Restructured Code Post-Implementation Review

Final Report: Analysis of Survey Responses and Recommendations

A. EXECUTIVE SUMMARY

1. This paper presents the Final Report of the Post-Implementation Review (PIR) of the Restructured Code, based on the Project Team's analysis of the responses to the PIR survey (the survey). The survey generated 40 responses[1] from a range of stakeholder groups, including regulators and oversight bodies, jurisdictional standard setters (JSS), professional accountancy organizations (PAOs), accounting firms, and individual professional accountants.

2. This report is organized around the two main components of the survey: (1) Adoption status of the Restructured Code (2018 edition and onwards) and implementation support (Questions 12-18); and (2) Usability, clarity of language and clarity of responsibility of the Restructured Code (Questions 19-30).

3. Overall, respondents expressed strong support for the Restructured Code. However, various respondents raised a number of comments or concerns regarding its length, complexity and navigability.

Adoption Status of the Restructured Code and Implementation Support

4. Respondents from 13 of the 21 jurisdictions[2] represented in the list of respondents have reported adoption of the Restructured Code in their jurisdictions, with most of these jurisdictions located in the Asia-Pacific, Middle East and Africa regions. Eleven respondents, representing 7 jurisdictions, indicated that the 2024 or 2025 edition of the Code has been adopted in their jurisdictions. Separately, two respondents reported convergence with the Code in their jurisdictions or that there are provisions in local law or regulation that are at least as stringent as the Code's provisions.

5. The IESBA Adoption and Implementation (A&I) Working Group is working closely with IFAC as IFAC seeks to modernize its Compliance Program to enhance the methodology that will support more consistent adoption status assessment across jurisdictions. The A&I Working Group is also developing its plan for 2027 on A&I, including stakeholder engagement and partnerships, that will be presented to the Board for consideration at its December 2026 meeting.

6. As part of its planning and activities, the A&I Working Group is already addressing with IFAC the matters relating to IFAC's adoption-status framework identified in this report.

7. Against this background, the Project Team **recommends** that the A&I Working Group:

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1 All survey responses can be accessed here.

2 Counts and percentages throughout this Final Report reflect the 40 survey responses analyzed by the Project Team and presented to the IESBA in September 2026. Feedback subsequently received from four regulators is not included, as it was received after the analysis was completed and two of those regulators did not respond to the survey questions. This feedback is summarized separately in Appendix 2.

- When assessing and reporting on the impact and reach of the Code, in addition to jurisdictional adoption, consider global and regional PAOs that have adopted the Code and require compliance from all their members;
- Consider other related matters raised in this report as part of its work on promoting A&I of the Code.

8. Respondents also reported providing or having access to a broad range of implementation support materials or resources, including guidance and educational materials, ethics hotlines and discussion forums. Inquiries received by respondents about the structure and drafting of the Code were relatively few, with most instead relating to the application of specific concepts and standards, which falls outside the scope of this PIR.

9. The Project Team **recommends** that the IESBA:

- Through the IESBA A&I Working Group, proactively engage with the Board's various stakeholders in identifying the most impactful implementation and other support materials as well as opportunities to leverage existing materials published by JSS, PAOs and other stakeholders.
- Explore ways to enhance access to the IESBA's existing online resources, such as implementation support material, thought leadership pieces, and other support and educational material, so they are easier to locate on the IESBA website.

10. The Project Team's analysis, detailed views and recommendations on A&I support are set out in Section D1 below.

Usability and Clarity of Language and Responsibility

11. Respondents expressed strong support for the foundational features of the Restructured Code, including the building-blocks approach, the distinction between requirements and application material, and the responsibility to comply with the fundamental principles and apply the conceptual framework. There was strong support for the Guide to the Code (Q.19-22). Support was also similarly strong for the clarity of responsibility for independence at the individual, firm and network firm level as set out in Parts 4A and 4B of the Code (Q.28-30).

12. Support was more mixed on the questions on the general clarity of language and responsibility, though combining "yes" and "somewhat" responses still shows high overall support across each of them. In this regard, the responses to the questions on scalability and proportionality as well as translation received the least "yes" response (44% and 54% respectively).

13. Respondents raised a number of key themes and topics across many of these questions, including:

- **Length and complexity**: The Code has grown in length and complexity since 2018 and, in places, has drifted from a principles-based toward a more rules-based approach.
- **Usability and accessibility**: Extensive cross-referencing, and inconsistent or ambiguous terminology can make the Code more difficult to navigate.
- **Scalability**: The Code's growing length undermines scalability and makes it harder to apply for less well-resourced users.

- **Translation:** Barriers to translation include the Code's length, pace of changes, and complex sentence structures.
- **Additional support**: There is a need for additional guidance, examples and digital navigation tools to support consistent application of the Code.

14. The Project Team **recommends** that the Board:

Usability, Clarity of Language and Responsibility

- Take into account the feedback received from respondents to this Restructured Code PIR survey when pursuing initiative(s) relating to simplification under the SMART framework and the proposed strategic objective under the Strategy and Work Plan (SWP) 2028–2031 to support global adoption and consistent implementation through a clear and accessible Code.
- As part of the upcoming PIRs of significant standards, seek feedback from stakeholders on any specific complexity issues that present barriers to effective implementation and consider how best to address such matters.
- Review the drafting conventions used to develop the 2018 Restructured Code and subsequent new and revised standards, providing clarifications and addressing any gaps where needed without changing their substance, and publish them on the IESBA website;
- As part of the review of the drafting conventions, consider whether the existing sections of the drafting conventions on:
    - Cross-references could be clarified, and any gaps addressed, to promote a consistent approach to cross-referencing in new and revised standards; and
    - Terms and definitions could be clarified, and any gaps addressed, to promote the consistent use of terms in new and revised standards.
- As part of any targeted simplifications of the Code, consider an assessment of whether:
    - The Code's usability could be improved by revising how provisions or Sections of the Code are cross-referenced; and
    - Certain terms and definitions in the Code could be revised to improve clarity, for example, "professional accountant," "audit team" and "assurance team."
- Consider clarifying the purpose of certain terms in the Guide to the Code.
- Consider clarifying, in the Guide to the Code and/or the drafting conventions, the purpose of certain phrasings in the application material to make clear that these are not intended to be applied as requirements.
- Recognizing that the Board debated at length how best to distinguish requirements from application material during the Structure of the Code project and determined to choose the current approach, balancing a number of considerations, explore ways to leverage technology in the digital Code to facilitate easier access to the requirements of the Code for users who would find it helpful.

Scalability and Translation

- Continue its strategic focus on promoting the scalability and proportionality of the Code with the aim of improving the understandability and accessibility of the Code, particularly for the small and medium practices (SMP) community; and
- Explore opportunities under its A&I workstream to highlight, promote and educate stakeholders on the scalability and proportionality of the Code.
- Consider feedback on translation issues when issuing exposure drafts and remain diligent in adhering to the drafting conventions to minimize complex drafting that increases the challenge of translation for adopting jurisdictions.

Digital Tools

- Engage with IFAC, together with the IAASB, on the new platform being developed to replace the eIS,[3] including seeking opportunities to provide input and participate in user testing, with the aim of ensuring that the platform supports the usability of the Code. Where feasible, this could include features suggested by the respondents such as better search tools, hyperlinks, defined terms and cross-references and direct access to guidance materials.

15. The Project Team's analysis, detailed observations and recommendations on usability and clarity of language and responsibility are set out in Section D2 below.

B. INTRODUCTION

16. In February 2012, while discussing the revisions to the IESBA strategy 2011-2012, the IESBA noted that various stakeholders had commented on issues associated with the structure of, and clarity of responsibility in, the Code. Therefore, the IESBA agreed to consider how the structure of the Code could be improved to raise the visibility of its requirements and clearly explain who is responsible for meeting them. In December that year, the IESBA established a Structure Working Group to explore options for the way forward and consider how the structure of the Code might be improved.

17. In December 2017, following a series of public consultations, the Board approved the final text of the Restructured Code. It was then released in April 2018 and became effective in June 2019. The Restructured Code enhanced the clarity, usability, and enforceability of the Code through a more intuitive structure, clearer drafting conventions, and the use of plain English. The objectives of restructuring and redrafting the Code were to improve the understanding and consistent application of the Code's provisions, facilitate global adoption and translation, and strengthen confidence in the Code as the international benchmark for ethics and independence standards for the accountancy profession.

18. As part of its 2024-2027 Strategy and Work Plan (SWP), the IESBA committed to conducting a Post-Implementation Review (PIR) of the Restructured Code. As part of the PIR, a survey was released on April 1, 2026. The comment period ended on July 3, 2026.

19. The survey included 30 questions over 4 Parts:

- Part A – Demographic Information
- Part B - General Information

[3] The eIS is a web-based platform, managed by IFAC, that provides electronic access to the standards developed by the IESBA, IAASB and the International Public Sector Accounting Standards Board (IPSASB).

- Part C - Usability and Clarity of Language and Responsibility
- Part D - Clarity of Responsibility for Independence Standards

20. The aim of the survey was to obtain information from stakeholders on the adoption status of the Code as well as on the usability and clarity of language and responsibility in the Code. The information gathered would then assist the IESBA in determining whether the restructuring of the Code has achieved its intended purpose.

C. OVERVIEW OF RESPONDENTS

21. As of September 14, 2026, the IESBA had received responses from 40 respondents representing different stakeholder groups, both organizations and individuals. Respondents came from 21 jurisdictions across different regions (See Appendix 1 for a list of the respondents). Additional feedback received from four regulators after this date is summarized separately in Appendix 2.

22. In terms of groupings, there are 3 regulators and oversight authorities, 2 independent JSS; 21 PAOs; 9 Accounting Firms; 3 Individual PAPPs; 1 from Academia and 1 "Other."

23. A total of 21 jurisdictions were represented:

Asia-Pacific	Europe	Middle East and Africa	North America
Australia Hong Kong SAR India Japan South Korea Malaysia New Zealand Singapore	France Germany Malta Netherlands Portugal United Kingdom	Ghana Kenya Lesotho Saudi Arabia South Africa Uganda	United States

24. No responses were received from investors and other users of financial statements. This is likely due to their lack of regular interaction with the Code. In this regard, the Project Team notes that the number of responses received for this survey is similar to that for the Restructured Code ED – Phase 2, which received 40 responses.

25. Given the role of regulators in the adoption and enforcement of the Code, the Project Team, in coordination with the NOCLAR® [4] PIR Project Team sought feedback from additional regulators, focusing on G20 jurisdictions because of their global impact. Of the 18 regulators and oversight authorities contacted, four provided feedback. 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 this Final Report. Instead, their responses are summarized separately in Appendix 2. The matters raised by these regulators are consistent with the themes identified in this Final Report and have been taken into account in finalizing the Project Team's recommendations.

[4] Responding to Non-Compliance with Laws and Regulations

D. ANALYSIS OF SURVEY RESPONSES

26. The survey was designed around two broad lines of inquiry to determine if the restructuring of the Code has achieved its intended purpose.

27. The first set of questions (Q.12-18) was addressed to all respondents. They focused on understanding the adoption status, implementation support available such as guidance and educational materials, and the types of inquiries and questions received by the respondents about the Code.

28. The second set included the remaining questions (Q.19-30) and was addressed to specific groups of respondents. These questions focused on:

- Whether or not the various design approaches in the Restructured Code, such as the building blocks approach and the distinction between requirements and application material, were helpful.
- The clarity and readability of the Code.
- The clarity of responsibilities in the independence standards in Parts 4A and 4B.

D1. Adoption Status of the Restructured Code and Implementation Support

Adoption Status of the Restructured Code

29. The revised structure and redrafted provisions of the IESBA Code from the Structure of the Code Project (Structure Project) were integrated into the 2018 Revised and Restructured IESBA Code (Restructured Code). Other new or revised standards were incorporated into later editions of the Code. Question 12 sought to understand the adoption status of the Restructured Code (2018 or later edition). This question was addressed only to respondents that are JSS, PAOs, Regulators or Oversight Bodies, Individual PAPPs or Accounting Firms.

30. Respondents were asked to select from one of the following options:

(a) Yes, through full adoption with no modifications of the Code

(b) Yes, through adoption with modifications

(c) No, the IESBA Code was used as a basis to develop the local Code (or equivalent provisions) which is converged with the IESBA Code

(d) There are provisions in relevant law or regulation or a different ethical framework that are at least as stringent as the Code's provisions

(e) Not adopted

31. While the survey briefly described adoption and convergence, it did not define the extent of modification that would still constitute adoption, or what "at least as stringent" means. Respondents could also benchmark against different editions of the Code. As the responses were self-assessed, there is a possibility of respondents interpreting these categories differently.

<u>Jurisdictional Information</u>

32. As part of its review of the information provided by respondents to Q.12, the Project Team has considered the adoption status information published on the International Federation of Accountants (IFAC) website. In addition, the Project Team also discussed with the IESBA's Adoption and

Implementation Workstream Staff (A&I Staff) the respondents' input, the relevance and currency of the IFAC data as well as other relevant A&I-related activities.

33. The Project Team noted that:

- IFAC has recently updated its jurisdictional adoption status information on its website with respect to international standards, including the Code.
- The adoption status on the IFAC website only shows "adopted," "partially adopted" and "not adopted." These categories do not fully align with the options provided in Q.12. For instance, the IFAC data does not differentiate between full adoption and adoption with modifications.
- In determining the adoption status of a jurisdiction, IFAC staff would review the information provided by stakeholders in that jurisdiction. That decision often involves judgment given the different jurisdictional regulatory frameworks and make-up of the profession.

34. The following table lists the responses provided by respondents on the adoption of the Code in their jurisdictions, with some minor adjustments made by the Project Team following discussion with the A&I Staff and assessment of the IFAC data:

Adoption Status	Jurisdictions
Full adoption with no modifications	Hong Kong SAR, Malaysia, Uganda
Adoption with modifications	Australia, India, Japan, Lesotho, New Zealand, Singapore, Saudi Arabia, South Africa, South Korea, UK
No, convergence with the Code	Germany, Malta, Netherlands
Local provisions are at least as stringent as the Code	Kenya, U.S.
Not adopted	None

35. The adjustments made by the Project Team include the following:

- One PAPP and one PAO respondent selected category (d) for India and South Korea. However, it is the Project Team's assessment that these two jurisdictions are more appropriately classified as "adoption with modifications" (category (b)).
- The adoption status for Japan (i.e., adoption with modifications) was based on input from the PAO[5] while a PAPP respondent from that jurisdiction selected the option of "not adopted."
- The adoption status for the UK (i.e., adoption with modifications) is based on the information provided by the PAOs,[6] while the jurisdictional regulator[7] selected "not adopted" on the basis that it has issued its own ethical standards for all statutory audits and other public interest assurance engagements.

[5] JICPA

[6] ICAEW and ICAS

[7] UK FRC

36. In addition, one regional PAO respondent[8] indicated that most jurisdictions in Africa have, in some ways, adopted the 2018 version of the Restructured Code. The respondent also noted that:

    - While some jurisdictions have adopted the Code in full, others have adopted the Code to align with local regulatory frameworks;
    - Translation in local languages remains limited; and
    - The effectiveness of implementation varies due to resource constraints, limited regulatory support, and inadequate training in emerging areas such as fraud detection and sustainability assurance ethics.

37. A number of respondents indicated that either the 2024 or 2025 version of the Code has been adopted in their jurisdictions.[9]

38. With regards to the types of modification made in adopting the Code (category (b)), respondents' feedback can be grouped as follows:

    - Minor or structural and stylistic changes rather than substantive modifications (e.g., replacement of "International" in the title of the Code).
    - Local enhancements on different provisions of the Code (e.g., professional skepticism and inducements) and other jurisdiction-specific provisions.
    - Some provisions omitted due to conflicts with local laws (e.g., confidentiality).
    - Modification to align with local legislative and regulatory requirements (e.g., ethical standards set by local regulator).
    - Narrower in scope (e.g., applicable only to assurance practitioners).

39. With regards to those jurisdictions listed under category (c):

    - Two PAOs[10] from Europe indicated that the Code has been incorporated into their local regulations within the context of the local and broader European Union (EU) regulatory frameworks in their local languages. A third European PAO[11] indicated that its local Code of Ethics was last updated in 2016 and a review process is underway to determine how best to implement the Code with local caveats.

40. Respondents from two jurisdictions[12] indicated that the Code has been translated into their local languages. One regional PAO[13] indicated that translation of the Code into local languages remains limited, with English serving as the predominant working language across most jurisdictions.

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8 PAFA. According to the IFAC website, 11 African jurisdictions have adopted the Code.

9 Australia, Japan, New Zealand, Saudi Arabia, Singapore, South Africa, UK (ICAEW with ICAS advising that they have adopted 2023 version of the Code with the Tax Planning standards added)

10 IDW (Germany), NBA (the Netherland)

11 MIA (Malta)

12 Japan, Saudi Arabia

13 PAFA

Other Information

41. Four global network firms[14] indicated that their global networks have adopted the Code in full, adjusting to local legal and regulatory requirements as appropriate, with one firm focusing its response on its global independence policy. In addition, two other global network firms[15] also indicated that the Code has been "adopted" within their global networks with local adjustments.

42. One global PAO[16] indicated that it has adopted and incorporated in full the 2025 Edition of the IESBA Code (Volume 1) and will adopt the IESSA,[17] effective December 2026, which is applicable to its global constituency.

Project Team Views and Recommendations

43. The responses received are generally consistent with the IESBA's understanding that jurisdictions in the Asia-Pacific and Middle East and Africa regions have fewer regulatory or other barriers to adopting the Code.

44. There is not one universally accepted methodology and criteria for determining the adoption status of the Code that is used or understood by IFAC, the IESBA and their stakeholders. Such determination is often not straightforward, requiring judgment and considering factors such as:

- Where responsibility lies within a jurisdiction for the adoption of the Code, for example, among regulators, JSS and PAOs.
- The nature and extent of modification or convergence with the Code, given the legal framework of a jurisdiction.

45. The A&I Working Group is working closely with IFAC as IFAC seeks to modernize its Compliance Program. This will include a more granular adoption-status framework and enhanced methodology that will provide greater clarity and support more consistent adoption status assessment across jurisdictions. As part of its engagement with IFAC, the A&I Working Group has made the following recommendations to IFAC that:

- It includes new classifications or sub-classifications in its adoption-status framework to enhance understanding of how a jurisdiction has adopted the Code.
- The criteria for determining whether the Code has been adopted or is used be tightened to reduce the level of subjective judgment and potential inconsistent determinations.
- It gives consideration to whether the local provisions of a jurisdiction are sufficiently aligned with the Code that those jurisdictions could be considered as having "adopted" the Code. This recognizes that the legal framework in certain jurisdictions may make it difficult for the Code to be adopted without significant modification to its structure and content.

46. The A&I Working Group is developing its forward plan on adoption, stakeholder engagement and partnerships for 2027, which will be presented to the Board for its consideration in December 2026.

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[14] BDO, DTTL, KPMG, PwC

[15] Forvis Mazars, RSM

[16] ACCA

[17] International Ethics Standards for Sustainability Assurance (including International Independence Standards). The IESSA falls outside the scope of this survey.

47. The Project Team **recommends** that the A&I Working Group:

- When assessing and reporting on the impact and reach of the Code, in addition to jurisdictional adoption, consider global and regional PAOs that have adopted the Code and require compliance from all their members.
- Consider other related matters raised in this Final Report as part of its work on promoting A&I of the Code.

Implementation Support – Guidance and Educational Materials

48. Questions 13 and 14 sought information on the types of guidance and educational materials that organizational respondents (JSS, PAOs, Regulators or Oversight Bodies, and Accounting Firms) have developed, or that individual respondents (Professional Accountants in Public Practice (PAPPs) and Professional Accountants in Business (PAIBs)) have received, to support understanding of how to use the local Code or provisions.

49. Respondents were asked to select from one or more of the following options:

- Technical guidance (e.g., FAQs)
- Education/training programs (e.g., webinars, CPD programs)
- Articles, publications or newsletters (e.g., updates about standards, case studies or illustrative examples)
- Other (Please specify)
- None

50. In response to Q.13, respondents across stakeholder groups indicated that they have provided guidance and education materials to support understanding of how to use the local Code as well as the IESBA Code:

Stakeholder Group	Technical Guidance	Education/ Training Programs	Articles, Publications or Newsletters	Other
Regulators or Oversight Bodies[18]	1	1	0	1
JSS[19]	2	2	1	1
PAO[20]	13	15	13	10[21]

18 IRBA

19 APESB, NZAuASB

20 ACCA, AICPA–PEEC, CA ANZ, CPA Australia, HKICPA, ICAEW, ICAS, ICPAU, IDW, ISCA, JICPA, KICPA, LIA, MIA, MICPA, NBA, PAFA, SAICA, WPK

21 Six PAO/firm respondents (ICAS, CA ANZ, IDW, KPMG, RSM and PAFA) — are counted only under "Other" as they have aggregated their responses to Q13 under this category.

Stakeholder Group	Technical Guidance	Education/ Training Programs	Articles, Publications or Newsletters	Other
Accounting Firms[22]	2	3	1	6
Total	**18**	**21**	**15**	**18**

51. In addition, respondents have also provided examples of the types of materials they have produced under the above categories, including:

Technical guidance

- Guidance, staff publications and alerts on specific topics such as whistleblowing and confidentiality, fundamental principles and conceptual framework, NOCLAR.
- Implementation guide for the local code, step-by-step plans.
- Direct technical support for local SMPs through helplines and other enquiry services.
- Independence guide.

Education/Training programs

- Presentations, workshops, training sessions, ethics sessions at annual conferences.
- Content incorporated into theoretical learning programs of universities.
- Webinars and other events to inform participants of major revisions to the Code.
- E-learnings.
- Ethics recordings.

Articles, publications or newsletters

- Regular e-newsletters, e-magazines, quarterly ethics digest.
- Awareness articles when revisions to the Code are made.
- Publications on the Restructured Code, new versions of the Code.
- Changes to the Code highlighted in a PAO's Rulebook Commentary.

Other materials or resources

- An app that presents short, practice-based ethical dilemmas drawn from real-life professional situations.
- Moral decision-making model for accountants with interactive PowerPoint slides.
- Video series featuring in-depth interviews with accountants who have faced significant professional and moral dilemmas.
- Podcasts, roundtables and pre-recorded live streaming events.

22 BDO, Crowe KSA, Deloitte, EY, Forvis Mazars, KPMG, PwC, RSM

- Discussions of ethical scenarios and the Code at a PAO's local branch meeting.
- Global ethics forums.
- Ethics-related research, thought-leadership activities.

52. One regional PAO[23] pointed out that the availability and quality of these resources vary considerably across jurisdictions within the region. It added that many PAOs continue to rely heavily on materials produced by the IESBA and IFAC, adapting them where possible to local circumstances.

53. Accounting firm respondents also provided additional examples, including:

- Guidance notes on different topics
- Mandatory annual training on ethics and independence
- Webcasts
- Global independence policy, global Code of Conduct
- Annual ethics, independence and compliance conferences
- Local firm supplements to network responses
- Use of IFAC and IESBA resources

54. In response to Q.14, individual respondents also indicated that they have received technical guidance and educational materials.

Project Team Views and Recommendations

55. Refer to paragraphs 62-65 on the Project Team's views and recommendations for Q.13-16.

Implementation Support – Other Activities

56. In addition to guidance and education material, the survey (Q.15 and 16) also sought information on whether organizational respondents (JSS, PAOs, Regulators or Oversight Bodies, and Accounting Firms) offer guidance to individual professional accountants, accounting firms, or other users on the application of the local Code or provisions, or whether PAPPs and PAIBs have access to such guidance in their jurisdictions, if such assistance is sought. Respondents were asked to select from one or more of the following:

- Ethics hotline or equivalent (e.g., for technical queries, application questions on how to use the local Code or provisions)
- Discussion forum (e.g., for sharing knowledge)
- Other (Please specify)
- None

[23] PAFA

57. For organizations (Q.15), respondents across stakeholder groups indicated that they have provided other support if assistance was sought:

Stakeholder Group	Ethics Hotline or Equivalent	Discussion Forum	Other
Regulators or Oversight Bodies[24]	1	0	0
JSS[25]	0	0	2
PAO[26]	15	8	6
Accounting Firms[27]	5	2	4
Total	**21**	**10**	**12**

58. Many respondents, particularly PAOs, indicated that they provide ethics hotlines, helpdesks, email enquiries or equivalent services. In this regard, JSS respondents pointed out that while they respond to queries, they do not provide professional advice.

59. On other types of additional support, respondents have provided a number of examples including:

- Professional standards teams that assist members in clarifying their ethical obligations and provide practical guidance on a confidential basis.
- Access to an advisory group that comprises of senior members of a PAO with a cross section of practice and business experience that assists members to apply the Code.
- Communities of practice, peer-learning platforms, knowledge sharing initiatives, other informal and structured discussion platforms which facilitate exchanges of experiences.
- Ethics "buddy" service which a PAO member can make use of in certain circumstances.
- Subscription to an independent free confidential advice line which a PAO member can contact if they are considering whistleblowing on a particular matter.
- Technical committees, ethics committees and panels.

60. Global network firm respondents noted that additional support can be drawn from a combination of both their global and network teams.

61. In response to Q.16, two of the individual respondents indicated that they have access to an ethics hotline or equivalent and discussion forum.

Project Team Views and Recommendations

62. Respondents' feedback to Q.13-16 highlights the importance of implementation support and the use

24 IRBA

25 APESB, NZAuASB

26 ACCA, AICPA–PEEC, CA ANZ, CPA Australia, HKICPA, ICAEW, ICAS, ICPAU, IDW, ISCA, JICPA, KICPA, LIA, MIA, MICPA, NBA, PAFA, SAICA, WPK

27 BDO, Crowe KSA, Deloitte, EY, Forvis Mazars, KPMG, PwC

of different tools in addition to the more traditional, technically-oriented materials.

63. In this regard, the IESBA has also been proactively expanding its range of guidance and support materials beyond technical materials to more effectively assist users of the Code and other stakeholders in gaining a practical understanding of how to apply the provisions of the Code.

64. The A&I Working Group has begun to expand its work beyond sustainability, including through the development of the IESBA's partnership program and engagement with stakeholders from the Board's agreed list of high-priority jurisdictions.

65. In this light, the Project Team **recommends** that the IESBA:

- Through the IESBA A&I Working Group, proactively engage with the Board's various stakeholders in identifying the most impactful implementation and other support materials as well as opportunities to leverage existing materials published by JSS, PAOs and other stakeholders.
- Explore ways to enhance access to IESBA's existing online resources, such as implementation support material, thought leadership pieces, and other support and educational material, so they are easier to locate on the IESBA website.

Common Inquiries Regarding the Structure and Drafting of the Local Code

66. Questions 17 and 18 sought information about the inquiries or questions relating to the structure and drafting of the local Codes or provisions that organizational respondents (JSS, PAOs, Regulators or Oversight Bodies, and Accounting Firms) have commonly received, or that the individual respondents (PAPPs and PAIBs) have raised or inquired about.

67. In response to Q.17, some respondents noted that the inquiries they have received are about application rather than the structure or drafting of the local provisions,[28] with some going further to suggest that they have not received any.[29] The inquiries on specific topics identified by respondents include:

- Independence requirements[30]
- Safeguards[31]
- Conflicts of interest[32]
- NOCLAR[33]
- Confidentiality[34]

[28] ICAEW, KPMG, Deloitte, NZAuASB, WPK, JICPA

[29] ICAS, ISCA, HKICPA, MICPA

[30] PAFA, SAICA, CAANZ

[31] IRBA

[32] CAANZ, ICAEW, Crowe KSA

[33] CAANZ, PAFA

[34] CAANZ, ICAEW

- PIE requirements[35]
- The interaction between local legal requirements and the Code.[36]

68. One respondent commented that users of the Code often misread illustrative "threat" examples as an exhaustive list and recommended that the Code clarify these examples are illustrative, not exhaustive.[37]

69. Question 18 sought information from individual PAPPs and PAIBs only and requested them to provide details on any specific structure or drafting matters pertaining to the local Code or provisions that they have inquired about. Only one PAPP respondent[38] provided a response and they identified NOCLAR and NAS as areas of inquiry. However, they did not provide any further details as to why they responded in this manner.

Project Team Views and Recommendations

70. Respondents' feedback indicates that most of the questions relate to specific concepts or standards of the Code rather than the structure and drafting of the Code. The Project Team noted that questions regarding the application of particular provisions of the Code fall outside the scope of the PIR.

D2. Usability and Clarity of Language and Responsibility

71. The Restructured Code[39] has four Parts focused on:

- All professional accountants (Part 1)
- Professional accountants in business (Part 2)
- Professional accountants in public practice (Part 3)
- Independence for audit and review engagements (Part 4A) and independence for other assurance engagements (Part 4B)

In addition, a building blocks approach was applied whereby Part 1 applies to all professional accountants but is not repeated in subsequent Parts. The provisions in subsequent Parts are incremental in nature and build off Part 1.

72. Questions 19-30 sought feedback from respondents on the usability, clarity of the structure, language and responsibilities for compliance with the Code. With the exception of Q.27, respondents were asked to select one of the following prescribed responses with the option of explaining their response:

(a) Yes;

(b) Somewhat; or

(c) No

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35 SAICA, IRBA, RSM

36 PAFA

37 BDO

38 Crowe KSA

39 Part 5 of the Code, which contains the International Ethics Standards for Sustainability Assurance (IESSA), is outside the scope of this survey and only becomes effective in December 2026. The adoption and implementation of Part 5 has been a key focus of the IESBA's A&I Working Group as well as its IESSA Implementation Monitoring Advisory Group (IIMAG).

Building Blocks

73. Question 19 was directed to all respondents and asked whether the building blocks approach of the Code is simple and clear, and whether it helps in navigating the Code. Out of 39 responses received, 31 (79%) were "yes." Seven respondents (18%) replied "somewhat" while one respondent PAPP indicated that they did not engage in any audit and consulting work and replied "no."

74. One common supportive feedback from some respondents is that the Code progresses logically from fundamental principles to more specific requirements, making it easier to understand and apply.[40] They also noted that:

- Part 1 establishes a clear, foundational baseline, avoiding unnecessary repetitions in the other Parts.[41]
- The clear distinction between and flow from requirements to application material within each section make obligations easy to identify before the Code explains how to apply them in practice.[42]
- The structure of the Code into Parts helps users focus on requirements that apply to their professional role or engagement type.[43]
- The building blocks approach provides a logical and understandable structure, particularly for education, training and identifying relevant ethical requirements.[44]

75. A few respondents expressed support for the four-part structure, including the distinction between Parts 4A and 4B.[45]

76. There were a few suggestions that non-authoritative and other support materials, such as Q&As, additional navigation aids, flowcharts and practical implementation examples and clickable links to related interpretive material, need better integration within the electronic version of the Code. This would further improve usability, particularly for SMPs and first-time users.[46]

77. Some respondents made suggestions about a digital code and navigational tools:

- A digital Code should help users search, filter and navigate the Code according to their circumstances while keeping the fundamental principles and conceptual framework visible.[47]
- Existing digital navigation tools should be enhanced to include better search tools, hyperlinks, defined terms and cross-references, and navigation aids, as well as direct access to guidance materials.[48]

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40 IRBA, Menash, NZAuASB, PAFA, PwC

41 IRBA

42 APESB, HKICPA

43 CAANZ, HKICPA

44 NZAuASB

45 IDW, WPK

46 KPMG, IFAC, PAFA

47 NZAuASB

48 APESB, IFAC, KPMG

- The eCode should be re-established and its digital navigational tools enhanced to include links to defined terms, cross-references, and direct and easy access to non-authoritative material, including FAQs and examples, making the structure more intuitive.[49]

78. A few respondents raised concerns about working within the Parts and commented that:

- Navigating across multiple Parts and Sections can be difficult — requirements are sometimes dispersed and need to be located quickly, and cross-referencing can be less intuitive for less experienced users or frustrating under time pressure.[50]
- The continued growth of the Code may create a perception that it is becoming more rule-based rather than principles-based.[51]
- The use of different Parts has resulted in a degree of duplication that has made the Code less user-friendly.[52]

79. A few respondents made specific comments regarding Parts 4A and 4B, including duplication and unnecessary length as well as occasional confusion where Parts 4A/4B provisions refer back to Part 3.[53]

80. One respondent recommended a major overhaul of the Code by reducing granularity and repetitions, making the Code more principles-based as well as improving structural alignment with the standards of the International Auditing and Assurance Standards Board (IAASB), including the use of drafting conventions.[54]

Guide to the Code

81. Question 20 asked respondents about whether the Guide to the Code is helpful in explaining how the Code is structured and how it should be applied. Out of 38 responses received, 32 (80%) were “yes.” 4 (11%) replied “somewhat,” two replied “no.”

82. In support of the Guide to the Code, respondents commented that:

- The Guide provides a helpful overview of how the Code is organized.[55]
- One of the key benefits of the restructuring project is that the Guide explains clearly and concisely how the Code should be used.[56]
- The Guide is most beneficial for new users who are becoming familiar with the Code.[57]

83. A few respondents raised concerns about the need for, and practical use of, the Guide. They commented as follows:

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49 AICPA, APESB, IFAC, KPMG

50 ECE, ICAEW

51 ICAS

52 WPK

53 PwC, WPK

54 IDW

55 APESB

56 ICAS

57 IRBA

- The existence of the Guide to the Code suggests that the Code has itself become too long, complex and difficult to use.[58]
- Instead of reliance on supplementary guidance such as the Guide, the IESBA should spend resources on improving the usability, structure and accessibility of the Code.[59]
- Busy practitioners might bypass the Guide and access the relevant provisions directly.[60]
- The Board should do more to raise awareness of the Guide.[61]

84. One respondent who answered "No" to the question repeated their earlier comments to Q.19 by suggesting further streamlining of the Code and a return to a principles-based approach.[62]

Emphasizing Compliance with the Fundamental Principles and Applying the Conceptual Framework

85. Question 21 sought input from respondents on how clear it is within each Section that a PA (or firm as appropriate) has the responsibility to comply with the fundamental principles and apply the conceptual framework. Out of 38 responses received to the question, 35 (92%) were "yes," and 3 responses (8%) were marked "somewhat."

86. In supporting this structure, a few respondents commented that:

- The Code clearly communicates the responsibility to comply with the fundamental principles and apply the conceptual framework.[63]
- Overarching requirements in Sections 200, 300, 400 and 900, together with references to the conceptual framework in the introductory sections, make this responsibility clear.[64]

87. A few respondents who answered "yes," however, suggested that while the requirement is clear, the repetition adds unnecessary length to the Code without meaningfully improving clarity, such as the message of complying with the fundamental principles and applying the conceptual framework (e.g., R120.3, R200.5, R300.4, R400.19, R900.12.)[65]

88. Respondents who selected "somewhat" raised the following comments:

- The Code should include part-specific summaries that consolidate Part 1 obligations alongside the Part-specific provisions to reduce the extent of the need for cross referencing.[66]
- There seem to be inconsistencies across Parts of the Code. In particular, Sections 270 and 220 are identified in paragraph 300.5 A1 as applying to both PAIBs and PAPPs, but are included only in Part 2 and not replicated in Part 3. The respondent recommended either incorporating

58 IDW, WPK

59 IFAC

60 ICAEW

61 NZAuASB

62 WPK

63 APESB

64 NZAuASB

65 IDW, WPK

66 ICAEW

these provisions into Part 3 or providing clearer cross-references and explanatory guidance to promote consistent application.[67]

Distinction between Requirements and Application Material

89. Question 22 sought input from respondents on whether the Code's approach to delineating requirements using the ("R") paragraphs from application material ("A" paragraphs) makes it clear what a PA's or firm's obligations are under the Code. Out of 39 responses received to the question, 31 (80%) were "yes," while 7 (18%) replied "somewhat" and one replied "no".

90. A few respondents expressed the view that the distinction between requirements and application material is effective. They commented that:

- Requirements are clearly identified, with application material placed immediately after them, helping users understand what is mandatory and what is explanatory.[68]
- Bolding the requirements paragraphs, as done in some local adaptations of the Code, further improves clarity and readability.[69]
- Clear, consistent drafting is increasingly important because digital and AI-based tools need to be able to reliably distinguish requirements from application material.[70]

91. A few respondents, however, questioned the effectiveness of this distinction, suggesting that the placement of the application material directly beneath requirements makes it difficult to distinguish the requirements.[71] There was also a comment that there are different interpretations of the status of application material relative to requirements.[72]

92. Some respondents also suggested that there may be hidden or implicit requirements in the application material.[73] Examples they provided included:

- Phrases such as "it is generally necessary" (e.g., 210.8 A1, 310.9 A3), "it is generally expected" (e.g., 410.12 A2, 905.8 A2), and the use of the word "expected." It was argued that these may be interpreted as creating implicit obligations.[74]
- A phrase such as "Factors to consider…include" which seems to imply the listed items are themselves requirements despite being placed in application material.[75]

93. Other feedback from respondents included the following:

- The Code could be shortened by focusing on requirements and essential application material only, with practical examples relocated to linked non-authoritative material accessible through

[67] BDO

[68] APESB

[69] APESB, CAANZ

[70] KPMG

[71] NBA

[72] ICAS

[73] ECE, DTTL, IDW, IFAC

[74] IDW, IFAC

[75] IDW

technology tools.[76]

- A question as to whether users understand the difference between application material within the Code and non-authoritative material that sits outside it.[77]
- A short summary of mandatory obligations at the beginning of each section might improve clarity.[78]

Scalability and Proportionality

94. Question 23 sought views from all respondents on whether the Code is scalable and proportionate. Out of 39 responses received, 17 (44%) were "yes," while 20 (51%) answered "somewhat" and two replied "no".

95. A few respondents acknowledged that the Code's principles-based approach creates scalability and proportionality, which allow firms to tailor compliance with their circumstances.[79] In also sharing this view, a few respondents pointed to the Code's differentiated requirements for PIEs and non-PIEs as demonstrating useful scalability of the Independence provisions.[80]

96. A number of respondents, however, questioned the effectiveness of scalability and proportionality in the Code. They commented that:

    - The growing length of the Code undermines these concepts and reinforces perceptions that it is becoming rules-based rather than principles-based, increasing the risk of the Code becoming outdated too quickly.[81] There was also a comment that a longer Code may constrain the IESBA's ability to respond to emerging issues in a timely manner.[82]
    - The concepts of scalability and proportionality are less apparent or more difficult to apply for less well-resourced users such as SMPs, including sole practitioners, and PAs in smaller businesses.[83]
    - The Code is less scalable for audit and assurance practitioners and firms that must apply multiple parts of the Code and understand fine distinctions between similar requirements.[84]

97. Examples of areas of concern a few respondents provided included the Long Associations provisions in Section 540, the NOCLAR provisions and certain requirements on inducements involving close family members.[85]

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76 IRBA, NZAuASB, PwC

77 CPAA

78 ICAEW

79 APESB, KPMG, PwC

80 IRBA, NZAuASB, PwC

81 ICAS, ICAEW, NBA, WPK

82 UK FRC

83 AICPA-PEEC, APESB, CPAA

84 NZAuASB

85 IFAC, KICPA, PwC

98. Some respondents also requested more examples, practical scenarios, and case studies illustrating how the Code can be applied proportionately in different circumstances.[86] In this regard, it was argued that while the IESBA's recent staff publication on proportionality is helpful, the fact that such a publication was needed illustrates that proportionality is not clearly embedded within the Code itself.[87]

99. A few respondents went further to suggest that scalability and proportionality are not explicitly acknowledged in the Code or incorporated as an underlying design principle. The respondents argued that scalability and proportionality are only achieved largely through interpretation and the exercise of professional judgment.[88]

Enforcement

100. Question 24 sought input from respondents that have the responsibility to enforce compliance with the provisions of the Restructured Code. Respondents were asked whether the delineation of requirements and application material in the Code helped with enforcement. Out of 22 responses received, 15 (68%) replied "yes," six (27%) replied "somewhat" and one replied "no."

101. Some respondents reported that drafting changes have helped enforcement. They commented that:

- Separating requirements from application material has made enforcement, oversight, investigations, and disciplinary processes easier.[89]
- Clearer delineation helps identify when a PA has failed to comply with a specific obligation during investigations and disciplinary proceedings.[90]
- Formatting techniques, particularly the use of bold type for mandatory requirements in the local version of the Code, improve the ability of regulators and disciplinary panels to identify minimum standards of conduct.[91]
- Using case studies and illustrations helps to explain the applicability of the Code for complex areas.[92]

102. A few respondents noted application material can sometimes resemble requirements, or certain terminology may have different legal meanings across jurisdictions and that these interpretation difficulties may complicate enforcement.[93] One example was given of enforcement issues relating to compliance with the fundamental principles of integrity and professional competence and due care.[94]

Clarity of Language and Readability

103. The Code was redrafted to increase the clarity of language, thereby improving its readability and understandability. Changes included using simpler and shorter sentences, simplifying complex

86 APESB, BDO, ECE, IFAC, Mensah, NZAuASB

87 ICAEW, UK FRC

88 IDW, IFAC

89 IFAC, PAFA

90 PAFA

91 CAANZ, CPAA

92 Crowe KSA

93 ICAEW, KICPA

94 ICAEW

grammatical structures, and avoiding legalistic and archaic terms. Question 25 sought views from respondents on whether the language used in the Code is clear, readable and understandable. Out of 40 responses received, 24(60%) were "yes," twelve (30%) replied "somewhat," and four replied "no."

104. A few respondents agreed that the restructuring of the Code has improved readability through simpler sentence structures, use of the active voice, and less legalistic language.[95] One respondent, however, made the observation that recently added material has drifted back toward longer and more complex sentences. Another respondent suggested that the IESBA explain the rationale for key requirements in plain language so that practitioners do not need to consult separate Board papers to understand why provisions operate as they do.[96]

105. Several respondents flagged specific terms that remain ambiguous, leading to inconsistent application, with some terms also difficult for translation. These terms include:

- "might" or "may"[97]
- "and/or"[98]
- "professional judgment"[99]
- "exceptional circumstances[100]"
- "encouraged"[101]
- "transfer" and "transmission"[102]

106. Some respondents also identified certain concepts, sections or provisions of the Code as more complex or may not be well defined, such as:

- The reasonable and informed third party test[103]
- "direction, supervision and review"[104]
- NOCLAR, NAS and PIE-related provisions[105]
- More recent standards such as using the work of an external expert, tax planning and sustainability-related material.[106]

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95 DTTL, NZAuASB, RSM

96 NZAuASB

97 CAANZ, NZAuASB, SAICA

98 IFAC

99 ICAEW, SAICA

100 IDW

101 IDW

102 JICPA

103 SAICA

104 PwC

105 Mensah, RSM, SAICA

106 DTTL

107. Some respondents requested more examples, practical education, case studies, real-world scenarios, or guidance to support consistent application of the Code, including for more complex areas.[107]

108. From those respondents who answered "no," the following concerns were raised:

- The Code has become overly detailed, granular, and difficult to apply including hidden requirements, ambiguous terminology, confusion over definitions and the status of the glossary, the lack of scalability and proportionality, and unnecessarily different wording for equivalent ideas.[108]
- Some application material appears to convey mandatory expectations such as "It is generally necessary" and "It is generally expected."[109]

Ease of Translation

109. Question 26 sought input from respondents on whether the Code is easy to translate. Out of 28 responses to this question, 15 (54%) were "yes," eight (29%) were "somewhat", and five were "no."

110. A few respondents suggested that plain-language explanations, illustrative examples, and clearer terminology would support translation and consistent understanding.[110]

111. Some respondents raised the following concerns:

- The size of the Code and the pace of amendments make translation resource-intensive and difficult to keep current.[111]
- Complex or lengthy sentence structures compound translation difficulty, making it harder to achieve consistent interpretation across languages, regardless of the specific terms involved.[112]
- Translation methodology is inconsistent across jurisdictions, with some translating very literally and others adapting wording for readability, which can lead to differences in how provisions are understood.[113]
- There may be an opportunity to use technology, including AI-based tools, during the standard-setting process to help identify terms or phrasing that could create translation or interpretation challenges before a standard is finalized.[114]

112. Some respondents also highlighted the following translation challenges:

- Some Code terms such as "concurred"[115] do not exist in the local language; others such as

[107] APESB, BDO, Crowe KSA, RSM

[108] IDW

[109] IFAC

[110] KPMG, Control Solutions

[111] IFAC, Menash, WPK

[112] IFAC

[113] KPMG

[114] KPMG

[115] KICPA noted that the term "concurred" (as used in paragraph R600.23 of the 2025 Code) is not used in their jurisdiction and is therefore difficult to translate

"determine," "indirect" and "encourage" do not translate naturally.[116]

- "may" versus "might" are difficult to translate consistently because some languages do not make the same distinction.[117]
- The distinction between "significant" and "material" needs to be reflected consistently in translation.[118]

113. A few respondents also raised concerns about how drafting choices may affect translation. It was noted that nuanced or technical English terms may lose precision or lead to inconsistent interpretation once translated.[119] A few others observed that lengthy, complex or heavily qualified sentence structures make translation more difficult and can undermine consistency across jurisdictions.[120] There was also a call for clearer, shorter, and more concise language to support accurate and consistent translation.[121]

Other Comments

114. Question 27 was an open-ended question for respondents to submit any comments not otherwise provided relating to the structure and drafting of the Code. Thirty respondents submitted comments.

115. While a number of respondents indicated they had no further comments,[122] a few expressed their support for the Restructured Code, commenting that it has improved the overall clarity, readability and understandability of the Code.[123]

Principles-Based, Length and Complexity

116. Several respondents observed that the Code has grown in length and granularity since the first version of the Restructured Code in 2018, with increased complexity and potentially moving away from a principles-based approach to a rules-based one. These respondents commented that:

- Requirements and application material should be more consistently linked back to the Fundamental Principles and Conceptual Framework.[124]
- The Code is becoming increasingly detailed and rules-based, risking a compliance-driven mindset and over-prescriptive requirements becoming quickly outdated.[125]
- The growing volume of requirements and application material risks making the Code difficult to use, inconsistently applied across jurisdictions, and less practicable to implement and applied

[116] KICPA, IFAC, NBA, PwC

[117] IFAC, SAICA, WPK

[118] KPMG

[119] IFAC, KPMG, WPK

[120] DTTL, IFAC, PwC

[121] DTTL, KPMG

[122] AICPA–PEEC, Control Solutions Forvis Mazars, ICPAU, K.K., MICPA, APESB, SARE Consulting, SAICA

[123] DTTL, KPMG, ISCA

[124] BDO

[125] NBA, CAANZ

in certain jurisdictions.[126]

- The IESBA's priority going forward should be consolidating the benefits already achieved, rather than further expansion or reorganization of the Code.[127]
- While there is complexity in some of circumstances the Code seeks to address, such as in some of the recent independence projects, the drafting choices made to address these technical complexities may have reduced the usability and understandability of requirements and guidance.[128]

117. A few respondents observed that the drafting conventions introduced in 2018 have not been consistently applied in subsequent projects.[129] One respondent further suggested that the IESBA should consider undertaking a focused review of its drafting conventions similar to the IAASB's drafting principles and guidelines "Complexity, Understandability, Scalability and Proportionality"(CUSP).[130]

118. One respondent suggested that the IESBA should continue to simplify language and terminology of the Code,[131] while another went further to suggest a simplification project to make the Code more accessible and practicable, particularly help to SMPs and individual PAs who do not have large resources to implement and manage compliance.[132]

Usability and Accessibility

119. One respondent suggested that usability should be treated as a priority by the IESBA. The respondent added that the IESBA should focus on simplification, digital navigation and practical implementation support during its next phase of work.[133]

120. A few respondents identified extensive cross-referencing as a specific obstacle to usability, noting that references between sections that are materially distant from one another interrupt the flow of reading and increase the risk of misinterpretation.[134] One suggested that, where a cross-referenced provision is central to another section, a concise summary should be included directly within the referring section rather than relying solely on a cross-reference.[135]

121. A few respondents also reiterated the importance of digital enhancements to promote accessibility and usability of the Code.[136] One respondent made a few suggestions,[137] including:

- Reintroducing an interactive, searchable electronic version of the Code with improved

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126 ICAEW, PwC, IDW

127 ECE

128 NZAuASB, IFAC

129 DTTL, IFAC

130 IFAC

131 KPMG

132 PwC, IDW

133 NZAuASB

134 ICAEW, RSM

135 RSM

136 KPMG, IFAC, ECE

137 KPMG

navigation, and features to compare versions and track changes over time.

- Ensuring that the Code and related resources remain accessible to AI and other digital tools, without access barriers that limit machine readability.

Other Comments

122. Other comments raised by respondents include the following:

- The content of Part 2 should be minimized and should be left to local regulatory frameworks.[138] Supporting material aimed at a broader finance or executive audience should not present voluntary reliance on the Code as equivalent to the formal oversight obligations of regulated PAs;[139]
- From an enforcement perspective, ambiguity arises when the Code uses encouraging language rather than explicit mandates.[140]
- The IESBA Handbook has, in some instances, been amended without notice, which risks creating a gap between the IESBA Code and jurisdictional codes.[141]

Clarity of Responsibility (For individual PAPPs, Accounting Firms, Regulators or Oversight Bodies or PAOs)

123. Questions 28-30 sought input from respondents on the clarity of responsibility in relation to independence for an individual PAPP (Q.28), for a firm (Q.29), and for a network firm (Q.30).

124. Only certain respondents (Individual PAPPs, Accounting Firms, Regulators or Oversight Bodies or PAOs) provided responses, which were either “Yes”, “Somewhat” or “No.”

125. For Q.28, of the 34 responses received, 30 respondents answered “Yes” (88%) with 4 respondents answered “Somewhat” (12%). For Q.29, 30 respondents indicated “Yes” (88%), while the same four respondents indicated “Somewhat.” For Q.30, 27 respondents answered “Yes” (79%) while 7 respondents answered “Somewhat.”

126. The same four respondents[142] answered “somewhat” on all three questions, and provided largely the same response for each of these questions. Their feedback mainly focused on principles-based Code, length of the Code, complexity of the independence provisions as well as clarity of terms and definitions. The comments included the following:

- There was a call for a return to a principles-based approach, as the Code’s growing length and duplication across Parts have made it increasingly bloated and user-unfriendly.
- Whether all the NAS examples need to be included in the Code, given that they contribute significantly to its length.
- The independence provisions relating to group engagements are among the most complex areas of the Code to interpret and apply consistently in practice.

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138 KICPA

139 ECE

140 IRBA

141 JICPA

142 CAANZ, IDW, IFAC, WPK

- The volume and intricacy of independence requirements mean firms often need to rely on dedicated independence specialists, a resource not available to every firm,
- A number of terms have been identified as difficult to apply. For instance, it was noted that "professional accountant" carries a different meaning in different Parts of the Code. In addition, the subtle differences between "audit team" and "assurance team" requires readers to work out from context who a given requirement actually binds.
- The continued lack of clarity in definition of PIE has undermined the clarity of independence-related responsibilities, creating uncertainty as to which entities are within the scope of the stricter independence requirements.

127. Additional feedback received from other respondents on Q.30 includes the following:

- The requirements relevant to network firms are dispersed across multiple sections of the Code, making them difficult to locate. Therefore, it would be better to bring the relevant provisions together more clearly through use of technology, additional guidance, or improved navigation.[143]
- Additional guidance and practical examples addressing complex network structures would be helpful. [144]
- There is some confusion over the distinction between "firm" and "network firm" in R400.18 and R400.20 and the practical application of the firm and network-firm responsibilities in some instances.[145]

Project Team Views and Recommendations

128. The following contains the Project Team's observations, views and recommendations in light of the responses received on Q.19-30 of the survey.

Overall Observations

129. Overall, responses to Q.19-30 show strong support among respondents for the clarity and usability of the Restructured Code. The "Yes" option was the most commonly selected of the three prescribed answers on every one of these questions, and a majority of respondents answered "yes" on all questions except for Q.23 on the topic of scalability and proportionality.

130. The Board received very strong support for the Code's foundational structural elements. There were high percentages (around 80% and above) on "yes" responses to questions on the building-blocks approach (Q.19), the responsibility to comply with the fundamental principles and apply the conceptual framework within each Section (Q.21), as well as the clarity of the distinction between requirements and application material (Q.22). The clarity of responsibility for independence as set out in Parts 4A and 4B of the Code with respect to individuals, firms and network firms also drew similarly strong support (Q. 28-30).

131. Support was more mixed on the remaining questions. However, combining "yes" and "somewhat" responses still shows high overall support across each of them, notwithstanding certain concerns raised by some respondents. Scalability and proportionality drew the lowest "yes" response of any

[143] KPMG

[144] Forvis Mazars, PAFA

[145] ICAEW, SAICA

question in this range, with 44% responding “yes”. However, a slim majority of respondents (51%) also answered "somewhat." Taken together, these responses therefore still represent overall strong support for the scalability and proportionality of the Code.

132. Ease of translation was the next lowest, at 54% "yes" (and the smallest response base of any question, at 28 respondents), followed by the clarity of the Code's language more generally, at sixty percent (Q25).

133. Respondents also strongly welcomed the Guide to the Code, with a large majority answering “yes” (80%), and several respondents highlighting it as a particularly useful entry point for those still becoming familiar with the Code.

134. In light of the responses received, the Project Team believes the Restructured Code has broadly achieved its objectives.

135. However, despite this overall support, respondents' comments on Q.19–30 have surfaced a number of key themes and topics where consideration could be given to further improving the Code's clarity and usability. The Project Team's observations and recommendations on these key themes are set out below.

Principles-Based Approach and Length of the Code

136. Some of the most frequently raised comments relate to the perception that the Code has moved away from a principles-based approach toward a more rules-based one. This perception seems to have been reinforced by the growth in length and granularity of the Code since the Restructured Code was first issued in 2018. Some respondents described later versions of the Code since 2018 as increasingly detailed and over-prescriptive, cautioning that a Code of this length risks becoming quickly outdated and constraining the IESBA's ability to respond to emerging issues in a timely manner. It was further suggested that the size of the Code and pace of change will impact on translation of the Code.

137. There was also some related feedback about potentially unnecessary duplication that does not add to clarity. The example often given is the requirement to comply with the fundamental principles and apply the conceptual framework, which is repeated in near-identical terms at R120.3, R200.5, R300.4, R400.19 and R900.12.

138. The Project Team notes that:

- It is a matter of fact that the Code has grown in length with the approval of a number of new or revised standards since the issuance of the 2018 Restructured Code.
- The Code is principles-based. However, certain recent standards, particularly in relation to independence, have been more granular, especially in terms of some of the requirements. This recognizes the inherent complexity of the topics addressed and the need to address the issues that arise with sufficient specificity to support consistent application and promote enforceability. This is the case, for example, with Section 405 addressing group audit engagements, and Section 410 addressing fees. Nevertheless, revisiting the length and granularity of particular standards is outside the scope of this PIR. These matters should be considered as part of future PIRs for these standards.
- As part of implementing its SMART framework, the Board will further consider how it can better promote the usability and accessibility of the Code under the “Simplification” pillar of the

framework. In particular, staff will undertake a "Use of the Code" Simplification initiative, evaluating opportunities, risks and trade-offs, as well as explore options such as segmented versions for specific user groups with the aim of improving the usability and accessibility of the Code.

- In addition, the draft SWP 2028–2031 Consultation Paper (Agenda Item 3-A of the December 2026 Board meeting) includes a proposed strategic objective to support global adoption and consistent implementation through a clear and accessible Code, which includes undertaking targeted simplifications of the Code where warranted.

139. The Project Team therefore **recommends** that the Board take into account the feedback received from respondents to this Restructured Code PIR survey when pursuing initiative(s) relating to simplification under the SMART framework and the proposed strategic objective under the SWP 2028–2031 to support global adoption and consistent implementation through a clear and accessible Code.

Complexity

140. Related to comments about the Code moving towards a more rules-based approach, comments were also raised about the increase in complexity of the Code. The most referenced examples relate to the new independence standards issued since the 2018 version of the Restructured Code, including NAS, PIE-related requirements, Engagement Team – Group Audits, and tax planning, and more recently, sustainability and using the work of an external expert. While respondents recognized that the Code is addressing some complex topics or issues, it was suggested that the drafting choices the IESBA has made to address technical complexities may have reduced the understandability and usability of the Code.

141. The IESBA was also asked to continue its efforts to simplify the language and terminology of the Code as well as to consider commencing a simplification project to make the Code more accessible and practicable, particularly for SMPs and less well-resourced users of the Code.

142. In the context of comments about the Code being lengthy, complex and moving away from principles-based approach, there was a call for the IESBA to more consistently follow the drafting conventions developed for the Restructured Code as well as a suggestion for the IESBA to consider undertaking a focused review of its drafting conventions.

143. The Project Team observes the following:

- As noted above, many of the comments raised by respondents about the perceived complexity of the Code are outside the scope of this PIR as they relate to specific standards, such as NAS, Engagement Team – Group Audits and tax planning, rather than to the structure and clarity of the Restructured Code. Some of the recent, significant standards will be subject to their own PIRs as part of the current SWP or the SWP 2028-2031.
- When addressing complex issues and circumstances such as those dealt with by the Board when developing some of its recent independence standards, it may not always be possible or appropriate to reach a simple standard-setting solution. When addressing these issues as part of due process, the Board takes into account a variety of factors, including the nature and complexity of the particular issue, the implementability and enforceability of the provisions, the need for consistency in application, and importantly, the need to be responsive to the public interest.

- Following the approval of a new standard, the IESBA often commissions the development of Staff Questions and Answers and other supporting materials to assist stakeholders in further understanding how certain provisions should be understood and implemented. In prioritizing adoption and implementation as a strategic focus area, the IESBA is engaging more closely with the profession and other stakeholders to identify any potential implementation issues and to develop materials that effectively address these issues and other barriers to adoption of the Code.
- It will be important for the Board to be agile and continue to develop its toolkit of responses to address emerging issues and other matters, such as barriers to implementation. These responses may include, among other matters, the development of NAM or other support materials as well as narrow-scope amendment projects that may be more effective than significant, multi-year projects in dealing with practical and complex issues.
- The Board will also be conducting PIRs for a number of the new or revised standards finalized since the release of the 2018 Restructured Code, including NAS and fees, PIE definition, Engagement Team – Group Audits, tax planning, sustainability, and using the work of an external expert. As part of these PIRs, the Board will have the opportunity to address any complexity-related implementation issues raised by stakeholders.
- The Project Team believes that any review of existing provisions should be limited to identifying opportunities to clarify the existing conventions and address any gaps where needed without changing substance and making the drafting conventions more visible to stakeholders.
- The Board debated at length how best to distinguish requirements from application material during the Structure of the Code project and determined to choose the current approach, balancing a number of considerations.

144. In light of the above, the Project Team **recommends** that the Board:

- As part of the upcoming PIRs of significant standards such as those mentioned above, seek feedback from stakeholders on any specific complexity issues that present barriers to effective implementation and consider how best to address such matters.
- Review the drafting conventions used to develop the 2018 Restructured Code in light of subsequent new and revised standards, clarifying these conventions and addressing any gaps where needed without changing their substance, and publishing them on the IESBA website.
- Take into account respondents' concerns about the complexity of the Code when pursuing initiatives relating to simplification under the SMART framework and the proposed strategic objective under the SWP 2028–2031 to support global adoption and consistent implementation through a clear and accessible Code.
- Explore ways to leverage technology in the digital Code to facilitate easier access to the requirements of the Code.

Cross-Referencing

145. A few respondents found cross-referencing within the Code less intuitive, especially for less experienced users, and at times an obstacle to usability. There was a view that cross-references

between sections that are materially distant from one another interrupt the flow of reading and increase the risk of misinterpretation. Suggestions made by respondents included Part-specific summaries consolidating Part 1 obligations alongside Part-specific provisions and including a concise summary directly within a referring section wherever a cross-referenced provision is central to it, rather than relying on the cross-reference alone.

146. The Project Team observes that:

- The use of cross-referencing in the Restructured Code is necessary in linking different provisions of the Code that are connected and required to meet an obligation without duplicating the provisions. Such cross-references may also serve as a navigational guide, without which there would be a risk of incomplete or inconsistent application.
- While the use of Part-specific summaries and concise in-section summaries might be helpful, it may considerably increase the length of the Code, which would exacerbate concerns from many stakeholders about the length of the Code. Such an approach would also increase the risk of readers bypassing the cross-referenced provisions and relying only on the summaries, leading potentially to an incomplete understanding of the relevant requirements.

147. In light of the above, the Project Team **recommends** that the Board consider:

- Reviewing whether the existing section on cross-references in the drafting conventions could be clarified, and any gaps addressed, to promote a consistent approach to cross-referencing in new and revised standards.
- Including, as part of any targeted simplifications of the Code, an assessment of whether the Code's usability could be improved by revising how provisions or Sections of the Code are cross-referenced.

Ambiguous and Inconsistent Terminology

148. A number of comments regarding terminology across the Code were also raised by respondents. Terms highlighted by some respondents as ambiguous or unclear include "might" or "may," "and/or," "professional judgment," "exceptional circumstances," "encouraged," "transfer" and "transmission," There were also terms raised in relation to independence, including different meaning of "professional accountant" in different Parts of the Code, the subtle differences between "audit team" and "assurance team," and the confusion over the distinction between "firm" and "network firm" as well as the PIE definition.

149. The Project Team observes that:

- The current drafting conventions already include an explanation on the use of the terms "Professional Accountant", "Firm" and "Network Firm" as well as the use of "may" and "might". Some of the terms flagged, such as "firm," "network firm," "audit team" and "assurance team are defined terms that are long established in the Code.
- The term "professional judgment" is extensively described in Section 120 of the Code.
- Certain terms such as "and/or" and "encouraged" have their ordinary plain English meaning.

- On the question raised by a respondent regarding Sections 220[146] and 270[147] being identified in paragraph 300.5 A1 as applying to both PAIBs and PAPPs, paragraph 300.5 A1 was introduced as part of the IESBA's Applicability project as one of the "applicability paragraphs."[148] The applicability paragraphs were finalized in 2017 as part of the broader Structure of the Code project. As part of the Applicability project, the Board agreed to:
    - Include a series of illustrative examples in Part 3 to explain how certain provisions of Part 2 might apply to an individual PAPP.
    - Not duplicate the provisions in Part 2 in Part 3 of the Code, to avoid the Code becoming unwieldy with duplicate requirements and application material relating to the same topic.
- On the concerns raised about the PIE definition, the IESBA has committed to conducting a PIR of the PIE definition and related provisions under the current SWP for the period 2024-2027. This PIR will be undertaken in close coordination with the IAASB. It will include an assessment of the effectiveness of the PIE definition and related provisions, as well as identify any implementation challenges.[149]

150. In light of the above, the Project Team **recommends** that the Board consider:
    - Reviewing whether the existing section on terms and definitions in the drafting conventions could be clarified, and any gaps addressed, to promote the consistent use of terms in new and revised standards.
    - Clarifying the purpose of certain terms in the Guide to the Code.
    - Including, as part of any targeted simplifications of the Code, an assessment of whether certain terms and definitions in the Code could be revised to improve clarity, for example, "professional accountant," "audit team" and "assurance team.".

Hidden Requirements in Application Material

151. Respondents expressed the view that specific phrasings and terms, such as "it is generally necessary," "it is generally expected" and "factors to consider...include," may be interpreted as creating implicit obligations despite being part of application material. There was also a view that the placement of application material directly beneath requirements may make it difficult to distinguish the two.

152. The Project Team observes that the phrase "it is generally necessary" is used only in Sections 210 and 310 in the context of disclosing conflicts of interest and obtaining consent from the relevant parties for the PA to undertake the professional activity or service. At the time of developing the conflicts of interest provisions, the IESBA had deliberated at length the best way to articulate the expectation of the PA in relation to these matters and determined that this phrase best conveyed the intended expectation, given that turning these expectations into requirements would not recognize, for example, that consent might be implied by a party's conduct.

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146 Section 220, *Preparation and Presentation of Information*

147 Section 270, *Pressure to Breach the Fundamental Principles*

148 The applicability paragraphs are paragraphs R120.4, R300.5 and 300.5 A1. (Section 300, *Applying the Conceptual Framework – Professional Accountants in Public Practice*)

149 The IESBA will discuss the timing of this workstream as part of its discussion on strategic priorities during its September 2026 meeting

153. With regard to the phrase “it is generally expected,” the Project Team notes that it is used in Sections 410 and 905 to describe a general expectation that the firm will obtain payment of overdue fees before the audit or assurance report is issued. No requirement is intended to be established through such a phrase.

154. With regard to the phrase "factors to consider...include," this phrase is intended to introduce a range of factors that the PA or firm is invited to consider in applying a specific requirement. A factor may or may not be relevant in the particular circumstances. However, in making the list of factors available, the Code is providing as much guidance as possible to assist PAs or firms in exercising their judgments and consistently applying the relevant requirements.

155. In light of the above, the Project Team **recommends** that the Board consider clarifying, in the Guide to the Code and/or the drafting conventions, the purpose of certain phrasings in the application material, to make clear that these are not intended to be applied as requirements.

Scalability and Proportionality

156. A number of respondents have questioned how well scalability and proportionality work in practice. They have commented that the Code's growing length undermines the concept of scalability and proportionality and that the Code is becoming harder to apply for less well-resourced users and for practitioners who must apply multiple parts of the Code.

157. The Project Team observes that:

- The IESBA recognizes the importance of scalability and proportionality when developing new standards. Scalability is one of the qualitative characteristics of an international standard under the Public Interest Oversight Board’s (PIOB) Public Interest Framework.
- As an important step towards better explaining the scalability and proportionality of the Code, the IESBA recently released a staff publication on proportionality of the IESBA Code. The publication provides a comprehensive explanation of the various design and structural elements that embed scalability and proportionality in the Code.

158. In light of the above, the Project Team **recommends** that the Board:

- Continue its strategic focus on promoting the scalability and proportionality of the Code with the aim of improving the understandability and accessibility of the Code, particularly for the SMP community; and
- Explore opportunities under its A&I workstream to highlight, promote and educate stakeholders on the scalability and proportionality of the Code.

Translation

159. A number of respondents pointed to some practical difficulties translating the Code, citing factors such as its length, the pace of changes to the Code, and complex or lengthy sentence structures, which compound translation difficulty. They also noted that translation methodology itself is inconsistent across jurisdictions. Some terms were also raised as hard to translate, including "concurred," "determine," "indirect" and "encourage." Some challenges were also flagged regarding the distinctions between "may"/"might" and "significant"/"material." It was suggested that plain-language explanations and clearer terminology would support translation.

160. The Project Team observes that:

- The responsibility for translating the Code primarily rests with local bodies such as the PAOs or JSS. The IESBA does not currently have the resources to assist with translating the Code or new or revised standards.
- IESBA Staff continues to receive and respond to queries from PAOs about certain provisions in newly released standards as they work towards implementing these standards at the local level, some of which may need to be translated.

161. In light of the above, the Project Team **recommends** that the IESBA consider feedback on translation issues when issuing exposure drafts and remain diligent in adhering to the drafting conventions to minimize complex drafting that increases the challenge of translation for adopting jurisdictions.

Implementation Support Materials and Digital Tools

162. Another commonly raised comment across the responses to Q19-30 is the need for additional guidance and other implementation support material. Respondents asked for more examples, case studies and practical implementation guidance, navigational aids, flowcharts, plain-language explanations and simplified terminologies. It was noted that these materials would be helpful not only to SMPs and first-time users but also to PAs in understanding complex areas such as network firm responsibilities.

163. There were several suggestions that enhanced digitization of the Code would improve its accessibility and usability. These include re-establishing a digital Code or eCode with enhanced search, filtering and navigation tools, including functions such as links to defined terms, cross-references, direct and easy access to NAM and other implementation support materials as well as features to compare versions and track changes over time. It was also noted that better use of technology could help bring together information spread across the Code such as requirements relevant to network firms.

164. The Project Team observes that:

- The IESBA has identified the development of implementation and other supporting materials as an important priority towards promoting consistent adoption and effective implementation of the Code. In recent years, the IESBA has significantly increased its efforts towards developing non-authoritative guidance materials in addition to the more traditional technical support materials. Most recently, these new materials have included the IESBA staff publications on proportionality of the IESBA Code and the ethical considerations for PAs using emerging technologies as well as the technology podcast series, "Decoding Ethics: Building trust in a tech-driven world".
- The IESBA will continue its focus on supporting implementation of the Code as part of its broader strategy on adoption and implementation. In this regard, the A&I Working Group will present its forward plan to expand its activities to other IESBA standards beyond the sustainability-related standards, including supporting capacity building, as part of Phase 2 of the workstream.
- The IESBA has recognized the importance of a digital code to promote usability and accessibility of the Code. In late 2021, the IESBA moved its first digital Code (the eCode) to the eIS. The eIS is currently not updated but will be replaced by a new platform being developed by IFAC.

165. The Project Team **recommends** that the IESBA:

- As mentioned in paragraph 65, explore ways to enhance access to the IESBA's existing online resources, such as implementation support material, thought leadership pieces, and other support and educational material, so that they are easier to locate on the IESBA website.
- Engage with IFAC, together with the IAASB, on the new platform being developed to replace the eIS, including seeking opportunities to provide input and participate in user testing, with the aim of ensuring that the platform supports the usability of the Code. Where feasible, this could include features suggested by the respondents such as better search tools, hyperlinks, defined terms and cross-references and direct access to guidance materials.

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APPENDIX 1

IESBA Restructured Code PIR Survey

List of Respondents

#	Abbrev.	Respondent	Region
Regulators and Oversight Authorities[150]			
1.	**IRBA**	Independent Regulatory Board for Auditors	MEA
2.	**NSE**	Nairobi Securities Exchange	MEA
3.	**UK FRC**	Financial Reporting Council (UK)	EU
Independent[151] **Jurisdictional Standard Setters**			
4.	**NZAuASB**	New Zealand Auditing & Assurance Standards Board	AP
5.	**APESB**	Accounting Professional & Ethical Standards Board	AP
Professional Accountancy Organizations (PAOs) [152]			
6.	**ACCA**	Association of Chartered Certified Accountants	GLOBAL
7.	**AICPA -- PEEC**	American Institute of Certified Public Accountants Professional Ethics Executive Committee	NA
8.	**CAANZ**	Chartered Accountants Australia and New Zealand	AP
9.	**CPAA**	CPA Australia	AP
10.	**ECE**	Institut des Diplomes D'Expertise	EU
11.	**HKICPA**	Hong Kong Institute of Certified Public Accountants	AP
12.	**ICAEW**	Institute of Chartered Accountants in England and Wales	EU
13.	**ICAS**	Institute of Chartered Accountants of Scotland	EU
14.	**ICPAU**	Institute of Certified Public Accountants of Uganda	MEA
15.	**IDW**	Institut der Wirtschaftsprüfer (Germany)	EU
16.	**IFAC**	International Federation of Accountants	GLOBAL

[150] This list reflects the 40 respondents to the survey as of September 14, 2026. Feedback subsequently received from four regulators is summarized separately in Appendix 2.

[151] JSS that have a mandate to set ethics standards, including independence requirements, in their jurisdictions and which do not belong to PAOs are categorized as "Independent Jurisdictional Standard Setters."

[152] For purposes of this categorization, a PAO is a member organization of professional accountants, of firms, or of other PAOs. PAOs include but are not limited to IFAC member bodies.

#	Abbrev.	Respondent	Region
17.	**ISCA**	Institute of Singapore Chartered Accountants	AP
18.	**JICPA**	Japanese Institute of Certified Public Accountants	AP
19.	**KICPA**	Korean Institute of Certified Public Accountants	AP
20.	**LIA**	Lesotho Institute of Accounting	MEA
21.	**MIA (Malta)**	The Malta Institute of Accountants	EU
22.	**MICPA**	Malaysian Institute of Certified Public Accountants	AP
23.	**NBA**	Royal Netherlands Institute of Chartered Accountants	EU
24.	**PAFA**	The Pan-African Federation of Accountants	MEA
25.	**SAICA**	South African Institute of Chartered Accountants	MEA
26.	**WPK**	Wirtschaftsprüferkammer (Germany)	EU
Accounting Firms[153]			
27.	**BDO***	BDO International Limited	GLOBAL
28.	**CROWE**	Crowe Solutions	MEA
29.	**DTTL***	Deloitte Touche Tohmatsu Limited	GLOBAL
30.	**EY***	Ernst & Young Global Limited	GLOBAL
31.	**KPMG***	KPMG International	GLOBAL
32.	**Forvis Mazars***	Forvis Mazars Group Limited	GLOBAL
33.	**PwC***	PricewaterhouseCoopers International Limited	GLOBAL
34.	**RSM***	RSM International Limited	GLOBAL
35.	**SARE**	SARE Consulting	MEA
Academia			
36.	**LA**	Luisa Anacoreta – UCP	EU

[153] Forum of Firms members are indicated with a *. The Forum of Firms is an association of international networks of accounting firms that perform transnational audits. Members of the Forum have committed to adhere to and promote the consistent application of high-quality audit practices worldwide, and use the ISAs as the basis for their audit methodologies. They also have policies and methodologies for the conduct of such audits that are based to the extent practicable on the International Standards on Auditing (ISAs), and policies and methodologies which conform to the extent practicable to the IESBA Code for transnational audits.

#	Abbrev.	Respondent	Region
Individual PAPPs			
37.		Representative Director (Control Solutions KK)	AP
38.		Hiroshi Shirai (Shirai CPA Office)	AP
39.		Shreekant Prasad (Govindham Consultancy Services LLP)	AP
Other			
40.		David Mensah	MEA

APPENDIX 2

Additional Feedback from Regulators as of November 20, 2026

Introduction

1. At its September 2026 meeting, the IESBA was supportive of the Project Team's plan to seek feedback from more regulators on the Restructured Code PIR survey (the survey), in coordination with the NOCLAR® PIR Project Team, given the role of regulators in the adoption and enforcement of the Code. The additional outreach focused on regulators in G20 jurisdictions because of their global influence.

2. Requests were sent to 18 regulators and oversight authorities, 12 in G20 jurisdictions and six in other jurisdictions. As of November 20, 2026, four had provided feedback, two from G20 jurisdictions and two from other jurisdictions. Their responses are summarized below.

Overview of Feedback Received

G20 Regulators

3. One G20 regulator,[154] whose response has been published on the IESBA website together with the other survey responses, provided the following comments:

   - Its jurisdiction has adopted the 2018 edition of the Code with modifications to align it with the local legal framework on ethics and independence. Only Parts 1, 3 and 4A have been adopted, reflecting the scope of its oversight of statutory auditors and audit firms. The local Code has been translated into the local language.
   - It has received informal reports that clarifications on the structure of the Code are often requested during professional development and training classes.
   - The building-blocks approach is helpful, although staff not involved in adapting the Code may find it more difficult to navigate.
   - The Guide to the Code is "somewhat" helpful. Supporting material such as the Guide is needed, but the structure of the Code is not simple and further effort is often needed to understand how it applies.
   - It is "somewhat" clear that the Code is scalable and proportionate, as these concepts are not expressly stated in the 2018 edition but are inferred from paragraphs 120.5 A1 and 100.3 A2.
   - The Code is "somewhat" easy to translate. Terminology needs to be adapted because the local Code applies only to auditors, and legal concepts and terms in the jurisdiction may differ from those in the Glossary.
   - Additional non-authoritative material could help users understand the most complex parts of the Code.
   - "Yes" was selected for all other questions, including those on the clarity of responsibility in relation to independence.

[154] Ministry of Economy and Finance (MEF), Italy

4. Another G20 regulator, which requested confidentiality, provided its general views on the Restructured Code:

   - Requirements and application material are presented in the same format apart from the bold paragraph numbers of requirements, so the distinction is not readily apparent. Formatting changes, such as shading or boxing requirements or presenting them in full bold type, could improve readability and help prevent requirements being overlooked.
   - Inspection findings are generally based on compliance with requirements, so a clear distinction between requirements and application material is important for enforceability. Application material should not contain provisions that could be perceived as mandatory in substance.
   - Clearer visual distinctions for PIE-specific provisions, such as bold type, a different font color, boxes or a dedicated symbol, should be considered given the public interest significance of these entities. Symbols or other indicators in the table of contents and throughout the Code could also identify non-PIE-specific provisions and provisions where scalability considerations may be relevant, helping users focus on the provisions relevant to their circumstances.

Non-G20 Regulators

5. One non-G20 regulator[155] did not respond to the survey questions but has indicated to the Project Team that it was generally supportive of the clarity and language of the Restructured Code. It also raised a number of matters that relate to the application of specific provisions of Code which are outside the remit of this PIR.

6. Another non-G20 regulator, which requested confidentiality, responded to all the survey questions, selecting “Yes” for each question in Parts C and D without further comment. It indicated that its jurisdiction has adopted the Code in full without modifications. It did not report issuing any guidance or educational materials on the Code, offering other support or receiving any inquiries relating to the structure and drafting of the Code.

Project Team Views

7. Three of the four regulators expressed general support for the structure and drafting of the Restructured Code.

8. The matters raised by the regulators are consistent with the themes identified in this Final Report, including the visibility of the distinction between requirements and application material, the scalability and proportionality of the Code, and the need for additional non-authoritative material. These matters have been taken into account in finalizing the Project Team’s recommendations.

[155] Accounting and Financial Reporting Council (AFRC), Hong Kong