Restructured Code Post-Implementation Review
Project Team Proposed Action Plan

Introduction

1. This paper sets out the Project Team's proposed Action Plan for three of its recommendations in the Restructured Code Post-Implementation Review (PIR) Final Report (Final Report):

   (a) Enhancing access to online resources;

   (b) Enhancing the Guide to the Code; and

   (c) Reviewing, and publishing the drafting conventions to the Code.

Background

2. At the September 2026 IESBA meeting, the Board was generally supportive of the Project Team's recommendations, including those that address the usability and clarity of language of the Code.

3. The Board asked the Project Team to identify actions that could be taken in the near term without significant resources, such as those relating to the Guide to the Code, the drafting conventions and online resources, and to report back to the Board in December 2026 on proposed actions and indicative timelines.

4. In responding to this request, the Project Team has undertaken initial work on each of the three recommendations, as summarized below. As their further development and implementation will extend beyond the conclusion of the project after the December 2026 IESBA meeting, the Project Team and IESBA Staff have identified the teams and workstreams that they recommend to take this work forward, as set out in the proposed next steps below. These teams and workstreams will determine the timing of the related actions as part of their planning.

Enhancing Access to Online Resources

Final Report Recommendations

FINAL REPORT RECOMMENDATIONS Agenda Item 6-A

The Project Team recommends that the IESBA:

- 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 that they are easier to locate on the IESBA website.

Project Team Considerations

5. In discussing the recommendation in September 2026, IESBA members suggested that the resources be curated, limited to IESBA materials, and supported by tools that make them easier to search. In this regard, the Project Team notes that the IESBA website already contains a wide range of IESBA materials, including implementation support material, thought leadership pieces and other educational

material, as well as a searchable repository of resources. However, there is an opportunity to make these materials easier to locate on the website.

6. The Communications team is already planning enhancements to the IESBA website that would help address this. These enhancements, being developed under the SMART initiative "Website Refresh by Stakeholder Journey," focus on improving the user experience and the presentation of information for different stakeholder groups. As part of this work, the Communications team will soon launch a survey of website users on the usability and "look and feel" of the website. Similar surveys will be conducted for the IAASB and IPSASB websites, and the feedback will be considered on a coordinated basis.

Proposed Next Steps

7. The Project Team proposes that the Communications team take forward the work on enhancing access to IESBA's online resources as part of its planned website enhancements.

8. The Communications team is best placed to lead this work because it is responsible for the IESBA website and is already planning improvements to the user experience. Taking the work forward as part of those improvements will avoid duplication of effort.

9. The Project Team will share with the Communications team the relevant survey feedback and the Board's comments from September 2026, for consideration together with the results of the website user survey.

Enhancing the Guide to the Code

Final Report Recommendations

FINAL REPORT RECOMMENDATIONS Agenda Item 6-A

The Project Team recommends that the IESBA consider:

- Clarifying the purpose of certain terms in the Guide to the Code; and
- 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.

Project Team Considerations

10. The Project Team conducted an initial assessment of the survey respondents' comments and the current Guide to the Code (the Guide). The Project Team observes that the Guide:
    - Already addresses some of the matters raised by respondents, such as the meaning of "may" and "might," the status of application material and the non-exhaustive nature of lists of examples.
    - Does not address other matters, such as phrases in application material that some respondents considered may create implicit requirements (for example, "it is generally necessary" and "factors to consider … include").

11. Based on this initial assessment, the Project Team identified a number of potential enhancements to the Guide:

- A summary of which Parts of the Code apply to each type of user;
- Simpler explanations, with examples, of "may" and "might" and the status of application material;
- Clarification that lists of threats, safeguards and factors, like lists of examples, are not exhaustive;
- An explanation of how definitions operate in the Code, including the different meanings of "professional accountant";
- Clarification that certain phrases in application material do not create requirements; and
- An explanation of how the Code is designed to be scalable and proportionate.

12. As some respondents indicated that the Guide tends to be overlooked, an updated Guide will only help users if they are made aware of it. This is particularly important as no new edition of the Code will be issued in 2027, so the updated Guide cannot reach users through a new edition in the usual way. Therefore, the Project Team also considered how to promote an updated Guide effectively. Options considered include publishing it separately on the IESBA website ahead of the next edition of the Code, announcing it through IESBA communications, and raising awareness through PAOs and other stakeholders.

Proposed Next Steps

13. The Project Team ***proposes*** that the SMART initiative on the "Use of the Code – Simplification" (SMART Simplification initiative) take forward the further development and implementation of the enhancements to the Guide, including the promotion of the updated Guide, using the Project Team's initial assessment as a starting point, and determine the timing of the related actions as part of its planning.

14. The SMART Simplification initiative is best placed to lead this work because its focus is on making the Code easier to understand and use, which is also the aim of the proposed enhancements to the Guide.

15. The Project Team has discussed these proposals with the SMART Simplification initiative team. The SMART Simplification initiative will liaise with the Communications team and the Adoption and Implementation (A&I) Working Group on promoting the updated Guide.

Reviewing and Publishing the Drafting Conventions to the Code

Final Report Recommendations

FINAL REPORT RECOMMENDATIONS Agenda Item 6-A

The Project Team recommends that the IESBA:

- 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; and

- 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.

Project Team Considerations

16. The drafting conventions were prepared in 2017 as a Board agenda paper to summarize the general drafting guidelines followed in restructuring the Code. They are currently difficult to find on the IESBA website.

17. The Project Team's initial assessment indicates that many of the drafting concerns raised by respondents, such as long and complex sentences, cross-referencing and the use of key terms, are already addressed in the drafting conventions. However, some matters are not addressed, or are only partly addressed, such as certain phrases used in application material and the consistent use of terms.

18. Consistent with the September 2026 discussion, in which IESBA members emphasized the importance of adhering to the drafting conventions rather than changing them to accommodate departures, the Project Team identified the following potential enhancements:

    - Updating the document for external publication, including explaining its purpose and status, removing material relating only to the 2017 restructuring, and extending it to cover Part 5 of the Code;
    - Clarifying existing conventions where needed, for example on certain phrases used in application material and on cross-references; and
    - Adding conventions in areas not currently addressed, for example the consistent use of terms.

19. The Project Team is also of the view that concerns about departures from the drafting conventions in standards issued since 2018 would be better addressed through the PIRs of those standards.

20. Once updated, the drafting conventions could be published in an easy-to-find location on the IESBA website, for example alongside the Code and the Guide. As the drafting conventions and the Guide address some of the same matters, they should be updated together so that their wording is consistent.

Proposed Next Steps

21. The Project Team proposes that the SMART Simplification initiative take forward the review, update and publication of the drafting conventions, using the Project Team's initial assessment as a starting point and determine the timing of the related actions as part of its planning.

22. The SMART Simplification initiative is best placed to lead this work because the drafting conventions and the Guide are closely related and should be updated together. Both aim to make the Code easier to understand and use, and the recommendations on certain phrasings in application material refer to both.

23. The SMART Simplification initiative will liaise with the Communications team on publishing the updated drafting conventions.

Other Recommendations Not Covered in the Action Plan

24. In addition to the three recommendations addressed in this Action Plan, the Final Report includes other recommendations relating to adoption, implementation support, simplification, the PIRs of recent standards, scalability and proportionality, translation and digital tools. These recommendations are not covered in this Action Plan, which focuses on actions that could be taken in the near term without significant resources (see paragraph 3).

25. The table below summarizes these recommendations and the proposed way forward for each. As some of the relevant workstreams, such as the PIRs of recent standards, have not yet been established, the way forward indicates where each recommendation is expected to be considered, rather than specific actions or timelines. The recommendations relating to the sections of the drafting conventions on cross-references and on terms and definitions are addressed in the drafting conventions section above.

Final Report Recommendations	Way Forward
Adoption The Adoption and Implementation Working Group consider global and regional PAOs that have adopted the Code and require compliance from all their members when assessing and reporting on the impact and reach of the Code, and consider other related matters raised in the Final Report.	To be considered by the A&I Working Group as part of its forward plan.
Implementation support Through the A&I Working Group, engage with stakeholders to identify the most impactful implementation and other support materials, as well as opportunities to leverage existing materials published by JSS, PAOs and other stakeholders.	To be considered by the A&I Working Group as part of its forward plan.
Simplification Take respondents' feedback into account 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. As part of any targeted simplifications of the Code, consider an assessment of whether:	To be considered as part of: • The SMART Simplification initiative; and • Any future IESBA activity or initiative to undertake targeted simplifications of the Code where warranted, subject to the Board's approval of the SWP 2028–2031.

Final Report Recommendations	Way Forward
• 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."	
Distinction between requirements and application material Explore ways of leveraging technology in the digital Code to facilitate easier access to the requirements of the Code for users who would find it helpful.	To be considered as part of any future IESBA on the digital Code.
Post-implementation reviews of standards As part of the upcoming PIRs of recent, significant standards, seek stakeholder feedback on any specific complexity issues that present barriers to effective implementation.	To be considered by the project teams for the upcoming PIRs.
Scalability and proportionality Continue the strategic focus on promoting the scalability and proportionality of the Code, particularly for the SMP community, and explore opportunities under the A&I workstream to highlight, promote and educate stakeholders on these features of the Code.	To be considered by the A&I Working Group as well as part of the IESBA's future work on addressing scalability and proportionality.
Translation 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.	To be considered by the Board and IESBA project teams when developing new and revised standards.
Digital tools Engage with IFAC, together with the IAASB, on the new platform being developed to replace the eIS (electronic International Standards), including seeking opportunities to provide input and participate in user testing.	IESBA staff, together with IAASB staff, to engage with IFAC as the new platform is developed.