

2. SECTION I: ABOUT THE RESPONDENT

1. From which perspective are you providing this feedback?

The view of an organization

Please complete:

Your name:

Your organization (if applicable):

E-mail address:

Please complete:

Organization:

Deloitte

Name(s) of contact(s) for this submission:

Jennifer Haskell

E-mail address(es) of contact(s):

jhaskell@deloitte.com

2. Please select from the following options to which stakeholder group you or your organization belongs:

Accounting Firm

Please specify the type of accounting firm:

Global Accounting Firm

Please specify:

Please specify:

Please specify:

Please specify:

3. Please select from the following options the geographical region that best matches you or your organization:

3. Please select from the following options the geographical region that best matches you or your organization:

Global

4. SECTION III: SSBs' STRATEGIC POSITIONING FOR 2028–2031

4. As the SSBs look toward the 2028–2031 period, they are reflecting on how to position their strategies and work plans to best serve the public interest within a rapidly changing global environment. This involves careful consideration of how the SSBs remain relevant, responsive, and impactful in their standard-setting and other related work. In that context, what do you believe the SSBs should aspire to achieve during their next strategy period, 2028–2031?

Your answer may touch on different dimensions, for example:

The relevance, responsiveness and impact of the SSBs' standard-setting and related activities.

Broader adoption and effective implementation of the SSBs' standards.

The SSBs' interaction and engagement with key stakeholder groups.

The SSBs' ability to serve the public interest.

The examples above are for illustrative purposes only and should not limit, direct, or otherwise influence your response.

Your answer should address the IAASB and IESBA collectively; however, you may wish to also highlight matters specifically for the IAASB or IESBA (if applicable, you could use separate headings to address such matters).

We are grateful to the SSBs for engaging the stakeholder community in a forward-looking way and providing the opportunity to share our views. In the 2028-2031 period, the SSBs should continue to promote confidence in the relevance and effectiveness of their standards by focusing on expressed needs of the users of the standards and by improving their processes for developing content (standards or implementation support) that is timely, responsive, and workable in practice globally. The themes covered in this survey are highly relevant in today's environment and the SSBs should track them closely. However, it is important to recognize that these issues will evolve and that the auditing, assurance, and ethical matters most critical to address in 2028 and beyond may look very different than they do today. The SSBs will need to closely monitor the macro environment to ensure their work plans are addressing topics of most concern to users of the standards. If needs were to shift, the standard setting model should be sufficiently flexible to allow for reprioritization of projects and timetables. A key measure of success for any standard-setting action is global acceptance/adoption. Therefore, we encourage the SSBs to stay alert to potential barriers to implementation throughout the standard-setting process so they can be effectively mitigated. Additionally, the effectiveness of the Boards and the standard-setting process depends on a well-functioning staff with sufficient knowledge of the subject matter and proficiency in drafting technical standards. The Board should augment the staff as necessary.

For IAASB, greater agility is needed to timely and effectively address emerging issues impacting audit and assurance while maintaining the foundational, principles-based standards. We encourage the IAASB to prioritize non-authoritative material

wherever possible and to draw upon guidance/standards that have already been issued by jurisdictional and other oversight bodies where appropriate. Greater integration with the broader standard-setting ecosystem will also help alleviate the risk of fragmentation.

We encourage IESBA to leverage input received from ongoing and forthcoming post-implementation reviews to inform its 2028-2031 priorities, as this will be a key source of feedback on potential implementation challenges with recent standards and whether they have achieved their public interest aims. Before investing in new projects that may widen the existing implementation gap, we recommend a deliberate pause in new standard setting activity to allow local jurisdictions time to adopt and embed existing requirements in a consistent and high-quality manner. A period of stability in standard setting would provide a clearer picture of the true state of global adoption of the Code and give IESBA the opportunity to determine the root causes behind the lack of uptake in certain jurisdictions.

Please note: In ranking the importance of the trends in Section IV of this survey, our key consideration was whether each trend merits continued monitoring by the SSBs and some degree of action or outreach. Our rankings should not be seen as a definitive call for standard setting.

6. SECTION IV: KEY TRENDS IMPACTING THE SSBs

A.1 Digital Transformation – Increasing Use of Emerging Technologies

6 – Strongly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

Digital transformation represents a seismic shift for society and is fundamentally changing the corporate reporting ecosystem. To stay relevant, the SSBs will need to be closely engaged with key stakeholders to understand how emerging technologies are being used and the impact they are having on entities and their environments, including processes and controls, the impact of ecosystem changes on audit and assurance engagement performance and behavior, and firm systems of quality management.

IAASB – From an audit and assurance perspective, agility is paramount for the IAASB to effectively address stakeholder needs. The current standard-setting lifecycle may be too time-consuming to keep up with the pace of technological change and demands for guidance. The IAASB should focus on determining areas where clarity is needed and developing processes and protocols to enable timely publish of non-authoritative guidance or educational material to support the consistent implementation of existing standards in specific technology-related contexts. For example, guidance may be needed to address the application of direction, supervision and review concepts and engagement team responsibilities to agentic AI or when testing management's accounting estimates developed using "black box" AI models. We recommend the IAASB consider creating a body like the IFRS Interpretations Committee (IFRIC) operating under the IASB, with transparent due process and clarity related to the authority of any guidance issued.

We acknowledge and support the recently formed multi-stakeholder Technology Expert Panel to support the development of guidance. As technologies continue to modernize business operations, corporate reporting processes, and auditing techniques, it will be important for the IAASB to stay connected with the profession on ways technology is being used in the audit and whether more substantive changes are needed to keep the standards relevant and workable in practice.

IESBA – We do not believe the IESBA should focus on standard setting in response to specific technological developments. The recent technology-related revisions to the Code provided enhancements that were designed to keep the Code relevant in the ever-evolving technological landscape. The pace of technological change only serves to emphasize the importance of robust, principles-based ethical standards that remain relevant into the future. Trying to address specific technologies through

prescriptive requirements risks creating standards that lag emerging practices and potentially undermine the usefulness of the principles already in the Code. Based on outreach, it may be beneficial for IESBA to develop educational materials addressing how existing standards for ethical behavior are expected to apply in the use of emerging technologies.

A.2 Digital Transformation – Digital Assets and Institutionalization of Digital Assets

5 – Increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

Digital assets is an area where the IAASB could draw on existing materials and expertise from other standard setters and jurisdictional bodies (e.g., AICPA) to quickly develop new guidance. This approach would enable faster speed to market and promote consistency in practice, contributing to the continued relevance of the international standards. This strategy aligns with IAASB's commitment to maintaining high-quality international standards that address emerging issues in a timely manner.

A.3 Digital Transformation – Financial Crimes Enabled by Technology

5 – Increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

IAASB – While we recognize that emerging technologies may alter the nature and complexity of financial crimes, we do not believe the auditor's responsibility has changed with respect to fraud and NOCLAR and that existing standards remain fit for purpose. We recommend the SSBs focus their efforts on developing guidance for applying existing standards to new technology-enabled fraud scenarios. For example, auditors would benefit from non-authoritative guidance/educational material on the application of professional skepticism in identifying and responding to risks associated with technology and cybercrime. The IAASB's Professional Skepticism Consultation Group could be a valuable source of input in this regard.

IESBA – We do not think this trend merits standard setting at the global level by IESBA. The fundamental principles of integrity and professional behavior in the existing Code are sufficient to address this topic. Any specific provisions are best addressed locally. We encourage IESBA to focus on the post-implementation review of the NOCLAR provisions and any barriers to implementation identified by stakeholders.

7. SECTION IV: KEY TRENDS IMPACTING THE SSBs

B.1 Changes in the Geopolitical and Regulatory Landscape – Regulatory Changes

5 – Increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

IAASB – Effective international standards, developed under robust due-process principles, can provide a global baseline for consistent and comparable corporate reporting and audit/assurance reporting thereon. Such an approach sponsors greater standardization across jurisdictions and in doing so enhances audit quality and more broadly supports efficient and well-functioning capital markets. We support efforts by the IAASB to continue to re-examine its governance and operational processes to make changes that enable it to be recognized universally as a producer of audit and assurance standards that are responsive, globally relevant and workable in practice such that the IAASB standards are considered a global baseline throughout the profession. We believe action steps in this regard need to be taken prior to 2028 (the period to which this survey relates).

IESBA – All of the mentioned changes to the geopolitical and regulatory landscape emphasize the value of having a stable global Code. We support a pause in standard setting and a focus on understanding barriers to global adoption. We note some of the recently issued standards are complex (e.g., sustainability, group audits) or conflict with local requirements (e.g., requiring public disclosure of fees). It would be useful for IESBA to perform accelerated post-implementation reviews, carefully consider whether recent changes were in the public interest, and allow sufficient time and resources to make targeted changes to the Code where necessary.

B.2 Changes in the Geopolitical and Regulatory Landscape – Risk of Fragmentation

6 – Strongly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

Fragmentation risk is linked to the pace and volume of standard setting activity in recent years. The ecosystem would benefit from a slow-down to allow time for jurisdictions and firms to effectively absorb the changes. Additionally, we note recent examples of new standards that have not achieved widespread global adoption (e.g., ISA for LCE, NOCLAR in the IESBA Code), which contributes to fragmentation and a loss of confidence in global standard setting. The SSBs should prioritize post-implementation reviews and other stakeholder outreach in the 2028-2031 SWP in order to understand challenges to global adoption/implementation and how this could be achieved going forward. The SSBs would benefit from transparent mechanisms for reaffirming stakeholder support for their projects throughout the development process to ensure there is clear intent to adopt upon finalization.

B.3 Changes in the Geopolitical and Regulatory Landscape – Call for Greater Agility in Standard Setting

5 – Increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

The existing standard setting process does not enable the SSBs to keep pace with changes in the environment and needs of the profession. Well-developed, non-authoritative material is a more efficient avenue for providing clarifications and targeted guidance and is therefore a more appropriate and agile approach to address some of the current trends impacting the profession. In developing non-authoritative material (NAM), it is critical that the SSBs be transparent with respect to the development process and adhere to their review and clearance principles (e.g., IAASB's Framework for Activities). There should also be a more effective mechanism for the voice of the profession to be heard in the development of NAM (potentially through involvement in task forces or similar structures).

B.4 Changes in the Geopolitical and Regulatory Landscape – Greater Diversity of Voices Sought

2 – Decreasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

As the IAASB has itself acknowledged, to function effectively as a global baseline standard setter, it must be committed to developing standards that are globally responsive, relevant, and workable in practice. The Board's ongoing engagement with diverse stakeholder groups is a demonstration of its commitment to tackling issues of global relevance. When it comes to practical applicability of the standards, this requires input from qualified professionals in practice who have experience applying the standards and a deep understanding of issues impacting the profession. In this context, diversity with respect to practical experience among SSB members is of utmost importance.

8. SECTION IV: KEY TRENDS IMPACTING THE SSBs

C.1 Evolving Expectations Concerning Sustainability Information – Continuing Demand for Sustainability Reporting and Assurance

4 – Slightly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

IAASB – Sustainability is an area where risk of fragmentation is of particular concern, and IAASB should remain diligent in its efforts to support widespread recognition of ISSA 5000 as the global baseline for sustainability assurance. While it is encouraging that more jurisdictions, including the EU, may be moving towards adoption/interoperability with ISSA 5000, it will be important to monitor developments in the sustainability reporting ecosystem before embarking on new standard setting action. Additionally, stakeholders will need time to implement and absorb the requirements of ISSA 5000 once it becomes effective. The IAASB should focus its efforts on monitoring adoption/implementation and developing NAM/educational material to address implementation challenges in a timely manner.

IESBA – Similar to above, IESBA's focus should be on effective adoption and implementation of IESSA prior to considering further projects. Additionally, while we acknowledge that IESBA's current work plan includes exploration of extending the Code to non-professional accountants who prepare sustainability information, we do not believe this is advisable given higher priorities and the lack of enforceability of the Code for non-professional accountants.

C.2 Evolving Expectations Concerning Sustainability Information – Regulatory and Geopolitical Changes

4 – Slightly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

Expectations concerning sustainability information are uneven across jurisdictions and in some cases, mandatory reporting has been subject to regulatory pause. The implementation challenges of the sustainability standards are becoming clearer across jurisdictions as adoption is, and will continue to be, inconsistent and create cross-border execution challenges. The SSBs should focus more time and effort on resolving these pressures, including considering whether aspects such as independence requirements for value chain components should be paused or reconsidered.

9. SECTION IV: KEY TRENDS IMPACTING THE SSBs

D.1 Evolving Structure and Business Models of Accounting Firms – Alternative Ownership Structures

0 – I do not agree that this is a trend to be considered

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

The trends covered in part D are something for IESBA to monitor as they evaluate the ongoing suitability of the Code and the definitions therein, and we encourage the Board to keep track of what jurisdictional standard-setters are doing in these areas to avoid fragmentation. However, we generally believe such topics are not in the remit of the international SSBs and are best addressed through jurisdiction-specific legal, regulatory, and oversight frameworks, which are best positioned to reflect local conditions and enforcement mechanisms.

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

D.2 Evolving Structure and Business Models of Accounting Firms – Increased Involvement of Non-Professional Accountants in the Accounting and Auditing Profession

0 – I do not agree that this is a trend to be considered

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

See response to D.1 above.

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

D.3 Evolving Structure and Business Models of Accounting Firms – Challenges to Attracting and Retaining Talent

0 – I do not agree that this is a trend to be considered

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

See response to D.1 above.

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

D.4 Evolving Structure and Business Models of Accounting Firms – Non-Assurance Service Line

0 – I do not agree that this is a trend to be considered

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

See response to D.1 above.

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

10. SECTION IV: KEY TRENDS IMPACTING THE SSBs - OTHER TRENDS AND RANKING

6. Are there trends or related areas or matters that you believe the SSBs should consider that are not covered? If so, please provide details.

Yes

Additional trends

Please number your additional trend (O.1, O.2, O.3, ...)

O.1 – Global baseline for other assurance

Please describe the additional trend

We continue to see increasing demand globally for independent assurance over subject matters other than historical financial information. We also recognize that the value of assurance reporting is largely dependent on users' understanding of the nature and level of assurance being provided. As such, it is important to have a robust global framework for assurance engagements that can be applied consistently across a broad range of subject matters. We are supportive of the IAASB's proposed information-gathering exercise on other assurance to inform their 2028-2031 SWP and would suggest that the outreach specifically address whether ISAE 3000 is still fit-for-purpose as a global baseline assurance standard or if revisions are needed.

On a scale of 1 to 6, indicate the extent to which you believe this trend will increase or decrease in importance for the SSBs for their next strategy period starting in 2028.

5 – Increasing in importance

Do you wish to explain your rating or highlight any matters relating to this trend for the IAASB, IESBA, or both the SSBs?

N/A

7. Based on your evaluation of the identified trends, please rank what you believe are the TOP FIVE most important trends for the SSBs to consider for their next strategy period starting in 2028.

Rank 1 : A.1 – Increasing use of emerging technologies

Rank 2 : B.2 – Risk of fragmentation

Rank 3 : B.3 – Greater agility in standard setting

Rank 4 : B.1 – Regulatory changes

Rank 5 : A.3 – Financial crimes enabled by technology

11. SECTION V: AREAS FOR JOINT ACTIONS IN SSBs' WORK PLANS

8. Please share your views about areas of common interest and possible joint or parallel work plan topics (e.g., standard-setting or non-authoritative materials), or other initiatives or activities.

Joint action by the IESBA and IAASB would be most impactful if directed toward coordinated implementation support, consistent interpretation, and post implementation reviews of recent standards.