

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:

The European Federation of Investors and Financial Services Users (BETTER FINANCE)

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

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

Other

Please specify the type of accounting firm:

Please specify:

Please specify:

Please specify:

2. Please specify:

NGO

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:

Europe

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).

From an end-user perspective, relevance and impact should be assessed not solely by the issuance of standards, but by whether those standards improve the quality, comparability and reliability of information available to markets. The increasing interconnection between financial reporting, sustainability reporting, corporate governance and stewardship means that assurance and ethics frameworks should continue evolving in a coordinated manner. The IAASB and IESBA should maintain close cooperation and proactively engage with other standard setters and regulators to reduce fragmentation and support a coherent reporting ecosystem.

The SSBs should also place greater emphasis on implementation and usability. Producing globally accepted standards is important, but effective implementation, consistent application and enforceability are equally critical to achieving public-interest outcomes. Differences in jurisdictional interpretation and implementation risk undermining comparability and public confidence. Enhanced implementation support, practical guidance and mechanisms for identifying emerging implementation issues should therefore become a more integral component of the SSBs' work.

Broader stakeholder engagement should remain a strategic priority. The SSBs should continue expanding engagement beyond the accounting and audit profession to include investors, consumer representatives, civil society organizations, academics and users of financial and sustainability information. This is particularly important in areas where standards increasingly affect

broader societal and market outcomes.

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?

The growing use of AI-enabled tools and other emerging technologies is likely to significantly reshape the audit and assurance environment. While these technologies may improve efficiency and analytical capabilities, they also create risks related to opacity, bias, explainability and excessive reliance on automated outputs. The IAASB and IESBA should ensure that standards continue to reinforce core principles such as professional skepticism, professional judgment and accountability. Technology should support, rather than substitute for, human responsibility and critical assessment. Guidance may also be needed on transparency around the use of technological tools within audit and assurance processes.

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

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?

The primary concern should not be technological innovation alone, but whether standards adequately address valuation uncertainty, governance risks, transparency and investor protection concerns associated with these markets. The SSBs should monitor developments closely and engage with financial market stakeholders as markets mature.

A.3 Digital Transformation – Financial Crimes Enabled by Technology

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?

AI and digital systems can facilitate more sophisticated forms of fraud, manipulation and misconduct while also creating new vulnerabilities. These developments have direct implications for market confidence and investor protection. The SSBs should consider whether standards and related guidance sufficiently equip professionals to identify emerging risks and maintain

professional skepticism in increasingly technology-driven environments. Strengthened engagement with cybersecurity, forensic and technology experts may also be appropriate.

7. SECTION IV: KEY TRENDS IMPACTING THE SSBs

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

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?

While efforts to reduce burdens and improve competitiveness may bring benefits, simplification should not come at the expense of transparency, accountability or investor protection. The SSBs should continue monitoring evolving regulatory trends and ensure standards remain capable of responding to changing market expectations while preserving the reliability and usefulness of reported information.

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?

The risk of regulatory and reporting fragmentation represents a significant concern. Increasing divergence between jurisdictions risks reducing comparability, increasing costs and complexity, and ultimately weakening confidence in reported information. For investors and users operating across markets, globally coherent approaches are particularly important.

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?

There is a legitimate need for greater responsiveness and flexibility in standard setting, particularly given the pace of

technological, market and regulatory change. However, agility should not come at the expense of due process, transparency or the quality and legitimacy of standards. A balanced approach may be appropriate, combining full standard-setting projects with targeted amendments and non-authoritative guidance where suitable. Such approaches can support responsiveness while preserving confidence in the standard-setting process.

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

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?

Beyond expanding participation from emerging economies, engagement should include investors, consumer representatives, civil society organizations and end users of financial and sustainability information. Broader participation can improve both legitimacy and the practical effectiveness of standards.

8. SECTION IV: KEY TRENDS IMPACTING THE SSBs

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

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?

Demand for sustainability information and related assurance is expected to remain significant as sustainability considerations become increasingly integrated into investment decision-making and risk assessment. However, future efforts should focus not merely on expanding reporting requirements but on improving the reliability, comparability and usefulness of information provided to end users. Investors and users require sustainability disclosures that are sufficiently robust to support informed decision-making and avoid risks of confusion, inconsistent interpretation or reduced confidence.

The increasing interconnectedness between sustainability and financial information further highlights the importance of coordinated approaches across reporting and assurance frameworks. The IAASB and IESBA should continue promoting coherence between sustainability assurance and broader reporting ecosystems.

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

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?

Regulatory and geopolitical developments relating to sustainability are likely to have a substantial impact on the future reporting and assurance landscape. Recent developments illustrate that jurisdictions may pursue different pathways, recalibrate requirements or adopt differing approaches to sustainability reporting and assurance. Such developments increase the risk of fragmentation and reduced comparability.

The SSBs therefore have an important role in promoting interoperability and supporting globally coherent approaches while maintaining high-quality standards. In responding to evolving regulatory landscapes, simplification and proportionality objectives should not weaken the reliability or usefulness of sustainability information for investors and other users.

Monitoring implementation experience and proactively identifying emerging challenges will also become increasingly important. As sustainability assurance frameworks mature, agile mechanisms for addressing implementation questions and ensuring consistency across jurisdictions may become essential.

9. SECTION IV: KEY TRENDS IMPACTING THE SSBs

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

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?

The emergence of alternative ownership models, including private equity investment in accounting firms, may create new opportunities but also raises important questions concerning governance, incentives, firm culture and independence. Audit and assurance activities fulfill a public-interest role that differs from many other commercial activities. Changes to ownership structures should therefore be carefully assessed to ensure that commercial incentives do not undermine ethical culture, audit quality or perceptions of independence.

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

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?

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

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?

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

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?

The continued growth of non-assurance services raises significant public-interest considerations, particularly where such activities may create actual or perceived conflicts of interest. Public confidence in audit and assurance depends heavily on perceptions of independence and objectivity.

Where commercial incentives increasingly shift toward advisory and other non-assurance services, the SSBs should continue assessing whether ethical and independence frameworks remain sufficiently robust and whether additional safeguards or guidance may be necessary.

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

Please describe the additional trend

Information complexity & Decision-usefulness

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.

6 – Strongly 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?

The public-interest objective should not be limited to increasing the amount of information disclosed, but should also ensure that information remains decision-useful, understandable and capable of supporting informed judgments.

From an investor perspective, excessive complexity, overlapping requirements and inconsistent reporting practices may contribute to information overload and reduce the practical usefulness of reporting and assurance outputs. This challenge may become increasingly important as sustainability information, technological disclosures and assurance requirements continue to expand and interact.

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 : B.2

Rank 2 : A.3

Rank 3 : A.1

Rank 4 : O.1

Rank 5 : C.2

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.

The IAASB and IESBA should continue strengthening early coordination and identifying topics where assurance, ethics and independence considerations are inherently interconnected. From an investor and public-interest perspective, greater alignment between the two Boards can support coherence, reduce fragmentation and improve trust in reporting and assurance outcomes.

The increasing use of AI and other technologies raises interconnected questions relating to audit methodologies, professional judgment, accountability, ethical responsibilities and independence. While the IAASB may focus on implications for audit and assurance performance, the IESBA may need to address issues such as over-reliance on technology, transparency, competence and accountability. Joint work or coordinated guidance could support a coherent approach and avoid gaps or inconsistencies.

Similarly, The growing sophistication of technology-enabled misconduct may require coordinated responses. IAASB considerations relating to audit procedures, risk identification and assurance methodologies intersect with IESBA considerations concerning professional responsibilities, ethical conduct and professional skepticism. Joint work may help ensure a more holistic

response to evolving risks.

In addition to standard-setting projects, the Boards should consider more agile forms of joint work, including implementation guidance, educational materials, stakeholder roundtables and mechanisms for identifying emerging implementation challenges. Such initiatives could support more timely responses while preserving due process and improving the practical operability of standards.

Overall, the SSBs should seek to identify areas where users of information experience the reporting and assurance ecosystem as interconnected, even where institutional mandates remain separate. Joint action in such areas can contribute to greater consistency, usability and confidence in reporting outcomes.