

IESBA Post-Implementation Review (PIR) Survey

Structure of the IESBA Code

Introduction

This survey is only applicable to respondents that have adopted or use or benefit from the 2018 or later edition of the [International Code of Ethics for Professional Accountants \(including International Independence Standards\)](#) (the Code). Part 5 of the Code as contained in the [International Ethics Standards for Sustainability Assurance](#) (IESSA) is outside the scope of this survey and only becomes effective in December 2026.

1. The International Ethics Standards Board for Accountants (IESBA) is conducting a post-implementation review of the structure and drafting of the Code.
2. This survey seeks to obtain input from a broad range of stakeholders to enable the IESBA to determine:
 - (a) Whether the restructuring of the Code through revising its structure and redrafting its provisions¹ has achieved its intended purpose by identifying:
 - (i) Benefits from the restructuring of the Code; and
 - (ii) Any practical challenges or questions regarding the understandability and usability of the Code, including whether it is being consistently understood and applied; and
 - (b) What actions, if any, are needed by the IESBA to address identified matters.
3. The responses received will be analyzed for purposes of providing feedback to the IESBA and in developing recommendations for any actions.
4. The survey comment period starts on April 1 and ends on July 3.

Survey Responses to be Made Public

5. Unless confidentiality is specifically requested, respondents' submissions will be considered a matter of public record and will be posted to IESBA's website. Where confidentiality is requested, the IESBA Project Team will include such input in its analysis on an anonymized basis.

Survey Instructions

6. Respondents to the survey are asked to provide their responses only on the questions applicable to the stakeholder group to which they belong:
 - [Part A](#) — Demographic Information (All Respondents)
 - [Part B](#) — General Information (All Respondents)
 - [Part C](#) — Usability and Clarity of Language and Responsibility (All Respondents)

¹ The restructured Code was [issued](#) in April 2018.

- [Part D](#) — Clarity of Responsibility (Individual Professional Accountants in Public Practice, Accounting Firms, Regulators or Oversight Bodies, Professional Accountancy Organizations)
7. Respondents may respond to all questions or only selected questions or matters. All responses to this survey, whether complete or partial, will be accepted and considered as input for the IESBA Project Team’s analysis.
 8. Please read the overview of the structure and drafting enhancements which can be accessed [here](#). The drafting guidelines that were adhered to in restructuring the IESBA Code can be accessed [here](#).

Part A – Demographic Information (All Respondents)

9. Please indicate if you are responding as an individual or on behalf of your organization?
 - (a) If you are responding as an individual:
 - (i) Please indicate your jurisdiction
 - (ii) Approximate years of professional experience:
 - Less than 5 years
 - 5–10 years
 - 11–20 years
 - More than 20 years
 - (b) If you are responding on behalf of your organization, please indicate the geographical profile which best represents your situation, i.e., from which geographical perspective are you providing your responses?
 - Global
 - Regional (*Please specify*)
 - Multiple jurisdictions (*Please specify*)
 - Single jurisdiction (*Please specify*)
10. Please indicate the stakeholder group to which you belong, i.e., from which perspective are you providing your responses?
 - Jurisdictional standard setters (JSS) (*Please indicate the users of your standards as a JSS, e.g., individual Professional Accountants in Public Practice (PAPPs), professional accountants in business (PAIBs) and/or accounting firms*)
 - Professional accountancy organizations (PAOs) (*Please indicate whether your members are PAPPs and/or PAIBs*)
 - Regulators or oversight bodies (*Please indicate which of the following you regulate or oversee (select all that apply): PAPPs (including auditors), PAIBs, accounting firms (including audit firms), none of the above*)
 - Individual professional accountants in public practice (PAPPs) and accounting firms

- Professional accountants in business (PAIBs)
- Other users or beneficiaries of the Code (Please specify) (e.g., investors or other users of financial statements, those charged with governance, academics)

11. Please provide the following information and other contact information:

- Your organization's name, if any (if you are responding on behalf of an organization²) : IFAC
- Your name and job title / role: Thokozani Nkosi, Audit Technical, Ethics, and Methodology Manager
- Your email address: ThokozaniNkosi@ifac.org
- Your jurisdiction: Global

Part B – General Information (All Respondents)

The revised structure and redrafted provisions of the IESBA Code from the Structure Project were integrated into the 2018 Revised and Restructured IESBA Code (Restructured Code).

Other revisions which were concurrently developed were integrated into the 2018 Restructured Code. Subsequent new or revised standards which were incorporated into later editions of the Code have all been structured and drafted consistently with the enhancements made in the Structure Project.

Accordingly, the following questions seek to understand the adoption status of the Restructured Code (2018 edition and onwards) in respondents' jurisdictions, relevant educational materials and guidance that have been issued or used by respondents, and the inquiries or questions related to the structure and drafting of the Restructured Code that have been commonly received or experienced by respondents.

Note:

In this survey, adoption (full or with modifications) refers to the formal acceptance and incorporation of the IESBA standards into your jurisdiction's national laws, regulations or professional requirements.

Convergence is where a jurisdiction aligns its national ethics (including independence) standards or provisions with the IESBA standards through a process that seeks to eliminate or minimize differences between the IESBA and national standards or provisions. This includes a process where an IESBA standard is used as a basis to develop the local standard or provisions.

Adoption status (Only for respondents that are JSS, PAOs, Regulators or Oversight Bodies, Individual PAPPs or Accounting Firms)

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

- (a) Yes, through full adoption with no modifications of the Code (Please (i) specify the latest edition of the IESBA Code that has been adopted, e.g., 2018, 2024, etc., and (ii) provide the links to the local Code or the specific announcement of the adoption or issuance of the local Code)
- (b) Yes, through adoption with modifications (Please (i) specify the latest edition of the IESBA

² If you respond on behalf of a global organization, the jurisdiction (or name of the country) in which you work. If you are responding on behalf of a global organization, please indicate "Global" as your jurisdiction.

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)

(c) No, the IESBA Code was used as a basis to develop the local Code (or equivalent provisions) which is converged with the IESBA Code *(Please (i) specify the latest edition of the IESBA Code that has been used to develop the local Code (or equivalent provisions), e.g., 2018, 2024, etc.; (ii) provide links to the local Code (or equivalent provisions) or the specific announcement of the converged version of the IESBA Code); and (iii) describe the significant differences related to structure and drafting between the local provisions and the Code's provisions)*

(d) There are provisions in relevant law or regulation or a different ethical framework that are at least as stringent as the Code's provisions *(Please (i) specify the edition of the IESBA Code against which the relevant law, regulation or local ethical framework is benchmarked, e.g., 2018, 2024, etc., and (ii) describe the significant differences related to structure and drafting between the local Code or provisions and the IESBA Code)*

(e) Not adopted *(Please specify reasons. If there is a plan to adopt the IESBA Code, please provide details)*

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.

Guidance and Educational Materials

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

13. 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)*

- Technical guidance (e.g., FAQs)
- Education/training programs (e.g., webinars, CPD programs)
- Articles, publications or newsletters (e.g., updates about standards, case studies or illustrative examples)
- Other *(Please specify)*
- None

For individual PAPPs and PAIBs only

14. 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)*

- Technical guidance (e.g., FAQs)
- Education/training programs (e.g., webinars, CPD programs)
- Articles, publications or newsletters (e.g., updates about standards, case studies or illustrative examples)
- Other *(Please specify)*

- None

Other Support

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

15. 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)*

- Ethics hotline or equivalent (e.g., for technical queries, application questions on how to use the local Code or provisions)
- Discussion forum (e.g., for sharing knowledge)
- Other *(Please specify)*
- None

For individual PAPPs and PAIBs

16. 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)*

- Ethics hotline or equivalent (e.g., for technical queries, application questions on how to use the local Code or provisions)
- Discussion forum (e.g., for sharing knowledge)
- Other *(Please specify)*
- None

Inquiries and Questions

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

17. 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)*

For individual PAPPs and PAIBs

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

Part C – Usability and Clarity of Language and Responsibility (All Respondents)

The overview below provides brief background to the questions that follow regarding specific aspects of the restructuring or redrafting of the IESBA Code.

Building Blocks Approach

The Restructured Code has four Parts which are focused on all professional accountants (Part 1), professional accountants in business (Part 2), professional accountants in public practice (Part 3), independence for audit and review engagements (Part 4A), and independence for other assurance

engagements (Part 4B).

A building blocks approach was applied whereby Part 1 applies to all professional accountants but is not repeated in subsequent Parts. Rather, the provisions in subsequent Parts are incremental in nature and build off Part 1.

Each Part includes various Sections to address specific topics. Each Section of the Restructured Code is structured, where appropriate, as follows:

- Introduction – sets out the subject matter addressed within the section and introduces the requirements and application material in the context of the conceptual framework.
- Requirements – establish general and specific obligations with respect to the subject matter addressed.
- Application material – provides context, explanations, suggestions for actions or matters to consider, illustrations and other guidance to assist in complying with the requirements.

To guide users in navigating the provisions in the Code, a “Guide to the Code” was added.

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

- Yes

IFAC agrees that the building-blocks approach of the IESBA Code is simple and clear. However, outreach indicated that many practitioners do not navigate the Code sequentially. Instead, users commonly search electronically for a particular topic or provision and go directly to the relevant section. As a result, the conceptual logic of the building-blocks approach is not always apparent in practice, particularly for occasional users or practitioners seeking guidance on a specific issue. Measures such as visual navigation aids may help to make the structure more intuitive.

- Somewhat (*Please explain your response*)
- No (*Please explain your response*)

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

- Yes

IFAC considers the “Guide to the IESBA Code” to be helpful. Rather than any future expansion of the Guide, IFAC encourages the IESBA to continue improving the usability of the Code itself so that users can readily understand how provisions interrelate without needing to consult separate explanatory material. Further consideration to how the Guide and Code structure support digital navigation, indexing and AI-assisted search tools is becoming increasingly necessary as the means by which practitioners access standards evolves.

- Somewhat (*Please explain your response*)
- No (*Please explain your response*)

Emphasizing Compliance with the Fundamental Principles and Applying the Conceptual Framework

To emphasize a professional accountant’s responsibility to comply with the fundamental principles and

apply conceptual framework:

- An overarching requirement was included in Sections 200, 300, 400 and 900; and
- Reference to the requirement to apply conceptual framework is included in the introductory sections of the remaining Sections within Parts 2, 3 and 4 of the Restructured Code.

21. 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

Overall, IFAC considers that the restructuring has made it sufficiently clear that compliance with the fundamental principles and application of the conceptual framework underpin all relevant sections of the Code.

- Somewhat (*Please explain your response*)
- No (*Please explain your response*)

Distinction Between Requirements and Application Material

To give more prominence to obligations set out in the Code (including specific prohibitions) and separate them from guidance or explanatory material, requirements are clearly distinguished from application material:

Requirements are designated with the letter “R” and, in most cases, include the word “shall”. The word “shall” in the Code imposes an obligation on a professional accountant or firm to comply with the specific provision in which “shall” has been used. In some situations, the Code provides a specific exception to a requirement. In such situation, the provision is also designated with the letter “R” and is linked to the requirement to which they pertain by using the phrase “as an exception to.”

Application material is designated with the letter “A.” Such provisions will follow the requirement that they are explaining.

Requirements will not reference application material to avoid blurring the distinction between requirements and application material.

Scalability

The Restructured Code was organized to illustrate the Code’s scalability by giving greater prominence to the overarching requirement to comply with the fundamental principles and apply the conceptual framework, followed by specific requirements.

Requirements that apply to firms when providing professional services to public interest entities (PIEs) are located after requirements that apply to other entities.

22. 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?

- Yes

IFAC supports the clear distinction between requirements and application material introduced through the restructuring. Overall, the use of separate “R” and “A” paragraphs improves readability and makes mandatory obligations easier to identify.

Some practical concerns regarding the wording of certain application material can be raised. In some cases, application paragraphs use language that may be interpreted as imposing obligations despite not being drafted as requirements. This may blur the distinction between explanatory guidance and enforceable requirements. For example:

- The phrase "It is generally necessary", in paragraphs 210.8 A1 and 310.9 A3, may be interpreted as creating an implicit obligation for the professional accountant.
- The phrase "It is generally expected", in paragraphs 410.12 A2 and 905.8 A2, may be interpreted as creating an implicit obligation for the firm.

- Somewhat (*Please explain your response*)
- No (*Please explain your response*)

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

- Yes
- Somewhat (*Please explain your response*)
- **No** (*Please explain your response*)

The Code addresses scalability and proportionality to some extent through the bottom-up approach, whereby prominence is given to the overarching requirements, and the introduction of additional requirements (where appropriate) for audits of public interest entities (PIEs). However, we believe significant challenges to scalability and proportionality remain.

The Code does not explicitly acknowledge scalability, nor explain how scalability has been addressed or considered and excludes examples on how requirements or application material are scalable.

The Code has become increasingly detailed and prescriptive over successive revisions. While additional specificity may improve consistency in some circumstances, it can also reduce the flexibility that is inherent in a principles-based ethical framework and make proportionate application more difficult. For example:

- The requirements related to long association, in Section 540, are difficult and at times impossible to apply for smaller firms with a limited number of engagement partners.
- The requirement for experts to provide information in writing for the accountant's evaluation of the external expert's objectivity, in paragraph R390.5(b)(i), is problematic. Suitably qualified experts may be unfamiliar with such requests or unwilling to invest the time and effort to prepare the required information for smaller firms, prior to engagement. Any resulting reduction in access to external experts is likely to have a disproportionate impact on small and medium-sized practices (SMPs). This may adversely affect engagement quality, constrain firms' ability to accept or continue engagements, and, in some cases, contribute to firms exiting the market altogether.

We would strongly support rationalization and a reduction in the length, complexity and granularity of the Code. Focus on the core principles, supplemented by implementation guidance that illustrates proportionate application in different circumstances, would be helpful.

24. 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?

- Yes

Somewhat *(Please explain your response)*

- No *(Please explain your response)*

- N/A as do not enforce the provisions of the Restructured Code

IFAC itself does not enforce compliance with the Code and therefore cannot comment directly from an enforcement perspective.

However, we are aware that the clearer distinction between requirements and application material has generally assisted interpretation and enforcement.

Clarity of Language and Readability

The Restructured Code was redrafted to increase the clarity of language to improve its readability and understandability, including use of simpler and shorter sentences, simplifying complex grammatical structures, and avoiding legalistic and archaic terms.

Further, to minimize the risk of ambiguity and confusion through inconsistent use of terms, the IESBA agreed that:

- When the word “may” is used in the Code, it denotes permission to take a particular action in certain circumstances, including as an exception to a requirement. It is not used to denote possibility.
- When the word “might” is used in the Code, it denotes the possibility of a matter arising, an event occurring or a course of action being taken.

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

- Yes

- Somewhat *(Please explain your response and provide examples with reference to specific provisions in the Code which you consider may not be clearly drafted)*

- No *(Please explain your response, and provide examples with reference to specific provisions in the Code which you consider are not clearly drafted)*

We believe there are some significant challenges to clarity, readability and understandability. In particular, some application material appears to convey mandatory expectations through wording that resembles requirements, which may create uncertainty.

For example:

- The phrase “It is generally necessary”, in paragraphs 210.8 A1 and 310.9 A3, may be interpreted as creating an implicit obligation for the professional accountant.
- The phrase “It is generally expected”, in paragraphs 410.12 A2 and 905.8 A2, may be interpreted as creating an implicit obligation for the firm.
- It is often unclear to professional accountants whether the use of “and/or”, in paragraphs R260.15, 220.9.A1 and 230.3.A2, is intended to be an “exclusive or”, or an “inclusive or”.

26. Is the language used in the Code easy to translate?

- Yes
- 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)*
- **No** *(Please explain your response, and provide examples with reference to specific provisions in the Code which you consider are not easy to translate)*

Translation continues to present challenges in many jurisdictions.

Certain drafting conventions, including nuanced distinctions between terms such as "may" and "might", do not always translate readily into other languages. Similarly, the meaning conveyed by the term "encourage" may not be readily transferable into other languages, potentially leading to a loss of precision and inconsistent interpretation across jurisdictions. Complex and lengthy sentence structures can also make it difficult to achieve consistent interpretation across translations.

The length of the Code itself and frequency of revisions also create barriers to effective translation.

Other Comments

27. 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?

A recurring pattern across several IESBA projects issued after the 2019 restructuring is that the linguistic clarity originally intended to improve readability has not been consistently maintained. Despite the 2019 focus on shorter sentences, simplified grammar and reduced legalistic drafting, more recent projects often contain lengthy, technical and highly detailed provisions.

This is evident in the Engagement Team and Group Audits Independence Project, where definitions include multiple embedded conditions and extensive cross referencing. In the Definitions of Listed Entity and PIE Project, jurisdictional overlays and explanatory material resemble legislative drafting. In the Technology Project and Sustainability Project, complex terminology results in dense and difficult to navigate sentences. Long multi-clause sentences and dense application material in the Tax Planning and Related Services Project create similar challenges for accessibility and understanding. Length and complexity are also evident in other paragraphs including 114.1 A1, R200.10, 260.3, R340.7, and R340.8. Overall, there is an argument that drafting choices made to address technical complexity may have reduced the usability of requirements and guidance.

We fully understand the challenges IESBA faces when aligning with IAASB standards and addressing emerging topics such as technology and sustainability. However, the increasing granularity and normative tone risk reducing accessibility, particularly for SMPs and jurisdictions with limited technical resources, and may undermine the usability gains achieved through the 2019 restructuring.

We encourage the IESBA to undertake a focused review of drafting conventions, similar to the IAASB's CUSP initiative, and to consider whether certain detailed application material could be

relocated outside the main body of the Code. This would help preserve the clarity of the core ethical provisions while still providing practitioners with the necessary explanatory guidance.

Part D – Clarity of Responsibility (For individual PAPPs, Accounting Firms, Regulators or Oversight Bodies, or PAOs)

The independence sections in the Restructured Code are included in the *International Independence Standards (IIS)* to emphasize its international application and enforceability.

The IIS comprise Part 4A – *Independence for Audit and Review Engagements* (i.e., Sections 400 to 899) and Part 4B – *Independence for Assurance Engagements Other than Audit and Review Engagements* (i.e., Sections 900 to 999).

In the IIS in Parts 4A and 4B, specific provisions relating to audits of entities that are not public interest entities (PIEs) and those relating to audits of PIEs are presented under separate headings titled:

- “All Audit Clients” to introduce provisions that apply in all circumstances and for all audits;
- “Audit Clients that are not Public Interest Entities” to introduce provisions that apply to audits of clients that are not PIEs; and
- “Audit Clients that are Public Interest Entities” to introduce provisions that apply to audits of PIEs only.

28. Is an individual PAPP’s responsibility in relation to independence clear?

- Yes
- **Somewhat** (*Please explain your response*)

The term “professional accountant” does not apply consistently throughout the Code, which can create challenges, especially for occasional users. For example, in Part 1, “professional accountant” refers to professional accountants in business (PAIBs), professional accountants in public practice (PAPPs) and their firms. In Part 2, this refers to PAIBs only, and in Part 3 PAPPs and their firms only. Without an understanding of application of terminology in specific parts, there could be confusion. This could create uncertainty regarding intended scope and application, which may result in inconsistent interpretation and implementation across jurisdictions.

- No (*Please explain your response*)

29. Is a firm’s responsibility in relation to independence clear?

- Yes
- **Somewhat** (*Please explain your response*)
- As stated in our response to question 28, we believe it is not always sufficiently clear whether the term “**professional accountant**” refers to PAIBs, PAPPs, firms, or some combination of these.
- No (*Please explain your response*)

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

- Yes
- Somewhat *(Please explain your response)*

This is generally clear but could also be impacted by the above issue described in question 28.

- No *(Please explain your response)*

End of Survey

Thank you for your valuable input. Your input will inform the IESBA's Post-Implementation Review and help the IESBA develop global ethics and independence standards that are user-friendly, understandable, capable of consistent application, and readily enforceable.