IESBA NOCLAR PIR Survey Response

Respondent: Khodor Ghattis, CFO

Organization: Hala Payments

Stakeholder Category: Professional Accountant in Business (PAIB)

Jurisdiction: Saudi Arabia

Q4. Guidance and educational materials received

Selected: Mainly articles, publications and newsletters

Hala's finance, compliance and governance functions have accessed NOCLAR-related guidance through professional publications, external advisors (if needed), regulatory communications and internal governance initiatives.

Q5. Sources of guidance

Selected: Professional Accountancy Organization; Regulator or oversight body; Accounting firms.

Guidance can be obtained from a combination of professional bodies, regulators and external advisors, helping ensure that ethical, regulatory and governance considerations are appropriately addressed. For us, it is still based on articles, publications, and research.

Q6. Access to support

Selected: Ethics disclosure; Whistleblowing policy; direct access to legal and control functions (internal compliance, legal and governance functions).

Hala maintains established governance, compliance and escalation channels that support employees and management when dealing with potential non-compliance or ethical concerns.

Q7. Provisions that raised questions

Questions generally relate to determining when a matter should be considered suspected NOCLAR, assessing significance and materiality, balancing confidentiality obligations, and determining the appropriate level of escalation.

Q8. Overall understanding of local NOCLAR provisions

Selected: Yes.

Hala's finance function has a good understanding of the principles underlying the NOCLAR framework and its objectives. These principles are broadly consistent with the governance and regulatory expectations applicable to regulated financial institutions.

Q9. Changes to governance mechanisms

Selected: Yes.

Over time, we strengthened governance, compliance, whistleblowing and escalation procedures as part of its overall control environment. These enhancements support the objectives underlying the NOCLAR framework.

Q10. Encountered NOCLAR or suspected NOCLAR

Selected: No

Q11. Benefits experienced

The NOCLAR framework provides a structured approach for evaluating and escalating potential non-compliance. It strengthens accountability, promotes timely action, supports effective governance and reinforces the public-interest responsibilities of finance professionals and management.

Q12. Most challenging provisions

The primary challenge relates to the exercise of professional judgment when assessing the significance of a matter and determining the appropriate course of action. However, this is inherent to a principles-based framework and does not represent a significant obstacle to implementation.

Q13. Use of whistleblowing policy

Selected: No.

Established management, compliance and governance escalation channels have generally been sufficient to address matters as they arise.

Q14. Legal protection

Selected: Yes.

I believe Saudi Arabia has legal and regulatory mechanisms that support the reporting of misconduct and provide protections for individuals acting in good faith. While such protections continue to evolve, they are generally perceived as increasingly effective in encouraging appropriate reporting and escalation.

Q15. Further efforts by IESBA

IESBA should continue promoting awareness through practical examples, case studies and implementation guidance. Additional industry-specific examples, particularly for regulated industries and cross-border situations, would further enhance consistency in application.

Q16. Other comments

Overall, the NOCLAR provisions have achieved their intended objective of strengthening ethical behavior and reinforcing the public-interest responsibilities of professional accountants. The framework provides an appropriate balance between professional judgment, confidentiality obligations and the need to address significant instances of non-compliance.