IESBA Post-Implementation Review (PIR) Survey
Structure of the IESBA Code

Part A – Demographic Information (All Respondents)

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

Single jurisdiction - The responses are provided by the Lesotho Institute of Accountants, a regulator and a PAO in Africa, Lesotho.

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

The Lesotho Institute of Accountants bears the roles of Jurisdictional Standard Setter, A Professional Accountancy Organisation and a Regulator. The Standards are used by individual Professional Accountants in Public Practice (PAPPs), professional accountants in business (PAIBs), accounting firms as well as auditors.

3 Please provide the following information and other contact information:

Organization's name: Lesotho Institute of Accountants (LIA)

Name and job title / role: Ms Matseliso Mokokoti, Technical Officer

Email address: Matseliso.mokokoti@lia.org.ls

Jurisdiction: Lesotho

Part B – General Information (All Respondents)

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

4 Has your jurisdiction adopted the Restructured Code (2018 edition and onwards)?

(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)*

Yes, through adoption with minor modifications – So far, there has not been any modification to the Code. Modifications were meant to be minor to accommodate or reflect our unique circumstances.

Link to the republication of adoption: Public notice - Lesotho institute of Accountants

Guidance and Educational Materials

5 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
- Education/training programs (e.g., webinars, CPD programs)
- Publications about standards *to all members of the Institute and members of the Public who members serve.*

6 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*)

- Education/training programs from IESBA as we provide training to members. For some years IESBA has formed part of our trainings to members

Other Support

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

7 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 forums

For individual PAPPs and PAIBs

8 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)*

Inquiries and Questions

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

9 **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)***

As both a regulator and a Professional Accountancy Organisation (PAO), one of the key avenues available to members facing ethical dilemmas is to seek guidance from the Institute. We would appreciate guidance on how the Institute can best support members.

10 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)

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

- Yes

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

- Somewhat - members believe that Code should simple and straight forward, once it requires guidance then it is complicated

13 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

14 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

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

- Somewhat

16 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

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

- Yes

18 Is the language used in the Code easy to translate?

- Yes

Other Comments

19 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?

Inputs

As a small jurisdiction, we face challenges of smaller audit firms, fewer engagement partners as most of the firms are owned and managed by 1 partner, no readily available independent reviewers. As a result, guidance could be provided that could addresses scarcity of specialist expertise, limited firm resources, concentrated client markets, limited availability of independent reviewers and practical safeguards where ideal safeguards are unavailable.

Further, since we are a small population, we have probably been in school together, are related, go to the same church or have worked together previously, there is a greater likelihood that familiarity threats arise. Additional examples would therefore be helpful to address extended family relationships, traditional community structures, long-standing friendships and former classmates;

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

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

- Yes

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

- Yes

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

- Yes

End of Survey