Meeting:	IESBA	**Agenda Item**
Meeting Location:	New York, United States	**6**
Meeting Date:	December 7 – 10, 2026	

Restructured Code Post-Implementation Review (PIR)

Objectives

1. To consider:
   (a) The Project Team's[1] Final Report; and
   (b) The Project Team's proposed Action Plan.

Activities Since September 2026

2. The Project Team, in coordination with the NOCLAR®[2] PIR Project Team, sought feedback from 18 regulators and oversight authorities, 12 in G20 jurisdictions and six in other jurisdictions. Four provided feedback, which is summarized in Appendix 2 of **Agenda Item 6-A**.
3. The Project Team engaged with the IESBA Communications team and other staff to develop the next steps in the proposed Action Plan and with IFAC on the development of the digital Code.
4. In Q4 2026, as part of the SMART pilot, the Project Team and the NOCLAR PIR Project Team took several actions to incorporate the five SMART pillars into their activities (see Appendix).
5. The Project Team held one virtual meeting with the Board Advisors to prepare the agenda material for the December 2026 IESBA meeting.

Coordination with the International Auditing and Assurance Standards Board (IAASB)

6. In January 2027, the two IESBA PIR Project Teams will engage with the IAASB's project teams for the PIRs of ISA 315 (Revised 2019)[3] and ISA 540 (Revised)[4] to share learnings from their respective PIRs and to identify common themes and good practices.

---

1 IESBA Restructured Code PIR Project Team:
- Geoffrey Kwan, IESBA Director
- Greg Walters, IESBA Senior Manager

Board Advisors:
- Saadiya Adam, IESBA member
- Sung-Nam Kim, IESBA member
- Rania Uwaydah, IESBA member

2 Responding to Non-Compliance with Laws and Regulations

3 International Standard on Auditing (ISA) 315 (Revised 2019), *Identifying and Assessing the Risks of Material Misstatement*

4 ISA 540 (Revised), *Auditing Accounting Estimates and Related Disclosures*

7. This discussion is consistent with the proposal in the draft IESBA SWP 2028–2031 Consultation Paper[5] to develop and implement with the IAASB a common approach to PIRs. The NOCLAR PIR Project Team will report back to the Board on the outcome of the discussion in March 2027.

Matters for IESBA Consideration

8. At its September 2026 meeting, the IESBA was generally supportive of the Project Team's recommendations. The Final Report builds on the Project Team's full analysis presented at that meeting, with revisions to reflect the Board's comments. The IESBA's consideration at its December 2026 meeting therefore focuses on the changes made since September 2026, which are summarized in the table below. A mark-up showing all changes from the September 2026 full analysis is provided for reference in **Agenda Item 6-C**.

Area	Key Changes
Adoption	• The matters relating to IFAC's adoption status framework are now presented as the Project Team's observations instead of recommendations, as the Adoption and Implementation (A&I) Working Group is already addressing them with IFAC. The A&I Working Group is asked to consider the other adoption-related matters raised in the Final Report, including the adoption of the Code by global and regional PAOs that require compliance from all their members. • A new paragraph explains the limitations of the adoption status data, as the responses were self-assessed and the survey did not define the extent of modification that would still constitute adoption or what "at least as stringent" means.
Drafting conventions	• The recommendation now takes into account new and revised standards issued since 2018, and makes clear that the review would clarify the existing conventions and address any gaps without changing their substance.
Online resources and digital Code	• The recommendation to explore the development of an online resource library has been replaced with a recommendation to enhance access to IESBA's existing online resources on the IESBA website. • The recommendation on the digital Code is now to engage with IFAC, together with the IAASB, on the new platform being developed to replace the eIS (electronic International Standards), including seeking opportunities to provide input and participate in user testing.
Simplification	• The recommendation to prioritize simplification as a strategic objective has been replaced with a recommendation to take

[5] See **Agenda Item 3-A**

Area	Key Changes
	respondents' concerns about complexity into account when pursuing initiatives relating to simplification under the SMART framework and the proposed strategic objective under the IESBA SWP 2028–2031 to support global adoption and consistent implementation through a clear and accessible Code. The assessments on cross-referencing and on terms and definitions are now to be considered as part of any targeted simplifications of the Code.
Distinction between requirements and application material	• A new recommendation to explore ways of leveraging technology in the digital Code to facilitate easier access to the requirements of the Code for users who would find it helpful, reflecting respondents' comments and a comment at the September 2026 IESBA meeting.
Additional feedback from regulators (Appendix 2)	• A new Appendix 2 summarizes the feedback from the four regulators that responded to the additional outreach in Q4 2026. As this feedback was received after the survey analysis was completed and two of the four regulators did not respond to the survey questions, it is not included in the counts and percentages in the Final Report. The matters raised by these regulators are consistent with the themes in the Final Report and have been taken into account in finalizing the Project Team's recommendations.

9. The proposed Action Plan (**Agenda Item 6-B**) covers three of the Final Report's recommendations that can be progressed in the near term without significant resources. It also sets out where the other recommendations are expected to be considered.

10. IESBA members are asked:

    (a) Whether they agree with the changes made to the Project Team's recommendations to reflect the Board's comments in September 2026, as summarized above, and with the finalization of the Final Report in **Agenda Item 6-A**; and

    (b) Whether they support the Project Team's proposed Action Plan in **Agenda Item 6-B**.

Materials Presented

For Discussion

Agenda Item 6-A	Restructured Code PIR – Final Report
Agenda Item 6-B	Restructured Code PIR – Proposed Action Plan

For Reference

Agenda Item 6-C	Restructured Code PIR – Final Report (Mark-up from September 2026 Full Analysis)

Appendix

Incorporating the SMART Framework – Q4 2026

In Q4 2026, the Restructured Code PIR Project Team and the NOCLAR PIR Project Team applied the five SMART pillars in their work as follows:

SMART Pillar	Activities
Simplification	• Used AI tools to facilitate the analysis of survey responses and key observations.
Mobilization	• Sought additional feedback from regulators and oversight authorities.
Adoption	• Shared survey feedback to support the A&I Working Group's work.
Responsiveness	• Coordinated with the IAASB on common approaches to PIRs.
Targeted Action	• Held discussions with IFAC and IESBA teams to develop the Restructured Code PIR Project Team's proposed Action Plan for its Final Report's recommendations.