

I. Executive Summary

1. The Role of CFOs workstream is one of the first full pilots of the IESBA SMART Framework (SMART). SMART has been integrated into the Project Team's (PT's) work from evidence gathering through to the final report and recommendations. Building on the PT's [June 2026 paper](#), this paper presents an overview of how SMART shaped Phase 1 of the workstream and the lessons learned. **Agenda Item 4A** seeks substantive decisions from the IESBA on the PT's recommendations.
2. SMART served as a working discipline and reference point, which prompted the PT to think critically about the scope of Phase 1 activities, stakeholder targeting, evidence veracity, treatment of stakeholder feedback, and practical responses to inform the IESBA's decisions. The PT's substantive conclusions remain grounded in the evidence gathered, the PT's approved [Terms of Reference \(ToR\)](#), and the IESBA's mandate.
3. The application of SMART is visible across two distinct and connected parts of Phase 1 (described further in paragraph 6):
 - a. **Fact-finding** – where it influenced how the PT scoped, targeted, and built the evidence base. It helped the PT simplify the problem definition, mobilize stakeholder feedback through different channels, and develop responsive feedback to stakeholders; and
 - b. **Final report and recommendations** – where it influenced how the PT synthesized, translated and presented the evidence into simplified, proportionate recommendations to the IESBA.
4. As the volume and diversity of evidence increased, the PT also developed and tested two project-specific working methods: an evidence triangulation framework and an evidence-to-conclusion record, which make the PT's analysis more digestible, visible, and traceable (refer paragraph 8).

II. Embedding SMART into the Role of CFOs Workstream

5. SMART contains guidelines and checks for each of its pillars, which the PT used as reference points to challenge and organize its work. The descriptions of the pillars are reproduced here for convenience:
 - **Simplification:** Promoting clarity, usability, and proportionality across IESBA's standards, communications, and internal processes, ensuring that every output is understandable, efficient, and fit for purpose.
 - **Mobilization:** Enhancing impact through collaboration and partnerships by building strong networks, co-owned initiatives, and shared advocacy for ethics in business, finance and public practice.
 - **Adoption:** Driving consistent uptake and implementation of the IESBA Code by fostering stakeholder commitment, offering tailored support, and demonstrating public-interest value.
 - **Responsiveness:** Ensuring timely, transparent, and evidence-based decisions that reflect stakeholder input, diverse perspectives, and emerging developments.
 - **Targeted Action:** Focusing on where impact is greatest through data-driven prioritization, proportionate engagement, and a deeper understanding of stakeholders' needs and contexts.

6. SMART's impact across Phase 1, from the initial workstream framing through evidence gathering, analysis, and the final report and recommendations, is summarized below:

- **Anchor the scope and problem definition.** Simplification and Targeted Action kept the workstream anchored in the ToR and framed as an evidence-gathering and assessment exercise. This maintained focus on the ethical responsibilities of professional accountant in business (PAIB) CFOs, while allowing broader ecosystem evidence to inform the context in which CFOs operate.
- **Design a broad and targeted evidence strategy.** Mobilization and Targeted Action shaped the use of multiple evidence channels, including surveys, academic and desktop research, targeted outreach, advisory input from institutional stakeholders (in particular, the Stakeholder Advisory Council (SAC), the IAASB-IESBA User Advisory Group, and the IESBA-Jurisdictional Standard Setters (JSS) liaison group), and IESBA Code and jurisdictional legislative framework analyses. Stakeholders and jurisdictions were segmented so that CFOs and other stakeholders were engaged differently and emerging issues were tested across sectors, jurisdictions, organizational settings, and professional backgrounds.
- **Build evidence cumulatively and respond as the work progressed.** Responsiveness helped turn individual outreach activities into a connected evidence-building process. Emerging themes were synthesized between engagements, feedback was provided to participants shortly after outreach, and findings informed subsequent engagement, IESBA updates, SAC and JSS discussions, and the PT's planning of remaining work.
- **Test evidence sufficiency and focus remaining work.** As Phase 1 progressed, Mobilization, Responsiveness, and Targeted Action helped the PT assess the contribution and limitations of evidence channels, identify where perspectives remained underrepresented, and direct further work towards areas of most relevance to the IESBA's mandate and the PT's eventual recommendations. The focus therefore moved progressively from gathering evidence to determining where sufficient convergence existed and where qualifications or evidence gaps needed to be addressed or explained.
- **Convert the evidence into findings and assess the Code.** Simplification and Responsiveness supported the development of the evidence triangulation framework and evidence-to-conclusion record, enabling recurring findings to be tested against the available evidence channels, contextual analysis, and relevant qualifications. These pillars focused the detailed assessment of Parts 1 and 2 and the Glossary of the Code on ethical issues and risks identified, including distinguishing matters relating to Code adequacy from operability of the Code, governance, and ecosystem considerations.
- **Develop proportionate recommendations and frame the IESBA's decisions.** In the final stage, Simplification and Targeted Action shaped the report architecture so that principal findings, recommendations, and decisions to be made are visible upfront and supported by a traceable evidential basis. Adoption, which played a more limited role during evidence gathering, became more relevant as the PT developed the proposed Phase 2 initiative and outcomes including co-designing, piloting, and evaluating implementation materials with appropriate partners before committing further resources.

III. How SMART Added Value

7. The following table illustrates how each SMART pillar influenced this pilot and the resulting value for both the IESBA's decision-making and stakeholders who participated in, or may be affected by, the workstream:

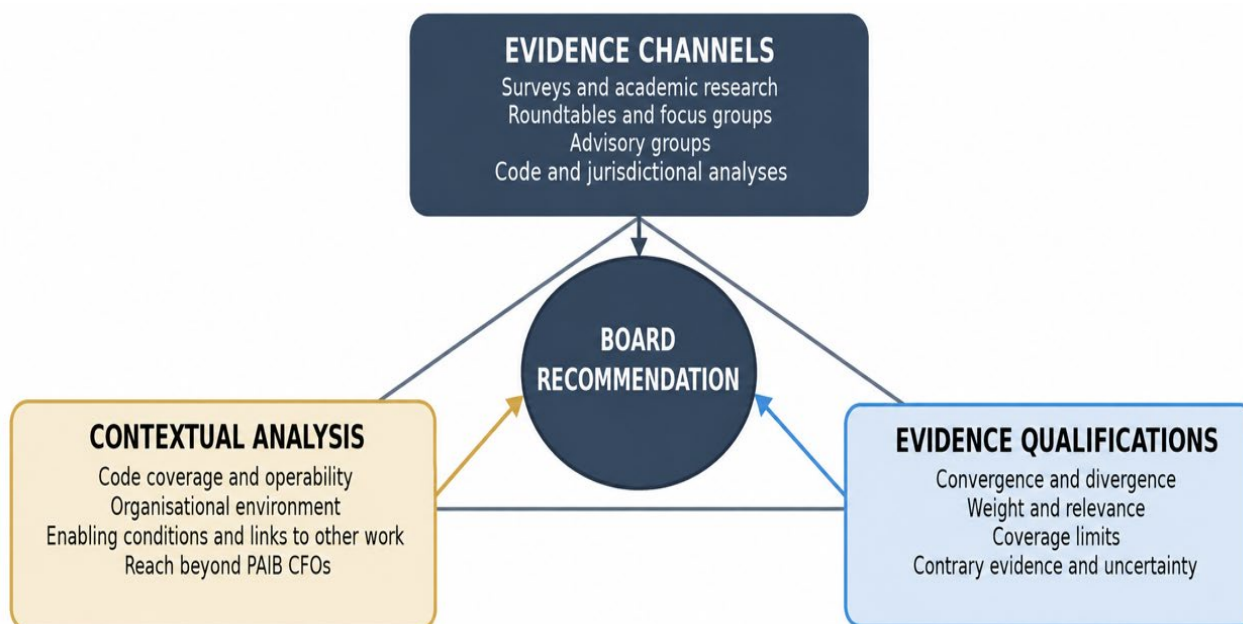
Pillar	Application	Board Value	Stakeholder value
Simplification	Kept Phase 1 anchored in the ToR during fact-finding. The final report's recommendations are positioned upfront, with Code adequacy distinguished from operability, governance, and ecosystem matters, and remaining evidence gaps clearly identified.	Enables the IESBA to readily identify the decisions required, understand the supporting rationale and distinguish matters requiring action from those requiring further evidence or monitoring.	Provides a clearer account of what the workstream examined, what it found and how the conclusions relate to the evidence gathered. This makes the outcome easier to understand and communicate beyond the IESBA.
Mobilization	Used segmented stakeholder groups and multiple evidence channels. Engagement extended beyond the IESBA's usual channels and included CFOs and other stakeholders with different professional, geographic, and organizational perspectives.	Gives the IESBA a broader and more differentiated evidential base, with the contributions and limitations of individual evidence channels made visible.	Creates meaningful opportunities for different stakeholder groups to contribute in ways suited to their context. Provides participants with greater confidence that conclusions are informed by their perspectives.
Adoption	As recommendations were developed, the PT considered the intended users, delivery routes, and potential partners for co-design, piloting, and evaluation of the proposed Phase 2 implementation support.	Allows the IESBA to consider likely usability and delivery implications before committing resources to further work.	Brings intended users and delivery partners into the design of future implementation support, increasing the likelihood materials are practical, accessible, and responsive to CFOs' ethical issues.
Responsiveness	Treated outreach cumulatively, using later engagements to test, refine or qualify earlier themes. Post-event summaries were provided promptly following outreaches. The evidence-to-conclusion record traces evidence through	Enables the IESBA to see how stakeholder input influenced, confirmed or qualified the PT's findings and conclusions and where differing views remain.	Provides a visible feedback loop. Stakeholders can see that their input was captured, tested against other evidence and carried through into the work where supported, strengthening transparency around how engagement informs the IESBA's work.

Pillar	Application	Board Value	Stakeholder value
	testing, qualifications, and findings.		
Targeted Action	Segmented CFO and other stakeholder outreach, used emerging evidence to identify remaining gaps, and focused further analysis on matters affecting the final conclusions rather than repeating work where sufficient evidence had already been obtained.	Supports a proportionate response by directing attention and resources to the issues most relevant to the IESBA's mandate and decisions.	Reduces unnecessary demands on stakeholders. Directs engagement toward groups, issues, and evidence gaps where further input can meaningfully contribute to evidence gathering. Supports more tailored future actions for different audiences and organizational settings.

IV. Project-Specific Methods Developed During the Pilot

8. The PT developed the following working methods as the evidence base grew and through the application of SMART concepts relevant to this workstream:
 - **Evidence triangulation framework.** Brings together three connected lenses: evidence channels, contextual analysis, and evidence qualifications. The underlying matrices and analytical records test which evidence bases support a finding, whether context affects its interpretation, and any limitations, divergence, or uncertainty that need to be flagged as qualifications before findings support recommendations.

Figure 1. How the evidence triangulation matrix supports PT recommendations to the IESBA



- **Evidence-to-conclusion record.** Records where material input arose, the issue or theme identified, how the PT tested or qualified it, where it was reflected in the analysis, and its effect on the final findings and recommendations. This provides a traceable account of how evidence and stakeholder input influenced the PT's reasoning, findings, and recommendations.

V. Lessoned Learned and Way Forward

9. Lessons learned and good-practice examples from the Role of CFOs pilot will be considered alongside experiences from embedding SMART in the post-implementation review (PIR) workstreams on NOCLAR® and the restructured Code and broader SMART initiatives. The SMART team will collate these insights in a report to the IESBA in March 2027, setting out key lessons, practical examples, and proposed next steps following SMART's first year of implementation.