



IESBA CODE SURVEY FOR POST-IMPLEMENTATION REVIEW OF THE RESTRUCTURED CODE

Issued 3 July 2026

ICAEW welcomes the opportunity to comment on the *Restructured Code Post Implementation Review (PIR) Survey* published by the International Ethics Standards Board for Accountants (IESBA) on March 30 2026, a copy of which is available from this [link](#).

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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)
 - [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](#).

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

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?
- **England and Wales**
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*)
- ICAEW members include both PAPPs and PAIB**
- 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)

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For more information, please contact: representations@icaew.com

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)

Institute of Chartered Accountants in England and Wales (ICAEW)

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)*

- 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 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)*

With the exception of Part 5 provisions relating to Sustainability Assurance and Reporting, and the Use of External Experts, ICAEW has adopted the 2025 IESBA Code. ICAEW is actively considering proposals to incorporate these remaining provisions and will do so in the next update of the ICAEW Code. In addition to the IESBA provisions, ICAEW has incorporated additional material into its Code, which include requirements that are specific to ICAEW members and to accountancy practice in England and Wales. Details of the ICAEW additional material can be

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.

found at this link: [ICAEW vs IESBA codes | ICAEW](#) .

- (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. **N/A**

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)**
[ICAEW Code of Ethics | Ethics | Technical | ICAEW](#)
[Code of ethics - the five fundamental principles | ICAEW](#)
[Code of Ethics - the conceptual framework | ICAEW](#)
[Guidance on NOCLAR | ICAEW](#)
- **Education/training programs (e.g., webinars, CPD programs)**
[ICAEW Code of Ethics | Ethics | Technical | ICAEW](#) ;
[ICAEW Ethics CPD Course – from theory to practice | ICAEW](#)
[Ethics recordings | Ethics | ICAEW](#)
- **Articles, publications or newsletters (e.g., updates about standards, case studies or illustrative examples)** [2026 Code of Ethics comes into force on 1 July | ICAEW](#);
[Code of Ethics 2025: are you ready? | ICAEW](#)
- Other (*Please specify*) **Discussions of ethical scenarios and the Code at local branch meetings.**
- 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*) **YES:**

- **Ethics hotline or equivalent (e.g., for technical queries, application questions on how to use the local Code or provisions)**

[Technical and ethics support | ICAEW](#)

- Discussion forum (e.g., for sharing knowledge)

Various ICAEW Committees, such as the Ethics Standards Committee and Ethics Advisory Committee, may suggest and oversee development of guidance on particular topics related to the Code.

- 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*)

ICAEW rarely receive queries from members specifically relating to the structure or drafting of the Code. Members usually contact our helpline with queries relating to their individual circumstances and they are then referred to specific parts of the Code.

Conflicts of Interest and Confidentiality are topics which routinely feature in inquiries to our ethics advisory service.

Feedback from our members is that the Code of Ethics is becoming increasingly unwieldy and difficult to use. This is a concern for smaller firms and members in business who may not have access to dedicated teams of ethics specialists.

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)***
Feedback from some of our members is that whilst the structure is helpful for study and familiarization, the volume of material is less helpful for time constrained audit engagements and the need to cross-refer to other parts of the Code can occasionally be frustrating when under time pressure.

- 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)***

Feedback from some of our members is that busy practitioners tend to go directly to the relevant provisions of the Code without reviewing the guide first.

- 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*)**

Feedback from some of our members is that it might be helpful to include part-specific summaries that consolidate Part 1 obligations alongside Part-specific provisions, to reduce the extent of the need to cross-refer.

- 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*).**

Feedback from some of our members is that a short summary of mandatory obligations at the beginning of a section might be helpful.

- No (*Please explain your response*)

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

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

The recent IESBA staff publication (“The Proportionality of the IESBA Code”) is helpful. But the need for the publication illustrates that the Code itself is not sufficiently clear in this regard. The increasing length of the Code and the drift from a broad set of principles towards an expanding body of rules and requirements is in danger of making the Code no longer fit for purpose.

- 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*)**

The Code uses some terms which have a specific legal definition in England and Wales. However, the Code defines or uses them in a way which is different from the accepted legal definition in this jurisdiction.

This presents a challenge to drafting allegations against the Code. The area in which this is most problematic is in respect of Integrity. The legal tests for intent (“knowingly”); and “recklessness”, have been the subject of detailed analysis in case law and the inclusion of both terms in section 111.2 creates the potential for confusion in disciplinary hearings.

Section R113 provides that a professional accountant must attain and maintain professional knowledge, at the level required to ensure that a client receives competent professional service, and act diligently and in accordance with technical and professional standards. It does not create a stand-alone requirement to act competently, because competence is linked to attaining and maintaining knowledge and skills at the level required.

This makes it more challenging to bring disciplinary prosecutions under this heading, as an allegation under R113 (a) needs to link (and prove) a failure to attain and maintain professional knowledge and skills at the level required, as opposed to seriously incompetent work.

- 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*)
Sometimes the precise meaning of a term has to be drawn out from its use in several contexts and statements at different parts of the Code, e.g. the term “professional judgement”.
- 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*)
- No (*Please explain your response, and provide examples with reference to specific provisions in the Code which you consider are not easy to translate*)
- N/A

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?

Feedback from some of our members is that internal cross-referencing can make parts of the Code difficult to follow and understand.

The Code is now simply too long. The drift away from a principles-based approach towards a detailed corpus of ever-expanding rules and application material within the Code itself, is in danger of making the Code difficult to use and rendering it no longer fit for purpose.

The value of a global code is that it establishes a global baseline. One significant consequence of an ever more detailed rules-based Code, which moves away from the main principles, is that elements of the Code cannot be practically applied in certain jurisdictions. This results in a patchwork of implementation and erodes the value of a global baseline.

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*)**

Feedback from some members indicates confusion over the distinction between “firm” and “network firm” in R400.18 and R400.20.’

- 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.