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CONSULTATION PAPER PROPOSED IESBA STRATEGY AND WORK PLAN, 2024 – 2027 TOWARDS A MORE SUSTAINABLE FUTURE: ADVANCING THE CENTRALITY OF ETHICS

We welcome the opportunity to comment on this Consultation Paper.

Moore Global is a leading mid-tier network with over 34,000 people in 522 offices across 112 countries. All our member firms comply with the IESBA International Code of Ethics for Professional Accountants (including International Independence Standards). The proposed strategy and work plan, therefore, affect all Moore Global people and member firms.

We have gathered input from our network member firms across the globe. This includes both professional accountants that perform assurance work and those that only perform non-assurance services. These professional accountants have vast knowledge and experience in the ethics space.

Request for specific comments

Strategic Drivers, Themes, and Actions

1. [Do you agree with the IESBA's Proposed Strategic Drivers \(see pp.9-13\)?](#)

Response: Yes, the strategic drivers are in line with the changing needs of the profession.

2. [Do you agree with the IESBA's Proposed Strategic Themes and Proposed Strategic Actions \(see pp.13-18\)?](#)

Response: For the most part, yes and we are pleased to see the focus on sustainability reporting and assurance. However, we are concerned with the concentration on a profession-agnostic Code. Our ethics are what sets our profession apart from the rest of the world. It is our "collective conscience". By creating a profession-agnostic Code, it may take away from this collective conscience. We also have concerns that many parts of our Code will not be applicable to other professions, such as NOCLAR. It is our suggestion that this be a separate, pared down Code, not meant for professional accountants, and that the standards for sustainability be written into the current Code for professional accountants.

Proposed Work Plan for 2024 - 2027

3. [Do you support the IESBA considering the topics set out in Table B as potential work streams \(see pp.22-24\)?](#)

Response: We agree with the majority of the work streams in Table B. However, there are two that we do not agree with.

(a) **Business relationships.** We do not view this as a priority.

(b) **Custody of data.** We believe this is too narrow and the focus should include cyber security.

In addition, far more is needed on the ethics around the use of AI, machine learning, and the use of data analytics, as these technologies are positioned to have a significant impact on our profession during the period that the working plan covers.

Proposed Work Plan for 2024 – 2027(continued)

4. Do you believe the IESBA should accelerate or defer any particular ongoing, potential or pre-committed work stream(s) set out in Table A, B, and C? Please explain your reasons.

Response: We believe that the project on Collective Investment Vehicles, Pension Funds & Investment Company Complexes in Table A could be deferred. It has a very narrow scope and we believe it does not have an impact on a sufficient number of professional accountants to warrant it being a priority right now.

For the reasons listed in question 3, we believe that Business Relationships in Table B could be deferred.

We believe that there should be a greater focus on technology and the ethics of the use of this technology, as indicated in question 3.

Post implementation review of NOCLAR should be accelerated. We have noticed that many professional accountants do not comprehend NOCLAR application and take an attitude that it is for auditors only.

5. Are there other topics the IESBA should consider as potential new work streams? If so, please indicate whether these topics are more important than the topics identified in Table B (see pp.22-24), and the needs and interests that would be served by undertaking work in such topic(s).

Response: Technology is changing at such a fast pace that more is needed in the Code, despite the recent changes made. The ethics of using AI, machine learning, etc. need to be written into the Code. Non-authoritative guidance is insufficient for the rapid changes expected in the coming 3 years.

Additional information

6. The IESBA's proposed Strategy and Work Plan emphasises the importance of close coordination with its sister Board, the IAASB. Do you have views or suggestions as to how coordination between the IESBA and IAASB could be enhanced to better serve the public interest?

Response: Coordination between the IESBA and IAASB is essential to the profession acting in the public interest. The Standards and the Code must be aligned to serve the public.

7. Do you have any comments on any other matters addressed in this Consultation Paper or any significant matters not covered that you believe the IESBA should consider in finalizing the SWP 2024-2027?

Response: No further comments.