

### IESBA Sustainability

#### Question 22(a) – Agree

#### Regulators and Oversight Authorities, incl. Monitoring Group members

##### BAOA - Botswana Accountancy Oversight Authority

Yes, the proposed revisions appear to be clear and adequate from a sustainability reporting perspective. They address various ethical considerations specific to sustainability reporting, such as conduct to mislead, value chain considerations, and forward-looking information. The examples provided help clarify the ethical expectations for Professional Accountants involved in sustainability reporting, enhancing transparency and accountability in this area.

##### NASBA - National Association of State Boards of Accountancy (US)

NASBA has no objections to the proposed revisions to Section 220.

##### UKFRC - United Kingdom Financial Reporting Council

Yes to all.

#### Investors and Other Users

##### DIR - Daiwa Institute of Research Ltd

Ans. Yes.

#### Preparers and Those Charged With Governance

##### BD - Bruno Dirringer

(a) : Agree

#### Public Sector Organizations

##### GAO - US Government Accountability Office

We agree that the proposed revisions to extant section 220, Preparation and Presentation of Information, are sufficiently clear and adequate from a sustainability reporting perspective.

##### UNCTAD ARL - UNCTAD's Latin America Regional Alliance

( ) I Agree 80% of respondents

( ) I am not sure 20% of respondents

( ) I don't agree (please qualify)

##### UNCTAD ARP - UNCTAD African Regional Partnership

100% of respondents agreed that the proposed revisions clarify the preparation and presentation of information, including data collection and measurement methods. The revisions also emphasize the need for professional accountants to exercise professional judgment and ensure ethical considerations are applied in preparing or presenting information.

## **Independent National Standard Setter**

### **APESB - Accounting Professional & Ethical Standards Board (Australia)**

APESB is of the view that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective. We acknowledge the need for conforming amendments to maintain the relevance of extant Parts, ensuring they incorporate sustainability references and address ethics issues specific to sustainability reporting once the sustainability standards are finalised. The proposed revisions to existing examples, as well as the addition of new examples relating to sustainability reporting the value chain and forward-looking information, will provide useful guidance to professional accountants in performing sustainability-related activities.

## **Professional Accounting Organizations (PAOs)**

### **ACCA - Association of Chartered Certified Accountants**

We agree that the proposed revisions to Section 220 are clear and adequate from a sustainability reporting perspective and guide PAIBs at all levels of the employing organisation when involved in preparing and presenting sustainability reporting including examples for Greenwashing (deliberately misleading others in relation to sustainability), Greenhushing (intentionally omitting information), Value Chain and collecting and measuring information in a timely and proper manner.

We agree that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective.

### **AE - Accountancy Europe**

Yes, we agree with the proposed revisions to Parts 1 to 3 of the extant Code.

### **AIC - Asociacion Interamericana de Contabilidad (Inter-American Accounting Association)**

Yes, we agree because we believe that the proposed revisions to Parts 1 through 3 of the current Code in Chapter 4 of the ED are clear and appropriate from a sustainability reporting perspective, including:

Proposed revisions to Section 220 that guides PAIBs at all levels of the employing organization when engaged in the preparation and presentation of financial or non-financial information, both inside and outside the organization; therefore, a substantial portion of the proposed revisions to sustainability reporting have been made to Section 220, including examples of misleading conduct in sustainability reporting, value chain and forward-looking information.

Other proposed revisions in Section 220 include

- Clarification that the preparation or presentation of information:
- Relates not only to an entity's condition, but also to its operations, which would include, for example, its services or products; and
- Includes the collection of information, for example, from an entity's value chain, and the measurement of information, for example, through measurement methods, metrics and estimates.

- Extending the existing requirement that, in preparing or presenting information, a PA should exercise professional judgment to also incorporate:
- Clearly describe the impacts of business transactions or activities, as impacts are an important aspect of certain sustainability reporting frameworks (such as GRI and ESRS); and
- Collect and measure information in a timely and appropriate manner.
- Expanding the types of information that is recommended it, that an independent public accountant consider documenting to include the analysis, assumptions, and judgments and decisions made in preparing or presenting the information.

#### **BICA - Botswana Institute of Chartered Accountants**

Proposed Revisions to the Extant Code:

Comment

- Agreeing that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective, including proposed revisions to Section 220 and examples on conduct to mislead in sustainability reporting, value chain, and forward-looking information, is essential for enhancing the quality and reliability of sustainability reporting.

#### **CAANZ - Chartered Accountants Australia and New Zealand**

We support the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED.

- (a) The proposed revisions to section 220 appear to be appropriate and we appreciate that the proposals are framework agnostic to allow for flexibility.

#### **CFAR - Chamber of Financial Auditors of Romania**

We agree that the proposed revisions to Section 220 are clear and adequate from a sustainability reporting perspective.

#### **CPAA - CPA Australia**

CPA Australia is comfortable with the proposed revisions to Section 220.

#### **CPAC - Chartered Professional Accountants Canada Public Trust Committee**

Yes, we agree.

#### **EFAA - European Federation of Accountants and Auditors for SMEs**

We agree that the proposed revisions to Section 220 are clear and adequate from a sustainability reporting perspective.

#### **ICAEW - Institute of Chartered Accountants in England and Wales**

110. We note that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 are clear and adequate, with terminology and principles familiar to professional accountants.
111. We agree with IESBA's assertion that "a distinguishing mark of the accountancy profession is its acceptance of the responsibility to act in the public

interest”, and that “confidence in the accountancy profession is a reason why businesses, governments and other organizations involve professional accountants in a broad range of areas, including financial, non-financial and corporate reporting, assurance and other professional activities.”

112. Furthermore, we concur with the assessment that “Accountants understand and acknowledge that such confidence is based on the skills and values that accountants bring to the professional activities they undertake.”

113. We do welcome IESBA’s acknowledgement in paragraph 134 of the explanatory memorandum of the need to expand the scope of extant Part 2 to all preparers of sustainability reporting, while recognising it is a much broader strategic matter which will require IESBA’s consideration over a longer period of time and discussions with a broad range of stakeholders.

### **IFAC - International Federation of Accountants**

We believe these are clear and adequate.

### **IICA - Institute of Indonesia Chartered Accountants**

Yes

### **IPA - Institute of Public Accountants (Australia)**

IPA generally supports the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED. The proposed revisions appear to be clear and adequate from a sustainability reporting perspective.

### **IWP - Institut Österreichischer Wirtschaftsprüferinnen**

Yes.

### **JICPA - Japanese Institute of Certified Public Accountants**

(a) We agree that the proposed revisions to Section 220 are clear and adequate from a sustainability reporting perspective.

### **KICPA - Korean Institute of Certified Public Accountants**

Questions 20 ~ 23

The KICPA supports the ED with no other matter to raise.

### **MIA (Malta) - The Malta Institute of Accountants**

The MIA agrees that the proposed revisions to Parts 1 to 3 of the extant code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective.

However, as already noted above, in our opinion, it is still too early to understand all implications of extending independence requirements to the entire value chain and to determine whether all practical considerations have been taken into account. We consider that a study is necessary in order to delineate the parameters of the scope so as to ensure that a balance is reached between the extent of restrictions and the practical implications. In fact, this could be a specific project that IESBA could consider undertaking.

### **MIA-Malaysian - Malaysian Institute of Accountants**

We agree that the proposed revisions to Parts 1 to 3 of the Code are clear and adequate from a sustainability reporting perspective.

### **MICPA - Malaysian Institute of Certified Public Accountants**

Comment:

We agree that the proposed revisions to Section 220 are clear and adequate.

### **PAFA - The Pan-African Federation of Accountants**

We believe these are clear and adequate.

### **Accounting Firms and Sole Practitioners**

### **EY - Ernst & Young Global Limited**

22.(a)

Yes, overall, we agree that the proposed revisions to Section 220 are clear and adequate.

Section 220 of the extant Code contains robust standards for a professional accountant when preparing and presenting information, and the updated references provide clarity that the section 220 considerations are applicable for the preparation of sustainability reporting.

### **KPMG - KPMG IFRG Limited**

We do agree that the remaining revisions in Chapter 4 are clear and adequate from a sustainability reporting perspective.

### **MAZARS - Mazars Group**

Response

We support the approach to incorporating further guidance and examples in the application material in Parts 1 to 3 of the extant Code, set out in Chapter 4 of the ED.

With regard to proposed revisions to Section 220 specifically, the additional examples provided are helpful and incorporating R220.7 and associated application material on using the work of others is appropriate to sustainability reporting.

### **MOORE - Moore Global Network Limited**

Yes

### **MU - Muhammad Umar - Mo Chartered Accountants**

a) Expanding the types of information that a PA is encouraged to consider documenting to include the PA's analysis, assumptions, and judgments and decisions made in preparing or presenting the information will be necessary due to the highly judgemental nature and susceptibility to subjectivity of the information. Professional scepticism will be brought much more into scope and focus for such engagements.

### **PKF - PKF Global**

PKF Global Response: We agree that the proposed revisions in Parts 1 to 3 of the extant Code in Chapter 4 of ED are clear and adequate, from a sustainability perspective.

## **PwC - PricewaterhouseCoopers International Limited**

Overall response: Yes, with no further comment

## **RSM - RSM International Limited**

We agree that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective. These standards are likewise suitable for addressing ethics issues that might arise when performing non-financial reporting.

We agree that the proposed revisions to Section 220, Preparation and Presentation of Information, of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective.

## **Question 22 (a) – Agree With Comments**

### **Professional Accounting Organizations (PAOs)**

#### **CAI - Chartered Accountants of Ireland**

- We support the revisions, with one recommendation to replace “operations” with ‘activities’ in 220.3 A2, as it is a broader term encompassing all sustainability activities, not just operations. For example, an organisation’s operations may not capture other activities such as social initiatives the organisation engages in, e.g. making charitable donations.

#### **ICAS - The Institute of Chartered Accountants of Scotland**

Paragraph 220.4 A3

Paragraph 220.4 A3 states the following:

“220.4 A3 An example of placing undue reliance on an organization is using the data provided by a large supplier within the entity’s value chain to prepare or present the entity’s sustainability information, without considering the source, relevance and sufficiency of that supplier’s data.”

We suggest referring at the end of this paragraph to the guidance at ‘Using the work of others’ (paragraph R220.7 and related application material) and ‘Using the output of technology’ (paragraph R220.8 and related application material).

Paragraph 220.6 A1

We suggest changing the order of this sentence (in red below) as reference is normally made firstly to financial and then non-financial information in the Code:

“220.6 A1 For example, when preparing or presenting ~~sustainability information or~~ pro forma reports, budgets or forecasts, ~~or sustainability information~~, the inclusion of relevant estimates, approximations and assumptions, where appropriate, would enable those who might rely on such information to form their own judgments.”

#### **SAICA - South African Institute of Chartered Accountants**

Response:

SAICA agrees with the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4. However, we recommend that application guidance includes examples of unethical behaviour to guide PAs.

The proposed revisions to section 220, including the additional references to collecting and measuring information specifically applicable to sustainability reporting, as well as other minor changes included in the various sections of 220 is clear and adequate.

### **Accounting Firms and Sole Practitioners**

#### **PP - Pitcher Partners Advisors Proprietary Limited**

In principle yes. However, given there is little sustainability reporting presently it is difficult to anticipate any practical issues which may arise.

### **Academia and Research Institutes**

#### **DIRC - Deakin University Integrated Reporting Centre**

We agree that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective, including:

(a) Proposed revisions to Section 220. However, we believe that in the interest of framework-neutrality, IFRS Sustainability Disclosure Standards and the International Integrated Reporting Framework should be referenced in addition to GRI and ESRS.

### **Question 22 (a) – Disagree**

### **Professional Accounting Organizations (PAOs)**

#### **AICPA - American Institute of Certified Public Accountants Professional Ethics Executive Committee**

Overall response: No. See our response to question 21.

Overall response: No.

Detailed comment: Given the immaturity of this area, how broadly sustainability information is defined and the lack of clarity around the value chain, we are concerned that these revisions could have unintended consequences. In addition, we have not had an opportunity to consider whether the proposals could have any unintended consequences when the standards issued by the International Sustainability Standards Board are applied.

#### **SOCPA - Saudi Organization for Chartered and Professional Accountants**

SOCPA Comments:

- (a) SOCPA has concerns regarding clarity and coverage. While the proposed revisions include examples on conduct to mislead in sustainability reporting, value chain considerations and forward-looking information, it's not explicitly stated how these examples will effectively address the unique ethical dilemmas posed by sustainability reporting. For instance, while the proposed revisions emphasize the importance of exercising professional judgment in preparing or presenting sustainability information (Paragraph 220.4), they do not provide clear guidance on how to navigate the complexities of sustainability reporting frameworks.



## **Accounting Firms and Sole Practitioners**

### **BDO - BDO International Limited**

BDO disagrees, with the following additional comments:

If the true intention with paragraph 220.3 A2 is for PAIBs to understand that the preparation or presentation of information relates not only to the state of an entity's financial affairs, but also to its operations i.e. its services or products, our suggestion would be that the example be customised to reflect information specific to an entity's operations. The broad example currently provided is: 'sustainability information, including information provided to the sustainability assurance practitioner'.

Similarly, if the intention is for PAIBs to consider value chain entities in terms of the preparation or presentation of information under paragraph 220.3 A3, our view is that reference should be made to the broad remit of entities that 'collecting, recording, measuring, maintaining and approving information' under 220.3 A3 refers to.

Paragraph 220.11 A1 encourages the professional accountant to document various aspects in relation to the preparation or presentation of information. It is not clear when this documentation is suggested, is it when there is a self-interest threat that is required to be mitigated, or is it when a professional accountant uses his/her discretion in preparing or presenting information?

## **Question 22(a) – No Specific Comments**

### **Regulators and Oversight Authorities, incl. Monitoring Group members**

**ACRA - Accounting and Corporate Regulatory Authority (Singapore)**

**CEAOB - Committee of European Auditing Oversight Bodies**

**ESMA - European Securities and Market Authority**

**IAASA - Irish Auditing & Accounting Supervisory Authority**

**IFIAR - International Forum of Independent Audit Regulators**

**IOSCO - International Organization of Securities Commissions**

**IRBA - Independent Regulatory Board for Auditors**

Our review of Chapter 4, Proposed Revisions to Parts 1 to 3 of the Extant Code to Reflect Sustainability Reporting Considerations for Professional Accountants, was limited to amendments made to Parts 1 and 3, because Part 2 has not been adopted by the IRBA and incorporated into the IRBA Code. We have no comments in respect of these proposed amendments and no responses have been provided to Questions 20 - 23 that relate to this chapter.

**PAABZ - The Public Accountants and Auditors Board of Zimbabwe**

**SGX - Singapore Exchange Limited**

### **Investors and Other Users**

**Ceres Accelerator**



**IAIP - Indian Association of Investment Professionals (CFA Society India)**

**MSCI - Morgan Stanley Capital International**

**NBIM - Norges Bank Investment Management**

**SAAJ - The Securities Analysts Association of Japan**

**Preparers and Those Charged With Governance**

**Asma Jan Muhammad**

**ICFOA - International CFO Alliance**

**Public Sector Organizations**

**AGNZ - Office of the Auditor General of New Zealand**

We have chosen not to comment on this question because it relates to the different view we have about the adequacy of the underlying Code.

**Independent National Standard Setter**

**NZAuASB - New-Zealand Auditing & Assurance Standard Board**

Response:

No comment. The preparation of sustainability information is outside the XRB's mandate.

**Professional Accounting Organizations (PAOs)**

**CBPS-CFC-IBRACON - Comitê Brasileiro de Pronunciamentos de Sustentabilidade, Conselho Federal de Contabilidade and Instituto Brasileiro de Auditoria Independente**

**CNCC-CNOEC - Compagnie Nationale des Commissaires aux Comptes and Conseil National de L'Ordre Des Experts-Comptables**

See our response to question 7 regarding NOCLAR. We disagree with amending section 360 to extend the responsibilities of the financial auditor to NOCLAR which are related to sustainability information.

**FACPCE - Federación Argentina de Consejos Profesionales de Ciencias Económicas**

**GAA - Global Accounting Alliance**

**HKICPA - Hong Kong Institute of Certified Public Accountants**

No specific comments.

**ICPAU - Institute of Certified Public Accountants of Uganda**

**IDW - Institute der Wirtschaftsprüfer (Germany)**

**INCP - National Institute of Public Accountants of Colombia**

**ISCA - Institute of Singapore Chartered Accountants**

**NBA - Royal Netherlands Institute of Chartered Accountants**

**NYSSCPA - New York State Society of CPAs**

**PICPA - Pennsylvania Institute of Certified Public Accountants**

**WPK - Wirtschaftsprüferkammer (Germany)**

We do not comment on the requirements for professional accountants in business (PAIB) since German law does currently not allow for PAIB.

**Other Assurance Providers and Accreditation Bodies (non-PAs)**

**AccountAbility**

**IAF - International Accreditation Forum**

**JAB - Japan Accreditation Board**

**Accounting Firms and Sole Practitioners**

**Assirevi - Association of Italian Audit Firms**

**BKTI - Baker Tilly International**

**DTTL - Deloitte Touch Tohmatsu Limited**

**GTIL - Grant Thornton International Limited**

Proposed Revisions to the Extant Code

As discussed above, sustainability assurance engagements are an emerging area and we do not agree with IESBA's approach to lift the requirements from the Code applicable to financial statement audits and make confirming changes without understanding the applicability and impact the requirements have on sustainability engagements.

With respect to value chain entities, please refer to the discussion in the section above "Assurance at, or With Respect to, a value chain entity."

**Academia and Research Institutes**

**AFAANZ - The Auditing and Assurance Standards Committee of the Accounting and Finance Association of Australia and New Zealand**

**NNN - Nada Naufal, Director at the American University of Beirut**

**NRS - Professor\_Nicole\_Ratzinger-Sakel**

**NSU - Nova Southeastern University (Florida)**

Questions 22 and 23: no responses

**Others**

**IBA - The International Bar Association**

**IIA - The Institute of Internal Auditors**

## **Question 22(b) – Agree**

### **Regulators and Oversight Authorities, incl. Monitoring Group members**

#### **BAOA - Botswana Accountancy Oversight Authority**

Yes, the proposed revisions appear to be clear and adequate from a sustainability reporting perspective. They address various ethical considerations specific to sustainability reporting, such as conduct to mislead, value chain considerations, and forward-looking information. The examples provided help clarify the ethical expectations for Professional Accountants involved in sustainability reporting, enhancing transparency and accountability in this area.

#### **NASBA - National Association of State Boards of Accountancy (US)**

NASBA has no objections to the proposed examples on conduct to mislead in sustainability reporting, value chain and forward-looking information.

#### **UKFRC - United Kingdom Financial Reporting Council**

Yes to all.

### **Investors and Other Users**

#### **DIR - Daiwa Institute of Research Ltd**

Ans. Yes.

### **Public Sector Organizations**

#### **GAO - US Government Accountability Office**

We agree that the proposed examples on conduct to mislead in sustainability reporting, value chain, and forward-looking information in section 220 are sufficiently clear and adequate.

#### **UNCTAD ARL - UNCTAD's Latin America Regional Alliance**

- (        ) I Agree 75% of respondents
- (        ) I am not sure 25% of respondents
- (        ) I don't agree (please qualify)

#### **UNCTAD ARP - UNCTAD African Regional Partnership**

100% of respondents agreed that the proposed revisions clarify the preparation and presentation of information, including data collection and measurement methods. The revisions also emphasize the need for professional accountants to exercise professional judgment and ensure ethical considerations are applied in preparing or presenting information.

### **Independent National Standard Setter**

#### **APESB - Accounting Professional & Ethical Standards Board (Australia)**

APESB is of the view that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective. We acknowledge the need for conforming amendments to maintain the relevance of extant Parts, ensuring they incorporate sustainability references and address ethics issues

specific to sustainability reporting once the sustainability standards are finalised. The proposed revisions to existing examples, as well as the addition of new examples relating to sustainability reporting the value chain and forward-looking information, will provide useful guidance to professional accountants in performing sustainability-related activities.

### **Professional Accounting Organizations (PAOs)**

#### **ACCA - Association of Chartered Certified Accountants**

We agree that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective.

No comments.

#### **AE - Accountancy Europe**

Yes, we agree with the proposed revisions to Parts 1 to 3 of the extant Code.

#### **AIC - Asociacion Interamericana de Contabilidad (Inter-American Accounting Association)**

Yes, we agree because we believe that the proposed revisions to Parts 1 through 3 of the current Code in Chapter 4 of the ED are clear and appropriate from a sustainability reporting perspective, including:

We understand that the proposed examples are appropriate on cases that could be misleading on sustainability information (greenwashing, omission of information, including false information, inadequate calculations, or over- or underemphasis on certain information), the value chain (relationships with entities in the value chain could also create threats to compliance with the core principles, such as the self-interest threat resulting from a PAIB having a financial interest in a supplier to its employing organization when that supplier is affected by the employing organization's sustainability practices) and forward-looking information (excessive optimism in analyzing estimates, and forward-looking information that is more qualitative and narrative in nature can lead to "greenwashing").

#### **BICA - Botswana Institute of Chartered Accountants**

Proposed Revisions to the Extant Code:

Comment

- Agreeing that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective, including proposed revisions to Section 220 and examples on conduct to mislead in sustainability reporting, value chain, and forward-looking information, is essential for enhancing the quality and reliability of sustainability reporting.

#### **CAANZ - Chartered Accountants Australia and New Zealand**

We support the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED.

(b) The proposed examples relating to conduct to mislead in sustainability reporting, value chain and forward-looking information appear to be appropriate.

### **CFAR - Chamber of Financial Auditors of Romania**

We agree that the proposed examples on conduct to mislead in sustainability reporting, value chain and forward-looking information are clear and adequate from a sustainability reporting perspective.

### **CPAA - CPA Australia**

CPA Australia is comfortable with the proposed examples on conduct to mislead in sustainability reporting, value chain and forward-looking information.

### **CPAC - Chartered Professional Accountants Canada Public Trust Committee**

Yes, we agree.

### **ICAS - The Institute of Chartered Accountants of Scotland**

We agree with the examples.

### **IFAC - International Federation of Accountants**

We believe these are clear and adequate.

### **IICA - Institute of Indonesia Chartered Accountants**

Yes

### **IPA - Institute of Public Accountants (Australia)**

IPA generally supports the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED. The proposed revisions appear to be clear and adequate from a sustainability reporting perspective.

### **IWP - Institut Österreichischer Wirtschaftsprüferinnen**

Yes.

### **JICPA - Japanese Institute of Certified Public Accountants**

We agree that the proposed examples on conduct to mislead in sustainability reporting, value chain and forward-looking information are clear and adequate from a sustainability reporting perspective.

### **KICPA - Korean Institute of Certified Public Accountants**

Questions 20 ~ 23

The KICPA supports the ED with no other matter to raise.

### **MIA-Malaysian - Malaysian Institute of Accountants**

We agree that the proposed revisions to Parts 1 to 3 of the Code are clear and adequate from a sustainability reporting perspective.

### **MIA (Malta) - The Malta Institute of Accountants**

The Institute notes that while we agree with the proposed examples on conduct to mislead in sustainability reporting, value chain and forward-looking information, we also refer to the importance of the study referred to above.

However, as already noted above, in our opinion, it is still too early to understand all implications of extending independence requirements to the entire value chain and to determine whether all practical considerations have been taken into account. We consider that a study is necessary in order to delineate the parameters of the scope so as to ensure that a balance is reached between the extent of restrictions and the practical implications. In fact, this could be a specific project that IESBA could consider undertaking.

#### **MICPA - Malaysian Institute of Certified Public Accountants**

Comment:

We have no objection on the proposed examples on conduct to mislead in sustainability reporting, value chain and forward-looking information.

#### **PAFA - The Pan-African Federation of Accountants**

We believe these are clear and adequate.

#### **SAICA - South African Institute of Chartered Accountants**

Response:

SAICA agrees that the proposed examples touching on the conduct to mislead in sustainability reporting, value chain and forward-looking information are clear and adequate.

#### **WPK - Wirtschaftsprüferkammer (Germany)**

We do not comment on the requirements for professional accountants in business (PAIB) since German law does currently not allow for PAIB.

As far as the proposed changes in Part 3 are concerned, we agree with the IESBA's approach.

#### **Accounting Firms and Sole Practitioners**

#### **MOORE - Moore Global Network Limited**

Yes

#### **MU - Muhammad Umar - Mo Chartered Accountants**

b) We agree

#### **PKF - PKF Global**

PKF Global Response:.. We agree that the proposed revisions in Parts 1 to 3 of the extant Code in Chapter 4 of ED are clear and adequate, from a sustainability perspective.

#### **PwC - PricewaterhouseCoopers International Limited**

Overall response: Yes, with no further comment

### **Question 22(b) – Agree With Comments**

#### **Preparers and Those Charged With Governance**

#### **BD - Bruno Dirringer**

(b): I recommend to add terms to dissuade misreporting that would result in facilitating or influencing the public / other business to buy / choose goods and services of the company.

### **Professional Accounting Organizations (PAOs)**

#### **CAI - Chartered Accountants of Ireland**

- Subject to the following recommendations we support the examples provided:
  - Regarding section 220.4 A1, we believe it provides a narrow interpretation of greenwashing and greenhushing, as referred to in paragraph 143 of the Explanatory Memorandum. As many cases of greenwashing or greenhushing may not be deliberate intentions to mislead others, we believe it would be relevant to also include guidance that highlights examples of preparing or presenting information in a manner that misrepresents the situation or circumstances. This may involve failing to apply an inquiring mindset to a question or consider the completeness of the information, including unverified data or data from an untrusted source, applying inappropriate or incomparable comparisons, etc.
  - Regarding section 220.5 A1, a further example to consider relating to forward-looking information is using an inappropriate or unsubstantiated baseline to assess progress against targets, e.g. climate-related goals, and remaining gaps.
  - A further threat, especially for SMEs, is the challenge of conflicts of interest arising within a small team, where an individual who is tasked with writing a particular sustainability assessment methodology for the business is also tasked with evaluating this methodology and reporting the organisation's actions taken or remaining actions necessary to achieve a particular outcome.

#### **EFAA - European Federation of Accountants and Auditors for SMEs**

We agree that the proposed examples on conduct to mislead in sustainability reporting, value chain and forward-looking information are clear and adequate from a sustainability reporting perspective.

As the practice of mandatory assurance over sustainability reporting is in its (relative) infancy, and yet the gains from greenwashing and greenhushing are significant, there is an acute risk that companies will engage in greenwashing or greenhushing. We welcome, therefore, the proposed examples on conduct to mislead in sustainability reporting. However, we welcome the IESBA intensifying its communication efforts around how the IESSA addresses the risk of greenwashing and greenhushing and the need for sustainability practitioners and other stakeholders to be especially vigilant.

#### **ICAEW - Institute of Chartered Accountants in England and Wales**

114. We note that the paragraph 143 of the Explanatory Memorandum refers to “intentionally” misleading. However, we consider that it would be helpful to also address circumstances in which firms or practitioners may have fallen into excessive optimism (“Green wishing”) rather than engaging in a deliberate intent to mislead and also to cover situations in which circumstances may have changed or



interpretations should be reassessed in the context of currently available information.

115. We consider that it would be helpful for IESBA to produce more detailed application material and/or worked case study examples in this regard, to ensure consistency in the application of the standards by Sustainability Assurance Practitioners from different backgrounds.

## **SOCPA - Saudi Organization for Chartered and Professional Accountants**

SOCPA Comments:

(b) The proposed examples aim to illustrate how sustainability information might be intentionally prepared or presented to mislead others, or how pressure exerted on professional accountants might result in breaches of compliance with fundamental principles. However, SOCPA believes while these examples provide valuable insights, there are concerns regarding their applicability and practicality. For instance, the proposed examples may be overly complex or difficult to apply in practice, particularly for professional accountants without extensive experience in sustainability reporting.

## **Accounting Firms and Sole Practitioners**

### **BDO - BDO International Limited**

The 'use of discretion in preparing or presenting information' section (R220.5 to 220.6 A2) provides clear examples of ways in which discretion might be misused to achieve inappropriate outcomes, however this section does not contemplate the relevant ethical considerations when using discretion to prepare or present information.

Should this section contain a cross reference to another section/s in the IESBA Code? Furthermore BDO would recommend that any considerations under this section be documented under paragraph 220.11 A1, given the discretion involved.

### **EY - Ernst & Young Global Limited**

22.(b)

With regard to the application material in paragraphs 220.4 A3, 220.5 A1 and 300.7 A4a we have the following observations.

(A) We note that references to the value chain are added as application material in both paragraphs 220.4 A3 and 300.7 A4a. While we agree that these examples highlight risks and list considerations for the preparer of sustainability reporting when relying on third party information for value chain reporting, we suggest that the IESBA also consider providing further guidance through NAM since value chain reporting is a new concept and preparers of sustainability reporting may need guidance in evaluating the adequacy of information provided by others in their value chain.

(B) We note that the following example has been added to paragraph 220.5 A1: "Performing a materiality assessment of opportunities, risks or impacts in order to misrepresent or omit sustainability information." While we recognize that this example is phrased similar to the other examples in paragraph 220.5 A1, we suggest that it may be clearer to phrase this example as: "Selecting, omitting or obscuring opportunities, risks or impacts as part of a materiality assessment to misrepresent sustainability information,"

since the risk is that the preparer of the materiality assessment omits or obscures information to misrepresent the scope of reporting.

#### **KPMG - KPMG IFRG Limited**

We do not support the addition of paragraph 300.7 A4a and the new bullet point under 320.3 A4, as we don't believe that these are appropriate examples for a PA's evaluation of threats to the fundamental principles. As we note in our responses to questions 13 and 14, VCEs are outside the organizational boundary of the sustainability assurance client and there is not a sufficient relationship with the sustainability assurance client requiring these as examples of factors that bear on the SAP's compliance with the fundamental principles.

We do agree that the remaining revisions in Chapter 4 are clear and adequate from a sustainability reporting perspective.

#### **MAZARS - Mazars Group**

##### **Response**

We agree with the proposed examples subject to the following comments:

- 220.4.A1 – this example would benefit from the use of the term “greenwashing” to make clear that this is what the example is discussing. Although we appreciate the term “greenwashing” is not clearly defined, it is well understood in concept and, as this content is application material rather than a requirement, we believe it would be appropriate to use the term.
- 220.5.A1 – we believe that listing the sustainability examples consecutively may be beneficial to PAIBs rather than scattering them among the list of bullet points
- 220.4.A3 – in addition to the source, relevance and sufficiency of the data, we believe that the PAIB should also consider its reliability given it is from a third party, and we suggest adding this criterion to the example.
- 320.3.A4 – a cross reference to the example in 300.7.4a would be helpful

#### **PP - Pitcher Partners Advisors Proprietary Limited**

In principle yes. However, given there is little sustainability reporting presently it is difficult to anticipate any practical issues which may arise.

#### **RSM - RSM International Limited**

We agree that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective. These standards are likewise suitable for addressing ethics issues that might arise when performing non-financial reporting.

We agree that the proposed examples on conduct to mislead in sustainability reporting, value chain and forward-looking information of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective, and they are appropriate and helpful.

We believe one of the new examples of a self-interest threat in paragraph 200.6 A1(a) of ED-IESSA should be re-assessed to see whether it is an appropriate example:

- A professional accountant holding a financial interest in a supplier of the employing organization and that supplier is impacted by the employing organization's sustainability targets or practices.

It should be recognised that holding shares in a supplier, for example, could in some cases indeed trigger a self-interest threat. However, it is questionable how it can be ruled out in practice that this situation could arise during a given financial year. Unlike group companies, suppliers are not in the control of the parent company, they can change quickly, and it is almost impossible to predict how long a value chain will exist as it did at the beginning of the audit period. Only in very few cases will holding a stake in a supplier lead to self-interest. In this respect, it seems questionable whether holding a financial interest in a supplier is a suitable example of a self-interest.

### **Academia and Research Institutes**

#### **DIRC - Deakin University Integrated Reporting Centre**

We agree that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective, including:

(b) Proposed examples on conduct to mislead in sustainability reporting, value chain and forward-looking information. We recommend the inclusion of a further example in relation to the omission of relevant or the inclusion of false or misleading information in relation to the entity's strategic objectives, governance, risk management or business model.

### **Question 22(b) – Disagree**

#### **Professional Accounting Organizations (PAOs)**

##### **AICPA - American Institute of Certified Public Accountants Professional Ethics Executive Committee**

Overall response: No. See our response to question 21.

Overall response: No.

Detailed comment: Given the immaturity of this area, how broadly sustainability information is defined and the lack of clarity around the value chain, we are concerned that these revisions could have unintended consequences. In addition, we have not had an opportunity to consider whether the proposals could have any unintended consequences when the standards issued by the International Sustainability Standards Board are applied.

### **Question 22(b) – No Specific Comments**

#### **Regulators and Oversight Authorities, incl. Monitoring Group members**

##### **ACRA - Accounting and Corporate Regulatory Authority (Singapore)**

##### **CEAOB - Committee of European Auditing Oversight Bodies**

##### **ESMA - European Securities and Market Authority**

##### **IAASA - Irish Auditing & Accounting Supervisory Authority**

**IFIAR - International Forum of Independent Audit Regulators**

**IOSCO - International Organization of Securities Commissions**

**IRBA - Independent Regulatory Board for Auditors**

Our review of Chapter 4, Proposed Revisions to Parts 1 to 3 of the Extant Code to Reflect Sustainability Reporting Considerations for Professional Accountants, was limited to amendments made to Parts 1 and 3, because Part 2 has not been adopted by the IRBA and incorporated into the IRBA Code. We have no comments in respect of these proposed amendments and no responses have been provided to Questions 20 - 23 that relate to this chapter.

**PAABZ - The Public Accountants and Auditors Board of Zimbabwe**

**SGX - Singapore Exchange Limited**

**Investors and Other Users**

**Ceres Accelerator**

**IAIP - Indian Association of Investment Professionals (CFA Society India)**

**MSCI - Morgan Stanley Capital International**

**NBIM - Norges Bank Investment Management**

**SAAJ - The Securities Analysts Association of Japan**

**Preparers and Those Charged With Governance**

**Asma Jan Muhammad**

**ICFOA - International CFO Alliance**

**Public Sector Organizations**

**AGNZ - Office of the Auditor General of New Zealand**

We were unable to readily identify the proposed examples you are referring to.

**Independent National Standard Setter**

**NZAuASB - New-Zealand Auditing & Assurance Standard Board**

Response:

No comment. The preparation of sustainability information is outside the XRB's mandate.

**Professional Accounting Organizations (PAOs)**

**CBPS-CFC-IBRACON - Comitê Brasileiro de Pronunciamentos de Sustentabilidade, Conselho Federal de Contabilidade and Instituto Brasileiro de Auditoria Independente**

**CNCC-CNOEC - Compagnie Nationale des Commissaires aux Comptes and Conseil National de L'Ordre Des Experts-Comptables**

See our response to question 7 regarding NOCLAR. We disagree with amending section 360 to extend the responsibilities of the financial auditor to NOCLAR which are related to sustainability information.

**FACPCE - Federación Argentina de Consejos Profesionales de Ciencias Económicas**

**GAA - Global Accounting Alliance**

**HKICPA - Hong Kong Institute of Certified Public Accountants**

No specific comments.

**ICPAU - Institute of Certified Public Accountants of Uganda**

**IDW - Institute der Wirtschaftsprüfer (Germany)**

Given our focus on assurance, we have chosen not to respond to the questions relating to Chapter 4.

**INCP - National Institute of Public Accountants of Colombia**

**ISCA - Institute of Singapore Chartered Accountants**

**NBA - Royal Netherlands Institute of Chartered Accountants**

**NYSSCPA - New York State Society of CPAs**

**PICPA - Pennsylvania Institute of Certified Public Accountants**

**Other Assurance Providers and Accreditation Bodies (non-PAs)**

**AccountAbility**

**IAF - International Accreditation Forum**

**JAB - Japan Accreditation Board**

**Accounting Firms and Sole Practitioners**

**Assirevi - Association of Italian Audit Firms**

**BKTI - Baker Tilly International**

**DTTL - Deloitte Touch Tohmatsu Limited**

**GTIL - Grant Thornton International Limited**

Proposed Revisions to the Extant Code

As discussed above, sustainability assurance engagements are an emerging area and we do not agree with IESBA's approach to lift the requirements from the Code applicable to financial statement audits and make confirming changes without understanding the applicability and impact the requirements have on sustainability engagements.

With respect to value chain entities, please refer to the discussion in the section above "Assurance at, or With Respect to, a value chain entity."

**Academia and Research Institutes**

**AFAANZ - The Auditing and Assurance Standards Committee of the Accounting and Finance Association of Australia and New Zealand**

**NNN - Nada Naufal, Director at the American University of Beirut**

**NRS - Professor\_Nicole\_Ratzinger-Sakel**

**NSU - Nova Southeastern University (Florida)**

Questions 22 and 23: no responses

**Others**

**IBA - The International Bar Association**

**IIA - The Institute of Internal Auditors**

## **Question 22(c) – Agree**

### **Regulators and Oversight Authorities, incl. Monitoring Group members**

#### **BAOA - Botswana Accountancy Oversight Authority**

Yes, the proposed revisions appear to be clear and adequate from a sustainability reporting perspective. They address various ethical considerations specific to sustainability reporting, such as conduct to mislead, value chain considerations, and forward-looking information. The examples provided help clarify the ethical expectations for Professional Accountants involved in sustainability reporting, enhancing transparency and accountability in this area.

#### **NASBA - National Association of State Boards of Accountancy (US)**

NASBA agrees with the other proposed revisions in paragraph 155.

#### **UKFRC - United Kingdom Financial Reporting Council**

Yes to all.

### **Investors and Other Users**

#### **DIR - Daiwa Institute of Research Ltd**

Ans. Yes.

### **Public Sector Organizations**

#### **GAO - US Government Accountability Office**

We generally agree that the other proposed revisions are sufficiently clear and adequate.

#### **UNCTAD ARP - UNCTAD African Regional Partnership**

100% of respondents agreed that the proposed revisions clarify the preparation and presentation of information, including data collection and measurement methods. The revisions also emphasize the need for professional accountants to exercise professional judgment and ensure ethical considerations are applied in preparing or presenting information.

### **Independent National Standard Setter**

#### **APESB - Accounting Professional & Ethical Standards Board (Australia)**

APESB is of the view that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective. We acknowledge the need for conforming amendments to maintain the relevance of extant Parts, ensuring they incorporate sustainability references and address ethics issues specific to sustainability reporting once the sustainability standards are finalised. The proposed revisions to existing examples, as well as the addition of new examples relating to sustainability reporting the value chain and forward-looking information, will provide useful guidance to professional accountants in performing sustainability-related activities.

### **Professional Accounting Organizations (PAOs)**

#### **ACCA - Association of Chartered Certified Accountants**

No comments.



We agree that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective.

#### **AE - Accountancy Europe**

Yes, we agree with the proposed revisions to Parts 1 to 3 of the extant Code.

#### **AIC - Asociacion Interamericana de Contabilidad (Inter-American Accounting Association)**

Finally, we also concur with other proposed revisions such as a number of additional examples and concepts related to sustainability reporting in Parts 1 to 3 of the current Code, relating to:

- A sustainability-related committee as another example of a TCWG subgroup in addition to an audit committee or individual TCWG member.
- A sustainability assurance professional as a possible avenue for independently practicing accountants to communicate concerns regarding misleading information or pressure to breach the fundamental principles.
- Identification of threats to compliance with the fundamental principles and pressures that may result in threats to compliance with the fundamental principles.
- Examples of circumstances with respect to financial interests, compensation and incentives that could create a self-interest threat.

Yes, we agree because we believe that the proposed revisions to Parts 1 through 3 of the current Code in Chapter 4 of the ED are clear and appropriate from a sustainability reporting perspective, including:

#### **BICA - Botswana Institute of Chartered Accountants**

Proposed Revisions to the Extant Code:

Comment

- Agreeing that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective, including proposed revisions to Section 220 and examples on conduct to mislead in sustainability reporting, value chain, and forward-looking information, is essential for enhancing the quality and reliability of sustainability reporting.

#### **CAANZ - Chartered Accountants Australia and New Zealand**

We support the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED.

(c) No comments.

#### **CPAC - Chartered Professional Accountants Canada Public Trust Committee**

Yes, we agree.

#### **EFAA - European Federation of Accountants and Auditors for SMEs**

We agree with the other proposed revisions.

### **ICAEW - Institute of Chartered Accountants in England and Wales**

110. We note that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 are clear and adequate, with terminology and principles familiar to professional accountants.

116. We have no additional comments.

### **ICAS - The Institute of Chartered Accountants of Scotland**

We agree with the other proposed revisions.

### **IFAC - International Federation of Accountants**

We believe these are clear and adequate.

### **IICA - Institute of Indonesia Chartered Accountants**

Yes

### **IPA - Institute of Public Accountants (Australia)**

IPA generally supports the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED. The proposed revisions appear to be clear and adequate from a sustainability reporting perspective.

### **IWP - Institut Österreichischer Wirtschaftsprüferinnen**

Yes.

### **JICPA - Japanese Institute of Certified Public Accountants**

(c) We agree that other proposed revisions are clear and adequate from a sustainability reporting perspective.

### **KICPA - Korean Institute of Certified Public Accountants**

Questions 20 ~ 23

The KICPA supports the ED with no other matter to raise.

### **MIA-Malaysian - Malaysian Institute of Accountants**

We agree that the proposed revisions to Parts 1 to 3 of the Code are clear and adequate from a sustainability reporting perspective.

### **PAFA - The Pan-African Federation of Accountants**

We believe these are clear and adequate.

### **WPK - Wirtschaftsprüferkammer (Germany)**

We do not comment on the requirements for professional accountants in business (PAIB) since German law does currently not allow for PAIB.

As far as the proposed changes in Part 3 are concerned, we agree with the IESBA's approach.

### **Accounting Firms and Sole Practitioners**

### **EY - Ernst & Young Global Limited**

22.(c)

Yes, we agree that the other edits to Parts 1 to 3 are clear and adequate.

#### **KPMG - KPMG IFRG Limited**

We do agree that the remaining revisions in Chapter 4 are clear and adequate from a sustainability reporting perspective.

#### **MAZARS - Mazars Group**

Response

We agree with the other proposed revisions.

#### **MOORE - Moore Global Network Limited**

Yes

#### **MU - Muhammad Umar - Mo Chartered Accountants**

c) We concur with the 4 additional proposals of the IESBA

#### **PKF - PKF Global**

PKF Global Response: We agree that the proposed revisions in Parts 1 to 3 of the extant Code in Chapter 4 of ED are clear and adequate, from a sustainability perspective.

#### **PwC - PricewaterhouseCoopers International Limited**

Overall response: Yes, with no further comment

#### **RSM - RSM International Limited**

We agree that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective. These standards are likewise suitable for addressing ethics issues that might arise when performing non-financial reporting.

We agree that the other proposed revisions of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective. However as detailed in our response to question #22(b), we believe the new example of a financial interest in a supplier should be reassessed for inclusion.

#### **Academia and Research Institutes**

#### **DIRC - Deakin University Integrated Reporting Centre**

We agree that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective, including:

#### **Question 22(c) – Agree With Comments**

#### **Professional Accounting Organizations (PAOs)**

#### **CAI - Chartered Accountants of Ireland**

- Regarding 200.6 A1 (b), an additional example of a self-review threat that is specific to sustainability could be: A professional accountant performing a taxonomy

alignment assessment to a sustainability reporting standard after writing the business case for a capital project, part of which related to the project aligning to that standard.

#### **CPAA - CPA Australia**

CPA Australia notes that the main changes proposed in Chapter 4 relate to the inclusion of wording such as “non-financial information, including sustainability information”. While this is not inappropriate, it does suggest that revisions will be made in the future when non-financial information reporting expands beyond sustainability information.

The IESBA may consider revisions to paragraphs 240.3 A2 third and fifth dot points, and 270.3 A2 Pressure related to financial interest. That is, the need for the wording “financial or non-financial” prior to “performance” goals/conditions/indicators and whether these words can be removed. At the least, this wording should consider using “and/or” or “and” rather than “or”, but it is arguable that the wording is not necessary, and that the meaning is appropriately conveyed simply by reference to “performance” goals/conditions/indicators.

#### **SOCPA - Saudi Organization for Chartered and Professional Accountants**

SOCPA Comments:

(c) The proposed revisions include additional examples and concepts aimed at enhancing the ethical framework for sustainability reporting. While these revisions aim to address emerging issues in sustainability reporting, SOCPA has concerns regarding integration, clarity and relevance. For instance, while the proposed revisions aim to enhance clarity and relevance for professional accountants, they do not provide specific examples of how they will achieve these objectives. Without clear guidance and practical relevance, the proposed revisions may have limited utility in practice.

#### **Accounting Firms and Sole Practitioners**

#### **PP - Pitcher Partners Advisors Proprietary Limited**

In principle yes. However, given there is little sustainability reporting presently it is difficult to anticipate any practical issues which may arise.

### **Question 22(c) – Disagree**

#### **Professional Accounting Organizations (PAOs)**

#### **AICPA - American Institute of Certified Public Accountants Professional Ethics Executive Committee**

Overall response: No. See our response to question 21.

Overall response: No.

Detailed comment: Given the immaturity of this area, how broadly sustainability information is defined and the lack of clarity around the value chain, we are concerned that these revisions could have unintended consequences. In addition, we have not had an opportunity to consider whether the proposals could have any unintended consequences when the standards issued by the International Sustainability Standards Board are applied.

## **Question 22(c) – No Specific Comments**

### **Regulators and Oversight Authorities, incl. Monitoring Group members**

ACRA - Accounting and Corporate Regulatory Authority (Singapore)

CEAOB - Committee of European Auditing Oversight Bodies

ESMA - European Securities and Market Authority

IAASA - Irish Auditing & Accounting Supervisory Authority

IFIAR - International Forum of Independent Audit Regulators

IOSCO - International Organization of Securities Commissions

IRBA - Independent Regulatory Board for Auditors

Our review of Chapter 4, Proposed Revisions to Parts 1 to 3 of the Extant Code to Reflect Sustainability Reporting Considerations for Professional Accountants, was limited to amendments made to Parts 1 and 3, because Part 2 has not been adopted by the IRBA and incorporated into the IRBA Code. We have no comments in respect of these proposed amendments and no responses have been provided to Questions 20 - 23 that relate to this chapter.

PAABZ - The Public Accountants and Auditors Board of Zimbabwe

SGX - Singapore Exchange Limited

### **Investors and Other Users**

Ceres Accelerator

IAIP - Indian Association of Investment Professionals (CFA Society India)

MSCI - Morgan Stanley Capital International

NBIM - Norges Bank Investment Management

SAAJ - The Securities Analysts Association of Japan

### **Preparers and Those Charged With Governance**

Asma Jan Muhammad

BD - Bruno Dirringer

(c): None

ICFOA - International CFO Alliance

### **Public Sector Organizations**

AGNZ - Office of the Auditor General of New Zealand

We have no comment to make in response to this question.

UNCTAD ARL - UNCTAD's Latin America Regional Alliance

No comments presented.

## **Independent National Standard Setter**

### **NZAuASB - New-Zealand Auditing & Assurance Standard Board**

Response:

No comment. The preparation of sustainability information is outside the XRB's mandate.

## **Professional Accounting Organizations (PAOs)**

### **CBPS-CFC-IBRACON - Comitê Brasileiro de Pronunciamentos de Sustentabilidade, Conselho**

### **CFAR - Chamber of Financial Auditors of Romania**

No comments

### **CNCC-CNOEC - Compagnie Nationale des Commissaires aux Comptes and Conseil National de L'Ordre Des Experts-Comptables**

See our response to question 7 regarding NOCLAR. We disagree with amending section 360 to extend the responsibilities of the financial auditor to NOCLAR which are related to sustainability information.

### **FACPCE - Federación Argentina de Consejos Profesionales de Ciencias Económicas**

### **GAA - Global Accounting Alliance**

### **HKICPA - Hong Kong Institute of Certified Public Accountants**

No specific comments.

### **ICPAU - Institute of Certified Public Accountants of Uganda**

### **IDW - Institute der Wirtschaftsprüfer (Germany)**

Given our focus on assurance, we have chosen not to respond to the questions relating to Chapter 4.

### **INCP - National Institute of Public Accountants of Colombia**

### **ISCA - Institute of Singapore Chartered Accountants**

### **MIA (Malta) - The Malta Institute of Accountants**

The addition of such examples would give sufficient material to guide professional accountants with independence related issues in relation to sustainability assurance engagements.

### **MICPA - Malaysian Institute of Certified Public Accountants**

Comment:

We have no comment on the other proposed revisions.

### **NBA - Royal Netherlands Institute of Chartered Accountants**

### **NYSSCPA - New York State Society of CPAs**

### **PICPA - Pennsylvania Institute of Certified Public Accountants**

## **SAICA - South African Institute of Chartered Accountants**

Response:

None.

## **Other Assurance Providers and Accreditation Bodies (non-PAs)**

### **AccountAbility**

**IAF - International Accreditation Forum**

**JAB - Japan Accreditation Board**

## **Accounting Firms and Sole Practitioners**

**Assirevi - Association of Italian Audit Firms**

**BDO - BDO International Limited**

BDO has no comments.

**BKTI - Baker Tilly International**

**DTTL - Deloitte Touch Tohmatsu Limited**

**GTIL - Grant Thornton International Limited**

Proposed Revisions to the Extant Code

As discussed above, sustainability assurance engagements are an emerging area and we do not agree with IESBA's approach to lift the requirements from the Code applicable to financial statement audits and make confirming changes without understanding the applicability and impact the requirements have on sustainability engagements.

With respect to value chain entities, please refer to the discussion in the section above "Assurance at, or With Respect to, a value chain entity."

## **Academia and Research Institutes**

**AFAANZ - The Auditing and Assurance Standards Committee of the Accounting and Finance Association of Australia and New Zealand**

**NNN - Nada Naufal, Director at the American University of Beirut**

**NRS - Professor\_Nicole\_Ratzinger-Sakel**

**NSU - Nova Southeastern University (Florida)**

Questions 22 and 23: no responses

## **Others**

**IBA - The International Bar Association**

**IIA - The Institute of Internal Auditors**