regulation.	The requirement remains relevant to CFOs, regardless of the activities undertaken.	No
Breaches of the Code			
R100.8	Paragraphs R400.80 to R400.89, 405.22 A1 to R405.29, R900.50 to R900.55, R5400.80 to R5400.89 and 5405.22 A1 to R5405.29 address a breach of International Independence Standards. A professional accountant who identifies a breach of any other provision of the Code shall evaluate the significance of the breach and its impact on the accountant's ability to comply with the fundamental principles. The accountant shall also: (a) Take whatever actions might be available, as soon as possible, to address the consequences of the breach satisfactorily; and (b) Determine whether to report the breach to the relevant parties.	The requirement remains relevant to CFOs, regardless of the activities undertaken.	No
100.8 A1	Relevant parties to whom such a breach might be reported include those who might have been affected by it, a professional or regulatory body or an oversight authority.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
SECTION 110			
THE FUNDAMENTAL PRINCIPLES			
General			
110.1 A1	There are five fundamental principles of ethics for professional accountants: (a) Integrity – to be straightforward and honest in all professional and business relationships. (b) Objectivity – to exercise professional or business judgment without being compromised by: (i) Bias; (ii) Conflict of interest; or (iii) Undue influence of, or undue reliance on, individuals, organizations, technology or other factors. (c) Professional Competence and Due Care – to: (i) Attain and maintain professional knowledge and skill at the level required to ensure that a client or employing organization receives competent professional service, based on current technical and professional standards and relevant legislation; and (ii) Act diligently and in accordance with applicable technical and professional standards. (d) Confidentiality – to respect the confidentiality of information acquired as a result of professional and business relationships. (e) Professional Behavior – to: (i) Comply with relevant laws and regulations; (ii) Behave in a manner consistent with the profession's responsibility to act in the public interest in all professional activities and business relationships; and	The fundamental principles remain relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	(iii) Avoid any conduct that the professional accountant knows or should know might discredit the profession.		
R110.2	A professional accountant shall comply with each of the fundamental principles.	The principle-based requirement remains relevant to CFOs, regardless of the activities undertaken.	No
110.2 A1	The fundamental principles of ethics establish the standard of behavior expected of a professional accountant. The conceptual framework establishes the approach an accountant must apply to comply with those fundamental principles. Subsections 111 to 115 set out requirements and application material for each fundamental principle.	Remains relevant to CFOs irrespective of activities undertaken.	No
110.2 A2	A professional accountant might face a situation in which complying with one fundamental principle conflicts with complying with one or more other fundamental principles. In such a situation, the accountant might consider consulting, on an anonymous basis if necessary, with: • Others within the firm or employing organization. • Those charged with governance. • A professional body. • A regulatory body. • Legal counsel. However, such consultation does not relieve the accountant from the responsibility to exercise professional judgment to resolve the conflict or, if necessary, and unless prohibited by law or regulation, disassociate from the matter creating the conflict.	Remains relevant to CFOs irrespective of activities undertaken.	No
110.2 A3	The professional accountant is encouraged to document the substance of the issue, the details of any discussions, the decisions made and the rationale for those decisions.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
SUBSECTION 111 – INTEGRITY			
R111.1	A professional accountant shall comply with the principle of integrity, which requires an accountant to be straightforward and honest in all professional and business relationships.	Remains relevant to CFOs irrespective of activities undertaken.	No
111.1 A1	Integrity involves fair dealing, truthfulness and having the strength of character to act appropriately, even when facing pressure to do otherwise or when doing so might create potential adverse personal or organizational consequences.	Remains relevant to CFOs irrespective of activities undertaken.	No
111.1 A2	Acting appropriately involves: (a) Standing one's ground when confronted by dilemmas and difficult situations; or (b) Challenging others as and when circumstances warrant, in a manner appropriate to the circumstances.	Remains relevant to CFOs irrespective of activities undertaken.	No
R111.2	A professional accountant shall not knowingly be associated with reports, returns, communications or other information where the accountant believes that the information: (a) Contains a materially false or misleading statement; (b) Contains statements or information provided recklessly; or (c) Omits or obscures required information where such omission or obscurity would be misleading.	The requirement remains relevant to CFOs, regardless of the activities undertaken.	No
111.2 A1	If a professional accountant provides a modified report in respect of such a report, return, communication or other information, the accountant is not in breach of paragraph R111.2.	Remains relevant to CFOs irrespective of activities undertaken.	No
R111.3	When a professional accountant becomes aware of having been associated with information described in paragraph R111.2, the accountant shall take steps to be disassociated from that information.	Remains relevant to CFOs irrespective of activities undertaken.	No
SUBSECTION 112 – OBJECTIVITY			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
R112.1	A professional accountant shall comply with the principle of objectivity, which requires an accountant to exercise professional or business judgment without being compromised by: (a) Bias; (b) Conflict of interest; or (c) Undue influence of, or undue reliance on, individuals, organizations, technology or other factors.	The requirement remains relevant to CFOs, regardless of the activities undertaken.	No
R112.2	A professional accountant shall not undertake a professional activity if a circumstance or relationship unduly influences the accountant's professional judgment regarding that activity.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
SUBSECTION 113 – PROFESSIONAL COMPETENCE AND DUE CARE			
R113.1	A professional accountant shall comply with the principle of professional competence and due care, which requires an accountant to: (a) Attain and maintain professional knowledge and skills at the level required to ensure that a client or employing organization receives competent professional service, based on current technical and professional standards and relevant legislation; and (b) Act diligently and in accordance with applicable technical and professional standards.	The requirement remains relevant to CFOs, regardless of the activities undertaken.	No
113.1 A1	Serving clients and employing organizations with professional competence involves exercising sound judgment in applying professional knowledge and skills.	Remains relevant to CFOs irrespective of activities undertaken.	No
113.1 A2	The knowledge and skills necessary for a professional activity vary depending on the nature of the activity being undertaken. For example, in addition to applying any technical knowledge relevant to the professional activity, interpersonal, communication, and organizational skills facilitate the professional accountant's interaction with entities and individuals with whom the accountant interacts.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
113.1 A3	Maintaining professional competence requires a professional accountant to have a continuing awareness and understanding of technical, professional, business and technology-related developments relevant to the professional activities undertaken by the accountant. Continuing professional development enables an accountant to develop and maintain the capabilities to perform competently within the professional environment.	Remains relevant to CFOs irrespective of activities undertaken.	No
113.1 A4	Diligence encompasses the responsibility to act in accordance with the requirements of an assignment, carefully, thoroughly and on a timely basis.	Remains relevant to CFOs irrespective of activities undertaken.	No
R113.2	In complying with the principle of professional competence and due care, a professional accountant shall take reasonable steps to ensure that those working in a professional capacity under the accountant's authority have appropriate training and supervision.	Requirement remains relevant to CFOs, regardless of the activities undertaken.	No
R113.3	Where appropriate, a professional accountant shall make clients, the employing organization, or other users of the accountant's professional activities aware of the limitations inherent in the activities and explain the implications of those limitations.	Requirement remains relevant to CFOs, regardless of the activities undertaken.	No
SUBSECTION 114 – CONFIDENTIALITY			
R114.1	A professional accountant shall comply with the principle of confidentiality, which requires an accountant to respect the confidentiality of information acquired in the course of professional and business relationships. An accountant shall: (a) Be alert to the possibility of inadvertent disclosure, including in a social environment, and particularly to a close business associate or an immediate or a close family member; (b) Maintain confidentiality of information within the firm or employing organization; (c) Maintain confidentiality of information disclosed by a prospective client or employing organization; and	Requirement remains relevant to CFOs, regardless of the activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	(d) Take reasonable steps to ensure that personnel under the accountant's control, and individuals from whom advice and assistance are obtained, comply with the accountant's duty of confidentiality.		
114.1 A1	Maintaining the confidentiality of information acquired in the course of professional and business relationships involves the professional accountant taking appropriate action to protect the confidentiality of such information in the course of its collection, use, transfer, storage, retention, dissemination, and lawful destruction.	Remains relevant to CFOs irrespective of activities undertaken.	No
R114.2	Subject to paragraph R114.3, a professional accountant shall not: (a) Disclose confidential information acquired in the course of professional and business relationships; (b) Use confidential information acquired in the course of professional and business relationships for the advantage of the accountant, the firm, the employing organization or a third party; (c) Use or disclose any confidential information, either acquired or received in the course of a professional or business relationship, after that relationship has ended; and (d) Use or disclose information in respect of which the duty of confidentiality applies notwithstanding that the information has become publicly available, whether properly or improperly.	Requirement remains relevant to CFOs, regardless of the activities undertaken.	No
R114.3	As an exception to paragraph R114.2, a professional accountant may disclose or use confidential information where: (a) There is a legal or professional duty or right to do so; or (b) This is authorized by the client or any person with the authority to permit disclosure or use of the confidential information, and this is not prohibited by law or regulation.	This requirement remains relevant to CFOs, regardless of the activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
114.3 A1	Confidentiality serves the public interest because it facilitates the free flow of information from the professional accountant's client or employing organization to the accountant in the knowledge that the information will not be disclosed to a third party. Nevertheless, the following are circumstances where professional accountants might be required or have the duty or right to disclose confidential information: (a) Disclosure is required by law or regulation, for example: (i) Production of documents or other provision of evidence in the course of legal proceedings; or (ii) Disclosure to the appropriate public authorities of infringements of the law that come to light; and (b) There is a professional duty or right to disclose or use, when not prohibited by law or regulation: (i) To comply with the quality review of a professional body; (ii) To respond to an inquiry or investigation by a professional or regulatory body; (iii) To protect the professional interests of a professional accountant in legal proceedings; or (iv) To comply with technical and professional standards, including ethics requirements.	Remains relevant to CFOs irrespective of activities undertaken.	No
114.3 A2	In deciding whether to disclose or use confidential information, factors to consider, depending on the circumstances, include: • Whether the interests of any parties, including third parties whose interests might be affected, could be harmed if the client or employing organization authorizes the disclosure or use of information by the professional accountant. • Whether all the relevant information is known and substantiated, to the extent practicable. Factors affecting the decision to disclose or use the information include:	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Unsubstantiated facts. • Incomplete information. • Unsubstantiated conclusions. • The proposed means of communicating the information. • Whether the parties to whom the information is to be provided or access is to be granted are appropriate recipients. • Any applicable law or regulation (including those governing privacy) in a jurisdiction where disclosure might take place and, if different, the jurisdiction where the confidential information originates.		
114.3 A3	The circumstances in which a firm or employing organization seeks authorization to use or disclose confidential information include when the information is used for training purposes, in the development of products or technology, in research, or as source material for industry or other benchmarking data or studies. Such authorization may be general in its application (for example, for internal training purposes or quality enhancement initiatives). When obtaining the authorization of the individual or entity that provided such information for use in specific circumstances, relevant considerations to be communicated (preferably in writing) might include: • The nature of the information to be used or disclosed. • The purpose for which the information is to be used or disclosed (for example, technology development, research or benchmarking data or studies). • The individual or entity who will undertake the activity for which the information is to be used or disclosed. • Whether the identity of the individual or entity that provided such information or any individuals or entities to which such information relates will be identifiable from the output of the activity for which the information is to be used or disclosed.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
R114.4	A professional accountant shall continue to comply with the principle of confidentiality even after the end of the relationship between the accountant and a client or employing organization. When changing employment or acquiring a new client, the accountant may use prior experience but shall not use or disclose any confidential information acquired or received in the course of a professional or business relationship.	Requirement remains relevant to CFOs, regardless of the activities undertaken.	No
SUBSECTION 115 – PROFESSIONAL BEHAVIOR			
R115.1	A professional accountant shall comply with the principle of professional behavior, which requires an accountant to: (a) Comply with relevant laws and regulations; (b) Behave in a manner consistent with the profession's responsibility to act in the public interest in all professional activities and business relationships; and (c) Avoid any conduct that the accountant knows or should know might discredit the profession. A professional accountant shall not knowingly engage in any business, occupation or activity that impairs or might impair the integrity, objectivity or good reputation of the profession, and as a result would be incompatible with the fundamental principles.	The requirement remains relevant to CFOs, regardless of the activities undertaken.	No
115.1 A1	Conduct that might discredit the profession includes conduct that a reasonable and informed third party would be likely to conclude adversely affects the good reputation of the profession.	Remains relevant to CFOs irrespective of activities undertaken.	No
R115.2	When undertaking marketing or promotional activities, a professional accountant shall not bring the profession into disrepute. A professional accountant shall be honest and truthful and shall not make: (a) Exaggerated claims for the services offered by, or the qualifications or experience of, the accountant; or (b) Disparaging references or unsubstantiated comparisons to the work of others.	Requirement remains relevant to CFOs, regardless of the activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
115.2 A1	If a professional accountant is unsure whether a form of advertising or marketing is appropriate, the accountant is encouraged to consult the relevant professional body.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) of NAM
SECTION 120			
THE CONCEPTUAL FRAMEWORK			
Introduction			
120.1	The circumstances in which professional accountants operate might create threats to compliance with the fundamental principles. Section 120 sets out requirements and application material, including a conceptual framework, to assist accountants in complying with the fundamental principles and meeting their responsibility to act in the public interest. Such requirements and application material accommodate the wide range of facts and circumstances, including the various professional activities, interests and relationships, that create threats to compliance with the fundamental principles. In addition, they deter accountants from concluding that a situation is permitted solely because that situation is not specifically prohibited by the Code.	Remains relevant to CFOs irrespective of activities undertaken.	No
120.2	The conceptual framework specifies an approach for a professional accountant to: (a) Identify threats to compliance with the fundamental principles; (b) Evaluate the threats identified; and (c) Address the threats by eliminating or reducing them to an acceptable level.	Remains relevant to CFOs irrespective of activities undertaken.	No
Requirements and Application Material			
General			
R120.3	The professional accountant shall apply the conceptual framework to identify, evaluate and address threats to compliance with the fundamental principles set out in Section 110.	Requirement remains relevant to CFOs, regardless of the activities undertaken.	No
120.3 A1	Additional requirements and application material that are relevant to the application of the conceptual framework are set out in: (a) Part 2 – <i>Professional Accountants in Business</i> ; (b) Part 3 – <i>Professional Accountants in Public Practice</i> ;	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) of NAM
	(c) <i>International Independence Standards</i>, as follows: (i) Part 4A – <i>Independence for Audit and Review Engagements</i>; and (ii) Part 4B – <i>Independence for Assurance Engagements Other than Audit Engagements, Review Engagements and Sustainability Assurance Engagements Addressed in Part 5</i>; and (d) Part 5 – <i>International Ethics Standards for Sustainability Assurance (including International Independence Standards)</i>.		
R120.4	When dealing with an ethics issue, the professional accountant shall consider the context in which the issue has arisen or might arise. Where an individual who is a professional accountant in public practice is performing professional activities pursuant to the accountant's relationship with the firm, whether as a contractor, employee or owner, the individual shall comply with the provisions in Part 2 that apply to these circumstances.	Requirement remains relevant to CFOs regardless of the activities undertaken.	No
R120.5	When applying the conceptual framework, the professional accountant shall: (a) Have an inquiring mind; (b) Exercise professional judgment; and (c) Use the reasonable and informed third party test described in paragraph 120.5 A9.	Remains relevant to CFOs irrespective of activities undertaken.	No
Having an Inquiring Mind			
120.5 A1	An inquiring mind is a prerequisite to obtaining an understanding of known facts and circumstances necessary for the proper application of the conceptual framework. Having an inquiring mind involves: (a) Considering the source, relevance and sufficiency of information obtained, taking into account the nature, scope and outputs of the professional activity being undertaken; and (b) Being open and alert to a need for further investigation or other action.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) of NAM
120.5 A2	When considering the source, relevance and sufficiency of information obtained, the professional accountant might consider, among other matters, whether: • New information has emerged or there have been changes in facts and circumstances. • The information or its source might be influenced by bias or self-interest. • There is reason to be concerned that potentially relevant information might be missing from the facts and circumstances known to the accountant. • There is an inconsistency between the known facts and circumstances and the accountant's expectations. • The information provides a reasonable basis on which to reach a conclusion. • There might be other reasonable conclusions that could be reached from the information obtained.	Remains relevant to CFOs irrespective of activities undertaken.	No
120.5 A3	Paragraph R120.5 requires all professional accountants to have an inquiring mind when identifying, evaluating and addressing threats to the fundamental principles. This prerequisite for applying the conceptual framework applies to all accountants regardless of the professional activity undertaken. Under auditing, review, and other assurance standards, including those issued by the IAASB, accountants must also exercise professional skepticism, which includes a critical assessment of evidence.	Remains relevant to CFOs irrespective of activities undertaken.	No
Exercising Professional Judgment			
120.5 A4	Professional judgment involves the application of relevant training, professional knowledge, skill and experience commensurate with the facts and circumstances, taking into account the nature and scope of the particular professional activities, and the interests and relationships involved.	Remains relevant to CFOs irrespective of activities undertaken.	No
120.5 A5	Professional judgment is required when the professional accountant applies the conceptual framework in order to make informed decisions about the courses of actions available, and to determine whether such decisions are appropriate in the circumstances. In making this determination, the accountant might consider matters such as whether:	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) of NAM
	• The accountant's expertise is sufficient to reach a conclusion. • There is a need to consult with others with relevant expertise. • The accountant's own preconception or bias might be affecting the accountant's exercise of professional judgment.		
120.5 A6	The circumstances in which professional accountants carry out professional activities, and the factors involved, vary considerably in range and complexity. The professional judgment exercised by accountants might need to take into account the complexity arising from the compounding effect of the interaction between, and changes in, elements of the facts and circumstances that are uncertain and variables and assumptions that are interconnected or interdependent.	Remains relevant to CFOs irrespective of activities undertaken.	No
120.5 A7	Managing complexity involves: • Making the firm or employing organization and, if appropriate, relevant stakeholders aware of the inherent uncertainties or difficulties arising from the facts and circumstances. (Ref: Para. R113.3) • Being alert to any developments or changes in the facts and circumstances and assessing whether they might impact any judgments the accountant has made. (Ref: Para. R120.5 to 120.5 A3, and R120.9 to 120.9 A2)	Remains relevant to CFOs irrespective of activities undertaken.	No
120.5 A8	Managing complexity might also involve: • Analyzing and investigating as relevant, any uncertain elements, the variables and assumptions and how they are connected or interdependent. • Using technology to analyze relevant data to inform the professional accountant's judgment. • Consulting with others, including experts, to ensure appropriate challenge and additional input as part of the evaluation process.	Remains relevant to CFOs irrespective of activities undertaken.	No
Reasonable and Informed Third Party			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) of NAM
120.5 A9	The reasonable and informed third party test is a consideration by the professional accountant about whether the same conclusions would likely be reached by another party. Such consideration is made from the perspective of a reasonable and informed third party, who weighs all the relevant facts and circumstances that the accountant knows, or could reasonably be expected to know, at the time the conclusions are made. The reasonable and informed third party does not need to be an accountant, but would possess the relevant knowledge and experience to understand and evaluate the appropriateness of the accountant's conclusions in an impartial manner.	Remains relevant to CFOs irrespective of activities undertaken.	No
Identifying Threats			
R120.6	The professional accountant shall identify threats to compliance with the fundamental principles.	Requirement remains relevant to CFOs, irrespective of the activities undertaken.	No
120.6 A1	An understanding of the facts and circumstances, including any professional activities, interests and relationships that might compromise compliance with the fundamental principles, is a prerequisite to the professional accountant's identification of threats to such compliance. The existence of certain conditions, policies and procedures established by the profession, legislation, regulation, the firm, or the employing organization that can enhance the accountant acting ethically might also help identify threats to compliance with the fundamental principles. Paragraph 120.8 A2 includes general examples of such conditions, policies and procedures which are also factors that are relevant in evaluating the level of threats.	Remains relevant to CFOs irrespective of activities undertaken.	No
120.6 A2	Threats to compliance with the fundamental principles might be created by a broad range of facts and circumstances. It is not possible to define every situation that creates threats. In addition, the nature of engagements and work assignments might differ and, consequently, different types of threats might be created.	Remains relevant to CFOs irrespective of activities undertaken.	No
120.6 A3	Threats to compliance with the fundamental principles fall into one or more of the following categories: (a) Self-interest threat – the threat that a financial or other interest will inappropriately influence a professional accountant's judgment or behavior;	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) of NAM
	(b) Self-review threat – the threat that a professional accountant will not appropriately evaluate the results of a previous judgment made, or an activity performed by the accountant or by another individual within the accountant’s firm or employing organization, on which the accountant will rely when forming a judgment as part of performing a current activity; (c) Advocacy threat – the threat that a professional accountant will promote a client’s or employing organization’s position to the point that the accountant’s objectivity is compromised; (d) Familiarity threat – the threat that due to a long or close relationship with a client, or employing organization, a professional accountant will be too sympathetic to their interests or too accepting of their work; and (e) Intimidation threat – the threat that a professional accountant will be deterred from acting objectively because of actual or perceived pressures, including attempts to exercise undue influence over the accountant.		
120.6 A4	A circumstance might create more than one threat, and a threat might affect compliance with more than one fundamental principle.	Remains relevant to CFOs irrespective of activities undertaken.	No
Evaluating Threats			
R120.7	When the professional accountant identifies a threat to compliance with the fundamental principles, the accountant shall evaluate whether such a threat is at an acceptable level.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
Acceptable Level			
120.7 A1	An acceptable level is a level at which a professional accountant using the reasonable and informed third party test would likely conclude that the accountant complies with the fundamental principles.	Remains relevant to CFOs irrespective of activities undertaken.	No
Factors Relevant in Evaluating the Level of Threats			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) of NAM
120.8 A1	The consideration of qualitative as well as quantitative factors is relevant in the professional accountant's evaluation of threats, as is the combined effect of multiple threats, if applicable.	Remains relevant to CFOs irrespective of activities undertaken.	No
120.8 A2	The existence of conditions, policies and procedures described in paragraph 120.6 A1 might also be factors that are relevant in evaluating the level of threats to compliance with the fundamental principles. Examples of such conditions, policies and procedures include: • Corporate governance requirements. • Educational, training and experience requirements for the profession. • Effective complaint systems which enable the professional accountant and the general public to draw attention to unethical behavior. • An explicitly stated duty to report breaches of ethics requirements. • Professional or regulatory monitoring and disciplinary procedures.	Remains relevant to CFOs irrespective of activities undertaken.	No
Consideration of New Information or Changes in Facts and Circumstances			
R120.9	If the professional accountant becomes aware of new information or changes in facts and circumstances that might impact whether a threat has been eliminated or reduced to an acceptable level, the accountant shall re-evaluate and address that threat accordingly.	Requirement remains relevant to CFOs, regardless of the activities undertaken.	No
120.9 A1	Remaining alert throughout the professional activity assists the professional accountant in determining whether new information has emerged or changes in facts and circumstances have occurred that: (a) Impact the level of a threat; or (b) Affect the accountant's conclusions about whether safeguards applied continue to be appropriate to address identified threats.	Remains relevant to CFOs irrespective of activities undertaken.	No
120.9 A2	If new information results in the identification of a new threat, the professional accountant is required to evaluate and, as appropriate, address this threat. (Ref: Paras. R120.7 and R120.10).	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) of NAM
Addressing Threats			
R120.10	If the professional accountant determines that the identified threats to compliance with the fundamental principles are not at an acceptable level, the accountant shall address the threats by eliminating them or reducing them to an acceptable level. The accountant shall do so by: (a) Eliminating the circumstances, including interests or relationships, that are creating the threats; (b) Applying safeguards, where available and capable of being applied, to reduce the threats to an acceptable level; or (c) Declining or ending the specific professional activity.	Requirement remains relevant to CFOs, regardless of the activities undertaken.	No
Actions to Eliminate Threats			
120.10 A1	Depending on the facts and circumstances, a threat might be addressed by eliminating the circumstance creating the threat. However, there are some situations in which threats can only be addressed by declining or ending the specific professional activity. This is because the circumstances that created the threats cannot be eliminated and safeguards are not capable of being applied to reduce the threat to an acceptable level.	Remains relevant to CFOs irrespective of activities undertaken.	No
Safeguards			
120.10 A2	Safeguards are actions, individually or in combination, that the professional accountant takes that effectively reduce threats to compliance with the fundamental principles to an acceptable level.	Remains relevant to CFOs irrespective of activities undertaken.	No
Consideration of Significant Judgments Made and Overall Conclusions Reached			
R120.11	The professional accountant shall form an overall conclusion about whether the actions that the accountant takes, or intends to take, to address the threats created will eliminate those threats or reduce them to an acceptable level. In forming the overall conclusion, the accountant shall: (a) Review any significant judgments made or conclusions reached; and (b) Use the reasonable and informed third party test.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) of NAM
Other Considerations when Applying the Conceptual Framework			
Bias			
120.12 A1	Conscious or unconscious bias affects the exercise of professional judgment when identifying, evaluating and addressing threats to compliance with the fundamental principles.	Remains relevant to CFOs irrespective of activities undertaken.	No
120.12 A2	Examples of potential bias to be aware of when exercising professional judgment include: • Anchoring bias, which is a tendency to use an initial piece of information as an anchor against which subsequent information is inadequately assessed. • Automation bias, which is a tendency to favor output generated from automated systems, even when human reasoning or contradictory information raises questions as to whether such output is reliable or fit for purpose. • Availability bias, which is a tendency to place more weight on events or experiences that immediately come to mind or are readily available than on those that are not. • Confirmation bias, which is a tendency to place more weight on information that corroborates an existing belief than information that contradicts or casts doubt on that belief. • Groupthink, which is a tendency for a group of individuals to discourage individual creativity and responsibility and as a result reach a decision without critical reasoning or consideration of alternatives. • Overconfidence bias, which is a tendency to overestimate one's own ability to make accurate assessments of risk or other judgments or decisions. • Representation bias, which is a tendency to base an understanding on a pattern of experiences, events or beliefs that is assumed to be representative. • Selective perception, which is a tendency for a person's expectations to influence how the person views a particular matter or person.	Remains relevant to CFOs irrespective of activities undertaken. However, some of these biases may be elevated as the CFO role evolves, particularly automation bias with the increased use of AI, and possibly overconfidence bias. The IESBA could address how these concepts might affect professional judgment as part of any non-authoritative material (NAM) it develops for CFOs.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) of NAM
120.12 A3	Actions that might mitigate the effect of bias include: • Seeking advice from experts to obtain additional input. • Consulting with others to ensure appropriate challenge as part of the evaluation process. • Receiving training related to the identification of bias as part of professional development.	Remains relevant to CFOs irrespective of activities undertaken.	No
Organizational Culture			
120.13 A1	The effective application of the conceptual framework by a professional accountant is enhanced when the importance of ethical values that align with the fundamental principles and other provisions set out in the Code is promoted through the internal culture of the accountant's organization.	Remains relevant to CFOs irrespective of activities undertaken. However, outreach activities consistency highlighted the CFO as a strategic partner, sounding board, or co-pilot to the CEO, and in some instances as the organization's ethical or guiding compass. It also highlighted that ethical outcomes are shaped by organizational culture, tone at the top, governance structures, ownership models, incentives, resourcing, regulatory expectations, PAO requirements, investor expectations, and the availability of escalation or whistleblowing channels.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) of NAM
		The importance of CFOs promoting ethical culture in their organizations could be addressed as part of any NAM for CFOs that the IESBA might develop. Also relevant to paragraphs 120.13 A2-A3.	
120.13 A2	The promotion of an ethical culture within an organization is most effective when: (a) Leaders and those in managerial roles promote the importance of, and hold themselves and others accountable for demonstrating, the ethical values of the organization; (b) Appropriate education and training programs, management processes, and performance evaluation and reward criteria that promote an ethical culture are in place; (c) Effective policies and procedures are in place to encourage and protect those who report actual or suspected illegal or unethical behavior, including whistle-blowers; and (d) The organization adheres to ethical values in its dealings with third parties.	Remains relevant to CFOs irrespective of activities undertaken. Refer paragraph 120.13 A1.	No Potential NAM
120.13 A3	Professional accountants are expected to: (a) Encourage and promote an ethics-based culture in their organization, taking into account their position and seniority; and (b) Exhibit ethical behavior in dealings with individuals with whom, and entities with which, the accountants, the firm or the employing organization has a professional or business relationship.	Remains relevant to CFOs irrespective of activities undertaken. Refer paragraph 120.13 A1.	No Potential NAM
Considerations for Audits, Reviews, Other Assurance and Related Services Engagements [paragraphs 120.14 A1 to 120.16 A2 have not been replicated as they do not apply to PAIBs/CFOs]			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
PART 2 – PROFESSIONAL ACCOUNTANTS IN BUSINESS			
SECTION 200			
APPLYING THE CONCEPTUAL FRAMEWORK – PROFESSIONAL ACCOUNTANTS IN BUSINESS			
Introduction			
200.1	This Part of the Code sets out requirements and application material for professional accountants in business when applying the conceptual framework set out in Section 120. It does not describe all of the facts and circumstances, including professional activities, interests and relationships, that could be encountered by professional accountants in business, which create or might create threats to compliance with the fundamental principles. Therefore, the conceptual framework requires professional accountants in business to be alert for such facts and circumstances.	Remains relevant to CFOs irrespective of activities undertaken.	No
200.2	Investors, creditors, employing organizations and other sectors of the business community, as well as governments and the general public, might rely on the work of professional accountants in business. Professional accountants in business might be solely or jointly responsible for the preparation and reporting of financial and non-financial, including sustainability, information on which both their employing organizations and third parties might rely. They might also be responsible for providing effective financial management and competent advice on a variety of business-related matters.	Remains relevant to CFOs irrespective of activities undertaken.	No
200.3	A professional accountant in business might be an employee, contractor, partner, director (executive or non-executive), owner-manager, or volunteer of an employing organization. The legal form of the relationship of the accountant with the employing organization has no bearing on the ethical responsibilities placed on the accountant.	Remains relevant to CFOs irrespective of activities undertaken. A fractional CFO may be a professional accountant in public practice (PAPP), as their consultancy business may constitute a firm and they would be providing professional services (CFO	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
		services). Alternatively, depending on the nature of the relationship with the client, they might be considered a contractor and therefore a PAIB. Irrespective of whether a PAIB or a PAPP, Part 2 applies to fractional CFOs (refer para. 200.4).	
200.4	In this Part, the term “professional accountant” refers to: (a) A professional accountant in business; and (b) An individual who is a professional accountant in public practice when performing professional activities pursuant to the accountant’s relationship with the accountant’s firm, whether as a contractor, employee or owner. More information on when Part 2 is applicable to professional accountants in public practice is set out in paragraphs R120.4, R300.5 and 300.5 A1.	Remains relevant to CFOs irrespective of activities undertaken. Refer paragraph 200.3.	No
Requirements and Application Material			
General			
R200.5	A professional accountant shall comply with the fundamental principles set out in Section 110 and apply the conceptual framework set out in Section 120 to identify, evaluate and address threats to compliance with the fundamental principles.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
200.5 A1	A professional accountant has a responsibility to further the legitimate objectives of the accountant’s employing organization. The Code does not seek to hinder accountants from fulfilling that responsibility, but addresses circumstances in which compliance with the fundamental principles might be compromised.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
200.5 A2	Professional accountants may promote the position of the employing organization when furthering the legitimate goals and objectives of their employing organization, provided that any statements made are neither false nor misleading. Such actions usually would not create an advocacy threat.	Remains relevant to CFOs irrespective of activities undertaken.	No
200.5 A3	The more senior the position of a professional accountant, the greater will be the ability and opportunity to access information, and to influence policies, decisions made and actions taken by others involved with the employing organization. To the extent that they are able to do so, taking into account their position and seniority in the organization, accountants are expected to encourage and promote an ethics-based culture in the organization and exhibit ethical behavior in dealings with individuals with whom, and entities with which, the accountant or the employing organization has a professional or business relationship in accordance with paragraph 120.13 A3. Examples of actions that might be taken include the introduction, implementation and oversight of: • Ethics education and training programs. • Management processes and performance evaluation and reward criteria that promote an ethical culture. • Ethics and whistle-blowing policies. • Policies and procedures designed to prevent non-compliance with laws and regulations.	This paragraph is highly relevant to CFOs (as the most senior in an organization's finance function) and remains relevant irrespective of activities undertaken. Findings from the CFO sessions include that in some instances CFOs are seen as the organization's ethical or guiding compass. Further, in the extended CFO survey, 45% of respondents identified the expanding CFO role to include organizational culture and ethical leadership. The importance of CFOs promoting ethical culture in their organizations could be addressed as part of any NAM for CFOs that the IESBA might develop.	No Potential NAM
Identifying Threats			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
200.6 A1	Threats to compliance with the fundamental principles might be created by a broad range of facts and circumstances. The categories of threats are described in paragraph 120.6 A3. The following are examples of facts and circumstances within each of those categories that might create threats for a professional accountant when undertaking a professional activity: (a) Self-interest Threats • A professional accountant holding a financial interest in, or receiving a loan or guarantee from, the employing organization. • A professional accountant participating in incentive compensation arrangements offered by the employing organization. • A professional accountant having access to corporate assets for personal use. • A professional accountant being offered a gift or special treatment from a supplier of the employing organization. (b) Self-review Threats • A professional accountant determining the appropriate accounting treatment for a business combination after performing the feasibility study supporting the purchase decision. • A professional accountant determining the appropriate methodology to calculate emission reductions after performing the feasibility study supporting a capital project to reduce emissions. (c) Advocacy Threats • A professional accountant having the opportunity to manipulate information in a prospectus, including in relation to a sustainability or sustainability-linked bond, in order to obtain favorable financing. (d) Familiarity Threats • A professional accountant being responsible for the financial or non-financial, including sustainability, reporting of the employing organization when an	These examples of threats remain highly relevant to CFOs. Findings from the CFO sessions include many similar, but more detailed and explicit examples. Such examples could be incorporated as part of any NAM for CFOs that the IESBA might develop with respect to other sections in the Code including 210, 220, and 270.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	immediate or close family member employed by the organization makes decisions that affect the financial or non-financial reporting of the organization. • A professional accountant having a long association with individuals influencing business decisions. (e) Intimidation Threats • A professional accountant or immediate or close family member facing the threat of dismissal or replacement over a disagreement about: • The application of an accounting principle or a sustainability reporting principle. • The determination of measurement methods, metrics, targets, estimation criteria or assumptions for sustainability information. • The way in which financial or non-financial information is to be reported. • An individual attempting to influence the decision-making process of the professional accountant, for example with regard to the awarding of contracts or the application of an accounting principle or a sustainability reporting principle.		
Identifying Threats Associated with the Use of Technology			
200.6 A2	The following are examples of facts and circumstances relating to the use of technology that might create threats for a professional accountant when undertaking a professional activity: • Self-interest Threats • The data available might not be sufficient for the effective use of the technology. • The technology might not be appropriate for the purpose for which it is to be used. • The accountant might not have sufficient information and expertise, or access to an expert with sufficient understanding, to use and explain the technology and its appropriateness for the purpose intended.	These examples of threats remain highly relevant to CFOs. Technology, including artificial intelligence (AI), was raised across multiple locations as both opportunities and sources of ethical threats for CFOs. Participants recognized the potential for efficiency gains and improved analysis from	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	(Ref: Para. 230.2). - Self-review Threats - The technology was designed or developed using the knowledge, expertise or judgment of the accountant or employing organization.	technological advances, but also noted risks related to data quality, data confidentiality, unauthorized tools, third-party software providers, the storage and processing of organizational data, the reliability of AI outputs, and the potential erosion of human judgment. Such examples could be incorporated as part of any NAM for CFOs that the IESBA might develop.	
Evaluating Threats			
200.7 A1	The conditions, policies and procedures described in paragraphs 120.6 A1 and 120.8 A2 might impact the evaluation of whether a threat to compliance with the fundamental principles is at an acceptable level.	Remains relevant to CFOs irrespective of activities undertaken.	No
200.7 A2	The professional accountant's evaluation of the level of a threat is also impacted by the nature and scope of the professional activity.	Remains relevant to CFOs irrespective of activities undertaken.	No
200.7 A3	The professional accountant's evaluation of the level of a threat might be impacted by the work environment within the employing organization and its operating environment. For example: - Leadership that stresses the importance of ethical behavior and the expectation that employees will act in an ethical manner. - Policies and procedures to empower and encourage employees to communicate ethics issues that concern them to senior levels of management without fear of retribution.	Remains relevant to CFOs irrespective of activities undertaken. Findings from the CFO sessions include that in some instances CFOs are seen as the organization's ethical or guiding compass.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Policies and procedures to implement and monitor the quality of employee performance. • Systems of corporate oversight or other oversight structures and strong internal controls over financial and non-financial, including sustainability, information and their interconnection. • Recruitment procedures emphasizing the importance of employing high caliber competent personnel. • Timely communication of policies and procedures, including any changes to them, to all employees, and appropriate training and education on such policies and procedures. • Ethics and code of conduct policies.	Further, in the extended CFO survey, 45% of respondents identified the expanding CFO role to include organizational culture and ethical leadership. The importance of CFOs promoting ethical culture in their organizations could be addressed as part of any NAM for CFOs that the IESBA might develop.	
200.7 A4	The professional accountant's evaluation of the level of a threat associated with the use of technology might also be impacted by the work environment within the employing organization and its operating environment. For example: • Level of corporate oversight and internal controls over the technology. • Assessments of the quality and functionality of technology that are undertaken by a third-party. • Training that is provided regularly to all relevant employees so they obtain and maintain the professional competence to sufficiently understand, use and explain the technology and its appropriateness for the purpose intended.	These factors remain highly relevant to CFOs. Refer paragraph 200.6 A2 with respect to potential NAM.	No Potential NAM
200.7 A5	Professional accountants might consider obtaining legal advice where they believe that unethical behavior or actions by others have occurred, or will continue to occur, within the employing organization.	Remains relevant to CFOs irrespective of activities undertaken.	No
Addressing Threats			
200.8 A1	Sections 210 to 270 describe certain threats that might arise during the course of performing professional activities and include examples of actions that might address such threats.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
200.8 A2	In extreme situations, if the circumstances that created the threats cannot be eliminated and safeguards are not available or capable of being applied to reduce the threat to an acceptable level, it might be appropriate for a professional accountant to resign from the employing organization.	Remains relevant to CFOs irrespective of activities undertaken.	No
Communicating with Those Charged with Governance			
R200.9	When communicating with those charged with governance in accordance with the Code, a professional accountant shall determine the appropriate individual(s) within the employing organization's governance structure with whom to communicate. If the accountant communicates with a subgroup of those charged with governance, the accountant shall determine whether communication with all of those charged with governance is also necessary so that they are adequately informed.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
200.9 A1	In determining with whom to communicate, a professional accountant might consider: (a) The nature and importance of the circumstances; and (b) The matter to be communicated.	Remains relevant to CFOs irrespective of activities undertaken.	No
200.9 A2	Examples of a subgroup of those charged with governance include an audit committee, another committee tasked with oversight of sustainability information, or an individual member of those charged with governance.	Remains relevant to CFOs irrespective of activities undertaken.	No
R200.10	If a professional accountant communicates with individuals who have management responsibilities as well as governance responsibilities, the accountant shall be satisfied that communication with those individuals adequately informs all of those in a governance role with whom the accountant would otherwise communicate.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
200.10 A1	In some circumstances, all of those charged with governance are involved in managing the employing organization, for example, a small business where a single owner manages the organization and no one else has a governance role. In these cases, if matters are communicated with individual(s) with management responsibilities, and those individual(s) also have governance responsibilities, the professional accountant has satisfied the requirement to communicate with those charged with governance.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
SECTION 210			
CONFLICTS OF INTEREST			
Introduction			
210.1	Professional accountants are required to comply with the fundamental principles and apply the conceptual framework set out in Section 120 to identify, evaluate and address threats.	Remains relevant to CFOs irrespective of activities undertaken.	No
210.2	A conflict of interest creates threats to compliance with the principle of objectivity and might create threats to compliance with the other fundamental principles. Such threats might be created when: (a) A professional accountant undertakes a professional activity related to a particular matter for two or more parties whose interests with respect to that matter are in conflict; or (b) The interest of a professional accountant with respect to a particular matter and the interests of a party for whom the accountant undertakes a professional activity related to that matter are in conflict. A party might include an employing organization, a vendor, a customer, a lender, a shareholder, or another party.	Remains relevant to CFOs irrespective of activities undertaken. However, stakeholder outreach highlighted that where a CFO holds multiple roles, safeguards that might otherwise come from separation of responsibilities, independent challenge, or expert review may be weakened. Participants noted that CFOs may act as CFO and COO, CFO and CEO, or CFO and broader administrative or corporate leader. This was identified as creating potential conflicts between stewardship responsibilities and operational delivery responsibilities. For	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
		example, it can reduce the distance between the person making or executing a business decision and the person expected to challenge its financial, reporting, or ethical effectiveness. While this specific example is not currently reflected in the Code, it could be addressed as part of any NAM for CFOs that the IESBA might develop.	
210.3	This section sets out specific requirements and application material relevant to applying the conceptual framework to conflicts of interest.	Remains relevant to CFOs irrespective of activities undertaken.	No
Requirements and Application Material			
General			
R210.4	A professional accountant shall not allow a conflict of interest to compromise professional or business judgment.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
210.4 A1	Examples of circumstances that might create a conflict of interest include: • Serving in a management or governance position for two employing organizations and acquiring confidential information from one organization that might be used by the professional accountant to the advantage or disadvantage of the other organization. • Undertaking a professional activity for each of two parties in a partnership, where both parties are employing the accountant to assist them to dissolve their partnership.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 210.2 regarding potential NAM.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Preparing financial or non-financial information for certain members of management of the accountant's employing organization who are seeking to undertake a management buy-out. • Being responsible for selecting a vendor for the employing organization when an immediate family member of the accountant might benefit financially from the transaction. • Serving in a governance capacity in an employing organization that is approving certain investments for the company where one of those investments will increase the value of the investment portfolio of the accountant or an immediate family member.		
Conflict Identification			
R210.5	A professional accountant shall take reasonable steps to identify circumstances that might create a conflict of interest, and therefore a threat to compliance with one or more of the fundamental principles. Such steps shall include identifying: (a) The nature of the relevant interests and relationships between the parties involved; and (b) The activity and its implication for relevant parties.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
R210.6	A professional accountant shall remain alert to changes over time in the nature of the activities, interests and relationships that might create a conflict of interest while performing a professional activity.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
Threats Created by Conflicts of Interest			
210.7 A1	In general, the more direct the connection between the professional activity and the matter on which the parties' interests conflict, the more likely the level of the threat is not at an acceptable level.	Remains relevant to CFOs irrespective of activities undertaken.	No
210.7 A2	An example of an action that might eliminate threats created by conflicts of interest is withdrawing from the decision-making process related to the matter giving rise to the conflict of interest.	Remains relevant to CFOs irrespective of activities undertaken.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
		Refer para. 210.2 regarding potential NAM.	
210.7 A3	Examples of actions that might be safeguards to address threats created by conflicts of interest include: • Restructuring or segregating certain responsibilities and duties. • Obtaining appropriate oversight, for example, acting under the supervision of an executive or non-executive director.	Remains relevant to CFOs irrespective of activities undertaken. Refer paras. 210.2 and 210.7 A2 regarding potential NAM.	No Potential NAM
Disclosure and Consent			
General			
210.8 A1	It is generally necessary to: (a) Disclose the nature of the conflict of interest and how any threats created were addressed to the relevant parties, including to the appropriate levels within the employing organization affected by a conflict; and (b) Obtain consent from the relevant parties for the professional accountant to undertake the professional activity when safeguards are applied to address the threat.	Remains relevant to CFOs irrespective of activities undertaken.	No
210.8 A2	Consent might be implied by a party's conduct in circumstances where the professional accountant has sufficient evidence to conclude that the parties know the circumstances at the outset and have accepted the conflict of interest if they do not raise an objection to the existence of the conflict.	Remains relevant to CFOs irrespective of activities undertaken.	No
210.8 A3	If such disclosure or consent is not in writing, the professional accountant is encouraged to document: (a) The nature of the circumstances giving rise to the conflict of interest; (b) The safeguards applied to address the threats when applicable; and (c) The consent obtained.	Remains relevant to CFOs irrespective of activities undertaken.	No
Other Considerations			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
210.9 A1	When addressing a conflict of interest, the professional accountant is encouraged to seek guidance from within the employing organization or from others, such as a professional body, legal counsel or another accountant. When making such disclosures or sharing information within the employing organization and seeking guidance of third parties, the principle of confidentiality applies.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
SECTION 220			
PREPARATION AND PRESENTATION OF INFORMATION			
Introduction			
220.1	Professional accountants are required to comply with the fundamental principles and apply the conceptual framework set out in Section 120 to identify, evaluate and address threats.	Remains relevant to CFOs irrespective of activities undertaken.	No
220.2	Preparing or presenting information might create a self-interest, intimidation or other threats to compliance with one or more of the fundamental principles. This section sets out specific requirements and application material relevant to applying the conceptual framework in such circumstances.	Remains relevant to CFOs irrespective of activities undertaken.	No
Requirements and Application Material			
General			
220.3 A1	Professional accountants at all levels in an employing organization are involved in the preparation or presentation of information both within and outside the organization.	Remains relevant to CFOs irrespective of activities undertaken.	No
220.3 A2	Stakeholders to whom, or for whom, such information is prepared or presented, include: • Management and those charged with governance. • Investors and lenders or other creditors. • Regulatory bodies. This information might assist stakeholders in understanding and evaluating aspects of the employing organization's activities and state of affairs and in making decisions concerning the organization. Information can include financial and non-financial information that might be made public or used for internal purposes. Examples include: • Operating and performance reports.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Decision support analyses. • Budgets and forecasts. • Information provided to the internal and external auditors. • Sustainability information, including information on the organization's business model, services, products, or other relevant activities, provided to the sustainability assurance practitioner. • Risk and impact analyses. • General and special purpose financial statements. • Tax returns. • Reports filed with regulatory bodies for legal and compliance purposes.		
220.3 A3	For the purposes of this section, preparing or presenting information includes collecting, recording, measuring, maintaining and approving information.	Remains relevant to CFOs irrespective of activities undertaken.	No
R220.4	When preparing or presenting information, a professional accountant shall: (a) Prepare or present the information in accordance with a relevant reporting framework, where applicable; (b) Prepare or present the information in a manner that is intended neither to mislead others nor to influence contractual or regulatory outcomes inappropriately; (c) Exercise professional judgment to: (i) Represent the facts accurately and completely in all material respects; (ii) Describe clearly the true nature and impacts of business transactions or activities; and (iii) Collect, classify, record or measure information in a timely and proper manner; (d) Not omit anything with the intention of rendering the information misleading or of influencing contractual or regulatory outcomes inappropriately;	Requirement remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	(e) Avoid undue influence of, or undue reliance on, individuals, organizations or technology; and (f) Be aware of the risk of bias.		
220.4 A1	An example of preparing or presenting the information in a manner that is intended to mislead others is deliberately giving a false impression in sustainability information about how well an organization or an investment is aligned with or achieving its sustainability goals, through practices such as: • Omitting relevant information to misrepresent the nature and impacts of business activities. • Including false information. • Inappropriately applying or reporting metrics. • Placing excessive emphasis on certain information while understating other information.	Remains relevant to CFOs irrespective of activities undertaken.	No
220.4 A2	An example of influencing a contractual or regulatory outcome inappropriately is using an unrealistic estimate with the intention of avoiding violation of a contractual requirement such as a debt covenant or of a regulatory requirement such as a capital requirement for a financial institution.	Remains relevant to CFOs irrespective of activities undertaken.	No
220.4 A3	An example of failing to exercise professional judgment to represent the facts accurately and completely in all material respects is placing undue weight on information that corroborates an organization's achievement of its targets or insufficient weight on other information which contradicts such achievement.	Remains relevant to CFOs irrespective of activities undertaken.	No
220.4 A4	An example of placing undue reliance on an organization is using the data provided by a large supplier within the entity's value chain to prepare or present the entity's sustainability information, without considering the source, relevance and sufficiency of that supplier's data.	Remains relevant to CFOs irrespective of activities undertaken.	No
Use of Discretion in Preparing or Presenting Information			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
R220.5	Preparing or presenting information might require the exercise of discretion in making professional judgments. The professional accountant shall not exercise such discretion with the intention of misleading others or influencing contractual or regulatory outcomes inappropriately.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
220.5 A1	Examples of ways in which discretion might be misused to achieve inappropriate outcomes include: • Determining estimates, for example, determining fair value estimates in order to misrepresent profit or loss. • Selecting or changing an accounting policy or method among two or more alternatives permitted under the applicable financial reporting framework, for example, selecting a policy for accounting for long-term contracts in order to misrepresent profit or loss. • Selecting or changing measurement methods among two or more alternatives permitted under the applicable sustainability reporting framework in order to misrepresent information. • Selecting, omitting or obscuring opportunities, risks or impacts as part of a materiality assessment in order to misrepresent sustainability information. • Determining the timing of transactions, for example, timing the sale of an asset near the end of the fiscal year in order to mislead. • Determining the timing of disclosures of sustainability information to achieve a more favorable presentation or outcome in order to mislead. • Determining the structuring of transactions, for example, structuring financing transactions in order to misrepresent assets and liabilities or classification of cash flows. • Selecting disclosures, for example, omitting or obscuring information relating to financial, sustainability or operating risk in order to mislead. • Preparing forward-looking information by relying on assumptions that are unrealistic or inconsistent with management's decisions or objectives in order to mislead.	Remains relevant to CFOs irrespective of activities undertaken. However, stakeholder outreach highlighted additional examples of where discretion might be misused to achieve inappropriate outcomes. While these specific examples are not currently reflected in the Code, they could be addressed as part of any NAM for CFOs that the IESBA might develop.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
R220.6	When performing professional activities, especially those that do not require compliance with a relevant reporting framework, the professional accountant shall exercise professional judgment to identify and consider: (a) The purpose for which the information is to be used; (b) The context within which it is given; and (c) The audience to whom it is addressed.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
220.6 A1	For example, when preparing or presenting pro forma reports, budgets or forecasts, or sustainability information, the inclusion of relevant estimates, approximations and assumptions, where appropriate, would enable those who might rely on such information to form their own judgments.	Remains relevant to CFOs irrespective of activities undertaken.	No
220.6 A2	The professional accountant might also consider clarifying the intended audience, context and purpose of the information to be presented.	Remains relevant to CFOs irrespective of activities undertaken.	No
Using the Work of Others			
R220.7	A professional accountant who intends to use the work of others (whether internal or external to the employing organization) or other organizations, other than external experts, shall exercise professional judgment to determine the appropriate steps to take, if any, in order to fulfill the responsibilities set out in paragraph R220.4.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
220.7 A1	When a professional accountant intends to use the work of an external expert, the requirements and application material set out in Section 290 apply.	Remains relevant to CFOs irrespective of activities undertaken.	No
220.7 A2	Factors to consider when a professional accountant intends to use the work of others include: • The reputation and expertise of, and resources available to, the other individual or organization. • Whether the other individual is subject to applicable professional and ethics standards.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	Such information might be gained from prior association with, or from consulting others about, the other individual or organization.		
Using the Output of Technology			
R220.8	A professional accountant who intends to use the output of technology, whether that technology was developed internally or provided by third parties, shall exercise professional judgment to determine the appropriate steps to take, if any, in order to fulfill the responsibilities set out in paragraph R220.4.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
220.8 A1	Factors to consider when a professional accountant intends to use the output of technology include: • The nature of the activity to be performed by the technology. • The expected use of, or extent of reliance on, the output of the technology. • Whether the accountant has the ability, or has access to an expert with the ability, to understand, use and explain the technology and its appropriateness for the purpose intended. • Whether the technology used has been appropriately tested and evaluated for the purpose intended. • Prior experience with the technology and whether its use for specific purposes is generally accepted. • The employing organization's oversight of the design, development, implementation, operation, maintenance, monitoring, updating or upgrading of the technology. • The controls relating to the use of the technology, including procedures for authorizing user access to the technology and overseeing such use. • The appropriateness of the inputs to the technology, including data and any related decisions, and decisions made by individuals in the course of using the technology.	These factors remain highly relevant to CFOs. Refer paragraph 200.6 A2 with respect to potential NAM.	No Potential NAM
Addressing Information that Is or Might be Misleading			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
R220.9	When the professional accountant knows or has reason to believe that the information with which the accountant is associated is misleading, the accountant shall take appropriate actions to seek to resolve the matter.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
220.9 A1	Actions that might be appropriate include: • Discussing concerns that the information is misleading with the professional accountant's superior and/or the appropriate level(s) of management within the accountant's employing organization or those charged with governance, and requesting such individuals to take appropriate action to resolve the matter. Such action might include: • Having the information corrected. • If the information has already been disclosed to the intended users, informing them of the correct information. • Consulting the policies and procedures of the employing organization (for example, an ethics or whistle-blowing policy) regarding how to address such matters internally.	Remains relevant to CFOs irrespective of activities undertaken.	No
220.9 A2	The professional accountant might determine that the employing organization has not taken appropriate action. If the accountant continues to have reason to believe that the information is misleading, the following further actions might be appropriate provided that the accountant remains alert to the principle of confidentiality: • Consulting with: • A relevant professional body. • The internal or external auditor or sustainability assurance practitioner of the employing organization. • Legal counsel. • Determining whether any requirements exist to communicate to: • Third parties, including users of the information.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Regulatory and oversight authorities.		
R220.10	If after exhausting all feasible options, the professional accountant determines that appropriate action has not been taken and there is reason to believe that the information is still misleading, the accountant shall refuse to be or to remain associated with the information.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
220.10 A1	In such circumstances, it might be appropriate for a professional accountant to resign from the employing organization.	Remains relevant to CFOs irrespective of activities undertaken.	No
Documentation			
220.11 A1	The professional accountant is encouraged to document: • The facts. • The accounting or reporting principles or other relevant professional standards involved. • The communications and parties with whom matters were discussed. • The accountant's analysis, assumptions, courses of action considered, and judgements and decisions made in preparing or presenting the information. • How the accountant attempted to address the matter(s).	Remains relevant to CFOs irrespective of activities undertaken.	No
Other Considerations			
220.12 A1	Where threats to compliance with the fundamental principles relating to the preparation or presentation of information arise from a financial interest, including compensation and incentives linked to financial or non-financial, including sustainability, reporting and decision making, the requirements and application material set out in Section 240 apply.	Remains relevant to CFOs irrespective of activities undertaken.	No
220.12 A2	Where the misleading information might involve non-compliance with laws and regulations, the requirements and application material set out in Section 260 apply.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
220.12 A3	Where threats to compliance with the fundamental principles relating to the preparation or presentation of information arise from pressure, the requirements and application material set out in Section 270 apply.	Remains relevant to CFOs irrespective of activities undertaken.	No
220.12 A4	When a professional accountant is considering using the work of others or the output of technology, a consideration is whether the accountant is in a position within the employing organization to obtain information in relation to the factors necessary to determine whether such use is appropriate.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
SECTION 230			
ACTING WITH SUFFICIENT EXPERTISE			
Introduction			
230.1	Professional accountants are required to comply with the fundamental principles and apply the conceptual framework set out in Section 120 to identify, evaluate and address threats.	Remains relevant to CFOs irrespective of activities undertaken.	No
230.2	Acting without sufficient expertise creates a self-interest threat to compliance with the principle of professional competence and due care. This section sets out specific requirements and application material relevant to applying the conceptual framework in such circumstances.	Remains relevant to CFOs irrespective of activities undertaken.	No
Requirements and Application Material			
General			
R230.3	A professional accountant shall not intentionally mislead an employing organization as to the level of expertise possessed.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
230.3 A1	The principle of professional competence and due care requires that a professional accountant only undertake significant tasks for which the accountant has, or can obtain, sufficient training or experience.	Remains relevant to CFOs irrespective of activities undertaken.	No
230.3 A2	A self-interest threat to compliance with the principle of professional competence and due care might be created if a professional accountant has: • Insufficient time for performing or completing the relevant duties. • Incomplete, restricted or otherwise inadequate information for performing the duties. • Insufficient experience, training and/or education. • Inadequate resources for the performance of the duties.	Remains relevant to CFOs irrespective of activities undertaken. However, stakeholder outreach consistently highlighted the impact of time pressure on CFOs. Participants considered it not as an ethical dilemma in	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
		itself but rather as a threat amplifier. Time pressure may reduce the ability to identify issues, obtain facts, consult experts, consider alternatives, involve the board or audit committee, document the basis for a decision, or apply safeguards. Time pressure, in conjunction with pressure more generally and the application of Section 270 of the Code, could be addressed as part of any NAM for CFOs that the IESBA might develop.	
230.3 A3	Factors that are relevant in evaluating the level of such a threat include: • The extent to which the professional accountant is working with others. • The relative seniority of the accountant in the business. • The level of supervision and review applied to the work.	Remains relevant to CFOs irrespective of activities undertaken.	No
230.3 A4	Examples of actions that might be safeguards to address such a self-interest threat include: • Obtaining assistance or training from someone with the necessary expertise. • Ensuring that there is adequate time available for performing the relevant duties.	Remains relevant to CFOs irrespective of activities undertaken.	No
R230.4	If a threat to compliance with the principle of professional competence and due care cannot be addressed, a professional accountant shall determine whether to decline to	Requirement remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	perform the duties in question. If the accountant determines that declining is appropriate, the accountant shall communicate the reasons.		
Other Considerations			
230.5 A1	The requirements and application material in Section 270 apply when a professional accountant is pressured to act in a manner that might lead to a breach of the principle of professional competence and due care.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 230.3 A2 regarding potential NAM.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
SECTION 240			
FINANCIAL INTERESTS, COMPENSATION AND INCENTIVES LINKED TO FINANCIAL OR NON-FINANCIAL REPORTING AND DECISION MAKING			
Introduction			
240.1	Professional accountants are required to comply with the fundamental principles and apply the conceptual framework set out in Section 120 to identify, evaluate and address threats.	Remains relevant to CFOs irrespective of activities undertaken.	No
240.2	Having a financial interest, or knowing of a financial interest held by an immediate or close family member might create a self-interest threat to compliance with the principles of objectivity or confidentiality. This section sets out specific requirements and application material relevant to applying the conceptual framework in such circumstances.	Remains relevant to CFOs irrespective of activities undertaken.	No
Requirements and Application Material			
General			
R240.3	A professional accountant shall not manipulate information or use confidential information for personal gain or for the financial gain of others.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
240.3 A1	Professional accountants might have financial interests or might know of financial interests of immediate or close family members that, in certain circumstances, might create threats to compliance with the fundamental principles. Financial interests include those arising from compensation or incentive arrangements linked to financial or non-financial, including sustainability, reporting and decision making.	Remains relevant to CFOs irrespective of activities undertaken. However, stakeholder outreach highlighted short-term performance expectations, investor pressure, commercial targets, founder or controlling shareholder	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
		influence, and pressure from CEOs, boards or senior management. These factors could create self-interest threats to objectivity, particularly where the CFO is expected to support a preferred business outcome while also providing independent challenge. This issue could be addressed as part of any NAM for CFOs that the IESBA might develop.	
240.3 A2	Examples of circumstances that might create a self-interest threat include situations in which the professional accountant or an immediate or close family member: • Has a motive and opportunity to manipulate price-sensitive information in order to gain financially. • Holds a direct or indirect financial interest in the employing organization and the value of that financial interest might be directly affected by decisions made by the accountant. • Is eligible for bonus or incentive based on financial or non-financial performance goals and the value of that bonus or incentive might be directly affected by decisions made by the accountant. • Holds, directly or indirectly, deferred bonus share rights or share options in the employing organization, the value of which might be affected by decisions made by the accountant.	These examples remain relevant to CFOs irrespective of activities undertaken. While stakeholder outreach identified additional examples, this could be addressed via NAM (refer para. 240.3 A1).	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	Participates in compensation arrangements which provide incentives to achieve targets or to support efforts to maximize the value of the employing organization's shares. An example of such an arrangement might be through participation in incentive plans which are linked to certain financial or non-financial performance conditions being met.		
240.3 A3	Factors that are relevant in evaluating the level of such a threat include: - The significance of the financial interest. What constitutes a significant financial interest will depend on personal circumstances and the materiality of the financial interest to the individual. - Policies and procedures for a committee independent of management to determine the level or form of senior management remuneration. - In accordance with any internal policies, disclosure to those charged with governance of: - All relevant interests. - Any plans to exercise entitlements or trade in relevant shares. - Internal and external audit procedures that are specific to address issues that give rise to the financial interest.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 240.3 A1 regarding potential NAM.	No Potential NAM
240.3 A4	Threats created by compensation or incentive arrangements might be compounded by explicit or implicit pressure from superiors or colleagues. See Section 270, <i>Pressure to Breach the Fundamental Principles</i>.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 230.3 A2 regarding potential NAM which could also link to pressure and Section 270.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) on NAM
SECTION 250			
INDUCEMENTS, INCLUDING GIFTS AND HOSPITALITY			
Introduction			
250.1	Professional accountants are required to comply with the fundamental principles and apply the conceptual framework set out in Section 120 to identify, evaluate and address threats.	Remains relevant to CFOs irrespective of activities undertaken.	No
250.2	Offering or accepting inducements might create a self-interest, familiarity or intimidation threat to compliance with the fundamental principles, particularly the principles of integrity, objectivity and professional behavior.	Remains relevant to CFOs irrespective of activities undertaken.	No
250.3	This section sets out requirements and application material relevant to applying the conceptual framework in relation to the offering and accepting of inducements when undertaking professional activities that does not constitute non-compliance with laws and regulations. This section also requires a professional accountant to comply with relevant laws and regulations when offering or accepting inducements.	Remains relevant to CFOs irrespective of activities undertaken.	No
Requirements and Application Material			
General			
250.4 A1	An inducement is an object, situation, or action that is used as a means to influence another individual's behavior, but not necessarily with the intent to improperly influence that individual's behavior. Inducements can range from minor acts of hospitality between business colleagues to acts that result in non-compliance with laws and regulations. An inducement can take many different forms, for example: • Gifts. • Hospitality. • Entertainment. • Political or charitable donations.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) on NAM
	• Appeals to friendship and loyalty. • Employment or other commercial opportunities. • Preferential treatment, rights or privileges.		
Inducements Prohibited by Laws and Regulations			
R250.5	In many jurisdictions, there are laws and regulations, such as those related to bribery and corruption, that prohibit the offering or accepting of inducements in certain circumstances. The professional accountant shall obtain an understanding of relevant laws and regulations and comply with them when the accountant encounters such circumstances.	Remains relevant to CFOs irrespective of activities undertaken.	No
Inducements Not Prohibited by Laws and Regulations			
250.6 A1	The offering or accepting of inducements that is not prohibited by laws and regulations might still create threats to compliance with the fundamental principles.	Remains relevant to CFOs irrespective of activities undertaken.	No
Inducements with Intent to Improperly Influence Behavior			
R250.7	A professional accountant shall not offer, or encourage others to offer, any inducement that is made, or which the accountant considers a reasonable and informed third party would be likely to conclude is made, with the intent to improperly influence the behavior of the recipient or of another individual.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
R250.8	A professional accountant shall not accept, or encourage others to accept, any inducement that the accountant concludes is made, or considers a reasonable and informed third party would be likely to conclude is made, with the intent to improperly influence the behavior of the recipient or of another individual.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
250.9 A1	An inducement is considered as improperly influencing an individual's behavior if it causes the individual to act in an unethical manner. Such improper influence can be directed either towards the recipient or towards another individual who has some relationship with the recipient. The fundamental principles are an appropriate frame of reference for a professional accountant in considering what constitutes unethical behavior on the part of the accountant and, if necessary by analogy, other individuals.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) on NAM
250.9 A2	A breach of the fundamental principle of integrity arises when a professional accountant offers or accepts, or encourages others to offer or accept, an inducement where the intent is to improperly influence the behavior of the recipient or of another individual.	Remains relevant to CFOs irrespective of activities undertaken.	No
250.9 A3	The determination of whether there is actual or perceived intent to improperly influence behavior requires the exercise of professional judgment. Relevant factors to consider might include: • The nature, frequency, value and cumulative effect of the inducement. • Timing of when the inducement is offered relative to any action or decision that it might influence. • Whether the inducement is a customary or cultural practice in the circumstances, for example, offering a gift on the occasion of a religious holiday or wedding. • Whether the inducement is an ancillary part of a professional activity, for example, offering or accepting lunch in connection with a business meeting. • Whether the offer of the inducement is limited to an individual recipient or available to a broader group. The broader group might be internal or external to the employing organization, such as other customers or vendors. • The roles and positions of the individuals offering or being offered the inducement. • Whether the professional accountant knows, or has reason to believe, that accepting the inducement would breach the policies and procedures of the counterparty's employing organization. • The degree of transparency with which the inducement is offered. • Whether the inducement was required or requested by the recipient. • The known previous behavior or reputation of the offeror.	Remains relevant to CFOs irrespective of activities undertaken.	No
Consideration of Further Actions			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) on NAM
250.10 A1	If the professional accountant becomes aware of an inducement offered with actual or perceived intent to improperly influence behavior, threats to compliance with the fundamental principles might still be created even if the requirements in paragraphs R250.7 and R250.8 are met.	Remains relevant to CFOs irrespective of activities undertaken.	No
250.10 A2	Examples of actions that might be safeguards to address such threats include: • Informing senior management or those charged with governance of the employing organization of the professional accountant or the offeror regarding the offer. • Amending or terminating the business relationship with the offeror.	Remains relevant to CFOs irrespective of activities undertaken.	No
Inducements with No Intent to Improperly Influence Behavior			
250.11 A1	The requirements and application material set out in the conceptual framework apply when a professional accountant has concluded there is no actual or perceived intent to improperly influence the behavior of the recipient or of another individual.	Remains relevant to CFOs irrespective of activities undertaken.	No
250.11 A2	If such an inducement is trivial and inconsequential, any threats created will be at an acceptable level.	Remains relevant to CFOs irrespective of activities undertaken.	No
250.11 A3	Examples of circumstances where offering or accepting such an inducement might create threats even if the professional accountant has concluded there is no actual or perceived intent to improperly influence behavior include: • Self-interest threats • A professional accountant is offered part-time employment by a vendor. • Familiarity threats • A professional accountant regularly takes a customer or supplier to sporting events. • Intimidation threats • A professional accountant accepts hospitality, the nature of which could be perceived to be inappropriate were it to be publicly disclosed.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) on NAM
250.11 A4	Relevant factors in evaluating the level of such threats created by offering or accepting such an inducement include the same factors set out in paragraph 250.9 A3 for determining intent.	Remains relevant to CFOs irrespective of activities undertaken.	No
250.11 A5	Examples of actions that might eliminate threats created by offering or accepting such an inducement include: • Declining or not offering the inducement. • Transferring responsibility for any business-related decision involving the counterparty to another individual who the professional accountant has no reason to believe would be, or would be perceived to be, improperly influenced in making the decision.	Remains relevant to CFOs irrespective of activities undertaken.	No
250.11 A6	Examples of actions that might be safeguards to address such threats created by offering or accepting such an inducement include: • Being transparent with senior management or those charged with governance of the employing organization of the professional accountant or of the counterparty about offering or accepting an inducement. • Registering the inducement in a log maintained by the employing organization of the accountant or the counterparty. • Having an appropriate reviewer, who is not otherwise involved in undertaking the professional activity, review any work performed or decisions made by the accountant with respect to the individual or organization from which the accountant accepted the inducement. • Donating the inducement to charity after receipt and appropriately disclosing the donation, for example, to those charged with governance or the individual who offered the inducement. • Reimbursing the cost of the inducement, such as hospitality, received. • As soon as possible, returning the inducement, such as a gift, after it was initially accepted.	Remains relevant to CFOs irrespective of activities undertaken.	No
Immediate or Close Family Members			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) on NAM
R250.12	A professional accountant shall remain alert to potential threats to the accountant's compliance with the fundamental principles created by the offering of an inducement: (a) By an immediate or close family member of the accountant to a counterparty with whom the accountant has a professional relationship; or (b) To an immediate or close family member of the accountant by a counterparty with whom the accountant has a professional relationship.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
R250.13	Where the professional accountant becomes aware of an inducement being offered to or made by an immediate or close family member and concludes there is intent to improperly influence the behavior of the accountant or of the counterparty, or considers a reasonable and informed third party would be likely to conclude such intent exists, the accountant shall advise the immediate or close family member not to offer or accept the inducement.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
250.13 A1	The factors set out in paragraph 250.9 A3 are relevant in determining whether there is actual or perceived intent to improperly influence the behavior of the professional accountant or of the counterparty. Another factor that is relevant is the nature or closeness of the relationship, between: (a) The accountant and the immediate or close family member; (b) The immediate or close family member and the counterparty; and (c) The accountant and the counterparty. For example, the offer of employment, outside of the normal recruitment process, to the spouse of the accountant by a counterparty with whom the accountant is negotiating a significant contract might indicate such intent.	Remains relevant to CFOs irrespective of activities undertaken.	No
250.13 A2	The application material in paragraph 250.10 A2 is also relevant in addressing threats that might be created when there is actual or perceived intent to improperly influence the behavior of the professional accountant or of the counterparty even if the immediate or close family member has followed the advice given pursuant to paragraph R250.13.	Remains relevant to CFOs irrespective of activities undertaken.	No
Application of the Conceptual Framework			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) on NAM
250.14 A1	Where the professional accountant becomes aware of an inducement offered in the circumstances addressed in paragraph R250.12, threats to compliance with the fundamental principles might be created where: (a) The immediate or close family member offers or accepts the inducement contrary to the advice of the accountant pursuant to paragraph R250.13; or (b) The accountant does not have reason to believe an actual or perceived intent to improperly influence the behavior of the accountant or of the counterparty exists.	Remains relevant to CFOs irrespective of activities undertaken.	No
250.14 A2	The application material in paragraphs 250.11 A1 to 250.11 A6 is relevant for the purposes of identifying, evaluating and addressing such threats. Factors that are relevant in evaluating the level of threats in these circumstances also include the nature or closeness of the relationships set out in paragraph 250.13 A1.	Remains relevant to CFOs irrespective of activities undertaken.	No
Other Considerations			
250.15 A1	If a professional accountant is offered an inducement by the employing organization relating to financial interests, compensation and incentives linked to performance, the requirements and application material set out in Section 240 apply.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 240.3 A2 regarding potential NAM.	No Potential NAM
250.15 A2	If a professional accountant encounters or is made aware of inducements that might result in non-compliance or suspected non-compliance with laws and regulations by other individuals working for or under the direction of the employing organization, the requirements and application material set out in Section 260 apply.	Remains relevant to CFOs irrespective of activities undertaken.	No
250.15 A3	If a professional accountant faces pressure to offer or accept inducements that might create threats to compliance with the fundamental principles, the requirements and application material set out in Section 270 apply.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
SECTION 260			
RESPONDING TO NON-COMPLIANCE WITH LAWS AND REGULATIONS			
Introduction			
260.1	Professional accountants are required to comply with the fundamental principles and apply the conceptual framework set out in Section 120 to identify, evaluate and address threats.	Remains relevant to CFOs irrespective of activities undertaken.	No.
260.2	A self-interest or intimidation threat to compliance with the principles of integrity and professional behavior is created when a professional accountant becomes aware of non-compliance or suspected non-compliance with laws and regulations.	Remains relevant to CFOs irrespective of activities undertaken.	No
260.3	A professional accountant might encounter or be made aware of non-compliance or suspected non-compliance in the course of carrying out professional activities. This section guides the accountant in assessing the implications of the matter and the possible courses of action when responding to non-compliance or suspected non-compliance with: (a) Laws and regulations generally recognized to have a direct effect on the determination of material amounts and disclosures in the employing organization's financial statements or sustainability information; and (b) Other laws and regulations that do not have a direct effect on the determination of the amounts and disclosures in the employing organization's financial statements or sustainability information, but compliance with which might be fundamental to the operating aspects of the employing organization's business, to its ability to continue its business, or to avoid material penalties.	Remains relevant to CFOs irrespective of activities undertaken.	No
Objectives of the Professional Accountant in Relation to Non-compliance with Laws and Regulations			
260.4	A distinguishing mark of the accountancy profession is its acceptance of the responsibility to act in the public interest. When responding to non-compliance or suspected non-compliance, the objectives of the professional accountant are: (a) To comply with the principles of integrity and professional behavior;	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	(b) By alerting management or, where appropriate, those charged with governance of the employing organization, to seek to: (i) Enable them to rectify, remediate or mitigate the consequences of the identified or suspected non-compliance; or (ii) Deter the non-compliance where it has not yet occurred; and (c) To take such further action as appropriate in the public interest.		
Requirements and Application Material			
General			
260.5 A1	Non-compliance with laws and regulations (“non-compliance”) comprises acts of omission or commission, intentional or unintentional, which are contrary to the prevailing laws or regulations committed by the following parties: (a) The professional accountant’s employing organization; (b) Those charged with governance of the employing organization; (c) Management of the employing organization; or (d) Other individuals working for or under the direction of the employing organization.	Remains relevant to CFOs irrespective of activities undertaken.	No
260.5 A2	Examples of laws and regulations which this section addresses include those that deal with: • Fraud, corruption and bribery. • Money laundering, terrorist financing and proceeds of crime. • Securities markets and trading. • Banking and other financial products and services. • Data protection. • Tax and pension liabilities and payments. • Environmental protection.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Public health and safety. • Protection of human rights. • Labor conditions and rights of employees. • Consumer rights.		
260.5 A3	Non-compliance might result in fines, litigation or other consequences for the employing organization, potentially materially affecting its financial statements or sustainability information. Importantly, such non-compliance might have wider public interest implications in terms of potentially substantial harm to investors, creditors, employees or the general public. For the purposes of this section, non-compliance that causes substantial harm is one that results in serious adverse consequences to any of these parties in financial or non-financial terms. Examples include the perpetration of a fraud resulting in significant financial losses to investors, and breaches of environmental laws and regulations endangering the health or safety of employees or the public.	Remains relevant to CFOs irrespective of activities undertaken.	No
R260.6	In some jurisdictions, there are legal or regulatory provisions governing how professional accountants are required to address non-compliance or suspected non-compliance. These legal or regulatory provisions might differ from or go beyond the provisions in this section. When encountering such non-compliance or suspected non-compliance, the accountant shall obtain an understanding of those legal or regulatory provisions and comply with them, including: (a) Any requirement to report the matter to an appropriate authority; and (b) Any prohibition on alerting the relevant party.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
260.6 A1	A prohibition on alerting the relevant party might arise, for example, pursuant to anti-money laundering legislation.	Remains relevant to CFOs irrespective of activities undertaken.	No
260.7 A1	This section applies regardless of the nature of the employing organization, including whether or not it is a public interest entity.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
260.7 A2	A professional accountant who encounters or is made aware of matters that are clearly inconsequential is not required to comply with this section. Whether a matter is clearly inconsequential is to be judged with respect to its nature and its impact, financial or otherwise, on the employing organization, its stakeholders and the general public.	Remains relevant to CFOs irrespective of activities undertaken.	No
260.7 A3	This section does not address: (a) Personal misconduct unrelated to the business activities of the employing organization; and (b) Non-compliance by parties other than those specified in paragraph 260.5 A1. The professional accountant might nevertheless find the guidance in this section helpful in considering how to respond in these situations.	Remains relevant to CFOs irrespective of activities undertaken.	No
Responsibilities of the Employing Organization's Management and Those Charged with Governance			
260.8 A1	The employing organization's management, with the oversight of those charged with governance, is responsible for ensuring that the employing organization's business activities are conducted in accordance with laws and regulations. Management and those charged with governance are also responsible for identifying and addressing any non-compliance by: (a) The employing organization; (b) An individual charged with governance of the employing organization; (c) A member of management; or (d) Other individuals working for or under the direction of the employing organization.	Remains relevant to CFOs irrespective of activities undertaken.	No
Responsibilities of All Professional Accountants			
R260.9	If protocols and procedures exist within the professional accountant's employing organization to address non-compliance or suspected non-compliance, the accountant shall consider them in determining how to respond to such non-compliance.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
260.9 A1	Many employing organizations have established protocols and procedures regarding how to raise non-compliance or suspected non-compliance internally. These protocols and procedures include, for example, an ethics policy or internal whistle-blowing mechanism. Such protocols and procedures might allow matters to be reported anonymously through designated channels.	Remains relevant to CFOs irrespective of activities undertaken.	No
R260.10	Where a professional accountant becomes aware of a matter to which this section applies, the steps that the accountant takes to comply with this section shall be taken on a timely basis. For the purpose of taking timely steps, the accountant shall have regard to the nature of the matter and the potential harm to the interests of the employing organization, investors, creditors, employees or the general public.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
Responsibilities of Senior Professional Accountants in Business			
260.11 A1	Senior professional accountants in business (“senior professional accountants”) are directors, officers or senior employees able to exert significant influence over, and make decisions regarding, the acquisition, deployment and control of the employing organization’s human, financial, technological, physical and intangible resources. There is a greater expectation for such individuals to take whatever action is appropriate in the public interest to respond to non-compliance or suspected non-compliance than other professional accountants within the employing organization. This is because of senior professional accountants’ roles, positions and spheres of influence within the employing organization.	Paragraphs 260.11 A1 to 260.23 A1 are highly relevant to CFOs (as the most senior in an organization’s finance function) and remain relevant irrespective of activities undertaken. Stakeholder outreach revealed certain situations faced by CFOs that may have represented NOCLAR or suspected NOCLAR. Further, findings from the CFO sessions include that in some instances CFOs are seen as the organization’s ethical or guiding compass.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
		Further, in the extended CFO survey, 45% of respondents identified the expanding CFO role to include organizational culture and ethical leadership. The greater expectation for CFOs with respect to NOCLAR could be addressed as part of any NAM for CFOs that the IESBA might develop.	
Obtaining an Understanding of the Matter			
R260.12	If, in the course of carrying out professional activities, a senior professional accountant becomes aware of information concerning non-compliance or suspected non-compliance, the accountant shall obtain an understanding of the matter. This understanding shall include: (a) The nature of the non-compliance or suspected non-compliance and the circumstances in which it has occurred or might occur; (b) The application of the relevant laws and regulations to the circumstances; and (c) An assessment of the potential consequences to the employing organization, investors, creditors, employees or the wider public.	Requirement remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
260.12 A1	A senior professional accountant is expected to apply knowledge and expertise, and exercise professional judgment. However, the accountant is not expected to have a level of understanding of laws and regulations greater than that which is required for the accountant's role within the employing organization. Whether an act constitutes non-compliance is ultimately a matter to be determined by a court or other appropriate adjudicative body.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
260.12 A2	Depending on the nature and significance of the matter, the senior professional accountant might cause, or take appropriate steps to cause, the matter to be investigated internally. The accountant might also consult on a confidential basis with others within the employing organization or a professional body, or with legal counsel.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
Addressing the Matter			
R260.13	If the senior professional accountant identifies or suspects that non-compliance has occurred or might occur, the accountant shall, subject to paragraph R260.9, discuss the matter with the accountant's immediate superior, if any. If the accountant's immediate superior appears to be involved in the matter, the accountant shall discuss the matter with the next higher level of authority within the employing organization.	Requirement remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
260.13 A1	The purpose of the discussion is to enable a determination to be made as to how to address the matter.	Requirement remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
R260.14	The senior professional accountant shall also take appropriate steps to: (a) Have the matter communicated to those charged with governance; (b) Comply with applicable laws and regulations, including legal or regulatory provisions governing the reporting of non-compliance or suspected non-compliance to an appropriate authority; (c) Have the consequences of the non-compliance or suspected non-compliance rectified, remediated or mitigated; (d) Reduce the risk of re-occurrence; and (e) Seek to deter the commission of the non-compliance if it has not yet occurred.	Requirement remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
260.14 A1	The purpose of communicating the matter to those charged with governance is to obtain their concurrence regarding appropriate actions to take to respond to the matter and to enable them to fulfill their responsibilities.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
260.14 A2	Some laws and regulations might stipulate a period within which reports of non-compliance or suspected non-compliance are to be made to an appropriate authority.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
R260.15	In addition to responding to the matter in accordance with the provisions of this section, the senior professional accountant shall determine whether disclosure of the matter to the employing organization's external auditor and/or sustainability assurance practitioner performing a sustainability assurance engagement that is within the scope of the International Independence Standards in Part 5, if any, is needed.	Requirement remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
260.15 A1	Such disclosure would be pursuant to the senior professional accountant's duty or legal obligation to provide all information necessary to enable the auditor to perform the audit or the sustainability assurance practitioner to perform the sustainability assurance engagement that is within the scope of the International Independence Standards in Part 5.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
Determining Whether Further Action Is Needed			
R260.16	The senior professional accountant shall assess the appropriateness of the response of the accountant's superiors, if any, and those charged with governance.	Requirement remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
260.16 A1	Relevant factors to consider in assessing the appropriateness of the response of the senior professional accountant's superiors, if any, and those charged with governance include whether: • The response is timely. • They have taken or authorized appropriate action to seek to rectify, remediate or mitigate the consequences of the non-compliance, or to avert the non-compliance if it has not yet occurred. • The matter has been disclosed to an appropriate authority where appropriate and, if so, whether the disclosure appears adequate.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
R260.17	In light of the response of the senior professional accountant's superiors, if any, and those charged with governance, the accountant shall determine if further action is needed in the public interest.	Requirement remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
260.17 A1	The determination of whether further action is needed, and the nature and extent of it, will depend on various factors, including: • The legal and regulatory framework. • The urgency of the situation. • The pervasiveness of the matter throughout the employing organization. • Whether the senior professional accountant continues to have confidence in the integrity of the accountant's superiors and those charged with governance. • Whether the non-compliance or suspected non-compliance is likely to recur. • Whether there is credible evidence of actual or potential substantial harm to the interests of the employing organization, investors, creditors, employees or the general public.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
260.17 A2	Examples of circumstances that might cause the senior professional accountant no longer to have confidence in the integrity of the accountant's superiors and those charged with governance include situations where: • The accountant suspects or has evidence of their involvement or intended involvement in any non-compliance. • Contrary to legal or regulatory requirements, they have not reported, or authorized the reporting of, the matter to an appropriate authority within a reasonable period.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
R260.18	The senior professional accountant shall exercise professional judgment in determining the need for, and nature and extent of, further action. In making this determination, the accountant shall take into account whether a reasonable and informed third party would be likely to conclude that the accountant has acted appropriately in the public interest.	Requirement remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
260.18 A1	Further action that the senior professional accountant might take includes: • Informing the management of the parent entity of the matter if the employing organization is a member of a group. • Disclosing the matter to an appropriate authority even when there is no legal or regulatory requirement to do so. • Resigning from the employing organization.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
260.18 A2	Resigning from the employing organization is not a substitute for taking other actions that might be needed to achieve the senior professional accountant's objectives under this section. In some jurisdictions, however, there might be limitations as to the further actions available to the accountant. In such circumstances, resignation might be the only available course of action.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
Seeking Advice			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
260.19 A1	As assessment of the matter might involve complex analysis and judgments, the senior professional accountant might consider: • Consulting internally. • Obtaining legal advice to understand the accountant's options and the professional or legal implications of taking any particular course of action. • Consulting on a confidential basis with a regulatory or professional body.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
Determining Whether to Disclose the Matter to an Appropriate Authority			
260.20 A1	Disclosure of the matter to an appropriate authority would be precluded if doing so would be contrary to law or regulation. Otherwise, the purpose of making disclosure is to enable an appropriate authority to cause the matter to be investigated and action to be taken in the public interest.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
260.20 A2	The determination of whether to make such a disclosure depends in particular on the nature and extent of the actual or potential harm that is or might be caused by the matter to investors, creditors, employees or the general public. For example, the senior professional accountant might determine that disclosure of the matter to an appropriate authority is an appropriate course of action if: • The employing organization is engaged in bribery (for example, of local or foreign government officials for purposes of securing large contracts). • The employing organization is regulated and the matter is of such significance as to threaten its license to operate. • The employing organization is listed on a securities exchange and the matter might result in adverse consequences to the fair and orderly market in the employing organization's securities or pose a systemic risk to the financial markets. • It is likely that the employing organization would sell products that are harmful to public health or safety.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• The employing organization is promoting a scheme to its clients to assist them in evading taxes.		
260.20 A3	The determination of whether to make such a disclosure will also depend on external factors such as: • Whether there is an appropriate authority that is able to receive the information, and cause the matter to be investigated and action to be taken. The appropriate authority will depend upon the nature of the matter. For example, the appropriate authority would be a securities regulator in the case of fraudulent financial reporting or an environmental protection agency in the case of a breach of environmental laws and regulations. • Whether there exists robust and credible protection from civil, criminal or professional liability or retaliation afforded by legislation or regulation, such as under whistle-blowing legislation or regulation. • Whether there are actual or potential threats to the physical safety of the senior professional accountant or other individuals.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
R260.21	If the senior professional accountant determines that disclosure of the matter to an appropriate authority is an appropriate course of action in the circumstances, that disclosure is permitted pursuant to paragraph R114.3 of the Code. When making such disclosure, the accountant shall act in good faith and exercise caution when making statements and assertions.	Requirement remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
Imminent Breach			
R260.22	In exceptional circumstances, the senior professional accountant might become aware of actual or intended conduct that the accountant has reason to believe would constitute an imminent breach of a law or regulation that would cause substantial harm to investors, creditors, employees or the general public. Having first considered whether it would be appropriate to discuss the matter with management or those charged with governance of the employing organization, the accountant shall exercise professional judgment and determine whether to disclose the matter immediately to an	Requirement remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	appropriate authority in order to prevent or mitigate the consequences of such imminent breach. If disclosure is made, that disclosure is permitted pursuant to paragraph R114.3 of the Code.		
Documentation			
260.23 A1	In relation to non-compliance or suspected non-compliance that falls within the scope of this section, the senior professional accountant is encouraged to have the following matters documented: • The matter. • The results of discussions with the accountant's superiors, if any, and those charged with governance and other parties. • How the accountant's superiors, if any, and those charged with governance have responded to the matter. • The courses of action the accountant considered, the judgments made and the decisions that were taken. • How the accountant is satisfied that the accountant has fulfilled the responsibility set out in paragraph R260.17.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 260.11 A1 with respect to potential NAM.	No Potential NAM
Responsibilities of Professional Accountants Other than Senior Professional Accountants [paragraphs R260.24 to 260.27 A1 have not been replicated as they do not apply to senior PAIBs/CFOs]			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
SECTION 270			
PRESSURE TO BREACH THE FUNDAMENTAL PRINCIPLES			
Introduction			
270.1	Professional accountants are required to comply with the fundamental principles and apply the conceptual framework set out in Section 120 to identify, evaluate and address threats.	Remains relevant to CFOs irrespective of activities undertaken.	No
270.2	Pressure exerted on, or by, a professional accountant might create an intimidation or other threat to compliance with one or more of the fundamental principles. This section sets out specific requirements and application material relevant to applying the conceptual framework in such circumstances.	Remains relevant to CFOs irrespective of activities undertaken.	No
Requirements and Application Material			
General			
R270.3	A professional accountant shall not: (a) Allow pressure from others to result in a breach of compliance with the fundamental principles; or (b) Place pressure on others that the accountant knows, or has reason to believe, would result in the other individuals breaching the fundamental principles.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
270.3 A1	A professional accountant might face pressure that creates threats to compliance with the fundamental principles, for example an intimidation threat, when undertaking a professional activity. Pressure might be explicit or implicit and might come from: • Within the employing organization, for example, from a colleague or superior. • An external individual or organization such as a vendor, customer or lender. • Internal or external targets and expectations.	Remains relevant to CFOs irrespective of activities undertaken.	No
270.3 A2	Examples of pressure that might result in threats to compliance with the fundamental principles include:	These examples remain relevant to CFOs.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Pressure related to conflicts of interest: • Pressure from a family member bidding to act as a vendor to the professional accountant's employing organization to select the family member over another prospective vendor. See also Section 210, <i>Conflicts of Interest</i>. • Pressure to influence preparation or presentation of information: • Pressure to report misleading financial or non-financial results to meet investor, analyst, lender or other stakeholder expectations. • Pressure from elected officials on public sector accountants to misrepresent programs or projects to voters. • Pressure to misrepresent, through labeling or otherwise, how certain programs, projects or products are aligned to or achieving sustainability goals. • Pressure from colleagues to misstate income, expenditure, rates of return or sustainability information to bias decision-making on capital projects and acquisitions. • Pressure from superiors to approve or process expenditures that are not legitimate business expenses. • Pressure to suppress internal audit reports containing adverse findings. See also Section 220, <i>Preparation and Presentation of Information</i>. • Pressure to act without sufficient expertise or due care: • Pressure from superiors to inappropriately reduce the extent of work performed. • Pressure from superiors to perform a task without sufficient skills or training or within unrealistic deadlines. • Pressure from supervisors to prepare sustainability information with insufficient data or deficiencies in the quality and accuracy of data available. See also Section 230, <i>Acting with Sufficient Expertise</i>.	However, stakeholder outreach highlighted many additional examples of pressure. Outreach participants consistently identified pressure as a central feature of the current CFO environment. Whilst pressure is not new the outreach suggests that the scale, speed and concentration of pressures have increased. This can make it more difficult for CFOs to identify ethical dimensions, pause to reflect or seek advice, escalate concerns, or exercise professional judgment before decisions are made. While these specific examples are not currently reflected in the Code, they could be addressed as part of any NAM for CFOs that the IESBA might develop.	Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Pressure related to financial interests: • Pressure from superiors, colleagues or others, for example, those who might benefit from participation in compensation or incentive arrangements to manipulate financial or non-financial performance indicators. See also Section 240, <i>Financial Interests, Compensation and Incentives Linked to Financial or Non-Financial Reporting and Decision Making</i>. • Pressure related to inducements: • Pressure from others, either internal or external to the employing organization, to offer inducements to influence inappropriately the judgment or decision making process of an individual or organization. • Pressure from colleagues to accept a bribe or other inducement, for example to accept inappropriate gifts or entertainment from potential vendors in a bidding process. See also Section 250, <i>Inducements, Including Gifts and Hospitality</i>. • Pressure related to non-compliance with laws and regulations: • Pressure to structure a transaction to evade tax. • Pressure to manipulate sustainability information to avoid fines for breaches or environmental laws and regulations. See also Section 260, <i>Responding to Non-compliance with Laws and Regulations</i>. • Pressure related to level of fees: • Pressure exerted by a professional accountant on another professional accountant to provide professional services at a fee level that does not allow for sufficient and appropriate resources (including human, technological and intellectual resources) to perform the services in accordance with technical and professional standards. See also Section 330, <i>Fees and Other Types of Remuneration</i>		

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
270.3 A3	Factors that are relevant in evaluating the level of threats created by pressure include: • The intent of the individual who is exerting the pressure and the nature and extent of the pressure. • The application of laws, regulations, and professional standards to the circumstances. • The culture and leadership of the employing organization including the extent to which they reflect or emphasize the importance of ethical behavior and the expectation that employees will act ethically. For example, a corporate culture that tolerates unethical behavior might increase the likelihood that the pressure would result in a threat to compliance with the fundamental principles. • Policies and procedures, if any, that the employing organization has established, such as ethics or human resources policies that address pressure.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 270.3 A2 regarding potential NAM.	No Potential NAM
270.3 A4	Discussing the circumstances creating the pressure and consulting with others about those circumstances might assist the professional accountant to evaluate the level of the threat. Such discussion and consultation, which requires being alert to the principle of confidentiality, might include: • Discussing the matter with the individual who is exerting the pressure to seek to resolve it. • Discussing the matter with the accountant's superior, if the superior is not the individual exerting the pressure. • Escalating the matter within the employing organization, including when appropriate, explaining any consequential risks to the organization, for example with: • Higher levels of management. • Internal or external auditors or the sustainability assurance practitioner. • Those charged with governance. • Disclosing the matter in line with the employing organization's policies, including ethics and whistleblowing policies, using any established mechanism, such as a confidential ethics hotline.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 270.3 A2 regarding potential NAM.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Consulting with: • A colleague, superior, human resources personnel, or another professional accountant; • Relevant professional or regulatory bodies or industry associations; or • Legal counsel.		
270.3 A5	An example of an action that might eliminate threats created by pressure is the professional accountant's request for a restructure of, or segregation of, certain responsibilities and duties so that the accountant is no longer involved with the individual or entity exerting the pressure.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 270.3 A2 regarding potential NAM.	No Potential NAM
Documentation			
270.4 A1	The professional accountant is encouraged to document: • The facts. • The communications and parties with whom these matters were discussed. • The courses of action considered. • How the matter was addressed.	Remains relevant to CFOs irrespective of activities undertaken. Refer para. 270.3 A2 regarding potential NAM.	No Potential NAM

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
SECTION 280			
TAX PLANNING ACTIVITIES			
Introduction			
280.1	Professional accountants are required to comply with the fundamental principles and apply the conceptual framework set out in Section 120 to identify, evaluate and address threats.	Remains relevant to CFOs.	No
280.2	Performing tax planning activities might create self-interest, self-review, advocacy or intimidation threats to compliance with the fundamental principles.	Remains relevant to CFOs.	No
280.3	This section sets out requirements and application material relevant to applying the conceptual framework in relation to the performance of tax planning activities. This section also requires a professional accountant to comply with relevant tax laws and regulations when performing such activities.	Remains relevant to CFOs.	No
Requirements and Application Material			
General			
Professional Accountants' Public Interest Role in Relation to Tax Planning Activities			
280.4 A1	Professional accountants play an important role in tax planning by contributing their expertise to assist employing organizations in meeting their tax planning goals while complying with tax laws and regulations. In doing so, accountants help to facilitate a more efficient and effective operation of a jurisdiction's tax system, which is in the public interest.	Remains relevant to CFOs.	No
280.4 A2	Employing organizations are entitled to organize their affairs for tax planning purposes. While there are a variety of ways to achieve such purposes, employing organizations have a responsibility to pay taxes as determined by the relevant tax laws and regulations. In this regard, professional accountants' role is to use their expertise to assist their employing organizations in achieving their tax planning goals and meeting their tax obligations. However, when accountants provide such assistance, it might	Remains relevant to CFOs.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	involve certain tax minimization arrangements that, although not prohibited by tax laws and regulations, might create threats to compliance with the fundamental principles.		
280.4 A3	It is ultimately for a tribunal, court or other appropriate adjudicative body to determine whether a tax planning arrangement complies with the relevant tax laws and regulations.	Remains relevant to CFOs.	No
Description of Tax Planning Activities			
280.5 A1	Tax planning activities are advisory activities designed to assist an employing organization in planning or structuring its affairs in a tax-efficient manner.	Remains relevant to CFOs.	No
280.5 A2	Tax planning activities cover a broad range of topics or areas. Examples of such activities include: • Advising management on structuring the employing organization's international operations to minimize its overall taxes. • Advising on the structuring of transfer pricing arrangements, taking into account tax-related transfer pricing guidelines. • Advising management on the utilization of losses in a tax-efficient manner for the employing organization. • Advising the employing organization on the structuring of its capital distribution strategy in a tax-efficient manner. • Advising management on structuring the employing organization's compensation strategy for senior executives to optimize the tax benefits for the employing organization. • Advising a non-profit employing organization on how to structure its business to avoid breaching its non-profit status. • Advising management on structuring the employing organization's investments to take advantage of tax incentives offered by jurisdictions or localities.	Remains relevant to CFOs.	No
280.5 A3	Tax planning activities do not include activities that are generally referred to as tax compliance or tax preparation, which are activities to assist the employing organization in fulfilling its filing, reporting, payment and other obligations under tax laws and	Remains relevant to CFOs.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	regulations. However, if a tax activity comprises both tax planning and tax compliance, the portion that relates to tax planning is covered by this section.		
280.5 A4	This section applies regardless of the nature of the employing organization, including whether it is a public interest entity.	Remains relevant to CFOs.	No
Related Activities			
280.6 A1	There might be circumstances where a professional accountant is involved in performing a related activity for an employing organization that is based on or linked to a tax planning arrangement developed by a third-party provider. In such circumstances, the provisions of this section apply to the underlying tax planning arrangement.	Remains relevant to CFOs.	No
280.6 A2	Examples of such related activities include: • Assisting the employing organization in resolving a dispute with the tax authority on the tax planning arrangement. • Representing the employing organization in administrative or court proceedings regarding the tax planning arrangement. • Implementing the tax planning arrangement for the employing organization. • Advising the employing organization on an acquisition where the valuation depends on the tax planning arrangement established by the target.	Remains relevant to CFOs.	No
Compliance with Laws and Regulations			
280.7 A1	This section does not address tax evasion, which is illegal.	Remains relevant to CFOs.	No
Anti-avoidance Laws and Regulations			
R280.8	Where there are laws and regulations, including those that might be referred to as anti-avoidance rules, that limit or prohibit certain tax planning arrangements, a professional accountant shall obtain an understanding of those laws and regulations and advise the employing organization to comply with them when performing tax planning activities.	Requirement remains relevant to CFOs.	No
Non-compliance with Tax Laws and Regulations			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
280.8 A1	If, in the course of performing a tax planning activity, a professional accountant becomes aware of tax evasion or suspected tax evasion, or other non-compliance or suspected non-compliance with tax laws and regulations by an employing organization, management, those charged with governance or other individuals working for or under the direction of the employing organization, the requirements and application material set out in Section 260 apply.	Remains relevant to CFOs.	No
Responsibilities of Management and Those Charged with Governance of the Employing Organization			
280.9 A1	In relation to tax planning, management, with the oversight of those charged with governance, has a number of responsibilities, including: • Ensuring that the employing organization's tax affairs are conducted in accordance with the relevant tax laws and regulations. • Maintaining all the books and records and implementing the systems of internal control necessary to enable the employing organization to fulfill its tax compliance obligations. • Engaging experts to advise on relevant aspects of the tax planning arrangement. • Deciding whether to accept and implement the professional accountant's recommendation or advice on a tax planning arrangement. • Authorizing the submission of the employing organization's tax returns and dealing with the relevant tax authorities in a timely manner. • Making such disclosures to the relevant tax authorities as might be required by tax laws and regulations or as might be necessary to support a tax position, including details of any tax planning arrangements. • Making appropriate disclosure of tax strategy, policies or other tax-related matters in the financial statements or other relevant public documents in accordance with applicable reporting requirements. • Ensuring that the employing organization's tax planning arrangements are consistent with any publicly disclosed tax strategy or policies.	Remains relevant to CFOs.	No
Responsibilities of All Professional Accountants			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
R280.10	As part of performing a tax planning activity for an employing organization, the professional accountant shall obtain an understanding of the nature of the tax planning activity, including: (a) The purpose, facts and circumstances of the tax planning arrangement; and (b) The relevant tax laws and regulations.	Requirement remains relevant to CFOs.	No
280.11 A1	A professional accountant is expected to apply professional competence and due care in accordance with Subsection 113 when performing a tax planning activity. The accountant is also expected to have an inquiring mind and exercise professional judgment in accordance with Section 120 when considering the specific facts and circumstances relating to the tax planning activity.	Remains relevant to CFOs.	No
Basis for Recommending or Otherwise Advising on a Tax Planning Arrangement			
R280.12	A professional accountant shall recommend or otherwise advise on a tax planning arrangement for an employing organization only if the accountant has determined that there is a credible basis in laws and regulations for the arrangement.	Requirement remains relevant to CFOs.	No
280.12 A1	The determination of whether there is a credible basis involves the exercise of professional judgment by the professional accountant. This determination will vary from jurisdiction to jurisdiction based on the relevant laws and regulations at the time.	Remains relevant to CFOs.	No
280.12 A2	If the professional accountant determines that the tax planning arrangement does not have a credible basis in laws and regulations, paragraph R280.12 does not preclude the accountant from explaining to the accountant's immediate superior or other responsible individual within the employing organization the accountant's rationale for the determination or advising on an alternative arrangement that has a credible basis.	Remains relevant to CFOs.	No
280.12 A3	Paragraph R280.12 also does not preclude the professional accountant from assisting the employing organization to remediate or rectify a tax planning arrangement which lacks a credible basis. Such type of activity is a related activity as described in paragraphs 280.6 A1 and A2. This includes, for example: Assisting the employing organization to restructure a tax planning arrangement to achieve a credible basis as part of a tax dispute resolution activity.	Remains relevant to CFOs.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Agreeing with the employing organization appropriate changes to the tax planning arrangement to achieve a credible basis as part of representing the employing organization in administrative or court proceedings.		
280.12 A4	Examples of actions that a professional accountant might take to determine that there is a credible basis in relation to a particular tax planning arrangement include: • Reviewing the relevant facts and circumstances, including the economic purpose and substance of the arrangement. • Assessing the reasonableness of any assumptions. • Reviewing the relevant tax legislation. • Reviewing legislative proceedings that discuss the intent of the relevant tax legislation. • Reviewing relevant literature such as court decisions, professional or industry journals, and tax authority rulings or guidance. • Considering whether the basis used for the proposed arrangement is an established practice that has not been challenged by the relevant tax authorities. • Considering how likely the proposed arrangement would be accepted by the relevant tax authorities if all the relevant facts and circumstances were disclosed. • Consulting with legal counsel or other experts within or outside the employing organization regarding what a reasonable interpretation of the relevant tax laws and regulations might be. • Consulting with the relevant tax authorities, where applicable.	Remains relevant to CFOs.	No
R280.13	If the professional accountant becomes aware of circumstances that might impact the previous determination of the credible basis, the accountant shall re-assess the validity of that basis.	Requirement remains relevant to CFOs.	No
Consideration of the Overall Tax Planning Recommendation or Advice			
R280.14	In addition to determining that there is a credible basis for the tax planning arrangement, the professional accountant shall exercise professional judgment and consider the	Requirement remains relevant to CFOs.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	reputational, commercial and wider economic consequences that could arise from the way stakeholders might view the arrangement.		
280.14 A1	The reputational and commercial consequences might relate to personal or business implications to the employing organization or implications to the reputation of the employing organization and the profession from a prolonged dispute with the relevant tax or other authorities. The implications to the employing organization might involve adverse publicity, costs, fines or penalties, loss of management time over a significant period, and potential adverse consequences for the employing organization.	Remains relevant to CFOs.	No
280.14 A2	An awareness of the wider economic consequences might take into account the professional accountant's general understanding of the current economic environment and the impact of the tax planning arrangement on the tax base of the jurisdiction, or the relative impacts of the arrangement on the tax bases of multiple jurisdictions, where the employing organization operates.	Remains relevant to CFOs.	No
R280.15	If, having considered the matters set out in paragraph R280.14, the professional accountant decides not to recommend or otherwise advise on a tax planning arrangement that the employing organization would like to pursue, the accountant shall inform management and, if appropriate, those charged with governance, of this and explain the basis for the accountant's conclusion.	Requirement remains relevant to CFOs.	No
Tax Planning Arrangements Involving Multiple Jurisdictions			
280.16 A1	There might be circumstances where a professional accountant becomes aware that an employing organization is obtaining a tax benefit from accounting for the same transaction in more than one jurisdiction, especially if there is no tax treaty between the jurisdictions. In such circumstances, while the employing organization might be in compliance with the tax laws and regulations of each jurisdiction, the accountant might advise management to disclose to the relevant tax authorities the particular facts and circumstances and the tax benefits derived from the transaction in the different jurisdictions.	Remains relevant to CFOs.	No
280.16 A2	Relevant factors the professional accountant might consider in determining whether to make such disclosure include: • The significance of the tax benefits in the relevant jurisdictions.	Remains relevant to CFOs.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Stakeholders' perceptions of the employing organization if the facts and circumstances were known to the stakeholders. • Whether there are globally or nationally accepted principles or practices regarding disclosure of similar situations to the tax authorities in the relevant jurisdictions.		
Circumstances of Uncertainty			
280.17 A1	In determining whether there is a credible basis for the tax planning arrangement, a professional accountant might encounter circumstances giving rise to uncertainty as to whether a proposed tax planning arrangement will be in compliance with the relevant tax laws and regulations. Such uncertainty makes it more challenging for the accountant to determine that there is a credible basis in laws and regulations for the tax planning arrangement and might, therefore, create threats to compliance with the fundamental principles.	Remains relevant to CFOs.	No
280.17 A2	Circumstances that might give rise to uncertainty include: • Difficulty in establishing an adequate factual basis. • Difficulty in establishing an adequate basis of assumptions. • Lack of clarity in the tax laws and regulations and their interpretation, including: • Gaps in the tax laws and regulations. • Challenges to previous court rulings. • Conflicting tax laws and regulations in different jurisdictions in circumstances involving cross-border transactions. • Innovative business models not addressed by the current tax laws and regulations. • Recent court or tax authority rulings or positions that cast doubt on similar tax planning arrangements. • Complexity in interpreting or applying the tax laws and regulations from a technical or legal point of view.	Remains relevant to CFOs.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Lack of a legal precedent, ruling or position. • Lack of clarity regarding the economic purpose and substance of the tax planning arrangement. • Lack of clarity about the ultimate beneficiaries of the tax planning arrangement.		
R280.18	Where there is uncertainty as to whether a tax planning arrangement is or will be in compliance with the relevant tax laws and regulations, a professional accountant shall discuss the uncertainty with management and, if appropriate, those charged with governance.	Requirement remains relevant to CFOs.	No
280.18 A1	The discussion serves a number of purposes, including: • Explaining the professional accountant's assessment about how likely the relevant tax authorities are to have a view that supports the tax planning arrangement where there is a lack of clarity in the interpretation of the relevant tax laws and regulations. • Considering any assumptions made when establishing the basis on which the tax planning advice is provided. • Obtaining any additional information from management and, if appropriate, those charged with governance that might reduce the uncertainty. • Discussing any reputational, commercial or wider economic consequences in pursuing the tax planning arrangement. • Discussing potential courses of action to mitigate the possibility of adverse consequences for the employing organization, including consideration of disclosure to the relevant tax authorities.	Remains relevant to CFOs.	No
Potential Threats Arising from Performing a Tax Planning Activity			
280.19 A1	Performing a tax planning activity for an employing organization might create a self-interest, self-review, advocacy or intimidation threat. For example: • A self-review threat might be created when a professional accountant has recently performed a valuation activity for the employing organization for tax purposes, the output	Remains relevant to CFOs.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	of which is then relied upon or is a key input to a tax planning activity for the employing organization. • A self-interest threat might be created when a professional accountant's career advancement prospects depend on developing a creative tax planning arrangement for which the interpretation of the relevant tax laws and regulations is unclear. • A self-interest threat might be created when a professional accountant participates in an incentive compensation scheme impacted by the accountant's design of a tax planning arrangement. • A self-interest threat might be created when a professional accountant is in possession of confidential information obtained from the accountant's involvement in formulating or drafting tax policy, laws or regulations for a government agency and the confidential information would be valuable in advising the accountant's employing organization in its tax planning arrangements. • Self-interest and advocacy threats might be created when a professional accountant advocates an employing organization's position in a tax planning arrangement which the accountant previously advised on before a tax authority when there are indications that the arrangement might not have a credible basis in laws and regulations. • Self-interest and intimidation threats might be created when a dominant owner or leader of the employing organization exerts significant influence over the design of a particular tax arrangement, in a way that might influence the accountant's determination that there is a credible basis for the arrangement in laws and regulations. • Self-interest and intimidation threats might be created when a professional accountant faces potential dismissal over the position the employing organization is insisting on pursuing regarding a tax planning arrangement.		
280.19 A2	Factors that are relevant in evaluating the level of such threats include: • The degree of transparency regarding the underlying business transaction or circumstances, including, where applicable, the identity of the ultimate beneficiaries. • Whether the tax planning arrangement has a clear economic purpose and substance based on the underlying business transaction or circumstances.	Remains relevant to CFOs.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• The nature and complexity of the underlying business transaction or circumstances. • The complexity or clarity of the relevant tax laws and regulations. • Whether the professional accountant knows, or has reason to believe, that the tax planning arrangement would be contrary to the intent of the relevant tax legislation. • The number of jurisdictions involved and the nature of their tax regimes. • The extent of the professional accountant's expertise in the relevant tax areas. • The significance of the potential tax savings. • The nature and significance of any incentives offered to the professional accountant to develop the arrangement. • The extent to which the professional accountant is aware that the tax planning arrangement reflects an established practice that has not been challenged by the relevant tax authorities. • Whether there is pressure being exerted on the professional accountant. • The degree of urgency in implementing the tax planning arrangement. • Whether it is a tax planning arrangement used for multiple clients with little modification for the employing organization's specific circumstances. • The organizational culture of the employing organization.		
280.19 A3	Examples of actions that might eliminate such threats include: • Advising the employing organization to structure the tax planning arrangement so that it is consistent with an existing interpretation or ruling issued by the relevant tax authorities. • Obtaining an advance ruling from the relevant tax or other authorities, where possible. • Advising management not to pursue the tax planning arrangement.	Remains relevant to CFOs.	No
280.19 A4	Examples of actions that might be safeguards to address such threats include:	Remains relevant to CFOs.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Establishing the identity of the ultimate beneficiaries. • Advising the employing organization to structure the tax planning arrangement so that it better aligns with the underlying economic purpose and substance. • Advising the employing organization to structure the tax planning arrangement based on an established practice that is currently not subject to challenge by the relevant tax authorities or is known to have been accepted by the relevant tax authorities. • Consulting with a legal counsel or other expert within or outside the employing organization in the relevant tax areas. • Obtaining an opinion from an appropriately qualified professional (such as legal counsel or another professional accountant) regarding the interpretation of the relevant tax laws and regulations as applied to the particular circumstances. • Having a tax expert, who is not otherwise involved in the tax planning activity, review any work performed or conclusions reached by the professional accountant with respect to the tax planning arrangement. • Having the employing organization provide full transparency about the tax planning arrangement to the relevant tax authorities, including the goals, business and legal aspects, and ultimate beneficiaries of the tax planning arrangement.		
280.19 A5	Examples of steps a professional accountant might take to establish the identity of the ultimate beneficiaries include: • Making inquiries of management and others within or outside the employing organization, having regard to the principle of confidentiality. • Reviewing the employing organization's tax records, financial statements and other relevant corporate records. • Researching relevant public records.	Remains relevant to CFOs.	No
Communication of Basis of the Tax Planning Recommendation or Advice			

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
R280.20	A professional accountant shall explain to management and, if appropriate, those charged with governance the basis on which the accountant recommended or otherwise advised on a tax planning arrangement to the employing organization.	Requirement remains relevant to CFOs.	No
Disagreement on the Tax Planning Arrangement			
R280.21	If the professional accountant disagrees with the accountant's immediate superior or other responsible individual within the employing organization that a tax planning arrangement that the employing organization would like to pursue has a credible basis, the accountant shall: (a) Inform the immediate superior or other responsible individual within the employing organization, and if appropriate, those charged with governance, of the accountant's assessment; (b) Communicate to them the potential consequences of pursuing the arrangement; and (c) Advise them not to pursue the arrangement.	Requirement remains relevant to CFOs.	No
R280.22	If the immediate superior or other responsible individual within the employing organization decides to pursue the tax planning arrangement, despite the professional accountant's advice to the contrary, the accountant shall consider: (a) Taking steps to have the details of the arrangement and the difference of views communicated with the next higher level of authority within the employing organization and, if appropriate, those charged with governance; (b) Advising the employing organization to make full disclosure of the arrangement to the relevant tax authorities; and (c) Communicating the details of the arrangement and the difference of views to the employing organization's external auditor, if any.	Requirement remains relevant to CFOs.	No
280.22 A1	In light of the response of the immediate superior or other responsible individual within the employing organization to the professional accountant's advice, the accountant might also consider whether there is a need to resign from the employing organization.	Remains relevant to CFOs.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
280.22 A2	Many employing organizations have established protocols and procedures regarding how to raise ethical or other concerns internally. These protocols and procedures include, for example, an ethics policy or internal whistle-blowing mechanism. Such protocols and procedures might allow matters to be reported anonymously through designated channels.	Remains relevant to CFOs.	No
Documentation			
280.23 A1	When performing a tax planning activity, a professional accountant is encouraged to document on a timely basis: • The purpose, circumstances and substance of the tax planning arrangement. • The identity of the ultimate beneficiaries. • The nature of any uncertainties. • The accountant's analysis, the courses of action considered, the judgments made, and the conclusions reached in advising the employing organization on developing the tax planning arrangement. • The results of discussions with the accountant's immediate superior and appropriate levels of management, those charged with governance and other parties. • The response of the accountant's immediate superior, management and, where applicable, those charged with governance to the accountant's advice. • Any disagreement with the accountant's immediate superior, management and, where applicable, those charged with governance.	Remains relevant to CFOs.	No
280.23 A2	Preparing such documentation assists the accountant to: • Consider the reputational, commercial and wider economic consequences that could arise from the way stakeholders might view the arrangement. • Develop the accountant's analysis of the facts, circumstances, relevant tax laws and regulations and any assumptions made or changed. • Record the basis of the professional judgments at the time they were made or changed.	Remains relevant to CFOs.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Support the position if the tax planning arrangement is challenged by the relevant tax authorities. • Demonstrate that the accountant has complied with the provisions in this section.		

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
SECTION 290			
USING THE WORK OF AN EXTERNAL EXPERT			
Introduction			
290.1	Professional accountants are required to comply with the fundamental principles and apply the conceptual framework set out in Section 120 to identify, evaluate and address threats.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.2	A professional accountant might use the work of an external expert in the performance of a professional activity for their employing organization. Using the work of such an external expert might create threats to compliance with the fundamental principles, particularly the principles of integrity, objectivity and professional competence and due care.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.3	This section sets out requirements and application material relevant to applying the conceptual framework in relation to using the work of an external expert.	Remains relevant to CFOs irrespective of activities undertaken.	No
Requirements and Application Material			
General			
290.4 A1	A self-interest threat to compliance with the principles of integrity and professional competence and due care is created if a professional accountant performs a professional activity for which the accountant has insufficient expertise.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.4 A2	An action that might be a safeguard to address such a threat is to use the work of an external expert for the professional activity who has the competence, capabilities and objectivity to deliver the work needed for such activity.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.4 A3	An external expert might be used to undertake specific work to support a professional activity performed by a professional accountant. Such work can be in a field that is well-established or emerging. Examples of such work include:	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• The valuation of assets such as complex financial instruments, land and buildings, plant and machinery, jewelry, works of art, antiques, intangible assets, assets acquired in business combinations, and assets that may have been impaired. • The valuation of liabilities such as those assumed in business combinations, those from actual or threatened litigation, environmental liabilities, complex financial instruments, site clean-up liabilities, and those associated with insurance contracts or employee benefit plans. • The calculation of greenhouse gas emissions. • The measurement of pollutants emitted to air, water and soil. • The assessment of forward-looking information about the decarbonization plans of an entity. • The assessment of the application of offsetting mechanisms for an entity, such as for carbon or biodiversity. • The valuation of products and materials designed along principles for a sustainable economy. • The estimation of oil and gas reserves. • The interpretation of contracts, laws and regulations, including tax and labor laws and regulations. • The assessment and evaluation of IT systems, including those related to cybersecurity.		
290.4 A4	This section does not apply to: (a) The use of the work of individuals or organizations that are engaged by the professional accountant and are under the accountant's direction, supervision and review, for example, subcontractors; and (b) The use of information provided by individuals or organizations that are external information sources for general use. Examples of those information sources include those that provide industry or other benchmarking data or studies, such as information about employment statistics including hours worked and compensation per week by	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	geographical area, real estate prices, carbon emissions by vehicle type, mortality tables, or other datasets for general use.		
Agreeing the Terms of Engagement with an External Expert			
R290.5	If the professional accountant has determined to use an external expert for a professional activity and, having regard to the employing organization's policies and procedures, has identified an external expert for such purpose, the accountant shall agree the terms of engagement with the external expert, including the nature, scope and objectives of the work to be performed by the external expert.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
290.5 A1	In agreeing the terms of engagement, matters that the professional accountant might discuss with the external expert include: • The intended use and timing of the external expert's work. • The external expert's planned approach to the work. • Expectations regarding: • The confidentiality of the external expert's work and the inputs to that work. • The information to be provided by the external expert and the nature of such information. • The content and format of the external expert's completed work, including any assumptions made and limitations to that work. • The fees for the external expert's work. • The external expert's communication of any non-compliance or suspected non-compliance with laws and regulations committed by the professional accountant's employing organization, or by those charged with governance, management or others working for or under the direction of the employing organization, of which the external expert becomes aware when performing the work.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.5 A2	A self-interest, self-review, familiarity or advocacy threat to compliance with the principles of integrity, objectivity and professional competence and due care might be created if a professional accountant uses an external expert who does not have the	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	necessary competence, capabilities or objectivity to deliver the work needed for the particular professional activity.		
Evaluating the External Expert's Competence, Capabilities, and Objectivity			
R290.6	The professional accountant shall evaluate whether the external expert has the necessary competence for the accountant's purpose.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
290.6 A1	Competence relates to the nature and level of expertise of the external expert.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.6 A2	Factors that are relevant in evaluating whether the external expert has the necessary competence include: • Whether the external expert's credentials, education, training, experience and reputation are relevant to, or consistent with, the nature of the work to be performed. • Whether the external expert belongs to a relevant professional body or is subject to oversight by a regulatory body or other authority, and, if so, whether the external expert is in good standing. • Whether any disciplinary actions have been published by a regulatory body or other authority relating to the external expert's competence. • Whether the external expert's work is subject to legal and regulatory requirements or professional standards issued by a recognized body, or follows generally accepted principles or practices in the external expert's field or area of expertise. • Whether the external expert can explain their work, including the inputs, assumptions and methodologies used. • Whether the external expert has a history of performing similar work.	Remains relevant to CFOs irrespective of activities undertaken.	No
R290.7	The professional accountant shall evaluate whether the external expert has the necessary capabilities for the accountant's purpose.	Requirement remains relevant to CFOs	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
		irrespective of activities undertaken.	
290.7 A1	Capabilities relates to the ability of the external expert to exercise their competence in the circumstances of the professional activity.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.7 A2	Factors that are relevant in evaluating whether the external expert has the necessary capabilities include: • The resources available to the external expert. • Whether the external expert has sufficient time to perform the work.	Remains relevant to CFOs irrespective of activities undertaken.	No
R290.8	The professional accountant shall evaluate whether the external expert has the necessary objectivity for the accountant's purpose.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
290.8 A1	Objectivity relates to the possible effects that bias, conflict of interest, or the undue influence of, or undue reliance on, others might have on the professional or business judgment of the external expert.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.8 A2	Factors that are relevant in identifying threats to the objectivity of the external expert for the period during which the external expert is performing the work include: • Whether the external expert or their employing organization has an actual or potential conflict of interest or other interests in relation to the work the external expert is performing at the entity. • Whether the professional accountant is aware of any potential bias that might affect the external expert's work. • Whether the external expert is charging a contingent fee, and if so, the basis for such fee. • Whether the external expert will evaluate or rely on any previous judgments made or activities performed by the external expert or their employing organization in relation to the subject matter of the external expert's work.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
290.8 A3	The external expert's employing organization is the entity that directly employs the expert, regardless of the legal form of the employment, and does not extend to other entities that might control, or are otherwise related to, the employing organization.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.8 A4	Other interests that might impact the level of threat to an external expert's objectivity include significant financial interests such as those arising from compensation, fees or incentive arrangements linked to financial and non-financial information and decision-making.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.8 A5	Examples of previous judgments made or activities performed by an external expert or their employing organization that might create a self-review threat to the external expert's objectivity include: • Having advised the entity on the matter for which the external expert is performing the work. • Having produced data or other information, or having designed, developed, implemented, operated, maintained, monitored, updated or upgraded an IT system, for the entity which is then used by the external expert in performing the work or is the subject of that work.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.8 A6	Factors that are relevant in evaluating the level of such threats to the external expert's objectivity include: • The existence of conditions, policies and procedures established by the external expert's profession, legislation, regulation, or the external expert's employing organization, including whether the external expert is subject to ethics standards issued by a body responsible for issuing such standards in the external expert's field of expertise. • The nature and scope of the external expert's work. • The existence and adequacy of any quality management system employed by the external expert.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
290.8 A7	Examples of actions that might be safeguards to address threats to an external expert's objectivity include: • Consulting with qualified personnel, or a professional outside the professional accountant's employing organization, who have the necessary expertise to evaluate the external expert's work for the intended purpose. • Requesting the external expert to take steps to address a conflict of interest, for example, implementing measures to segregate the work from such conflict of interest. • Restructuring or reassigning the part of the external expert's work giving rise to the threat to another external expert.	Remains relevant to CFOs irrespective of activities undertaken.	No
Sources of Information			
290.9 A1	Information about the external expert's competence, capabilities and objectivity might be obtained from various sources, including: • Personal association or experience with previous work undertaken by the external expert. • Inquiry of others within or outside the professional accountant's employing organization who are familiar with the external expert's work. • Discussion with the external expert about their background, including their field of expertise and business activities. • Inquiry of the external expert's professional body or industry association. • Articles, papers or books written by the external expert and published by a recognized publisher or in a recognized journal or other medium. • Published records, such as legal proceedings involving the external expert. • Inquiry of management of the professional accountant's employing organization and, if different, the entity at which the external expert is performing the work regarding any interests and relationships between the external expert and the employing organization or the entity.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	The internal controls, policies and procedures of the professional accountant's employing organization.		
Additional Considerations when Evaluating Competence, Capabilities and Objectivity			
290.10 A1	Evaluating whether an external expert has the necessary competence, capabilities and objectivity for the professional accountant's purpose involves exercising professional judgment and using the reasonable and informed third party test.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.10 A2	A professional accountant might face pressure to breach the fundamental principles if the accountant encounters difficulties in concluding, or is unable to conclude, that the external expert has the necessary competence, capabilities and objectivity for the accountant's purpose when the external expert has already performed a significant portion of their work. In such circumstances, Section 270 is relevant in considering how to address such pressure.	Remains relevant to CFOs irrespective of activities undertaken.	No
Consideration of New Information or Changes in Facts or Circumstances			
R290.11	The professional accountant shall re-evaluate whether the external expert has the necessary competence, capabilities and objectivity for the accountant's purpose when new information or changes in facts and circumstances arise.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No
Concluding on the External Expert's Competence, Capabilities and Objectivity			
R290.12	The professional accountant shall not use the work of the external expert if the accountant: (a) Is unable to determine whether the external expert has the necessary competence or capabilities, or is objective; (b) Determines that the external expert does not have the necessary competence or capabilities for the accountant's purpose; or (c) Determines that there are threats to the external expert's objectivity that cannot be eliminated or reduced to an acceptable level.	Requirement remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
290.12 A1	If a professional accountant uses the work of such external expert, this creates threats to the accountant's compliance with the principles of integrity, objectivity and professional competence and due care that cannot be eliminated or reduced to an acceptable level by the application of safeguards.	Remains relevant to CFOs irrespective of activities undertaken.	No
Potential Threats Arising from Using the Work of an External Expert			
290.13 A1	Threats to compliance with the fundamental principles might still be created from using the work of an external expert even if a professional accountant has satisfactorily concluded that the external expert has the necessary competence, capabilities and objectivity for the accountant's purpose.	Remains relevant to CFOs irrespective of activities undertaken.	No
Identifying Threats			
290.14 A1	Examples of facts and circumstances that might create threats to a professional accountant's compliance with the fundamental principles when using an external expert's work include: (a) Self-interest threats • A professional accountant has insufficient expertise to understand and explain the external expert's conclusions and findings. • A professional accountant has undue influence from, or undue reliance on, the external expert or multiple external experts when performing a professional activity. • A professional accountant has insufficient time or resources to evaluate the external expert's work. (b) Self-review threats • A professional accountant uses the work of an external expert who relies on previous judgments made by the accountant and provided to the external expert for the purposes of their work. (c) Advocacy threats	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• A professional accountant promotes the use of an external expert who has known bias towards conclusions potentially advantaging or disadvantaging the professional accountant's employing organization. (d) Familiarity threats • A professional accountant has a close personal relationship with the external expert. (e) Intimidation threats • A professional accountant feels pressure to defer to the external expert's opinion due to the external expert's perceived authority. • A professional accountant feels pressure to use the work of a particular external expert in order to meet internal or external targets and expectations.		
Evaluating Threats			
290.15 A1	Factors that are relevant in evaluating the level of such threats include: • The scope and purpose of the external expert's work. • The impact of the external expert's work on the professional accountant's activity. • The nature of the professional activity for which the external expert's work is intended to be used. • The professional accountant's oversight relating to the use of the external expert and the external expert's work. • The appropriateness of, and transparency over, the data, assumptions and other inputs and methods used by the external expert. • The professional accountant's ability to understand and explain the external expert's work and its appropriateness for the intended purpose. • Whether the external expert's work is subject to technical performance standards or other professional or industry generally accepted practices, or law or regulation.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
	• Whether the external expert's work, if it were to be performed by two or more parties, is not likely to be materially different. • The consistency of the external expert's work, including the external expert's conclusions or findings, with other information. • The availability of other evidence, including peer-reviewed academic research, to support the external expert's approach. • Whether there is pressure being exerted by the professional accountant's employing organization to accept the external expert's conclusions or findings due to the time or cost spent by the external expert in performing the work.		
Addressing Threats			
290.16 A1	An example of an action that might eliminate a familiarity threat is identifying a different external expert to use.	Remains relevant to CFOs irrespective of activities undertaken.	No
290.16 A2	Examples of actions that might be safeguards to address threats include: • Consulting with qualified personnel, or a professional outside the professional accountant's employing organization, who have the necessary expertise to evaluate the external expert's work, obtaining additional input, or challenging the appropriateness of the external expert's work for the intended purpose. • Using another external expert to reperform the external expert's work. • Agreeing with management of the professional accountant's employing organization additional time or resources to complete the activity.	Remains relevant to CFOs irrespective of activities undertaken.	No
Other Matters			
External Experts in Emerging Fields or Areas			
290.17 A1	Expertise in emerging fields or areas might evolve depending on how laws, regulations and generally accepted practices develop. Emerging fields might also involve multiple areas of expertise. There might therefore be limited availability of external experts in emerging fields or areas.	Remains relevant to CFOs irrespective of activities undertaken.	No

Paragraph number	Text	IESBA Staff Analysis	Any Gap (Y/N) or NAM
290.17 A2	Information relating to some of the factors relevant to evaluating the competence of an external expert in paragraph 290.6 A2 might not be available in an emerging field or area. For example, there might not be public recognition of the external expert, professional standards might not have been developed, or professional bodies might not have been established in the emerging field. In such circumstances, a factor that might assist the professional accountant in evaluating an external expert's competence is the external expert's experience in a similar field to the emerging field, or in an established field, that provides a reasonable basis for the external expert's work in the emerging field.	Remains relevant to CFOs irrespective of activities undertaken.	No
Communicating with Management and Those Charged with Governance When Using the Work of an External Expert			
290.18 A1	Where appropriate, the professional accountant is encouraged to communicate with management and those charged with governance: • The purpose of using an external expert and the scope of the external expert's work. • The respective roles and responsibilities of the accountant and the external expert in the performance of the professional activity. • Any threats to the accountant's compliance with the fundamental principles created by using the external expert's work and how they have been addressed.	Remains relevant to CFOs irrespective of activities undertaken.	No
Documentation			
290.19 A1	The professional accountant is encouraged to document: • The steps taken by the accountant to evaluate the external expert's competence, capabilities and objectivity, and the resulting conclusions. • Any significant threats identified by the accountant in using the external expert's work and the actions taken to address the threats. • The results of any significant discussions with the external expert.	Remains relevant to CFOs irrespective of activities undertaken.	No

APPENDIX FOUR-B: ANALYSIS OF THE GLOSSARY TO THE CODE

The following table sets out the PT's analysis of the Glossary of the Code¹⁹ which was based on the following parameters:

- **Column 1 – Defined Term** – Defined term used in the Code. The analysis does not replicate defined terms or other terms described in the Code that do not apply to PAIBs.
- **Column 2 – Definition** – Corresponding definition of the defined term in the Code.
- **Column 3 – IESBA Staff Analysis** – PT's analysis of the Code's definition against the expanded and evolved CFO role. It identifies the PT's view as to whether the definition remains fit-for-purpose for PAIB CFOs.
- **Column 4 – Any Gap (Y/N) or NAM** – Following the PT's analysis in Column 3 it highlights whether a revision to the definition is required to address the expanded and evolved CFO role and areas of potential NAM.

GLOSSARY, INCLUDING LISTS OF ABBREVIATIONS

In the *International Code of Ethics for Professional Accountants (including International Independence Standards)*, the singular shall be construed as including the plural as well as the reverse, and the terms below have the following meanings assigned to them.

In this Glossary, explanations of defined terms are shown in regular font; italics are used for explanations of described terms which have a specific meaning in certain parts of the Code or for additional explanations of defined terms. References are also provided to terms described in the Code.

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
Acceptable level	A level at which a professional accountant or sustainability assurance practitioner using the reasonable and informed third party test would likely conclude that the accountant or practitioner complies with the fundamental principles.	Term used in Parts 1 and 2 and remains relevant to PAIB CFOs (hereinafter referred to as CFOs in this	No

¹⁹ The current draft of the 2026 IESBA Handbook was used for the purposes of this analysis as it contains relevant revisions to Parts 1 and 2 and the Glossary of the Code resulting from the [International Ethics Standards for Sustainability Assurance \(including International Independence Standards\) and related revisions to the Code](#) issued in January 2025 with an effective date of December 15, 2026.

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
		appendix) irrespective of activities undertaken.	
Advertising	The communication to the public of information as to the services or skills provided by professional accountants in public practice or sustainability assurance practitioners with a view to procuring professional business.	Term used in para. 115.2 A1 but not in the context of CFOs.	No
Appropriate reviewer	<i>An appropriate reviewer is a professional with the necessary knowledge, skills, experience and authority to review, in an objective manner, the relevant work performed or service provided. Such an individual might be a professional accountant or a sustainability assurance practitioner. This term is described in paragraphs 300.8 A4 and 5300.8 A3.</i>	Term used in para. 250.11 A6 and remains relevant to CFOs irrespective of activities undertaken.	No
Assurance engagement	An engagement in which a professional accountant in public practice aims to obtain sufficient appropriate evidence in order to express a conclusion designed to enhance the degree of confidence of the intended users other than the responsible party about the subject matter information. (ISAE 3000 (Revised) describes the elements and objectives of an assurance engagement conducted under that Standard and the Assurance Framework provides a general description of assurance engagements to which <i>International Standards on Auditing</i>TM (ISAsTM), <i>International Standards on Review Engagements</i>TM (ISREsTM), <i>International Standards on Assurance Engagements</i>TM (ISAEsTM) and <i>International Standards on Sustainability Assurance</i> (ISSAs) apply.) <i>In Part 4B, the term ‘assurance engagement’ addresses assurance engagements other than audit engagements, review engagements, or sustainability assurance engagements addressed in Part 5.</i>	Term used in Parts 1 and 2 and remains relevant to CFOs irrespective of activities undertaken.	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
Assurance team	(a) All members of the engagement team for the assurance engagement; (b) All others within, or engaged by, the firm who can directly influence the outcome of the assurance engagement, including: (i) Those who recommend the compensation of, or who provide direct supervisory, management or other oversight of the assurance engagement partner in connection with the performance of the assurance engagement; (ii) Those who provide consultation regarding technical or industry-specific issues, transactions or events for the assurance engagement; and (iii) Those who perform an engagement quality review, or a review consistent with the objective of an engagement quality review, for the engagement. <i>In the case of sustainability assurance engagements addressed in Part 5, see the definition of “sustainability assurance team.”</i>	Term used in para. 120.15 A1 but not in the context of CFOs.	No
Audit	<i>In Part 4A, the term “audit” applies equally to “review.”</i>	Term used in Parts 1 and 2 and remains relevant to CFOs irrespective of activities undertaken.	No
Audit engagement	A reasonable assurance engagement in which a professional accountant in public practice expresses an opinion whether financial statements are prepared, in all material respects (or give a true and fair view or are presented fairly, in all material respects), in accordance with an applicable financial reporting framework, such as an engagement conducted in accordance	Term used in para. 120.3 A1 but not in the context of CFOs.	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
	with <i>International Standards on Auditing</i> . This includes a Statutory Audit, which is an audit required by legislation or other regulation. <i>In Part 4A, the term “audit engagement” applies equally to “review engagement.”</i>		
Audit report	<i>In Part 4A, the term “audit report” applies equally to “review report.”</i>	Term used in para. 270.3 A2 and remains relevant to CFOs irrespective of activities undertaken.	No
Close family	A parent, child or sibling who is not an immediate family member.	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
Conceptual framework	<i>This term is described in Sections 120 and 5120.</i>	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
Confidential information	Any information, data or other material in whatever form or medium (including written, electronic, visual or oral) that is not publicly available.	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
Contingent fee	A fee calculated on a predetermined basis relating to the outcome of a transaction or the result of the services performed by the firm. A fee established by a court or other public authority is not a contingent fee.	Term used in para. 290.8 A2 and remains applicable to CFOs irrespective of activities undertaken.	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
Expert	An individual possessing expertise that is outside the professional accountant's or sustainability assurance practitioner's competence. Where appropriate, the term also refers to the individual's organization.	Term used in Parts 1 and 2 and remains relevant to CFOs irrespective of activities undertaken.	No
Expertise	Skills, knowledge and experience in a particular field.	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
External expert	An expert engaged by a professional accountant, professional accountant's employing organization or firm, or by a sustainability assurance practitioner. <i>In the context of audit engagements, an expert (who is not a partner or a member of the professional staff, including temporary staff, of the firm or a network firm) possessing expertise in a field other than accounting or auditing, whose work in that field is used to assist the professional accountant in obtaining sufficient appropriate audit evidence.</i> <i>In the context of other assurance engagements, including sustainability assurance engagements, an expert (who is not an engagement leader, a partner or a member of the professional staff, including temporary staff, of the firm or a network firm) possessing expertise in a field other than assurance, whose work in that field is used to assist the professional accountant or sustainability assurance practitioner in obtaining sufficient appropriate evidence.</i> <i>In the context of audit and other assurance engagements, external experts are not members of the engagement team,</i>	Term used in Parts 1 and 2 and remains relevant to CFOs irrespective of activities undertaken.	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
	<i>audit team, review team, assurance team, or sustainability assurance team.</i> <i>Sections 290, 390 and 5390 set out the requirements and application material addressing the use of the work of an external expert.</i>		
Financial interest	An interest in an equity or other security, debenture, loan or other debt instrument of an entity, including rights and obligations to acquire such an interest and derivatives directly related to such interest.	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
Financial statements	A structured representation of historical financial information, including related notes, intended to communicate an entity's economic resources or obligations at a point in time or the changes therein for a period of time in accordance with a financial reporting framework. The related notes ordinarily comprise a summary of significant accounting policies and other explanatory information. The term can relate to a complete set of financial statements, but it can also refer to a single financial statement, for example, a balance sheet, or a statement of revenues and expenses, and related explanatory notes. <i>The term does not refer to specific elements, accounts or items of a financial statement.</i>	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
Firm	(a) A sole practitioner, partnership or corporation of professional accountants or sustainability assurance practitioners; (b) An entity that controls such parties, through ownership, management or other means; and	Term used in Parts 1 and 2 but not in the context of CFOs.	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)										
	(c) An entity controlled by such parties, through ownership, management or other means. <i>Paragraphs 400.4 and 900.3 explain how the word “firm” is used to address the responsibility of professional accountants and firms for compliance with Parts 4A and 4B, respectively.</i> <i>Paragraph 5400.4 explains how the word “firm” is used to address the responsibility of individual sustainability assurance practitioners and firms for compliance with Part 5.</i>												
Fundamental principles	<i>This term is described in paragraphs 110.1 A1 and 5110.1 A1. Each of the fundamental principles is, in turn, described in the following paragraphs:</i> <table><tr><td><i>Integrity</i></td><td><i>R111.1 and R5111.1</i></td></tr><tr><td><i>Objectivity</i></td><td><i>R112.1 and R5112.1</i></td></tr><tr><td><i>Professional competence and due care</i></td><td><i>R113.1 and R5113.1</i></td></tr><tr><td><i>Confidentiality</i></td><td><i>R114.1 to R114.3 and R5114.4 to R5114.3</i></td></tr><tr><td><i>Professional behavior</i></td><td><i>R115.1 and R5115.1</i></td></tr></table>	<i>Integrity</i>	<i>R111.1 and R5111.1</i>	<i>Objectivity</i>	<i>R112.1 and R5112.1</i>	<i>Professional competence and due care</i>	<i>R113.1 and R5113.1</i>	<i>Confidentiality</i>	<i>R114.1 to R114.3 and R5114.4 to R5114.3</i>	<i>Professional behavior</i>	<i>R115.1 and R5115.1</i>	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
<i>Integrity</i>	<i>R111.1 and R5111.1</i>												
<i>Objectivity</i>	<i>R112.1 and R5112.1</i>												
<i>Professional competence and due care</i>	<i>R113.1 and R5113.1</i>												
<i>Confidentiality</i>	<i>R114.1 to R114.3 and R5114.4 to R5114.3</i>												
<i>Professional behavior</i>	<i>R115.1 and R5115.1</i>												
Group	A reporting entity for which group financial statements or group sustainability information is prepared.	Term used in para. 260.18 A1 and remains applicable to CFOs irrespective of activities undertaken.	No										
Immediate family	A spouse (or equivalent) or dependent.	Term used in para. 210.4 A1 and remains applicable to CFOs irrespective of activities undertaken.	No										

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
Independence	Independence comprises: (a) Independence of mind – the state of mind that permits the expression of a conclusion without being affected by influences that compromise professional judgment, thereby allowing an individual to act with integrity, and exercise objectivity and professional skepticism. (b) Independence in appearance – the avoidance of facts and circumstances that are so significant that a reasonable and informed third party would be likely to conclude that a firm's, or an audit or assurance, or sustainability assurance team member's, integrity, objectivity or professional skepticism has been compromised. <i>As set out in paragraphs 400.5, 900.4 and R5400.5, references to an individual or firm being "independent" mean that the individual or firm has complied with Parts 4A, 4B and 5, as applicable.</i>	Term used in Parts 1 and 2 but not in the context of CFOs.	No
Indirect financial interest	A financial interest beneficially owned through a collective investment vehicle, estate, trust or other intermediary over which the individual or entity has no control or ability to influence investment decisions.	Term used in para. 240.3 A2 and remains applicable to CFOs irrespective of activities undertaken.	No
Inducement	An object, situation, or action that is used as a means to influence another individual's behavior, but not necessarily with the intent to improperly influence that individual's behavior. <i>Inducements can range from minor acts of hospitality between business colleagues (for professional accountants in business), or between professional accountants and existing or prospective clients (for professional accountants in public practice), or between sustainability assurance practitioners and existing or prospective sustainability assurance clients, to acts</i>	Term used in Section 250 and para. 240.3 A2 and remains applicable to CFOs irrespective of activities undertaken.	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
	<i>that result in non-compliance with laws and regulations. An inducement can take many different forms, for example:</i> <i>• Gifts.</i> <i>• Hospitality.</i> <i>• Entertainment.</i> <i>• Political or charitable donations.</i> <i>• Appeals to friendship and loyalty.</i> <i>• Employment or other commercial opportunities.</i> <i>• Preferential treatment, rights or privileges.</i>		
May	<i>This term is used in the Code to denote permission to take a particular action in certain circumstances, including as an exception to a requirement. It is not used to denote possibility.</i>	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
Might	<i>This term is used in the Code to denote the possibility of a matter arising, an event occurring or a course of action being taken. The term does not ascribe any particular level of possibility or likelihood when used in conjunction with a threat, as the evaluation of the level of a threat depends on the facts and circumstances of any particular matter, event or course of action.</i>	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
Non-compliance with laws and regulations (Professional Accountants in Business)	<i>Non-compliance with laws and regulations (“non-compliance”) comprises acts of omission or commission, intentional or unintentional, which are contrary to the prevailing laws or regulations committed by the following parties:</i> <i>(a) The professional accountant’s employing organization;</i> <i>(b) Those charged with governance of the employing organization;</i>	Term used in Section 260 and remains applicable to CFOs irrespective of activities undertaken.	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
	(c) <i>Management of the employing organization; or</i> (d) <i>Other individuals working for or under the direction of the employing organization.</i> <i>This term is described in paragraph 260.5 A1.</i>		
Professional accountant	An individual who is a member of an IFAC member body. <i>In Part 1, the term “professional accountant” refers to individual professional accountants in business and to professional accountants in public practice and their firms.</i> <i>In Part 2, the term “professional accountant” refers to professional accountants in business.</i> <i>In Parts 3, 4A and 4B, the term “professional accountant” refers to professional accountants in public practice and their firms.</i>	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
Professional accountant in business	A professional accountant working in areas such as commerce, industry, service, the public sector, education, the not-for-profit sector, or in regulatory or professional bodies, who might be an employee, contractor, partner, director (executive or non-executive), owner-manager or volunteer.	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
Professional accountant in public practice	A professional accountant, irrespective of functional classification (for example, audit, tax or consulting) in a firm that provides professional services. <i>The term “professional accountant in public practice” is also used to refer to a firm of professional accountants in public practice.</i>	Term used in Parts 1 and 2 but not relevant to CFOs.	No
Professional activity	An activity requiring professional skills undertaken by a professional accountant or a sustainability assurance practitioner, including accounting, auditing, sustainability	The reference to “ <i>activity requiring professional skills</i> ” is broad enough to capture the additional	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
	reporting or assurance tax, consulting, and financial management.	responsibilities and functions that now fall within the CFO mandate, including strategy, technology and AI, risk, and data governance. While the list of such activities “<i>including accounting, auditing, sustainability reporting or assurance tax, consulting, and financial management</i>” is not intended to be exhaustive, it is centered in accounting-related and sustainability activities. However, the PT is of the view that to create an exhaustive list of all CFO-related activities would be difficult to establish and remain evergreen due to the dynamic and continuing evolution of the role.	
Professional judgment	<i>Professional judgment involves the application of relevant training, professional knowledge, skill and experience commensurate with the facts and circumstances, taking into account the nature and scope of the particular professional activities, and the interests and relationships involved.</i> <i>This term is described in paragraph 120.5 A4 and 5120.5 A4.</i>	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
Professional services	Professional activities performed for clients.	Term used in para. 270.3 A2 but not in the context of CFOs.	No
Public interest entity	For the purposes of Part 4A, an entity is a public interest entity when it falls within any of the following categories: (a) A publicly traded entity; (b) An entity one of whose main functions is to take deposits from the public; (c) An entity one of whose main functions is to provide insurance to the public; or (d) An entity specified as such by law, regulation or professional standards to meet the purpose described in paragraph 400.15. The Code provides for the categories to be more explicitly defined or added to as described in paragraphs 400.23 A1 and 400.23 A2.	Term used in paras. 260.7 A1 and 280.5 A4 and remains applicable to CFOs irrespective of activities undertaken.	No
Reasonable and informed third party Reasonable and informed third party test	<i>The reasonable and informed third party test is a consideration by the professional accountant or the sustainability assurance practitioner about whether the same conclusions would likely be reached by another party. Such consideration is made from the perspective of a reasonable and informed third party, who weighs all the relevant facts and circumstances that the accountant or the sustainability assurance practitioner knows, or could reasonably be expected to know, at the time that the conclusions are made. The reasonable and informed third party does not need to be an accountant or sustainability assurance practitioner, but would possess the relevant knowledge and experience to understand and evaluate the appropriateness of</i>	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
	<i>the accountant's or sustainability assurance practitioner's conclusions in an impartial manner.</i> <i>These terms are described in paragraph 120.5 A9 and 5120.5 A9.</i>		
Review engagement	An assurance engagement, conducted in accordance with <i>International Standards on Review Engagements</i> or equivalent, in which a professional accountant in public practice expresses a conclusion on whether, on the basis of the procedures which do not provide all the evidence that would be required in an audit, anything has come to the accountant's attention that causes the accountant to believe that the financial statements are not prepared, in all material respects, in accordance with an applicable financial reporting framework.	Term used in para. 120.3 A1 but not in the context of CFOs.	No
Safeguards	<i>Safeguards are actions, individually or in combination, that the professional accountant or sustainability assurance practitioner takes that effectively reduce threats to compliance with the fundamental principles to an acceptable level.</i> <i>This term is described in paragraph 120.10 A2 and 5120.10 A2.</i>	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
Senior professional accountant in business	<i>Senior professional accountants in business are directors, officers or senior employees able to exert significant influence over, and make decisions regarding, the acquisition, deployment and control of the employing organization's human, financial, technological, physical and intangible resources.</i> <i>This term is described in paragraph 260.11 A1.</i>	Term used in Section 260 and remains applicable to CFOs irrespective of activities undertaken.	No
Special purpose financial statements	Financial statements prepared in accordance with a financial reporting framework designed to meet the financial information needs of specified users.	Term used in para. 230.3 A2 and remains applicable	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
		to CFOs irrespective of activities undertaken.	
Substantial harm	<i>This term is described in paragraphs 260.5 A3, 360.5 A3 and 5360.5 A3.</i>	Term used in Section 260 and remains applicable to CFOs irrespective of activities undertaken.	No
Sustainability assurance engagement	An engagement in which a sustainability assurance practitioner aims to obtain sufficient appropriate evidence in order to express a conclusion designed to enhance the degree of confidence of the intended users about the sustainability information. A sustainability assurance engagement can be either a: • Reasonable assurance engagement – An assurance engagement in which the practitioner reduces engagement risk to an acceptably low level in the circumstances of the engagement as the basis for the practitioner's conclusion. The practitioner's conclusion is expressed in a form that conveys the practitioner's opinion on the outcome of the measurement or evaluation, including presentation and disclosure, of the underlying subject matter against applicable criteria; or • Limited assurance engagement – An assurance engagement in which the practitioner reduces engagement risk to a level that is acceptable in the circumstances of the engagement but where that risk is greater than for a reasonable assurance engagement as the basis for expressing a conclusion in a form that conveys whether, based on the procedures performed and evidence obtained, a matter(s) has come to the practitioner's attention to cause the practitioner to believe	Term used in Parts 1 and 2 and relevant to CFOs.	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
	the sustainability information is materially misstated. The nature, timing and extent of procedures performed in a limited assurance engagement is limited compared with that necessary in a reasonable assurance engagement but is planned to obtain a level of assurance that is, in the practitioner's professional judgment, meaningful. To be meaningful, the level of assurance obtained by the practitioner is likely to enhance the intended users' confidence about the sustainability information to a degree that is clearly more than inconsequential.		
Sustainability assurance practitioner	The individual(s) conducting a sustainability assurance engagement (usually the engagement leader or other members of the engagement team, or, as applicable, the firm).	Term used in Part 2 and remains relevant to CFOs.	No
Sustainability information	Information about sustainability matters. Sustainability matters are environmental, social, governance or other sustainability-related matters as defined or described in law or regulation or relevant sustainability reporting frameworks, or as determined by the entity for purposes of preparing or presenting sustainability information. <i>Sustainability information includes information that may be:</i> • <i>Expressed in financial or non-financial terms.</i> • <i>Historical or forward-looking.</i> • <i>Prepared for internal purposes or for mandatory or voluntary disclosure.</i> • <i>Obtained from an entity or its value chain.</i> • <i>Related to the quantitative or qualitative evaluation of an entity's past or expected performance over the short, medium, or long term.</i>	Term used in Part 2 and remains applicable to CFOs irrespective of activities undertaken.	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
	<i>Described in an entity's governance structure, policies, plans, goals, commitments or representations.</i> <i>About the effects (including risks and opportunities) of environmental, social, governance or other sustainability-related matters on an entity's business model, activities, services or products.</i> <i>About the effects of an entity's business model, activities, services or products on the environment, society or economy.</i>		
Those charged with governance	The person(s) or organization(s) (for example, a corporate trustee) with responsibility for overseeing the strategic direction of the entity and obligations related to the accountability of the entity. This includes overseeing the financial reporting process or the sustainability reporting process, as applicable. For some entities in some jurisdictions, those charged with governance might include management personnel, for example, executive members of a governance board of a private or public sector entity, or an owner-manager.	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No
Threats	<i>This term is described in paragraph 120.6 A3 and includes the following categories:</i> <i>Self interest</i> 120.6 A3(a) and 5120.6 A3(a) <i>Self-review</i> 120.6 A3(b) and 5120.6 A3(b) <i>Advocacy</i> 120.6 A3(c) and 5120.6 A3(c) <i>Familiarity</i> 120.6 A3(d) and 5120.6 A3(d) <i>Intimidation</i> 120.6 A3(e) and 5130.6 A3(e)	Term used in Parts 1 and 2 and remains applicable to CFOs irrespective of activities undertaken.	No

Defined Term	Definition	IESBA Staff Analysis	Any Gap (Y/N)
Value Chain	The value chain is a reporting concept that is defined, described or otherwise specified in the applicable sustainability reporting framework. <i>The value chain might include, for example, certain sustainability assurance client's customers and suppliers for sustainability reporting purposes.</i>	Term used in para. 220.4 A4 and remains applicable to CFOs irrespective of activities undertaken.	No

APPENDIX FIVE: SURVEY RESULTS ANALYSIS

A. 2026 CFO Survey

Survey design and reporting basis

1. The PT conducted two separate extended surveys in 2026. The first was directed at CFOs and equivalent senior finance leaders. The second targeted other stakeholders with an interest in, or influence over, the CFO role, including PAOs, regulators and oversight bodies, standard setters, governance bodies, investors, and senior organizational leaders. The extended surveys closed on July 31, 2026.
2. The CFO survey recorded 257 submissions, of which 118 were complete and 139 partial. The other-stakeholder survey recorded 142 submissions, of which 25 were complete and 117 partial.
3. Both surveys were distributed through stakeholder and professional networks and are therefore non-probability samples. The results provide directional evidence from the respondents reached through those networks and cannot be treated as statistically representative of either the global CFO population or the wider other stakeholder population.
4. The number of respondents varies by question because respondents could provide partial responses. Percentages are therefore calculated against respondents who answered the relevant question. The denominator is shown where it is material to interpretation.

Respondent Profile and Professional Status

5. The CFO survey provides evidence primarily of individuals currently performing CFO or equivalent senior finance roles. Of 183 respondents who answered the role question, 118 (64.5%) identified as CFOs. The remainder included 20 finance directors, 9 chief accounting officers, 9 controllers and 27 respondents in other equivalent roles. The inclusion of adjacent senior finance roles is relevant because the workstream's functional definition of CFO extends beyond the formal job title.
6. The respondents represented 40 jurisdictions. Italy accounted for 51 respondents, Greece 19 and Japan 17, with the United Kingdom, Australia, South Africa, South Korea, the US and other jurisdictions also represented. The survey therefore provides international evidence, although the distribution is uneven and the results should not be interpreted as jurisdictional prevalence.
7. The respondents were predominantly from the industry or commercial sector. Of 183 respondents, 125 (or 68.3%) worked in that sector, 24 (or 13.1%) worked in not-for-profit or NGO organizations, 11 (or 6.0%) in the public sector or government, and 23 (or 12.6%) selected another category.
8. The respondent base also contains substantial senior-level experience. Of 182 respondents, 74 (or 40.7%) had more than 10 years of experience in a CFO or equivalent role, 35 (or 19.2%) had six to ten years, 40 had three to five years (or 22%), and 33 (or 18.1%) had less than three years.
9. Of 178 respondents answering the professional-status question, 106 (or 59.6%) identified as members of a PAO, 14 (or 7.9%) were in progress, and 58 (or 32.6%) were not members. This gives the survey evidence from both PAIB CFOs and CFOs outside the PAO infrastructure.

Role expansion

10. The survey provides clear evidence of a broader CFO remit. Of 182 respondents, 122 (or 67.0%) reported expansion into risk management, compliance and/or internal controls. 96 (or 52.7%)

reported increased responsibility for sustainability or ESG²⁰ reporting. 83 (or 45.6%) reported expansion into technology, data governance and/or AI oversight. 82 (or 45.1%) reported increased focus on organizational culture and ethical leadership, and 77 (or 42.3%) reported greater engagement with investors, regulators and/or other external stakeholders.

Area of change	Responses	%
Risk management, compliance and/or internal controls	122	67.0%
Sustainability / ESG reporting	96	52.7%
Technology, data governance and/or AI oversight	83	45.6%
Organizational culture and ethical leadership	82	45.1%
Investors, regulators and/or other external stakeholders	77	42.3%
Largely unchanged	8	4.4%

Ethical Frameworks Applicable to CFOs

11. The survey asked respondents what codes or ethical frameworks applied to them and multiple responses were permitted. Of 178 respondents, 108 (or 60.7%) were subject to an organizational code of ethics or conduct. 90 (50.6%) were subject to a professional-body code; 41 (23.0%) identified the Code directly; and 29 (16.3%) identified a national or industry-specific code. 13 respondents reported no applicable code, and nine were unsure.

Applicable framework	Responses	%
Employing organization's Code	108	60.7%
Professional body's Code	90	50.6%
IESBA Code	41	23.0%
National or industry-specific Code	29	16.3%
No applicable Code	13	7.3%
Not sure	9	5.1%

²⁰ Environmental, social and governance (ESG) reporting

Recognition of Ethical Issues

12. Respondents were asked how they typically identify ethical issues or risks. 109 of 154 respondents (70.8%) selected personal judgment or intuition. Respondents selected discussions with peers, management, or board members for 101 (65.6%). Formal risk management, compliance, or internal-control processes were selected by 98 (63.6%). Company policies or Codes were selected by 86 (or 55.8%).

Method	Responses	%
Personal judgment or intuition	109	70.8%
Discussions with peers, management or board	101	65.6%
Risk management, compliance or internal controls	98	63.6%
Company policies or Codes	86	55.8%
Concerns raised by colleagues, staff or internal audit	84	54.5%
External triggers	70	45.5%
Training / professional development	67	43.5%
Legal, compliance or ethics advice	63	40.9%

Experience of Ethical Challenges

13. Of 154 respondents, 54 (or 35.1%) said they had faced an ethical challenge in their CFO or equivalent role during the previous five years. 82 (53.2%) said they had not, and 18 (11.7%) preferred not to say.
14. The open-text responses provide greater insight than the structured results alone. Respondents described pressure related to financial reporting, provisions, revenue recognition, liquidity, procurement, tax and VAT, conflicts of interest, improper payments, political influence, whistleblowing, sustainability information, AI, data governance, cybersecurity, and privacy. Several respondents described these situations as business pressure, judgment or compliance issues rather than explicitly identifying them as ethical dilemmas.
15. This supports a distinction between encountering an ethical issue and recognizing it as such. The survey evidence suggests that CFOs may encounter the ethical dimension through operational, commercial, regulatory or governance decisions.

Sources of Ethical Guidance

16. Internal company policies or Codes were the most frequently selected source of guidance, cited by 88 of 153 respondents (or 57.5%). Respondents also cited a professional body's Code (78, or 51.0%), legislative or compliance frameworks (71, or 46.4%), and personal judgment or peer consultation (68, or 44.4%). Respondents selected the Code directly (26, or 17.0%).

Source	Responses	%
Internal company policies / Code	88	57.5%
Professional body's Code	78	51.0%
Legislative / compliance frameworks	71	46.4%
Personal judgment/peer consultation	68	44.4%
National / industry-specific Code	33	21.6%
IESBA Code	26	17.0%
Professional-body ethics hotline	19	12.4%

Perceived Practical Sufficiency of the Code

17. Only 23 CFO respondents answered the direct question on whether the Code provides sufficient practical guidance. 19 (or 82.6%) considered it sufficient and practical. 4 (or 17.4%) considered it partially sufficient and requested clearer examples.
18. This question should carry limited analytical weight because of its small denominator. It does not establish a broad perception within this sample that the fundamental principles are inadequate. The four qualitative responses instead referred to practical application in areas such as NOCLAR, political or cultural pressures, public-sector environments, and organizational culture.

Professional Body Membership and Ethical Decision-making

19. Of 152 respondents, 64 (or 42.1%) said professional-body membership significantly affects how CFOs identify and address ethical challenges. A further 19 (or 12.5%) considered the effect somewhat significant. 10 (6.6%) said it had no effect, and 59 (38.8%) were unsure.
20. The qualitative responses associated professional membership with ethics training, CPD, a framework for decision-making, external accountability, access to advice, and greater confidence in challenging inappropriate conduct. Other responses emphasized that membership does not determine ethical behavior and that personal integrity, organizational culture, and governance remain important.

Readiness to Navigate Ethical Challenges

21. Of 153 respondents, 47 (or 30.7%) considered themselves fully equipped to navigate ethical challenges. 77 (or 50.3%) considered themselves somewhat equipped. 18 (11.8%) considered themselves not well equipped.

Level of guidance	Responses	%
Fully equipped	47	30.7%
Somewhat equipped	77	50.3%
Not well equipped	18	11.8%

Level of guidance	Responses	%
Not sure	9	5.9%
Prefer not to say	2	1.3%

22. This should not be read as a measure of technical competence. The CFO's expanded remit can require judgment involving legal, technology, sustainability, operational and sector-specific matters. The finding is more appropriately interpreted as evidence of demand for support when ethical issues arise in unfamiliar or cross-functional contexts.

Professional Membership as a Signal in Appointments

23. When asked whether professional-body membership is considered a signal of ethical leadership when appointing or promoting CFOs, 48 of 145 respondents (or 33.1%) said it was a key consideration. Forty-five (31.0%) said it sometimes mattered, depending on sector or region. 25 (or 17.2%) said it was rarely or not at all considered.
24. A similar pattern appeared in finance-team recruitment. 54 of 145 respondents (or 37.2%) said they preferred candidates who belonged to a professional accountancy body or were studying towards membership. 48 (or 33.1%) said this depended on experience and role requirements.
25. These results suggest that professional membership can carry signaling value, while its significance varies considerably. The evidence does not support treating membership as a proxy for ethical behavior.

Support Requested by CFOs

26. The clearest support preference was for case studies or practical examples. These were selected by 104 of 137 respondents (or 75.9%). Webinars, podcasts, or workshops were selected by 79 (or 57.7%). 72 (52.6%) selected awareness materials for boards and audit committees. 62 (45.3%) selected FAQs and short guidance.

Support	Responses	%
Case studies / practical examples	104	75.9%
Webinars/podcasts/workshops	79	57.7%
Board/audit committee materials	72	52.6%
FAQs / short guidance	62	45.3%
Practice aids/implementation tools	60	43.8%
Additional material not required	7	5.1%

27. The preference is therefore strongly oriented towards material that can be readily used in practice. Open responses requested real-life scenarios, training, board materials, peer discussion, and clearer signposting to existing material.

Adequacy of Current Ethical Standards

28. Of 138 respondents, 89 (or 64.5%) considered current ethical standards and Codes adequate to promote ethical leadership and culture within finance functions, 16 (or 11.6%) considered them somewhat adequate, 5 (or 3.6%) considered them inadequate, and 28 (or 20.3%) were unsure.

B. 2026 Other Stakeholder Survey

Respondent Profile

29. The other-stakeholder survey provides a different perspective. It received 142 submissions: 25 complete and 117 partial. Of 97 respondents answering the organization-category question, 53 (or 54.6%) represented PAOs. Other respondents represented professional organizations, regulators or oversight bodies, standard setters, corporate governance bodies, investors and commercial enterprises.
30. The respondents were drawn from a range of sectors. Of 97 respondents, 25 (or 25.8%) represented industry or commercial organizations, 24 (or 24.7%) public-sector or government organizations, and 21 (or 21.6%) not-for-profit or NGO organizations.
31. The stakeholder groups had substantial interaction with CFOs. Of 97 respondents, 76 (or 78.4%) said they or their organization interacted with CFOs regularly. A further 10 (or 10.3%) interacted occasionally.
32. Of 97 respondents, 52 (or 53.6%) said their organization sets or influences ethical requirements, governance expectations or professional standards applicable to CFOs. 14 (or 14.4%) said they did so partially.

Stakeholder Perspective on Role Expansion

33. Stakeholders broadly corroborated the CFO evidence on role expansion. Of 70 respondents, 44 (or 62.9%) identified increased responsibility for risk management, compliance, or internal controls; 36 (or 51.4%) identified sustainability or ESG reporting; while 34 (or 48.6%) identified technology, data governance, or AI oversight.

Area identified by stakeholders	Responses	%
Risk management, compliance and/or internal controls	44	62.9%
Sustainability / ESG reporting	36	51.4%
Technology, data governance and/or AI oversight	34	48.6%
Investors, regulators and external stakeholders	25	35.7%
Organizational culture and ethical leadership	19	27.1%
Largely unchanged	6	8.6%

34. Stakeholders therefore broadly agree that the CFO role has become wider and more cross-functional. Their responses place somewhat greater emphasis on risk, sustainability, and technology than on ethical leadership itself. This difference is useful because it suggests that the ethical implications may arise as a consequence of role expansion rather than being perceived as a separate development.

Whether Role Expansion Creates Additional Ethical Challenges

35. Stakeholders were more divided on whether these changes have resulted in new or additional ethical challenges. Of 71 respondents, 25 (or 35.2%) said yes, 7 (or 9.9%) said somewhat, 31 (or 43.7%) said no, and 8 (or 11.3%) were unsure.
36. The qualitative responses provide more support for the connection between role expansion and ethical challenges than the structured results alone. Stakeholders referred to sustainability reporting, AI and technology, data governance, pressure to meet targets, management influence, rapidly changing regulatory expectations, and the difficulty of applying ethical principles in new areas.
37. This provides an important counterweight to the CFO responses. The other stakeholder survey does not show consensus that role expansion has created wholly new categories of ethical problems. Instead, it suggests existing ethical tensions may become harder to manage when applied to new technologies, non-financial information, strategic decisions, and rapidly changing expectations.

Frameworks Applying to CFOs

38. Of 69 respondents answering the framework question, corporate governance or stewardship codes were identified most frequently, by 40 respondents (or 58.0%). Legislative or regulatory requirements were identified by 26 (37.7%), internal corporate codes by 25 (36.2%), PAO Codes by 24 (34.8%), and the Code by 19 (27.5%).
39. This reinforces the evidence from the CFO survey that the Code operates within a broader ethical and governance ecosystem.

Effectiveness of Ethical and Governance Frameworks

40. Of 64 stakeholders answering the question, 44 (or 68.8%) considered the applicable ethical or governance frameworks effective in guiding CFOs through ethical dilemmas, 17 (or 26.6%) considered them partially effective, 2 considered them ineffective, and 1 was unsure.
41. The finding is important because stakeholders generally did not characterize the existing framework architecture as ineffective. The more frequent qualification was partial effectiveness, consistent with the CFO evidence concerning practical application.

Professional Background and Membership

42. Stakeholders were divided on whether a CFO's professional background influences ethical decision-making. Of 70 respondents, 25 (or 35.7%) said yes, 6 (or 8.6%) said somewhat, 25 (or 35.7%) said no, and 14 (or 20.0%) were unsure.
43. Stakeholders nevertheless placed considerable value on professional accountancy membership. Of 70 respondents, 47 (or 67.1%) said membership contributes meaningfully to confidence in ethical conduct, and 9 (or 12.9%) said its importance depends on context.
44. The distinction is useful. Other stakeholders see professional membership as relevant ethical infrastructure, but the evidence does not establish that professional designation determines ethical behavior.

Stakeholder Familiarity with the Code

45. Of 63 stakeholders answering the question, 41 (or 65.1%) described themselves as very familiar with the Code and its relevance to CFOs, 9 (or 14.3%) were somewhat familiar, 4 (or 6.3%) were aware but not familiar, and 9 (or 14.3%) were not aware.

46. This question is important when interpreting other stakeholders' views on the Code. The stakeholder sample includes a relatively high level of Code familiarity; however, it should not be treated as representative of the wider population of CFO stakeholders.

Stakeholder Assessment of Practical Sufficiency

47. Of 63 respondents, 33 (or 52.4%) considered the Code sufficient and practical for CFOs, 16 (or 25.4%) considered it partially sufficient or practical, 1 considered it insufficient, 2 considered it not relevant, and 11 were unsure.
48. The qualitative responses were more informative than the headline result. Several stakeholders described the fundamental principles as sufficient while calling for practical guidance, examples, or awareness-raising. Technology, data governance, and AI were recurring areas where respondents wanted help applying the Code.

Ethical Leadership and Culture

49. Of 63 stakeholders, 34 (or 54.0%) considered the Code sufficient to promote ethical leadership and culture within finance functions, 13 (or 20.6%) considered it somewhat sufficient, 3 (or 4.8%) said no, and 13 (or 20.6%) were unsure.
50. Several stakeholders explicitly distinguished the Code from the broader organizational environment. Their comments referred to implementation, awareness, and tone from leadership, and the fact that the Code applies to PAIBs rather than finance functions.

Collaboration with Boards, Audit Committees and Auditors

51. Stakeholders were relatively cautious about using the Code as a vehicle for collaboration. Of 63 respondents, 14 (22.2%) thought it could better support collaboration, 8 (12.7%) said somewhat, 27 (42.9%) said no, and 14 (22.2%) were unsure.
52. The qualitative responses suggest that stakeholders who saw a role for the IESBA generally favored a shared ethical framework, awareness, and practical examples rather than prescriptive requirements governing the relationships among CFOs, boards, audit committees, and external auditors.

Stakeholder Support Preferences

53. Stakeholders also favored practical material, although their preferences were less concentrated than those of CFO respondents. Of 57 respondents, 35 (or 61.4%) selected case studies or practical examples, 25 (or 43.9%) selected awareness materials for boards and audit committees, 21 (or 36.8%) selected FAQs or short guidance, and 19 (or 33.3%) selected webinars or workshops.

Support	Responses	%
Case studies / practical examples	35	61.4%
Board/audit committee materials	25	43.9%
FAQs / short guidance	21	36.8%
Webinars/workshops	19	33.3%
Practice aids/implementation tools	15	26.3%
Additional materials not required	7	12.3%

54. The stakeholder results therefore broadly corroborate the CFO preference for practical support, while placing relatively greater emphasis on material for boards and audit committees.

Stakeholder Priorities for Future IESBA Work

55. Among 57 respondents, ethical leadership and culture was the most frequently selected priority, cited by 25 respondents (or 43.9%). Pressure, incentives, and organizational dynamics were selected by 21 (36.8%); technology, data, and AI governance by 18 (31.6%); and sustainability reporting and non-financial information by 16 (28.1%).
56. Only 9 respondents (or 15.8%) selected application of the Code to CFOs who are not PAIBs. Several qualitative responses instead questioned whether additional standard-setting for non-PAIB CFOs would be effective, and some suggested that implementation and adoption of the existing Code should receive greater attention.
57. The two surveys should first be read separately because they were designed for different respondent groups and do not contain identical questions throughout.

Analytical Limits and Possible Further Work

58. Both surveys are non-probability samples. Respondents were reached through stakeholder and professional networks, which may have increased participation by people with a particular interest in CFOs, ethics, professional accountancy, or standard setting.
59. The response rate cannot be calculated as a conventional population response rate because the surveys were distributed through networks rather than to a defined sampling frame. The total submission count therefore reflects the volume of evidence collected, not the prevalence of views in the CFO or stakeholder population.
60. Partial completion is material. In the CFO survey, 139 of 257 submissions were partial, and in the stakeholder survey, 117 of 142 submissions were partial. Question-level denominators are therefore materially smaller than total submissions for many questions. Consider the denominator when assessing the strength of an individual result.
61. Geographic representation is also uneven. The CFO survey includes respondents from 40 jurisdictions, but responses are concentrated in a small number. The other stakeholder survey similarly contains an international spread but cannot support conclusions about individual jurisdictions.
62. The other stakeholder sample is also institutionally concentrated. More than half of respondents answering the organization-category question represented PAOs. This makes the survey particularly useful for understanding the views of bodies that influence professional or ethical infrastructure but limits its use as evidence of the views of all stakeholders relevant to CFOs.
63. Several questions concern perceptions rather than observed conduct. Responses about ethical readiness, the influence of professional membership, Code sufficiency and framework effectiveness are self-reported assessments. They do not establish ethical competence, compliance, or actual organizational outcomes.
64. Open-text responses provide important context but cannot be treated as prevalence measures. They identify examples and recurring themes, including pressure, conflicts, financial reporting judgments, technology, AI, sustainability, data governance, and organizational culture. The number of respondents mentioning a particular theme should not be interpreted as a measure of how widespread or significant that issue is across the CFO population.

65. The survey also cannot establish causation. For example, the evidence cannot demonstrate that professional membership causes better ethical decision-making, that greater Code familiarity produces better outcomes, or that governance support prevents ethical failures. Those relationships would require a different research design.
66. Taken together, the two surveys provide complementary evidence. The CFO survey provides direct evidence of the experience, pressures and support needs of CFOs and equivalent senior finance leaders. The other stakeholder survey provides evidence from organizations and individuals that shape, observe, or interact with the CFO environment. The areas where the two surveys converge are particularly useful for the Phase 1 assessment.

APPENDIX SIX: ACADEMIC RESEARCH AND LITERATURE REVIEW ASSESSMENT

1. The PT commissioned [Dr. Mukesh Garg](#), Associate Professor in the Department of Accounting (Monash University, Melbourne) to undertake an independent [academic literature review](#) to examine how the role of CFOs and equivalent senior finance leaders is changing, the ethical issues associated with that evolution, and the extent to which existing research provides an adequate evidence base for assessing those issues. The review drew principally on peer-reviewed academic research, supplemented by selected practitioner and industry material where research had not yet caught up with emerging developments. It focused mainly on literature published between 2015 and 2025, while incorporating earlier seminal studies where relevant.
2. The review found substantial established evidence concerning the CFO's influence over financial reporting and the conditions under which ethical breakdown can occur. Research associates CFO misconduct and aggressive reporting with a combination of positional authority, reporting discretion, performance and compensation pressures, behavioral factors, and governance weaknesses. The evidence also indicates that ethical failure may develop progressively through rationalization, organizational pressure, and the normalization of aggressive practices, rather than arising only from deliberate fraudulent intent. The consequences can extend beyond the individual CFO, affecting investor confidence, organizational reputation, and the careers of other finance leaders associated with the entity.
3. The literature also supports a significant expansion in the CFO's decision-making perimeter. Financial stewardship and reporting remain central, while CFOs are increasingly involved in strategy, sustainability and climate-related matters, AI and data-driven decision-making, cybersecurity, geopolitical and supply-chain risk, and broader enterprise resilience. This expansion broadens the circumstances in which CFOs may need to exercise ethical judgment under uncertainty. The review identifies relevance to objectivity, professional competence and due care, confidentiality, conflicts of interest, and pressure from boards, executives, investors, and other stakeholders. It also highlights the practical difficulty of maintaining sufficient expertise and reflection as the scope of responsibility expands faster than the available skills, information, and time.
4. The review identified several areas in which the nature of the CFO role itself is becoming more diverse. Public-sector CFOs may face tensions arising from political pressures, public accountability and competing demands for fiscal discipline and public value. Not-for-profit CFOs may need to reconcile financial sustainability with mission objectives and stakeholder expectations. Fractional and virtual CFO arrangements raise additional questions about conflicts of interest, confidentiality, remote oversight, commercial pressures, and how accountability is allocated between an external or part-time finance leader and the entity's management. Academic evidence on these newer models remains limited.
5. A further issue identified by the review concerns CFOs who are not members of a professional accounting organization. The literature indicates that senior finance positions can be occupied through a variety of professional and career pathways and that PAO membership is not necessarily required for appointment as a CFO. Non-membership does not imply a lack of competence and does not remove legal, regulatory, fiduciary or corporate governance responsibilities. It can, however, mean that an individual is outside the ethical requirements, CPD expectations, and disciplinary arrangements associated with professional accounting membership. The review

therefore identifies CFOs' professional status as an area requiring further evidence, particularly as CFO responsibilities extend into increasingly complex domains.

6. An important finding for the PT is the mismatch between the pace at which the CFO role is changing and the available academic evidence. Much of the strongest empirical literature still focuses on financial reporting, earnings management, fraud, and governance. Research directly examining CFO ethical judgment in sustainability, AI, cybersecurity, geopolitical risk, and newer organizational models is comparatively limited, and practitioner evidence is more prominent in these areas. The absence of extensive empirical research should therefore not be interpreted as evidence that the associated ethical risks are absent. Rather, it limits the conclusions that can presently be drawn about their nature, prevalence, and significance.
7. The literature review consequently supports continued evidence-building rather than, by itself, establishing the need for changes to the Code. It reinforces the continuing relevance of a principles-based ethical framework as CFO responsibilities become broader and more interconnected, while identifying areas requiring further examination through the PT's surveys, stakeholder outreach, and jurisdictional analysis. In particular, the review supports further examination of how CFOs experience pressure and conflicts in practice, how ethical responsibilities operate beyond traditional financial reporting, whether differences arise between PAIBs and non-PAIB CFOs, and whether existing resources sufficiently support ethical judgment in emerging areas of responsibility.

APPENDIX SEVEN: OVERVIEW OF JURISDICTIONAL AND LEGISLATIVE FRAMEWORK ASSESSMENT (EU AND US)

Scope and implications

1. The PT undertook the jurisdictional review to examine how legal and institutional frameworks allocate responsibility for matters commonly associated with CFOs. It examines the legal and institutional framework of the European Union (EU) at Union level and the United States (US) federal public-issuer framework. It does not assess or compare the laws, transposition measures in the EU, enforcement arrangements, or professional requirements of individual EU Member States, US states, public-sector statutes, or sector-specific regimes.
2. From this preliminary analysis, the frameworks reviewed do not establish a uniform legal model for a CFO. It does show that accountability may arise from obligations imposed on the entity, the collective responsibility of a board or management body, responsibility assigned to a named officer, sector- or function-specific requirements, professional status, delegation, or individual conduct. The absence of a separately regulated or licensed CFO office does not mean that the individual is free from legal or ethical accountability.
3. At the EU level, company and reporting legislation generally places formal responsibility on the undertaking and relevant administrative, management, or supervisory bodies. Certain issuer-reporting requirements also refer to named responsible persons, but EU law does not prescribe a universal CFO certification. EU measures can affect financial reporting, market conduct, sustainability, cybersecurity, data, and technology decisions without converting the CFO title into a regulated office.
4. By comparison, the US federal public-issuer framework directly identifies the principal financial officer or CFO for specified reporting certifications, filing signatures, and compensation-recovery requirements. Other federal obligations are attached to the issuer, management, audit committee, executive officers, insiders, persons acting on behalf of the issuer, or individuals whose conduct falls within a prohibition. A person holding the title of CFO is not necessarily the relevant principal financial officer or equivalent for every federal requirement.
5. The exercise is a limited comparison rather than a representative analysis of legal models globally. The evidence is strong for listed entities, public issuers, and regulated financial institutions; however, it provides limited evidence for private, founder-led, public-sector, and not-for-profit entities, and with respect to fractional or virtual CFOs. The review also did not assess the consistency of implementation or enforcement, the practical effectiveness of governance arrangements, or the effect of different legal models on ethical conduct.
6. The principal implication for the IESBA is that the Code should be applied through a functional and fact-specific assessment. A PAIB CFO may still be subject to the Code where legislation assigns the relevant legal obligation to the entity, governing body, or another designated person. A CFO who is not a PAIB may be subject to direct legal duties without becoming subject to the Code. Legal accountability and professional ethical accountability therefore require separate analysis.

7. A comprehensive global legal map would require continuing jurisdiction-specific legal analysis and regular updating. Such an exercise is not necessary to establish the ethical analysis expected under the Code. A more proportionate approach would be for the IESBA to identify the factual variables and ethical considerations to be assessed, with local bodies adding the applicable legal and institutional context.
8. The assessment is based on sources checked through to July 30, 2026, is intended to inform the PT's analysis, and does not constitute legal advice.

Purpose, scope and methodology

9. The assessment responds to the workstream objective of understanding the regulatory and governance requirements relevant to the ethical conduct of CFOs.²¹
10. The European Commission is considered in its capacity as an institution of the EU, rather than as a separate jurisdiction. The EU analysis distinguishes directly applicable regulations from directives that require national transposition and does not assess how individual Member States have transposed or enforced those directives.
11. The US analysis is confined to the federal public-issuer framework. It includes relevant federal securities laws, US Securities and Exchange Commission (SEC) rules, the Sarbanes-Oxley Act, SEC-approved exchange requirements, and Public Company Accounting Oversight Board (PCAOB) related requirements. It does not examine the laws of individual US states or other relevant federal, or local public-sector regimes.
12. For each framework, the assessment considers the primary legal addressee, the entities and activities covered, the status and effective date of the measure, the relevant accountability route, and whether responsibility attaches by title, function, governing-body membership, delegation, professional status, or conduct. Primary legislation and official regulatory sources are used where available.

Comparative conclusions and implications for the Code

13. The EU and US frameworks illustrate different legal routes to CFO accountability. EU-level measures generally regulate the undertaking, governing body, designated person, defined function, or individual conduct. The US federal public-company framework more frequently identifies the principal financial officer, CFO, executive officer, or filing signatory for specified requirements, while continuing to rely extensively on issuer, management, audit-committee, and conduct-based obligations. These differences concern the source and allocation of legal responsibility and do not establish a hierarchy of ethical quality or alter how the Code applies to PAIBs undertaking professional activities.

²¹ Refer paragraph 9 of the PT's [Terms of Reference](#)

Question	Assessment
Is there one global CFO legal model?	No. The two systems use different mixtures of entity, body, personal and professional responsibility, and neither analysis supplies a universal corporate model.
Does named officer certification provide a complete ethical framework?	No. It addresses defined reports, controls, transactions, or compensation. It does not address bias, conflicts, commercial pressure, ethical normalization/fading, stakeholder impact, or public-interest judgment.
Does collective responsibility imply weak accountability?	No. Entity, governing body, audit committee, market conduct, and national law routes can be substantial. The personal route depends on the applicable rule and facts.

EU Legal Order and European Commission Role

14. The [EU](#) constitutes the relevant legal order. The European Commission is an institution within that legal order and is not a general CFO regulator. The Commission proposes European Union legislation, adopts delegated and implementation measures within conferred powers, monitors implementation and may commence infringement proceedings; the European Parliament and the Council ordinarily legislate. The legal obligations considered below arise from the applicable EU instruments, rather than from the Commission's institutional role alone.
15. The assessment remains at Union level. [Under Article 288](#) of the Treaty on the Functioning of the European Union, regulations are binding and directly applicable, subject to their scope and application dates. Directives, by contrast, require implementation through national law. The assessment identifies the requirements established by EU-level directives but does not examine how individual Member States have transposed, applied, or enforced them. It also does not compare national company law offices, signature requirements, liability regimes, professional requirements, or sanctions.
16. The central finding is that EU law does not establish a general statutory office of CFO, a protected CFO title or a universal personal certification requirement. Most measures relevant to a CFO's work impose obligations on the undertaking, issuer or governing body. A CFO may nevertheless be brought within a requirement where the individual:
 - Is a member of a governing body that the instrument addresses;
 - Is designated as a "responsible person" under issuer arrangements and national law;
 - Satisfies a functional test written into the instrument itself, notably the Market Abuse Regulation's definition of persons discharging managerial responsibilities;

- Is subject to requirements that apply directly to individuals within their scope, or assume responsibilities through ordinary delegation and employment duties; or
 - Is subject to national law or professional requirements that operate alongside the EU-level measure which may impose personal responsibility on the individual even where the EU measure itself places the primary obligation on the undertaking, issuer, or governing body.
17. The following analysis is organized by the business context in which a CFO may encounter the legislation. Inclusion of an instrument does not mean that it regulates CFO conduct. The tables distinguish the underlying legal obligation from the CFO's practical involvement and identify when the CFO maybe liable within the scope of the legal requirement.
- a) Financial Reporting, capital markets and external audit
18. Financial reporting is an area in which the CFO is most likely to exercise operational responsibility. EU law nevertheless generally assigns the formal obligation to the undertaking, the issuer, the specified governing bodies, or the identified responsible persons. It does not prescribe the CFO as the universal preparer, approver or certifying officer.
19. The key distinction is between preparing information and bearing the legal responsibility assigned by the relevant instrument. A CFO may exercise extensive control over reporting without being the person to whom EU law formally assigns responsibility. Conversely, a CFO who is a governing-body member or identified responsible person may face a more direct accountability route.

Instrument and EU-level status	Core obligation	How the CFO may be affected	EU-level boundary
Accounting Directive 2013/34/EU	- Requires annual financial statements, management reporting and specified corporate disclosures. - Member States must ensure collective responsibility of the relevant administrative, management and supervisory bodies.	A CFO may prepare the information, maintain controls or share responsibility where the individual is a member of the relevant body.	- The Directive does not assign responsibility to the CFO title. - National implementation determines the governing bodies, sanctions and individual liability.
IFRS Regulation	Covered regulated-market issuers use EU-endorsed international accounting standards for consolidated accounts and publish specified annual financial reports in the European single electronic format.	The CFO may oversee accounting judgments, consolidation, controls, tagging, and the reporting process.	- The undertaking or issuer is the addressee. - Neither measure creates a personal CFO certification.

Instrument and EU-level status	Core obligation	How the CFO may be affected	EU-level boundary
Transparency Directive 2004/109/EC	Covered issuers publish annual and half-yearly financial reports containing prescribed responsibility statements by identified persons.	A CFO may be one of the identified responsible persons where issuer arrangements and national law provide for it.	- The Directive does not prescribe the CFO as signatory. - Responsibility and liability depend on national implementation and the person's formal role.
Audit Directive and Audit Regulation	Establish statutory-audit, public-interest-entity audit, audit-committee and auditor-independence requirements.	The CFO commonly supports audit evidence, estimates, controls and communications with the audit committee and auditor.	- These measures principally regulate undertakings, governing bodies, audit committees, statutory auditors and audit firms. - Operational liaison does not transfer audit committee or auditor duties to the CFO.
Market Abuse Regulation, Regulation (EU) No 596/2014	Prohibits insider dealing, unlawful disclosure of inside information and market manipulation and imposes obligations on issuers and persons discharging managerial responsibilities.	A CFO may be directly affected through possession or use of inside information, regulated conduct or status as a person discharging managerial responsibilities.	- CFO title alone does not establish that status. - Issuer disclosure duties should be distinguished from prohibitions applying directly to individuals.
Prospectus Regulation, Regulation (EU) 2017/1129	Requires identified responsible persons and prescribed declarations for prospectus information.	A CFO may be covered when formally identified as responsible for the prospectus.	The Regulation does not automatically designate the CFO. Civil-liability consequences depend partly on Member State law.
Shareholder Rights Directive II	Addresses director remuneration, shareholder engagement, and disclosure and approval of material related-party transactions.	The CFO may support remuneration metrics, valuations, related-party controls and disclosures, with a more direct route through governing-body membership or formal delegation.	- Finance ownership of data or process does not by itself establish responsibility. - Materiality, approval and liability depend on national implementation.

b) Sustainability reporting and due diligence

Instrument and EU-level status	Core obligation	How the CFO may be affected	EU-level boundary
CSRD and the Accounting Directive, as amended by Directive (EU) 2026/470	- Under the amended Union-level scope, sustainability reporting applies principally to undertakings or groups exceeding EUR 450 million in net turnover and an average of 1,000 employees, subject to the detailed scope and transition provisions. - Member States must transpose the reporting amendments by 19 March 2027.	The CFO may oversee sustainability information, connectivity with financial statements, data controls, materiality processes, digital tagging and assurance preparation. Responsibility may apply where the CFO is a member of the relevant body.	- The obligation attaches to the covered undertaking or group. - The amended thresholds should not be presented as fully operative in every Member State before transposition and application requirements are considered.
EU Taxonomy Regulation, Regulation (EU) 2020/852	Requires specified undertakings and financial-market participants to disclose information concerning alignment of economic activities with the EU taxonomy.	The CFO may oversee classification and controls for turnover, capital expenditure and operating expenditure and their connection with investment planning and sustainability reporting.	- The disclosure requirement attaches to the covered undertaking or financial-market participant. - It does not require personal CFO certification.
Corporate Sustainability Due Diligence Directive, as amended by Directive (EU) 2026/470	- Requires covered companies to address specified adverse human-rights and environmental impacts. - The amended principal EU-company threshold is more than 5,000 employees and more than EUR 1.5 billion in worldwide net turnover. - Transposition is required by 26 July 2028 and application principally from 26 July 2029.	The CFO may influence investment, procurement, acquisition diligence, resource allocation, contractual controls, remediation costs and provisions.	- Obligations are imposed on covered companies. - Member States must ensure full compensation where a company is held liable under national law. - Individual CFO liability cannot be determined at EU level.

c) Cybersecurity, digital resilience and artificial intelligence

Instrument and EU-level status	Core obligation	How the CFO may be affected	EU-level boundary
NIS2 Directive, particularly Article 20	Requires Member States to ensure that management bodies of covered essential and important entities approve cybersecurity risk-management measures, oversee implementation, and can be held liable for infringements by the entity.	A CFO may be included where the individual is a member of the relevant management body. Finance may also support cyber investment, insurance, continuity and financial-exposure assessment.	- A CFO outside the management body is not brought within Article 20 merely by approving expenditure or monitoring cyber risk. - National implementation determines management-body status and liability.
Digital Operational Resilience Act	- Requires covered financial entities to maintain an ICT risk-management framework. - The management body bears ultimate responsibility for managing ICT risk and has specified approval and oversight duties.	A CFO who is a member of the relevant management body may share those responsibilities. Other involvement may concern budgets, third-party contracts, incident costs and resilience investment.	- DORA applies within its financial-sector perimeter. - It does not establish a general personal cybersecurity duty for CFOs.
Artificial Intelligence Act, as amended by Regulation (EU) 2026/1744	- Regulates providers, deployers and other operators according to role and system classification. - The general application date is 2 August 2026, with specified high-risk requirements applying from 2 December 2027 for Annex III systems and 2 August 2028 for Annex I systems.	The CFO may oversee AI procurement, investment, finance-function deployment, data and model controls, or financial provision for compliance risk.	- Responsibility depends on the organization's operator role and the CFO's formally assigned authority or conduct. - Funding, purchasing or using an AI system within finance does not create responsibility by title, rather it does by individual activity.
Cyber Resilience Act	Imposes cybersecurity requirements on manufacturers, importers and distributors of products with digital elements, with staged application from 11 June 2026, 11 September 2026 and 11 December 2027.	The CFO may be involved in product-development expenditure, cyber investment, acquisition diligence, incident costs, insurance and provisioning.	This is principally product-cybersecurity legislation. It does not make the CFO responsible for enterprise cybersecurity because finance approves technology expenditure.

d) Internal reporting, data and selected cross-cutting obligations

Instrument and EU-level status	Core obligation	How the CFO may be affected	EU-level boundary
Whistleblower Protection Directive	Requires Member States to ensure that covered legal entities establish internal reporting channels and protect qualifying reporting persons.	A CFO may use the channels, receive or investigate reports under an assigned role, or be responsible for resources and related controls.	- The Directive does not assign the obligation to the CFO title. - Responsible functions, remedies, sanctions and individual liability depend on national implementation.
EU anti-money laundering package	Harmonizes customer due diligence, beneficial ownership, suspicious-transaction reporting, governance and internal controls for obliged entities, with staged transition to the new framework.	A CFO may be covered within a covered financial institution, through an assigned compliance function or through conduct involving payments, controls or reporting.	- An ordinary in-house CFO is not an obliged entity by title. - Entity classification, regulated function and applicable transition provisions determine the route.
GDPR and the Data Act	Regulate personal-data processing and specified data-access, sharing and cloud-switching settings.	Finance systems, payroll, investigations, due diligence, cloud procurement, and AI use may involve data governance, confidentiality, and incident decisions.	- Controllers, processors and other defined actors are the principal addressees. - Neither measure creates a personal CFO certification.

Overall Findings

20. Across the thematic areas reviewed, most EU measures regulate the undertaking, issuer, governing body, designated responsible person or defined economic operator. They do not regulate the CFO as a universal corporate officer.
21. Whether a CFO is personally brought within an EU requirement should therefore be assessed by asking:
 - Does the entity and activity fall within the measure's scope?
 - Is the CFO a member of a body to which responsibility is assigned?
 - Has the CFO been formally identified or designated as a responsible person?
 - Does the CFO's conduct or functional authority fall within a rule applying directly to individuals?

- Does a sector-specific framework expressly regulate the CFO or another finance function?
22. This distinction is also important when applying the Code. A PAIB CFO may have ethical obligations under the Code even where legislation does not impose an individual duty on the CFO title.

U.S framework assessment

23. The US does not have a single federal statute governing all CFOs. This assessment is centered on the federal framework applicable to public companies and securities market activity, including the federal securities laws, the Sarbanes-Oxley Act of 2002, SEC rules, SEC-approved exchange requirements, and the interface with PCAOB auditing standards. It does not assess state company law, fiduciary duties, employment law, public-sector requirements or sector-specific frameworks applying, for example, to banking, insurance or regulated utilities. These exclusions are material because officers' duties in private and public companies also arise under the law of the state in which the entity is incorporated.
24. The federal framework frequently uses the terms “principal financial officer,” “chief financial officer,” or “person performing similar functions.” The federal framework does not treat these terms as interchangeable in every context. A person holding the CFO title will ordinarily perform the principal financial officer function in many public companies, but one must confirm the legal position in the relevant rule, filing designation, and the functions performed.
25. Within the federal public-company framework, the US uses a named-officer model more extensively than the EU-level framework. Certain requirements attach directly to the principal financial officer, CFO, or person performing an equivalent function. Other requirements are attached to the issuer, management, audit committee, executive officers generally, persons who sign a filing, or any individual whose conduct falls within the relevant prohibition.
26. A CFO may therefore be brought within the federal framework through five principal routes:
- A requirement attaching directly to the principal financial officer or CFO;
 - Status as a signatory or other specifically identified person;
 - Participation in a responsibility assigned to the issuer or management;
 - Conduct falling within an antifraud, accounting, market-conduct or obstruction provision; or
 - Status as an executive officer, insider or person acting on behalf of the issuer.

a) Financial reporting, signatures and officer certifications

Instrument and federal status	Core obligation	How the CFO is brought within the requirement	Qualifications and limits
Forms 10-K and 10-Q signatures	Form 10-K must be signed by, among others, the principal executive officer, principal financial officer, controller, or principal accounting officer, and at least a majority of the board. Form 10-Q requires a duly authorized officer and the principal financial officer or chief accounting officer.	Direct signatory route where the CFO is the principal financial officer or another required signatory.	A filing signature does not make the CFO liable for every deficiency. Personal liability depends on the relevant statutory or regulatory basis and its elements.
SOX Section 302 and Exchange Act Rules 13a-14 and 15d-14	The principal executive and financial officers, or persons performing similar functions, provide prescribed certifications for covered annual and quarterly reports addressing review, material accuracy and fair presentation, disclosure controls, internal control over financial reporting (ICFR), evaluations and specified communications to auditors and the audit committee.	Direct role-based requirement applying to the principal financial officer or person performing similar functions.	The certification covers prescribed matters and applicable reports. It does not guarantee that every statement is 100% accurate.

b) Internal control, accounting integrity and the external audit

Instrument and federal status	Core obligation	How the CFO is brought within the requirement	Qualifications and limits
Exchange Act Rules 13a-15 and 15d-15 and SOX Section 404(a)	Reporting companies maintain disclosure controls and ICFR. Management assesses ICFR annually and cannot conclude that ICFR is effective where one or more material weaknesses exist.	The CFO may lead the controls process and, as a certifying officer, assumes the specific Section 302 responsibilities and representations.	Management does not assign the assessment exclusively to the CFO. Operational leadership should be separated from the legal responsibilities of the issuer, management, and certifying officers.
SOX Section 404(b)	Where applicable, the registered public accounting firm attests to and reports on management's ICFR assessment.	The CFO ordinarily oversees evidence, testing, remediation, and auditor interaction.	The attestation requirement applies to issuers and auditors. Current filer categories and exemptions must be tested.

Instrument and federal status	Core obligation	How the CFO is brought within the requirement	Qualifications and limits
Exchange Act Section 13(b) and Rule 13b2-1	Require accurate books and records and internal accounting controls that provide reasonable assurance, and prohibit knowing circumvention, knowing failure to implement controls, and record falsification.	Direct personal relevance arises where a CFO falsifies records, circumvents controls, causes a violation, or engages in prohibited conduct.	The standard is reasonable assurance. Personal liability must be assessed under the particular provision rather than inferred from general finance responsibility.
Exchange Act Rule 13b2-2	Prohibits materially false or misleading communications with accountants and improper influence on an auditor in specified circumstances.	Direct conduct-based application to a CFO as an officer and to persons acting under the CFO's direction.	The rule does not prohibit legitimate challenges or disagreement with the auditor. The required conduct, context, materiality and knowledge standard must be established.
PCAOB AS 2805	Requires auditors to obtain appropriate management representations, ordinarily from the CEO and CFO or equivalent positions.	The CFO provides reliable information and access when acting for management.	PCAOB standards principally regulate the auditor. They are not independent statutory duties imposed on the CFO, although false representations or interference may engage other provisions.

c) Capital raising, market conduct and officer transactions

Instrument and federal status	Core obligation	How the CFO is brought within the requirement	Qualifications and limits
Securities Act registration forms and Section 11	Common forms require the principal financial officer to sign the registration statement. Section 11 includes persons who signed the statement within its civil liability provisions for material misstatements or omissions.	Direct signatory route where the CFO is the principal financial officer or otherwise signs.	Liability depends on the registration statement, signatory status, materiality, statutory defenses, loss and other requirements, rather than title alone.
Exchange Act Section 16 and Rule 16a-1	Requires specified officers, directors and beneficial owners to report covered ownership and transactions and provides for recovery of specified short-swing profits.	The officer definition expressly includes the principal financial officer.	Issuer registration status, security, officer status, transaction and exemptions must be tested. Foreign private issuers are generally exempt.

Instrument and federal status	Core obligation	How the CFO is brought within the requirement	Qualifications and limits
Insider-trading law and Rule 10b5-1	Trading while aware of material non-public information may be unlawful where the required duty, deception and other elements exist. Rule 10b5-1 sets conditions for an affirmative defense for qualifying arrangements.	Direct conduct-based relevance where the CFO trades, tips information or adopts or operates a trading arrangement.	CFO title does not establish insider-trading liability. A trading plan is optional and protects only when its conditions and good-faith requirements are satisfied.

d) Governance safeguards, codes of ethics and reporting concerns

Instrument and federal status	Core obligation	How the CFO is brought within the requirement	Qualifications and limits
SOX Section 406 and Item 406 of Regulation S-K	Require disclosure of whether the company adopted a code of ethics applying to the principal executive officer, principal financial officer, principal accounting officer or controller, and specified amendments and waivers.	Expressly identify the principal financial officer and comparable senior finance functions.	This is principally a disclosure regime. A company-code breach is not automatically a federal securities-law violation, and a company code is distinct from the IESBA Code.
SOX Section 301 and Exchange Act Rule 10A-3	Require listed issuers to have an appropriately independent audit committee responsible for auditor appointments, compensation, retention, and oversight, and procedures for accounting, control, and auditing complaints.	The CFO usually manages the finance function's relationship with the auditor and audit committee and supplies relevant information.	Formal oversight duties attach to the audit committee and issuer. The CFO does not acquire the committee's responsibility by managing the interface.
SOX Section 806, Rule 21F-17 and Dodd-Frank Section 21F	Provide distinct whistleblower, anti-impediment and non-retaliation routes.	A CFO may be directly implicated by retaliation, instructions impeding SEC reporting, restrictive contractual language or interference with escalation and investigation.	Coverage, protected activity, forum, limitation periods and remedies differ. Internal reporting may be protected under SOX, while Dodd-Frank anti-retaliation protection requires reporting to the SEC.

e) Bribery

Instrument and federal status	Core obligation	How the CFO is brought within the requirement	Qualifications and limits
Foreign Corrupt Practices Act	Combines issuer accounting requirements with anti-bribery provisions covering issuers, domestic concerns and specified territorial conduct.	CFO relevance may arise through payment authorization, third-party controls, acquisition diligence, consolidation, reserves, transaction descriptions and responses to misconduct. Liability exposure depends on conduct and the applicable provision.	An accounting-provision violation does not require proof of an underlying bribe. Anti-bribery jurisdiction can extend beyond Exchange Act reporting companies.

f) Cybersecurity, climate and artificial intelligence disclosures

Topic and federal status	Core obligation	Potential CFO relevance	Accountability boundary
Cybersecurity disclosure	Form 8-K Item 1.05 generally requires disclosure within four business days after determining that a cybersecurity incident is material; the determination must not be unreasonably delayed. Regulation S-K Item 106 requires annual risk-management, strategy and governance disclosure.	A CFO may be covered through financial-impact analysis, materiality, disclosure controls, ICFR, insurance, estimates, and Section 302 certification.	These are issuer disclosure obligations, not a stand-alone CFO cybersecurity duty. Delayed provisions and foreign-private-issuer requirements must be considered.
Artificial intelligence	No SEC issuer disclosure rule specific to AI was identified as of the status date. Existing anti-fraud, materiality, books-and-records, disclosure-control and reporting requirements apply to material AI claims, risks, investments, uses and financial effects.	Finance-function use of AI, public claims, expenditure, valuation, forecasting and controls over data, model change, access, human review and supporting evidence.	There is no separate federal CFO AI certification. The AI Risk Management Framework is voluntary unless incorporated through legal, regulatory or contractual requirement.

APPENDIX EIGHT: REFERENCES

This appendix consolidates the principal project, legal and regulatory sources cited in the report. The status and scope of legal sources are assessed in Appendix Seven as of July 30, 2026. Inclusion does not imply that an instrument regulates the CFO title or applies to every entity.

Project Documents

- [IESBA, Role of CFOs Workstream, Terms of Reference \(2025\)](#)
- [IESBA, Academic Research and Literature Review Report, Agenda Item 8B \(2026\)](#)

European Union Sources

- [European Union institutional role](#)
- [Treaty on the Functioning of the European Union, Article 288](#)
- [Accounting Directive 2013/34/EU](#)
- [IFRS Regulation, Regulation \(EC\) No 1606/2002](#)
- [Transparency Directive 2004/109/EC](#)
- [Audit Directive 2006/43/EC](#)
- [Market Abuse Regulation, Regulation \(EU\) No 596/2014](#)
- [Prospectus Regulation, Regulation \(EU\) 2017/1129](#)
- [Shareholder Rights Directive II, Directive \(EU\) 2017/828](#)
- [Directive \(EU\) 2026/470 on sustainability reporting and due diligence requirements](#)
- [EU Taxonomy Regulation, Regulation \(EU\) 2020/852](#)
- [Corporate Sustainability Due Diligence Directive, Directive \(EU\) 2024/1760](#)
- [NIS2 Directive, Directive \(EU\) 2022/2555](#)
- [Digital Operational Resilience Act, Regulation \(EU\) 2022/2554](#)
- [Digital Omnibus on AI, Regulation \(EU\) 2026/1744](#)
- [Cyber Resilience Act, Regulation \(EU\) 2024/2847](#)
- [Whistleblower Protection Directive, Directive \(EU\) 2019/1937](#)
- [EU anti-money laundering package, Regulation \(EU\) 2024/1624](#)
- [General Data Protection Regulation, Regulation \(EU\) 2016/679](#)
- [Capital Requirements Directive VI, Directive \(EU\) 2024/1619](#)

United States Sources

- [SEC Form 10-K](#)
- [SOX Section 302 and Exchange Act Rules 13a-14 and 15d-14](#)
- [SOX Section 906, 18 U.S.C. § 1350](#)
- [Regulation G and Item 10\(e\) of Regulation S-K](#)
- [Exchange Act Rules 13a-15 and 15d-15 and SOX Section 404\(a\)](#)

- [SEC guidance on accelerated filer and large accelerated filer definitions](#)
- [SEC filer-status proposal, May 2026](#)
- [Exchange Act Section 13\(b\) and Rule 13b2-1](#)
- [Exchange Act Rule 13b2-2](#)
- [PCAOB Auditing Standard 2805](#)
- [Securities Act registration forms and Section 11](#)
- [Securities Act Section 17\(a\), Exchange Act Section 10\(b\) and Rule 10b-5](#)
- [Regulation FD](#)
- [Exchange Act Section 16 and Rule 16a-1](#)
- [Insider-trading arrangements and Rule 10b5-1](#)
- [SOX Section 406 and Item 406 of Regulation S-K](#)
- [SOX Section 301 and Exchange Act Rule 10A-3](#)
- [SEC whistleblower protections](#)
- [DOJ and SEC, A Resource Guide to the US Foreign Corrupt Practices Act](#)
- [Sarbanes-Oxley Act, including Section 304](#)
- [Exchange Act Rule 10D-1 and listing standards on compensation recovery](#)
- [SEC cybersecurity disclosure requirements](#)
- [SEC proposed rescission of climate-related disclosure rules, May 2026](#)
- [NIST Artificial Intelligence Risk Management Framework](#)

APPENDIX NINE: LIST OF STAKEHOLDER OUTREACHES IN Q1-Q3 2026

The following lists the stakeholders the PT reached out to in Q1-Q3 2026 via email, virtual meetings, or both, in alphabetical order for each outreach activity. This does not include outreach with individual CFOs.

International Organizations

1. Accounting 4 Sustainability (A4S)
2. Forum of Firms (FoF)
3. IFAC Professional Accountants in Business Advisory Group (IFAC PAIBAG)
4. IFAC Small and Medium Practices Advisory Group (IFAC SMP AG)
5. International Accounting Standards Board (IASB)
6. International Auditing and Assurance Standards Board (IAASB)
7. International CFO Alliance (ICFOA)
8. International Corporate Governance Network (ICGN)
9. International Federation of Accountants (IFAC)
10. International Forum of Independent Audit Regulators (IFIAR)
11. International Organization of Securities Commissions (IOSCO)
12. International Sustainability Standards Board (ISSB)
13. Organisation for Economic Co-operation and Development (OECD)
14. Public Interest Oversight Board (PIOB)
15. Transparency International
16. World Business Council for Sustainable Development (WBCSD)

London Focus Group Meetings (March 3, 5, and 6)

17. Association of Chartered Certified Accountants (ACCA)
18. Chartered Institute of Management Accountants (CIMA)
19. CFGI (UK)
20. CFO Mastermind
21. Group of 100 (G100)
22. Institute of Chartered Accountants in England and Wales (ICAEW)
23. Pensions and Lifetime Savings Association (Pensions UK/PLSA)
24. The Investment Association
25. The Investor Forum
26. UK Financial Reporting Council

Milan Global Roundtable (March 4)

27. Accountancy Europe
28. Autoriteit Financiële Markten (AFM – Netherlands Authority for the Financial Markets)

29. Associazione Nazionale Direttori Amministrativi e Finanziari (ANDAF – National Association of Administrative and Financial Directors)
30. Associazione fra le Società Italiane per Azioni (ASSONIME – Association of Italian Joint Stock Companies)
31. Associazione Italiana Società di Revisione (Assirevi)
32. Bocconi School of Management, Italy
33. Body of Expert and Licensed Accountants of Romania (CECCAR)
34. Borsa Italiana
35. Business Europe
36. Centre for European Policy Studies (CEPS)
37. Chartered Institute of Management Accountants (CIMA)
38. Commission de Surveillance du Secteur Financier (CSSF)
39. Committee of European Auditing Oversight Bodies (CEAOB)
40. Conseil Supérieur de l'Ordre des Experts-Comptables (CSOEC), France
41. Consiglio Nazionale dei Dottori Commercialisti e degli Esperti Contabili (CNDCEC), Italy
42. Commissione Nazionale per le Società e la Borsa (CONSOB – National Commission for Companies and the Stock Exchange), Italy
43. Deloitte Milan
44. Association nationale des directeurs financiers et de contrôle de gestion (DFCG), France
45. European Confederation of Directors' Associations (ecoDa)
46. European Federation of Accountants and Auditors for SMEs (EFAA)
47. European Fund and Asset Management Association (EFAMA)
48. ECE (Institut des diplômés d'expertise comptable en entreprise), France
49. European Capital Markets Institute (ECMI)
50. European Corporate Governance Institute (ECGI)
51. European Securities and Markets Authority (ESMA)
52. European Stability Mechanism (ESM)
53. Institute for the Accountancy Profession in Sweden (FAR)
54. Florence School of Banking and Finance
55. Danske Revisorer Denmark (FSR)
56. Institute for Tax Advisors and Accountants (ITAA)
57. Institute of Certified Accountants of Montenegro (ISRCG)
58. Institute of Certified Public Accountants of Cyprus (ICPAC)
59. Institut sertifikovanih računovođa Crne Gore
60. IOSCO
61. Malta Institute of Accountants (MIA)

- 62. Ministry of Economics and Finance – Italy
- 63. Ordre des Experts-Comptables (OEC)
- 64. Royal Netherlands Institute of Chartered Accountants (NBA)
- 65. Slovenian Institute of Auditors (SIZR)
- 66. Stichting Eumedion
- 67. Union of Chambers of Certified Public Accountants of Türkiye (TÜRMOB)

New York Global Roundtable (March 13)

- 68. American Institute of Certified Public Accountants (AICPA)
- 69. Analytical Mechanics Associates
- 70. Auditing Standards Board of AICPA
- 71. BDO International Limited
- 72. Chartered Accountants Worldwide Network USA
- 73. Chartered Professional Accountants of Canada
- 74. Chartered Professional Accountants of Ontario
- 75. Ernst & Young LLP
- 76. Governmental Accounting Standards Board
- 77. Hillspire, LLC
- 78. Hofstra University
- 79. Illinois CPA Society Ethics Committee
- 80. IAASB
- 81. IFAC PAIBAG
- 82. IFAC SMP AG
- 83. IFIAR
- 84. ISSB
- 85. JCA Consulting, LLC
- 86. Kaiser Permanente
- 87. KET Solutions LLC
- 88. Maryland Association of Certified Public Accountants
- 89. Market Integrity Solutions LLC
- 90. National Association of State Auditors, Comptrollers and Treasurers
- 91. New York State Society of Certified Public Accountants
- 92. Public Company Accounting Oversight Board
- 93. PIOB
- 94. State of Michigan
- 95. The Estée Lauder Companies Inc.

96. UltimQuest Knowledge

97. University of Dayton

Nairobi Global Roundtable (April 16)

98. Andersen

99. Association of Professional Societies in East Africa

100. BDO Global (representing the Global Public Policy Committee (GPPC))

101. Botswana Institute of Chartered Accountants

102. Capital Markets Authority, Kenya

103. Commission on Revenue Allocation, Kenya

104. CQ University Australia

105. Emkaco Enterprises

106. Engineers Board of Kenya

107. Ernst and Young

108. Institute of Certified Public Accountants of Kenya (ICPAK)

109. Institute of Economic Affairs, Kenya

110. IFAC SMP AG

111. Kenya Accountants and Secretaries National Examinations Board

112. Kenya Flower Council

113. Kenya National Chamber of Commerce and Industry

114. Kenya School of Government

115. KPMG (representing the GPPC)

116. National Assembly of the Republic of Kenya

117. Office of the Auditor-General, Kenya

118. Office of the Controller of Budget, Republic of Kenya

119. Pan African Federation of Accountants (PAFA)

120. Public Procurement Regulatory Authority, Kenya

121. Public Sector Accounting Standards Board, Kenya

122. Renaissance Africa Energy Company Limited

123. South African Institute of Chartered Accountants

124. South African Institute of Professional Accountants

125. The National Treasury and Economic Planning, Kenya

126. University of the Witwatersrand

127. Wiseman Nkuhlu Centre for Innovation, Thought Leadership and Governance

Hong Kong Global Roundtable (May 12)

128. Accounting and Financial Reporting Council

- 129. Association of Chartered Certified Accountants
- 130. Association of International Certified Professional Accountants, representing the American Institute of Certified Public Accountants and The Chartered Institute of Management Accountants
- 131. Confederation of Asian and Pacific Accountants
- 132. Hong Kong Institute of Certified Public Accountants (HKICPA)
- 133. Impax Asset Management
- 134. Institute of Singapore Chartered Accountants
- 135. International Finance Corporation
- 136. Japanese Institute of Certified Public Accountants
- 137. Securities and Futures Commission, Hong Kong (representing IOSCO)

Latin America Virtual Global Roundtable (June 2, 2026)

- 138. Associação Brasileira das Companhias Abertas (Abrasca)
- 139. Associação de Investidores no Mercado de Capitais (Amec)
- 140. Colegio de Auditores o Contadores Públicos de Bolivia (CAUB)
- 141. Colegio de Contadores de Chile A.G. (CCCH)
- 142. Colegio de Contadores Públicos Autorizados de Panamá (CCPAP)
- 143. Colegio de Contadores Públicos de Costa Rica (CCPA)
- 144. Colegio de Contadores Públicos de Nicaragua (CCPN)
- 145. Colegio de Contadores Públicos del Ecuador
- 146. Colegio de Contadores Públicos y Auditores de Guatemala (CCPAG)
- 147. Colegio de Contadores, Economistas y Administradores del Uruguay (CCEAU)
- 148. Colegio Hondureño de Profesionales Universitarios en Contaduría Pública (COHPUCP)
- 149. Comissão de Valores Mobiliários (CVM), Brazil
- 150. Comisión Nacional Bancaria y de Valores (CNBV), Mexico
- 151. Comisión Nacional de Valores (CNV), Argentina
- 152. Conselho Federal de Contabilidade (CFC), Brazil
- 153. Consejo de Vigilancia de la Profesión de Contaduría Pública y Auditoría (CVPCPA), El Salvador
- 154. Consejo Técnico de la Contaduría Pública (CTCP), Colombia
- 155. Ernst and Yong, representing JICPA
- 156. Federación Argentina de Consejos Profesionales de Ciencias Económicas (FACPCE)
- 157. IFAC
- 158. Instituto Brasileiro de Governança Corporativa (IBGC)
- 159. Instituto Colombiano de Gobierno Corporativo (ICGC)
- 160. Instituto de Auditoria Independente do Brasil (IBRACON)

- 161. Instituto de Contadores Públicos Autorizados de la República Dominicana (ICPARD)
- 162. Instituto de Gobernanza Empresarial y Pública (IGEP), Argentina
- 163. Instituto Guatemalteco de Contadores Públicos y Auditores (IGCPA)
- 164. Instituto Mexicano de Contadores Públicos, A.C. (IMCP)
- 165. Instituto Nacional de Contadores Públicos de Colombia (INCP)
- 166. Instituto Salvadoreño de Contadores Públicos (ISCP)
- 167. Junta de Decanos de Colegios de Contadores Públicos del Perú (JDCCPP)
- 168. KPMG, representing GPPC
- 169. Ministerio de Hacienda y Crédito Público, Colombia
- 170. National Association of Finance, Administration, and Accounting Executives
- 171. PwC Brazil, representing GPPC
- 172. Superintendencia de Compañías, Valores y Seguros (SCVS), Ecuador
- 173. Superintendencia del Mercado de Valores (SMV), Panama
- 174. Superintendencia del Mercado de Valores (SMV), Peru
- 175. Superintendencia del Sistema Financiero (SSF), El Salvador

India Focus Group Meeting (June 1, 2026)

- 176. CFO Board India

Australia and New Zealand (June 19, 2026) – Invitations issued; session did not proceed

- 177. Accounting and Finance Association of Australia and New Zealand (AFAANZ)
- 178. Accounting Professional & Ethical Standards Board (APESB)
- 179. Auditing and Assurance Standards Board (AuASB)
- 180. Australian Accounting Standards Board (AASB)
- 181. Australian Chamber of Commerce and Industry (ACCI)
- 182. Australian Charities and Not-for-profits Commission (ACNC)
- 183. Australian Institute of Company Directors (AICD)
- 184. Australian Restructuring Insolvency & Turnaround Association (ARITA)
- 185. Australian Securities and Investments Commission (ASIC)
- 186. Australian Small Business and Family Enterprise Ombudsman (ASBFEO)
- 187. Australian Taxation Office (ATO)
- 188. Business Council of Australia (BCA)
- 189. CFA Society
- 190. Chartered Accountants Australia and New Zealand (CA ANZ)
- 191. Council of Small Business Organisations Australia (COSBOA)
- 192. CPA Australia
- 193. Financial Reporting Council

- 194. Group of 100 (G100)
- 195. Institute of Public Accountants (IPA)
- 196. La Trobe University
- 197. The Governance Institute

Other Stakeholder Engagement

- 198. IAASB-IESBA User Advisory Group
- 199. Dr. Mukesh Garg – Associate Professor in the Department of Accounting (Monash University, Australia)
- 200. Jose Esposito (Stakeholder Advisory Council member)
- 201. Ivanyra Correia (Stakeholder Advisory Council member)