Response ID:135 Data

2. (untitled)

Please indicate if you are responding as an individual or on behalf of your organization?

Responding on behalf of your organization.

Please complete:

(ii) Approximate years of professional experience:

Please provide the following information and other contact information:

Your organization's name, if any (if you are responding on behalf of an organization[2])

Your name and job title / role:

Your email address:

Your jurisdiction/country:

Please provide the following information and other contact information:

Your organization's name, if any (if you are responding on behalf of an organization[2])

CPA Australia

Your name and job title / role:

Belinda Zohrab
Regulation and Standards Leas

Your email address:

belinda.zohrab@cpaaustralia.com.au

Your jurisdiction/country:

Australia predominantly, also Asia-Pacific

Please indicate the geographical profile which best represents your situation, i.e., from which geographical perspective are you providing your responses?

Regional (Please specify): Australasia

Please indicate the stakeholder group to which you belong, i.e., from which perspective are you providing your responses?

Professional accountancy organizations (PAOs) (Please indicate whether your members are PAPPs and/or PAIBs): PAPPs and PAIBs

3. (untitled)

Has your jurisdiction adopted the Restructured Code (2018 edition and onwards)? (Please choose the most representative answer)

(b) Yes, through adoption with modifications (Please (i) specify the latest edition of the IESBA Code that has been adopted, e.g., 2018, 2024, etc.; (ii) describe the nature and reasons for the modifications; and (iii) provide links to the local Code or the specific announcement of the adoption or issuance of the local Code): The APESB Code of Ethics contains the restructured Code of Ethics issued in 2018 and all eleven Amending Standards issued up until the end of July 2025, including the Amending Standard for Sustainability Assurance and Reporting and the use of External Experts (effective from 1 January 2026). The most minor modifications made such as modifications to the tax planning services provisions to align with local tax avoidance law for consistency and for the avoidance of confusion.

If you have answered (a), (b) or (c), was the local Code translated? If yes, please indicate the language in which the local Code was translated.

Not translated

4. (untitled)

For JSS, PAOs, Regulators or Oversight Bodies, and Accounting Firms only

What guidance or educational materials has your organization issued, or what programs has your organization developed, to support understanding of how to use the local Code or provisions? (Select all that apply and provide links)

Education/training programs (e.g., webinars, CPD programs)
Other (Please specify): As a PAO, we have provide workshops for the Code and for additional supplementary standards. In addition, our local professional stanbdards setter has provided guidance materials in respect of which we have provided considerable input.

For individual PAPPs and PAIBs only

What guidance or educational materials have you received or accessed with respect to how to use the local Code or provisions? (Select all that apply)

5. (untitled)

For JSS, PAOs, Regulators or Oversight Bodies, and Accounting Firms only

Does your organization offer guidance to individual professional accountants, accounting firms, or other users on the application of the local Code or provisions if they seek such assistance? (Select all that apply)

Discussion forum (e.g., for sharing knowledge)
Other (Please specify): We generally receive queries from our members via email and our response is to direct the member to the specific part(s) of the Code and other non-authoritative materials relevant to their query. The email triage may from time to time result in a direct call to the member to support them in their understanding of their obligations.

For individual PAPPs and PAIBs

Do you have access to guidance on the application of the local Code or provisions in your jurisdiction if you seek such assistance? (Select all that apply)

6. (untitled)

For JSS, PAOs, Regulators or Oversight Bodies or Accounting Firms

Which inquiries or questions relating to the structure and drafting of the local Code or provisions has your organization commonly received? (Please provide details, including from which stakeholder groups the inquiries or questions arose)

We do not receive specific code based questions like "how does section XYZ apply here?" the questions we receive are always from a circumstance, and seek general guidance.

The closest direct query to the code may be from questions such as for a NOCLAR event. Our feedback here is that the code is working for NOCLAR, the issue is that members are not aware of the code, or want to short cut direct to an answer from CPA Australia.

For individual PAPPs and PAIBs

Which specific structure or drafting matters pertaining to the local Code or provisions have you inquired or raised questions about? (Please provide details)

7. (untitled)

Is the building-blocks approach of the IESBA Code simple and clear, and does it help in navigating the Code?

Yes
Comments:

Is the “Guide to the IESBA Code” helpful in explaining how the Code is structured and should be applied?

Somewhat (Please explain your response)
Comments: Anecdotally, we hear our members do not tend to use it much. Rather users go straight to the relevant section/s. It is useful when used. We recommend it is not expanded further.

8. (untitled)

Is it clear within each Section that a professional accountant (or firm as appropriate) has the responsibility to comply with the fundamental principles and apply the conceptual framework?

Yes
Comments: This is a very sensible feature.

Does the IESBA Code’s approach to delineating requirements (“R” paragraphs) from application material (“A” paragraphs) make it clear what a professional accountant’s or firm’s obligations are?

Somewhat (Please explain your response)
Comments: APES 110 differentiates between the requirements and the application materials by presenting teh requierments in bold. This is very helpful visually. We query whether the status of the application material within the Code is confused with non-authoritative material which sits outside the Code. Neither are requirements but one is within and one is without the Code. Maybe distinction should be made clearer - perhaps at the start of every part in the same manner that the fundamental principles are reiterated at the start of each part.

Is it sufficiently clear that the Code is scalable and proportionate?

Somewhat (Please explain your response)
Comments: Language supporting or demonstrating proportionality and scalability is not always evident. Particularly where the language is less principles-based but prescriptive - the prescription tends to relate to larger firms/businesses and is difficult to be scalable and proportionate. The language doesn't lend itself to micro firms and sole-practitioners. As an example, sections 300.7 and 300.8 do not give examples relevant to a sole practitioner. It would help if the unique threats and resolutions that a sole/small firm faces would help apply this section of the code where needed

If your organization has responsibility to enforce compliance with the provisions of the Restructured Code, has the delineation of requirements and application material helped

with enforceability?

Somewhat (Please explain your response)
Comments: In our investigation and discipline function, we rely on the APES (Code and Standards) modelled on the IESBA Code to provide a clear indication of a breach. In most instances the instructions are clear and easy to follow (the APES 110 is somewhat easier to rely upon in some instances as the matters deemed important/mandatory are in bold).   The restructured code is a definite improvement since the 2018 version, it is clearer easier to read and implement/impose.

9. (untitled)

Is the language used in the Code clear, readable and understandable?

Yes
Comments: Note however, that predominantly our users have English as their first or very strong second language.

Is the language used in the Code easy to translate?

Somewhat (Please explain your response and provide examples with reference to specific provisions in the Code which you consider may not be easy to translate)
Comments: We are unable to comment here, however anecdotally it is not.

10. (untitled)

Is an individual PAPP's responsibility in relation to independence clear?

Yes
Comments:

Is a firm's responsibility in relation to independence clear?

Yes
Comments:

Is a network firm's responsibility in relation to independence clear, and is that responsibility clearly distinguished from a firm's responsibility?

Yes
Comments:

11. (untitled)

Other Comments

Are there any other comments relating to the structure and drafting of the IESBA Code that

the IESBA should consider as part of this PIR?