July 30, 2026

International Ethics Standards Board for Accountants (IESBA)
570 Lexington Avenue
New York, New York 10022

Dear Members of the IESBA,

We are pleased to submit the following response to the IESBA's Post-Implementation Review survey on the NOCLAR provisions on behalf of the PwC network of firms. This response incorporates perspectives from member firms across multiple jurisdictions and global functional teams responsible for policy and regulation, ethics and compliance, risk and quality, and legal matters.

Our experience is that the NOCLAR framework has achieved its intended purpose of guiding professional accountants in deciding how best to act in the public interest when they become aware of NOCLAR or suspected NOCLAR. The principles-based structure gives practitioners confidence to identify and act on NOCLAR, provides a common language for consultation across functions, and promotes consistency of response across lines of service and jurisdictions.

Where we have identified practical challenges, these relate to the complexities of applying the framework across jurisdictions with differing legal and regulatory requirements, not to deficiencies in the provisions themselves. Our suggestions for further IESBA actions focus on implementation support (such as non-authoritative guidance and case studies) and continued advocacy for legal protections for professional accountants, rather than changes to the requirements.

We are happy to discuss any aspects of our response with the IESBA.

Yours sincerely,

Sarah Isted
Global Policy and Regulatory Leader
PwCIL

IESBA Post-Implementation Review (PIR) Survey
Responding to Non-Compliance with Laws and Regulations (NOCLAR®)

Introduction

This survey is only applicable to respondents that have adopted or use or benefit from the Responding to Non-Compliance with Laws and Regulations (NOCLAR) provisions in the International Code of Ethics for Professional Accountants (including International Independence Standards) (the Code). Sections 5260 and 5360 as contained in the International Ethics Standards for Sustainability Assurance (including International Independence Standards) (IESSA), and conforming amendments to Sections 260 and 360 arising from the development of the IESSA, are outside the scope of this survey and only become effective in December 2026.

1. The International Ethics Standards Board for Accountants (IESBA) is conducting a post-implementation review (PIR) of the NOCLAR provisions in Sections 260 and 360 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 NOCLAR provisions have achieved their intended purpose by identifying:
      (i) Benefits from applying the provisions; and
      (ii) Any practical challenges or questions regarding their implementation, including whether they are 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. Recognizing that some respondents may wish to discuss certain NOCLAR or NOCLAR-related matters on a confidential basis instead of documenting them in writing when responding to this survey, respondents are welcome to reach out to the IESBA Project Team (email jeanneviljoen@ethicsboard.org and kamleung@ethicsboard.org) to discuss such matters confidentially. In such circumstances, respondents are requested to discuss the matters on an anonymized basis.
5. The survey comment period starts on April 1 and ends on July 30.

Survey Responses to be Made Public

6. Unless confidentiality is specifically requested, respondents' submissions will be considered a matter of public record and will be posted to the IESBA's website. Where confidentiality is requested, respondents are nonetheless requested to provide any detailed input on an anonymized basis.

7. Some questions ask for details, examples or sharing of relevant reports or materials. Respondents are requested to provide such information on an anonymized basis.

Survey Instructions

8. 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 — Jurisdictional Standard Setters (JSS)
- Part C — Professional Accountancy Organizations (PAOs)
- Part D — Regulators or Oversight Bodies
- Part E — Accounting Firms or Individual Professional Accountants in Public Practice (PAPPs)
- Part F — Professional Accountants in Business (PAIBs)
- Part G — Other Users or Beneficiaries of the Code

9. 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.

Overview and Key Intended Outcomes of the IESBA NOCLAR Provisions

10. The IESBA NOCLAR provisions establish a response framework to guide auditors, other PAPPs, and PAIBs in deciding how best to act in the public interest when they become aware of NOCLAR or suspected NOCLAR.

11. NOCLAR is any act of omission or commission, intentional or unintentional, committed by a client or employer, or by those charged with governance (TCWG), by management or by other individuals working for or under the direction of a client or employer which is contrary to the prevailing laws or regulations.

12. For a more detailed overview of the NOCLAR provisions of the Code, please access the following link here.

13. Key intended outcomes of the NOCLAR provisions in the public interest include:

- Ensuring that PAs respond in a timely way to identified or suspected NOCLAR.
- Rectifying, remediating, or mitigating the adverse consequences of identified or suspected NOCLAR to stakeholders and the general public.
- Deterring the commission of NOCLAR.
- Stimulating increased reporting of identified or suspected NOCLAR where required by law or regulation, or where determined appropriate under the Code in the public interest.

Part A – Demographic Information (All Respondents)

1. 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 jurisdictional profile which best represents your situation, i.e., from which jurisdictional perspective are you providing your responses?

      - Global
      - Regional *(Please specify)*
      - Multiple jurisdictions *(Please specify)*
      - Single jurisdiction *(Please specify)*

2. Please indicate the stakeholder category to which you belong, i.e., from which perspective are you providing your responses? *If you or your organization has one or more roles (e.g., JSS and Regulator), please respond to all relevant parts of the survey.*

   - JSS **(Complete Part B)** *(Please indicate the users of your standards as a JSS, e.g., individual PAPPs, professional accountants in business (PAIBs) and/or accounting firms (including audit firms))*
   - PAOs **(Complete Part C)** *(Please indicate whether your members are PAPPs and/or PAIBs)*
   - Regulators or oversight bodies **(Complete Part D)** *(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)*
   - Accounting firms and individual PAPPs **(Complete Part E)**
   - PAIBs **(Complete Part F)**
   - Other users or beneficiaries of the Code *(Please specify)* (e.g., investors or other users of financial statements, those charged with governance, academics) **(Complete Part G)**

3. Please provide the following information (*Personal information will not be made public and will only be used by the Project Team to follow up if clarification on your responses is needed)*:

- Your organization's name, if any (if you are responding on behalf of an organization[1]) **PwCIL**
- Your name and job title / role **Sarah Isted / Global Policy and Regulatory Leader**
- Your email address **sarah.t.isted@pwc.com**
- Your jurisdiction **Global**

  This response is submitted on behalf of the PwC network. It reflects input from member firms across multiple jurisdictions spanning Europe, Americas, Middle East, Asia-Pacific, and Africa, representing small through large firms operating in diverse legal and regulatory environments, as well as input from global functional teams responsible for ethics and compliance, risk and quality, and legal matters across the network.

[1] 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.

Part E – Accounting Firms or individual PAPPs

Adoption status and effective date

> *Note:*
>
> *Adoption (full or with modifications) refers to the formal acceptance and incorporation of the IESBA standards into a jurisdiction's national laws, regulations or professional requirements or, if your firm belongs to a network, your network's policies and methodologies.*
>
> *Convergence is where a jurisdiction aligns its national ethics (including independence) standards 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 standards or provisions.*

4. Has your firm implemented global, regional or local policies and methodologies that adopt the NOCLAR provisions of the Code (IESBA NOCLAR provisions) or the locally adopted version of the IESBA NOCLAR provisions, as applicable? *(Please choose the most representative answer*)

    (a) Yes, through full adoption with no modifications *(Please provide (i) information on the effective date and (ii) details of your firm's NOCLAR policies and methodologies)*

    (b) Yes, through adoption with modifications *(Please (i) describe the nature of, and reasons for the modifications, (ii) provide information on the effective date and (iii) provide details of your firm's NOCLAR policies and methodologies)*

    Nature of and reasons for modifications: The network adopted the IESBA NOCLAR provisions globally without modification, requiring all member firms to comply. At the implementation level, modifications arise because the network framework is designed to operate in conjunction with local legal and regulatory requirements, which may impose additional reporting obligations or limitations beyond the IESBA provisions. Member firms implement supplementary local policies where needed to address jurisdiction-specific requirements. These requirements may relate to matters such as mandatory reporting to regulators under banking or insurance supervisory statutes, anti-money laundering obligations, reportable irregularity regimes, or stricter confidentiality rules that define the circumstances under which disclosure is permitted or prohibited. Some member firms operate under the global policy without further supplementation where local requirements are fully aligned.

    Effective date: 2017, aligned with the IESBA effective date.

    Details of NOCLAR policies and methodologies: The network's NOCLAR policy applies to all partners and staff across all lines of service and internal functions. Upon identifying actual or suspected NOCLAR that is not clearly inconsequential, personnel are required to: (1) react promptly and alert the engagement leader, discuss the matter with the engagement quality reviewer (if assigned), and consult with risk and quality and/or legal functions; (2) identify and comply with applicable local laws, regulations, and professional obligations, including requirements or prohibitions on reporting to authorities, confidentiality, professional secrecy, and restrictions on alerting the client. The network policy covers responsibilities for audits, non-audit assurance engagements, and non-assurance services, including communication protocols with management and those charged with governance. An additional network-level audit policy addresses responsibilities specific to actual or suspected fraud identified by engagement teams. Some member firms have added NOCLAR procedures at the local level, for example, NOCLAR identification triggers within engagement methodologies, standardised documentation and decision templates, and designated consultation for specific NOCLAR categories such as fraud. The network's NOCLAR policy is closely aligned with the IESBA provisions and is designed to work alongside applicable local regulatory requirements, including those relating to anti-money laundering, anti-bribery, and financial services supervision.

Translation: The network policy is issued in English. Individual member firms translate local NOCLAR guidance into local languages as needed.

(c) No, our firm's policies and methodologies implement local NOCLAR provisions that are converged with the IESBA NOCLAR provisions *(Please (i) provide information on the effective date, (ii) provide details of your firm's NOCLAR policies and methodologies, and (iii) describe any significant differences between your firm's NOCLAR policies and methodologies and the IESBA NOCLAR provisions)*

(d) No, our firm's policies and methodologies are based on law or regulation or a different ethical framework that address NOCLAR *(Please describe any significant differences between your firm's NOCLAR policies and methodologies and the IESBA NOCLAR provisions)*

(e) Not adopted *(Please specify reasons. If there is a plan to adopt the IESBA or local NOCLAR provisions, please provide details, including timing)*

If you have answered (a), (b) or (c), were the IESBA NOCLAR provisions translated into the local NOCLAR provisions? If yes, please indicate the language of translation.

5. This question is for global networks.

Where an individual firm is part of a global network and the network has adopted the IESBA NOCLAR provisions, how are these provisions implemented across network firms in the following situations:

- The jurisdiction in which the individual firm is based has not adopted the IESBA NOCLAR provisions *(Please describe the circumstances and how this interacts with the network policies)*
- The jurisdiction in which the individual firm is based has provisions in relevant law or regulation or another ethical framework that address NOCLAR *(Please describe the circumstances and how this interacts with the network policies)*

All network firms are required by network policy to comply with the IESBA Code, including the NOCLAR provisions, subject to their applicable local legal and regulatory requirements. In practice, there is no difference in the expectation to apply the IESBA NOCLAR provisions between firms in jurisdictions that have formally adopted the provisions and those that have not. Compliance with the network policy is expected in either case, subject to applicable local legal and regulatory requirements.

Where a jurisdiction has its own laws or regulations addressing NOCLAR, firms comply with both the network policy and local requirements; where local obligations are more prescriptive (e.g., mandatory reporting), firms follow local law in addition to the network policy. This approach provides a consistent baseline for responding to NOCLAR across the network while respecting local legal requirements.

Guidance and Educational Materials

6. What guidance or educational materials has your firm or network issued, or what programs has your firm or network developed, to support understanding of the NOCLAR policies and methodologies of the firm or network? (*Select all that apply and provide links*)

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

  The network has invested in guidance and training to support consistent understanding and application of the NOCLAR framework, complementing existing regulatory guidance in local jurisdictions. At the network level, the global NOCLAR policy is supported by guidance for audits, non-audit assurance engagements and non-assurance services, FAQs, and NOCLAR training. Periodic communications on NOCLAR are shared by legal, risk and quality, and ethics and compliance functions across the network and at the jurisdictional level. In addition to the global NOCLAR policy, member firms may supplement these with locally developed materials as appropriate. These materials may include, for example, territory-specific FAQs and decision trees, targeted webinars and trainings, case-study sessions, guidance on quality management, and guidance addressing the interaction between NOCLAR and local legal and regulatory reporting obligations. Technical resources on NOCLAR are also available on internal member firm websites.
- None

Other support

7. If your firm is part of a network, does the network provide guidance to network firms in the application of the network's NOCLAR policies and methodologies? *(Select all that apply)*

- Ethics hotline or equivalent (e.g., for technical queries, application questions on the network's NOCLAR policies and methodologies)
- Discussion forum (e.g., knowledge sharing)
- Other *(Please specify)*

  The network provides: global NOCLAR policies and methodologies applicable across all lines of service; supplementary guidance for audit and non-audit service contexts; consultation protocols with network risk and quality, legal, and ethics and compliance functions on cross-border or complex NOCLAR matters; and periodic technical updates and regularly held knowledge-sharing forums such as network-wide community calls for ethics and risk and quality.

- None

Level of understanding by auditors

8. Do audit partners and staff within your firm have an overall understanding of your firm's NOCLAR policies and methodologies? *(Please explain the basis for your response, including how your organization evaluates the overall understanding of the local NOCLAR provisions by its audit personnel)*

   - Yes
   - Somewhat
   - No
   - Not known or no data available

   On the basis of the steps taken, we believe audit partners and staff have an overall understanding of the network's NOCLAR policies and methodologies and, in addition, local requirements applicable to their jurisdiction. The framework gives audit teams a clear structure for identifying, escalating, and responding to NOCLAR within the context of their audit procedures.

   Understanding is built and maintained through a combination of actions including: a dedicated network-wide NOCLAR training course (with knowledge-check assessments); NOCLAR requirements embedded in audit methodology and guidance, including mandatory activities in audit and non-audit assurance work programmes; mandatory consultation protocols with risk and quality, ethics and compliance, and legal functions; and annual ethics and compliance training.

   Indicators that understanding is effective in practice include (1) inspection results (including engagement quality reviews, engagement compliance reviews, and regulatory inspections) with related root-cause analysis of any identified deficiencies; and (2) regular use of consultation protocols, which demonstrates awareness of the requirements and when and where to seek guidance.

Level of understanding by non-auditors (i.e., consulting/advisory)

9. Do non-audit partners and staff within your firm have an overall understanding of your firm's NOCLAR policies and methodologies? *(Please explain the basis for your response, including how your organization evaluates the overall understanding of the local NOCLAR provisions by its non-audit personnel)*

   - Yes
   - Somewhat
   - No
   - Not known or no data available

   On the basis of the steps taken to embed knowledge of NOCLAR across all lines of service, we believe non-audit partners and staff have an overall understanding of the network's NOCLAR policies and methodologies, and, in addition, local requirements applicable to their jurisdiction, including the obligation to identify, escalate, and consult.

   Understanding is built and maintained through a combination of actions including: a dedicated network-wide NOCLAR training course (the same as for audit personnel, with knowledge-check assessments), comprehensive onboarding programmes, annual ethics and compliance training, and periodic communications from risk and quality and ethics functions. For tax advisors and lawyers, the NOCLAR concept may be further reinforced through their professional frameworks.

   Indicators that this understanding is effective in practice include: (1) inspection results, with related root-cause analysis of any identified deficiencies; and (2) regular use of NOCLAR consultation protocols, which demonstrate awareness of the requirements and when to seek guidance. Given that NOCLAR matters arise less frequently in non-audit contexts, the depth of procedural familiarity may be more variable by region or role than among audit personnel; however, this is addressed through the mandatory consultation protocols described above.

Practical experience (benefits and challenges)

10. Have you or your firm encountered any NOCLAR or suspected NOCLAR (i) at a client, or (ii) within the firm?

   - Yes, *(Where possible, please provide details such as (i) general nature of the NOCLAR or suspected NOCLAR, (ii) whether the client was an audit or non-audit client, (iii) to whom it was communicated, and (iv) how the matter has been addressed (information provided may be anonymized))*
   - No

   Matters have been encountered both at clients and within individual member firms of the network. Matters identified at individual firms were reported through whistleblowing channels or directly to ethics and compliance functions and addressed through established investigation processes.

   In respect of matters at clients, these include:

(i) **General nature:** Matters encountered include suspected fraud; misappropriation of assets; accounting irregularities; breaches of corporate/companies legislation (e.g., financial reporting, corporate governance requirements, directors' duties); anti-money laundering and terrorist financing violations; anti-bribery and corruption matters; breaches of banking and financial services regulatory requirements (e.g., capital, liquidity, risk management); tax non-compliance; data breaches; exchange-control violations; sector-specific regulatory non-compliance (e.g., financial services, mining, public-sector procurement); and failure to meet statutory filing or disclosure obligations.

(ii) **Audit vs. non-audit clients:** Matters have been identified at both audit and non-audit clients, with the majority arising in the audit context given the breadth of audit procedures, including those addressing compliance with laws and regulations, as required under applicable standards. In the banking and insurance sectors, the extended scope of statutory audits (covering regulatory compliance) means NOCLAR identification is comparatively more frequent.

(iii) **Communicated to:** Internally to the engagement leader, engagement quality reviewer (if assigned), risk and quality, legal counsel, and ethics and compliance functions. Externally to those charged with governance and management of the entity, and where required by law, to appropriate authorities (e.g., financial intelligence units, banking/insurance supervisory authorities, audit regulators, revenue authorities, and corporate registrars).

(iv) **How addressed:** Through application of the network/firm's NOCLAR response framework, including: mandatory consultation with risk and quality and legal functions (which includes evaluation of qualitative and quantitative factors); engagement with management and those charged with governance to encourage rectification or remediation, including confirmation that management has taken appropriate responsive action where NOCLAR has been identified; consideration of engagement implications (auditor's report, going concern, engagement continuance); reporting to authorities where required; and, where necessary, withdrawal from the engagement or client. Where NOCLAR is suspected to involve fraud, investigations were conducted and, depending on jurisdiction, mandatory reporting to government authorities was undertaken.

The framework has provided a structured and consistent approach to addressing NOCLAR across diverse contexts and jurisdictions.

11. Have you or your firm observed any trend in instances of NOCLAR reported or escalated?

If so, please describe the trend and indicate the period for which this trend has been observed, as well as the general nature of the NOCLAR commonly observed.

Across the network as a whole, we have not observed a consistent trend in the volume or nature of NOCLAR matters, with instances addressed on a case-by-case basis and the majority identified in the audit context.

However, in certain jurisdictions, an increase in both consultations on potential NOCLAR and confirmed matters requiring action has been observed over the past five years, attributable to broader regulatory developments and increased firm focus, as well as greater awareness following implementation of the NOCLAR provisions. Areas of relative increase include bribery/corruption, money laundering, procurement irregularities, tax-related matters, and data protection/cyber matters. Engagement teams are also consulting risk and legal functions earlier and more proactively. This suggests the framework is supporting earlier identification and consistent decision-making in practice.

12. What benefits have you or your firm experienced as a result of the implementation of its NOCLAR policies and methodologies? *(Please explain the basis for your response, e.g., do partners and staff feel better equipped to hold a conversation on a NOCLAR matter with their client; the standard helpful in guiding partners and staff as to how to respond to a NOCLAR or suspected NOCLAR matter?)*

Prior to the implementation of the IESBA's NOCLAR provisions, the network already had policies and processes in place to identify and respond to non-compliance with laws and regulations, informed by professional obligations, legal requirements (e.g., anti-money laundering, anti-bribery, regulatory reporting), and our ethical values. The IESBA standard has further strengthened and formalised that framework. Its close alignment with existing professional obligations and regulatory frameworks has made integration into practice straightforward in most jurisdictions.

In particular, it has provided a globally recognised, principles-based framework and common language that supports professional judgement in complex situations, enhances consultation between engagement teams, risk and quality, legal, and ethics and compliance functions, and promotes greater consistency of response across lines of service and jurisdictions. Partners and staff have noted additional confidence to identify, raise, and act on suspected NOCLAR, and improved ability to hold difficult conversations with management and those charged with governance, supported by reference to a recognised, mutually understood, public-interest-based standard. A growing awareness of the NOCLAR framework among stakeholders has further supported these interactions. The standard has contributed to earlier escalation and more proactive consultation, supporting appropriate outcomes including, where applicable, rectification by clients and reporting to authorities where required. The framework has also strengthened how firms connect NOCLAR with related legal obligations such as anti-money laundering and anti-bribery reporting, and has reinforced ethical culture more broadly.

13. Which aspects of the IESBA NOCLAR provisions or the local NOCLAR provisions has your firm found most challenging to apply when responding to a NOCLAR or suspected NOCLAR? *(Please provide details, including whether the challenges were for (i) audit partners and staff, and (ii) non-audit partners and staff)*

While the NOCLAR framework provides clear principles for responding to identified or suspected NOCLAR, practical challenges arise in certain situations.

(i) For audit partners and staff: Some identified challenges include: (1) Navigating the interaction between the IESBA NOCLAR framework and local statutory obligations, particularly where multiple reporting regimes are simultaneously engaged so determining the correct sequencing of steps can be complex, and where requirements or guidance on disclosure to authorities may differ across regulatory frameworks within the same jurisdiction. (2) Balancing NOCLAR disclosure expectations with local confidentiality and professional secrecy requirements or assertions of attorney-client privilege or similar doctrines, particularly where clients may not be familiar with the firm's obligations under the framework. (3) Judgement around evidentiary thresholds, specifically determining when a matter moves from a concern to suspected NOCLAR triggering the response framework, particularly where evidence is inconclusive. (4) Judgement on matters that fall between the "clearly inconsequential" and "substantial harm" thresholds, where the Code provides direction at either end, but the appropriate level of response for matters in between can be highly subjective.

(ii) For non-audit partners and staff: Some identified challenges include: (1) Application of the framework where the engagement scope is narrow, access to information may be more limited, and the advisory nature of the client relationship means there may be less access to those charged with governance and navigating how to raise NOCLAR concerns requires more careful consideration than in an audit context. (2) Determining whether matters encountered during tax, advisory, or forensic engagements fall within the NOCLAR response framework or are protected by legal professional privilege.

14. Has your firm's whistleblowing policy been used by personnel within the firm to respond to a NOCLAR or suspected NOCLAR? If so, why was this used instead of escalating the matter to a supervisor or above? *(Please provide details (information provided may be anonymized))*

Yes. Personnel from certain member firms have used their firm's whistleblowing channels to raise concerns that were subsequently identified as suspected NOCLAR. This is consistent with the firm's speak-up culture and is considered an appropriate reporting channel. In all cases, matters raised through whistleblowing channels are triaged in line with the appropriate response framework (NOCLAR consultation, investigations, or other), in consultation with risk, legal, and ethics functions as appropriate, and addressed consistently with local whistleblowing policies. The framework provides a clear structure that complements the firm's speak-up culture, giving personnel confidence that matters raised will be directed to the appropriate response pathway.

Legal protection

15. In your jurisdiction, does legislation or regulation exist (e.g., under whistleblowing laws or regulations) that provides protection from civil, criminal, or professional liability, or from retaliation, when NOCLAR or suspected NOCLAR is disclosed to an appropriate authority? Please provide details.

If yes, is the protection under the relevant law and regulation perceived to be effective? *(Please explain your response)*

Yes, in the jurisdictions represented across our network, legislation providing protection for disclosure of NOCLAR or suspected NOCLAR to appropriate authorities generally exists, though the scope and form vary significantly by jurisdiction.

Examples include: comprehensive statutory protections against civil, criminal, and administrative liability and retaliation for auditors and accountants (e.g., under corporations legislation); dedicated whistleblower protection legislation providing protection against occupational detriment for protected disclosures; immunity provisions under anti-money laundering, anti-corruption, and financial intelligence legislation for reporters of suspicious transactions; and general employment law protections against termination or discipline for raising compliance concerns. In some jurisdictions, these protections are framework-specific (e.g., covering disclosures under particular statutes) rather than NOCLAR-specific.

In certain jurisdictions, statutory whistleblower protections may not extend to partnership structures or to partners themselves, meaning individuals within firms structured as partnerships may not benefit from the same protections available to employees of corporations. In some cases, protections are enforced contractually between the auditor and the entity.

Regarding effectiveness: where protections exist, they are generally perceived to be effective in practice, though some jurisdictions have relatively new legislation with limited case law to date. The NOCLAR framework supports practitioners in navigating these protections by providing a structured consultation process before any external disclosure is made. Where several overlapping regimes exist in the same jurisdiction, determining which protections apply can be complex.

Other comments

16. From your perspective, what further efforts should IESBA pursue to enhance the effectiveness of implementation of the IESBA NOCLAR provisions globally? *(Please explain your response)*

The NOCLAR provisions are broadly effective, and we do not believe they need changing. The following suggestions would enhance implementation globally:

Practical guidance and case studies: IESBA might consider issuing further practical, non-authoritative implementation support materials (e.g., anonymised case studies, decision trees, factual examples) to support more consistent judgement on escalation thresholds, confidentiality and tipping-off restrictions, and withdrawal considerations, across both assurance and non-assurance service contexts.

Interaction with other legal frameworks: We recommend that IESBA consider developing non-authoritative support materials on the interaction between NOCLAR and (i) legal professional privilege, (ii) data protection and privacy laws, and (iii) cross-border matters involving conflicting requirements.

Whistleblower protections: We recommend that IESBA continue to advocate with regulators and legislators globally for legal protections for professional accountants disclosing NOCLAR to appropriate authorities, including where such disclosure is not legally mandated.

Coordination with related standards: We recommend that IESBA consider working with the IAASB to develop joint guidance explaining the interaction of the IESBA NOCLAR provisions and ISA 240 (Revised) and ISA 250 (Revised), including clarifying what (if anything) an auditor would need to do beyond compliance with the ISAs to meet the Code's NOCLAR requirements. Alignment with the forthcoming sustainability assurance standards should also be ensured to maintain a coherent, integrated framework.

Stakeholder awareness and outreach: We recommend that IESBA consider continuing education and outreach with PAOs, national standard-setters, and regulators to support consistent global adoption, address conflicts or overlaps with local frameworks, and emphasise the importance of ethical culture and psychological safety in applying the provisions. Guidance to support firm engagement with local regulators on NOCLAR matters would also be valuable.

17. Do you have any other comments or specific matters the IESBA should consider as part of this PIR on the IESBA NOCLAR provisions (including on matters of translation)?

We recommend that IESBA consider that NOCLAR remains a sensitive matter for clients, particularly those not directly subject to the IESBA Code. Clients, including those charged with governance, may have limited awareness of or appreciation for NOCLAR obligations, especially in contexts beyond financial statement audits. Ongoing dialogue and clear communication with the broader business community about the purpose and public-interest basis of the NOCLAR framework would support more effective implementation and client engagement.

We also recommend that IESBA continue to consider the diversity of local legal and regulatory frameworks governing NOCLAR reporting, which vary significantly across jurisdictions and may result in different reporting obligations, protections, and constraints for professional accountants.