

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 Nordic Federation of Public Accountants

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

Helene Agélii

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

helene.agelii@nrfaccount.org

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

IFAC Member Body or Other Professional Accountancy or Professional Organization

Please specify the type of accounting firm:

Please specify:

IFAC Member Body or Affiliate

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:

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).

We appreciate the initiative between the IAASB and the IESBA to provide a joint consultation and are very supportive of collaborative efforts between the two boards. However, the grading approach has proven challenging — both in terms of assigning a single grade applicable to both boards, which is not self evident, and because discussions with several persons have shown that individuals often wish to grade differently even though, when explaining their reasoning, they express similar views. Bearing this in mind, we believe it is important that both boards avoid drawing extensive conclusions from the grading results and instead focus primarily on the written input.

The following themes are equally important for both boards and should, in our view, guide their joint strategic direction.

1. Aim to achieve increased adoption and implementation

Both boards should aspire to achieve greater adoption and implementation of the existing standards and the current version of the Code. Stability and continuity are essential to enable consistent application and to build trust across jurisdictions and firm sizes.

2. The importance of truly principles based standards

In a rapidly changing global environment, ensuring that standards and the Code remain genuinely principles based must be a top priority. The boards should focus on maintaining standards that are stable over time and capable of absorbing change without frequent amendment. Constant revisions are a sign that the standards are not sufficiently anchored in enduring

principles. Emerging issues are better addressed through non authoritative guidance rather than through continuous changes to the standards and the Code.

3. Focus on simplification, relevance, and fit for purpose for the entire profession

The boards should acknowledge the need for simplification and ensure that outputs remain fit for purpose for the entire profession — including SMPs and SMEs. This perspective must be embedded from the outset and maintained throughout the standard setting process. Simplification is also closely linked to relevance: in a world where the profession faces increasing competition from other service providers and technological solutions, usability and accessibility of the standards are essential to maintaining the profession's relevance and credibility.

4. Focus on pre assessments

Before initiating new projects, both boards should strengthen their pre assessment processes by stress testing whether emerging developments truly require changes to the standards or the Code. This assessment should also help determine whether issues can be more effectively addressed through non authoritative guidance rather than formal revisions. Such an approach ensures that the boards remain responsive to new developments while preserving the stability and principles based nature of the standards and the Code.

5. Balanced stakeholder input

External stakeholder input is vital to the boards' understanding of how standards and the Code are perceived and applied in practice. At the same time, it is important not to weigh the views of regulators disproportionately compared to other stakeholders. As the standards and the Code are ultimately applied by practitioners, their perspectives provide essential insight into practical implementation and usability. Input from users, investors, and other external parties also contributes valuable context, particularly regarding expectations and emerging needs. A balanced consideration of these perspectives will help ensure that the boards' outputs remain relevant, practical, and broadly supported.

6. SECTION IV: KEY TRENDS IMPACTING THE SSBs

A.1 Digital Transformation – Increasing Use of Emerging Technologies

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?

We anticipate increasing use of emerging technologies, both within firms' audit processes and within their clients' systems. Over the next strategy period, it will therefore be important to regularly stress test the standards to ensure they remain fit for purpose and continue to encourage the effective and responsible use of technology and AI. At the same time, it will be neither feasible nor desirable to attempt to keep pace with every technological development through changes to the standards. This is an area where the importance of truly principles based standards becomes particularly evident. Emerging developments should be carefully assessed and, in most cases, primarily addressed through non authoritative guidance rather than through frequent changes to the standards themselves. The substantial technology related projects already underway at the IAASB are expected to address many of the current needs in this area.

Regarding the IESBA, we would rate this area as 3. The fundamental principles in the Code are, in our view, sustainable and sufficiently robust to accommodate technological developments. As with the IAASB, any increasing use of emerging technologies that affects the profession's services should, as a general approach, be dealt with outside the Code unless a clear and compelling need for authoritative change is identified.

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

Assets

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?

We view this primarily as a matter of regional divergence rather than a global issue, and therefore not an area that should be a priority for the international standard setters. Historically, separate standards have not been created for each class of assets, and we see no compelling reason to depart from that approach. In our view, this is an area for regulators to address, as the underlying drivers stem from jurisdiction specific requirements and market developments. Any response — if needed — should therefore primarily be dealt with outside the standards and the Code.

A.3 Digital Transformation – Financial Crimes Enabled by Technology

3 – Slightly 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?

We acknowledge the increase in financial crimes in society, not least driven by the growing use of technology and AI. Recent revisions to ISA 240 have already sought to strengthen the auditor's responsibilities in this area, and the extensive anti money laundering regulatory frameworks in many jurisdictions also address these risks. From our perspective, these developments suggest that further changes to the standards are not the immediate priority.

At the same time, the rise in financial crime may lead to increased demand for external assurance services beyond the audit. Should such needs emerge, any initiative from the IAASB should take ISAE 3000 as the starting point, ensuring a consistent and principles based foundation for any future work.

With respect to the Code, and consistent with our responses to other questions, we believe that the fundamental principles are robust enough to be applied to these situations as well. Given the rapid pace of change — where it is difficult to anticipate what new forms of financial crime or technology enabled misconduct may arise over the next five years — it is reasonable to expect that new scenarios will emerge. However, such developments should primarily be addressed through non- authoritative material, which provides the necessary agility without compromising the stability and principles based nature of the Code.

7. SECTION IV: KEY TRENDS IMPACTING THE SSBs

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

We view regulatory actions that affect the work of the standard setting boards more as overarching themes than as distinct areas of regulation. In particular, the continued focus on simplification and deregulation is highly relevant for both boards and should remain an important consideration in their future work. Ensuring that standards and the Code remain usable, scalable, and principles based will be essential in this environment.

At least in the EU, we also observe a clear trend in which legislators increasingly request or encourage external assurance over companies' information. At the same time, they are explicit that such services should not be exclusive to the profession. This creates a competitive environment in which the profession's continued relevance cannot be assumed. High quality services remain fundamental, but the question of what constitutes quality — and how it is demonstrated — is an area where the SSBs play a critical role.

In this context, it will be important for the boards to continue considering how their standards can support both quality and relevance in a market where assurance services may be provided by a broader set of actors.

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

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?

Fragmentation is a global issue, and responsibility for it is shared across many actors — regulators, legislators, oversight bodies, and the profession itself. It should therefore not be viewed as arising solely from the work of the standard setting boards. What the SSBs can do to avoid contributing to further fragmentation is to prioritize adoption, simplification, and usability, rather than expanding the standards or the Code unnecessarily. Fragmentation is often driven by having too many and too complex requirements, not too few. Ensuring that the standards remain principles based, scalable, and fit for purpose is therefore essential.

From this perspective, the focus should be on supporting global adoption and reducing complexity, rather than introducing additional layers of requirements that risk widening the gap between jurisdictions.

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

3 – Slightly 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?

We support greater agility in the work of the standard setting boards, and we believe it will be increasingly important as the profession moves into an uncertain and rapidly changing future. At the same time, agility should be exercised with appropriate caution. Not every emerging issue requires an immediate response, and quick solutions should primarily be addressed through non authoritative guidance, which provides flexibility without compromising the stability of the standards.

It is essential that both the Code and the standards remain stable, principles based, and usable. Frequent changes risk undermining their effectiveness, increasing complexity, and making global adoption more difficult. Agility should therefore focus on timely support, clarification, and guidance — while preserving the long term coherence and durability of the authoritative texts.

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

3 – Slightly 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?

While diversity of perspectives is valuable, this is not a new concept; the boards have long engaged with a broad range of stakeholders, and it remains essential that they continue to do so.

At the same time, the primary objective must remain the development of clear, practical, and globally applicable standards that support high quality engagements and respond to the expectations and needs of major stakeholders — including, importantly, the accountancy and audit profession. Ensuring that the standards are usable across different firm sizes, business models, and jurisdictions is fundamental to their credibility and adoption.

In our view, the focus should therefore be on maintaining a balanced and inclusive approach to stakeholder engagement, while keeping the central purpose of standard setting firmly in view.

8. SECTION IV: KEY TRENDS IMPACTING THE SSBs

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

3 – Slightly 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?

IAASB rating: 3 Slightly decreasing in importance

We currently observe a declining political focus and a reduced demand for sustainability matters. In addition, the EU has decided to develop a European sustainability assurance standard which, although intended to be based on ISSA 5000, will ultimately be the standard applied within Europe for sustainability reporting required by law. Regarding voluntary sustainability

reporting, it is still unclear which assurance standard will apply. These circumstances should reasonably influence the IAASB's work and the resources allocated to this area.

IESBA rating: 2 Decreasing in importance

For the IESBA, the need for additional work in this area appears even more limited. The IESSA initiative has faced considerable criticism from the outset, and before any further projects related to sustainability are undertaken, it would be prudent to first assess the extent of interest in and commitment to applying IESSA in practice. Looking ahead, there may be increased risks of greenwashing, and it could be useful to reassess whether the measures already developed remain fit for purpose. It may also be useful for the IESBA to reflect on how its recent expansions to include non professional accountants interact with the Code's intended scope, as this could raise questions of clarity and consistent enforceability in practice.

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

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?

We believe the considerations outlined under C1 equally apply here. The continuing demand for sustainability assurance appears to be decreasing, reflecting reduced political focus and market interest, as well as the EU's decision to develop its own assurance standard.

9. SECTION IV: KEY TRENDS IMPACTING THE SSBs

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

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 rating: 2 Decreasing in importance

This does not fall within the remit of the IAASB per se, as the structure and ownership of accounting firms are matters defined by law and regulation.

However, as new business structures evolve, including private equity invested firms, a broader discussion has emerged around how these firms maintain high quality. The IAASB already has a strong foundation through ISQM 1, which provides a principles based framework adaptable to different firm contexts. The emergence of new ownership models does not in itself suggest a need to revise that standard. Rather, it highlights the importance of continuing to apply ISQM 1 effectively and of responding thoughtfully—rather than reactively—to emerging developments.

IESBA rating: 4 Slightly increasing in importance

Private equity ownership within the profession is growing, bringing renewed attention to quality, ethical culture, and independence. While some concepts may be new in these ownership structures, this does not necessarily indicate deficiencies in the Code, given its principles based nature. It may nonetheless be appropriate for the IESBA to stress test whether emerging business structures and ownership models create situations not specifically covered. Regulators have expressed increasing concern, including regarding firms auditing entities within the same private equity fund that also holds a stake in the audit firm. Some have indicated that such arrangements may not be acceptable, even if current rules do not explicitly prohibit them. One area that may warrant further consideration is the definition of a network firm. In this context, rather than broad expansion, targeted revisions could be explored, supported by enhanced coordination between the IESBA and IAASB to ensure coherence across ethics and audit frameworks. At the same time, it would be preferable to first assess whether non authoritative guidance could adequately address these matters before any expansion of the Code is contemplated.

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

1 – Strongly 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?

We do not consider this a trend that warrants standard setting attention. The involvement of non professional accountants in accounting and auditing firms is not new and will continue to grow. The Code applies to professional accountants, and firms are responsible for ensuring that all personnel operate within its ethical framework. The SSBs may wish to collaborate to ensure consistent interpretation and implementation across ethics and quality management frameworks, but this should focus on awareness and application rather than new requirements.

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

1 – Strongly 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?

Attracting and retaining talent is a recognized challenge for the profession. However, this topic does not fall within the remit of global audit or ethics standard setting. While auditing and ethical standards may have an indirect impact through their complexity or practical application, they are not the root cause of talent related challenges. The attractiveness of the profession depends on factors such as firm culture, workload, organizational practices, regulation, and market expectations—matters for firms, PAOs, and regulators rather than standard setters.

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:

The growth of non assurance service lines may influence firm business models and public perceptions, but this should not be treated as a standalone standard setting priority. For IESBA, any action should build on experience with existing non assurance services and fees provisions and be evidence based. For IAASB, relevance arises only if clear implications for quality management or audit quality are identified. Broader changes in firm business models should not, by themselves, drive new standard setting activity.

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.

No

Additional trends

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

Please describe the additional trend

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.

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

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 : B.1

Rank 3 : A.1

Rank 4 : D.1

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.

This consultation relates to the 2028–2031 strategy period. Throughout the document, the rapid pace of change, emerging issues, and the increasing influence of technology and AI are highlighted as factors that will significantly shape the work of both boards. In light of this, and reflecting on the experience from the current strategy and work plan cycle, we believe it is appropriate to consider whether the existing process remains fit for purpose.

The world looks very different today compared to when the current SWP was initiated. Developments have unfolded at a speed that could not have been anticipated five years in advance. This raises a broader question: does it make sense — or is it even feasible — to begin the strategy and work plan process so far ahead of the period it is intended to cover, and to identify topics that may only be addressed several years later? In an environment characterized by rapid change, such an approach risks locking in priorities too early and limiting the boards' ability to respond to emerging needs.

We therefore encourage the boards to reflect on whether the process itself should be reconsidered. A more adaptive or rolling approach may be better suited to the environment described throughout this consultation, enabling the boards to maintain strategic direction while remaining responsive and agile. As the boards move forward to develop their individual draft strategies and work plans, close collaboration between the IAASB and IESBA will be essential to support appropriate alignment where their work intersects.