

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)

RSM International Limited

- Your name and job title / role

Claire Blanton, Global Leader—Quality and Risk

- Your email address

Claire.Blanton@rsm.global

- 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.

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.

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 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)*

(i) We have adopted the Restructured Code globally as the baseline benchmark.

(ii) Member firms supplement, where necessary, the specific requirements applicable to each member firm within its local jurisdiction. Where local or regulatory requirements are more stringent or restrictive, they take precedence and are applied in addition to the global requirements.

(iii) RSM International Limited is a global organization representing firms in approximately 120 countries; thus, it is not prudent to provide links to the local Codes used by individual member firms.

(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.

The local Code was translated in each member firm's respective jurisdiction where the official language is not English.

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*)

Guidance is also provided through a global independence and policies manual as well as the Code and related implementation materials provided by IESBA.

- None

Links to internal guidance or educational materials are considered proprietary. Any external guidance or educational materials may be found on our website at www.rsm.global.

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)*

We acknowledge that the Restructured Code explains both the use of terms such as ‘may’ and ‘might’ and the distinction between numbered requirements and application guidance. However, we continue to receive a significant number of inquiries regarding the interpretation of terms such as ‘trivial’ and ‘inconsequential’. While the Restructured Code describes the meaning of ‘might’ and sets out a test for determining whether a service might create a self-review threat (see paragraph R600.15 of the Code), its application in certain circumstances—particularly for public interest entities (PIEs)—continues to raise questions.

We recommend that terms such as ‘trivial’, ‘inconsequential’ and other nuanced terms not already described in the Restructured Code be clarified further through enhanced descriptions, additional application guidance, or simpler and more precise wording to improve consistency of interpretation and facilitate translation, particularly given that English is not the primary language in many jurisdictions and nuanced terminology can be easily misinterpreted. For ‘may’, ‘might’ or other terms where the meaning is already described, we recommend additional examples to support consistent application, rather than any change to the term itself.

In addition, we have commonly received inquiries or questions regarding the need to clarify the separate requirements and safeguards relating to PIEs and non-PIEs. We recognise that, for self-review threats, the Restructured Code is explicit that safeguards cannot reduce the threat to an acceptable level for a PIE (paragraph 600.16 A2 of the Code). The uncertainty we encounter relates to other threat types and whether safeguards may be used to reduce a threat identified for a PIE audit client to an acceptably low level.

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

- 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

- 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
- 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
- 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*)

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

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*)

We believe the language used in the Code is generally clear, readable and understandable, and the restructuring has achieved its objective of improving clarity through the use of simpler sentence structures, reduced legalistic phrasing and more consistent terminology. In some areas, we noted that the Code is clearer than certain local Codes.

However, certain aspects of drafting continue to give rise to interpretative challenges in application. We acknowledge that the Code defines ‘might’ as denoting possibility, without ascribing any particular level of likelihood, and that paragraph R600.15 of the Code sets out the test for determining whether a non-assurance service might create a self-review threat. In practice, applying that test still calls for judgement, for example, in assessing whether the results of a service will ‘form part of or affect’ the accounting records, or whether the audit team will ‘evaluate or rely on’ the firm’s work related to the service. This can lead to differing conclusions about whether a particular service falls within the prohibition, especially for PIEs, where the possibility of a self-review threat is itself the trigger for prohibition (paragraph R600.17 of the Code). The risk is heightened in translation, where a rendered term may inadvertently imply a degree of likelihood that ‘might’ is deliberately drafted to avoid.

We support this framework and do not suggest any change to the term ‘might’ or to the breadth of the prohibition it triggers for PIEs, which reflects a deliberate policy choice. Our recommendation is directed solely at supporting consistent application: additional explanatory

and application guidance—in particular, examples illustrating application of the test described in paragraph R600.15 of the Code—would help firms reach consistent conclusions across firms and jurisdictions.

We have identified two examples relating to non-assurance services that are typically prohibited under other independence frameworks, where the issue described above is particularly evident: the UK Financial Reporting Council's *Revised Ethical Standard 2024* and the auditor independence rules of the US Securities and Exchange Commission, codified in the US Code of Federal Regulations at 17 C.F.R. § 210.2-01 .

Paragraph R608.7 of the Code prohibits the provision of legal advice to a PIE audit client where the service might create a self-review threat. Similarly, paragraph R605.6 of the Code prohibits the provision of internal audit services to a PIE audit client where the service might create a self-review threat. While Subsection 605 of the Code, 'Internal Audit Services', provides examples of internal audit services that would be prohibited, there is still a risk of inconsistent interpretation regarding what constitutes a service that 'might create' a self-review threat. As a result, significant judgement may still be required in practice, which may lead to inconsistent application across firms and jurisdictions. Greater clarity, additional examples or more objective criteria may help promote more consistent outcomes and reduce the risk of differing interpretations.

While many sections of the Code are well drafted, there remain areas where ambiguity persists. These issues are less a function of readability in isolation than of provisions that can support a variety of interpretations and application in practice. This suggests that further refinement of supporting guidance in using certain terminology and more explicit linkage between principles, threats and outcomes would be beneficial.

Finally, although some respondents noted that the Code is voluminous, length in itself does not detract from readability where the material is logically structured, as is generally the case under the building-blocks approach.

On balance, the Code represents a significant improvement in clarity and readability; however, targeted refinements—particularly additional illustrative examples to support consistent application of the use of probabilistic language and in reducing interpretative ambiguity—would further enhance its understandability and consistent application.

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

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*)

We believe that the language used in the Code is easy to translate. However, as mentioned in our responses to questions 17 and 25, certain terms, such as 'trivial', 'inconsequential' or 'might', may not be easily translatable in a manner that preserves their intended applications or uses, as they are subject to multiple interpretations or meanings.

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

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?

While the structure of the Code, including its building-blocks approach and use of cross-referencing, is conceptually sound and supports consistency across topics, the extent of cross-referencing can, in practice, reduce usability and make the Code less efficient to navigate.

Frequent cross-references between sections that are materially distant from one another can interrupt the flow of reading and make it more difficult for users to apply the requirements in a timely and practical manner. For example, Section 420, 'Gifts and Hospitality', refers to Section 340, 'Inducements, Including Gifts and Hospitality', which itself is referenced extensively throughout the Code and may be located more than 100 pages away. This requires users to navigate repeatedly between sections, which can be inefficient and may increase the risk of misinterpretation or oversight.

Although cross-referencing is an effective drafting tool to avoid duplication and maintain consistency, there is a balance to be struck between structural efficiency and user accessibility. In situations where a provision is central to the application of another section, it may be more user-friendly to include the relevant requirements or a concise summary within the referring section, rather than relying solely on cross-references.

Enhancing usability in this way would support more efficient application of the Code, particularly for practitioners who need to make timely judgements, and may also assist in reducing fragmentation in interpretation. Consideration could therefore be given to selectively reducing reliance on extensive cross-referencing.

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*)

• No (*Please explain your response*)

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

• Yes

• Somewhat (*Please explain your response*)

• 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*)

• 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.