

IESBA and IAASB Joint Stakeholder Survey – B.4 Changes in the Geopolitical and Regulatory Landscape - Greater Diversity of Voices Sought

09.01. 0 – I do not agree that this is a trend to be considered

06. Jurisdictional and National Standards Setters (JSS)

Wirtschaftsprüferkammer (WPK)

0 – I do not agree that this is a trend to be considered

Diversity of perspectives is important and to be welcomed. However, the key challenge remains the development of clear, practical, and globally applicable standards that meet the expectations of key stakeholders.

07. Accounting Firms

José María Hinojal (BNFIX)

0 – I do not agree that this is a trend to be considered

10. Member Bodies or Other Professional Accountancy Organizations

Chartered Accountants Ireland (CAI)

0 – I do not agree that this is a trend to be considered

There is an existing importance of ensuring that international standards remain relevant and capable of adoption across a diverse range of jurisdictions, including emerging economies. The inclusion of broader perspectives support legitimacy and inform more effective standard setting, but this is not an increasing or decreasing trend. It is a constant essential requirement to ensure effective global standards. The primary determinants of successful adoption remain the clarity, proportionality and usability of standards, and their ability to operate alongside different legal and regulatory frameworks. Diversity of input during the standard development process supports this outcome.

09.02. 2 – Decreasing in importance

07. Accounting Firms

Deloitte Touch Tohmatsu Limited

2 – Decreasing in importance

As the IAASB has itself acknowledged, to function effectively as a global baseline standard setter, it must be committed to developing standards that are globally responsive, relevant, and workable in practice. The Board's ongoing engagement with diverse stakeholder groups is a demonstration of its commitment to tackling issues of global relevance. When it comes to practical applicability of the standards, this requires input from qualified professionals in practice who have experience applying the standards and a deep understanding of issues impacting the profession. In this context, diversity with respect to practical experience among SSB members is of utmost importance.

10. Member Bodies or Other Professional Accountancy Organizations

Institute of Singapore Chartered Accountants (ISCA)

2 – Decreasing in importance

While greater diversity and inclusion would continue to be beneficial, we do not see "greater diversity of voices" as a standalone trend requiring prioritisation by the SSBs compared with other key trends identified in this survey.

09.03. 3 – Slightly decreasing in importance

02. Users of Financial or Non-Financial Information

Martin Lawrence (Ownership Matters Pty Ltd)

The SSBs will need to be vigilant about the rise of powerful vested interests within management lobbies seeking to bend the bodies to their wills

3 – Slightly decreasing in importance

06. Jurisdictional and National Standards Setters (JSS)

Royal Netherlands Institute of Chartered Accountants (NBA)

3 – Slightly decreasing in importance

Overall, this trend would be better characterized as "no change" rather than increasing or decreasing in importance. Both Boards have over recent years conducted extensive regional outreach, which should be maintained, including efforts to enhance engagement with investors, preparers and those charged with governance.

The primary objective should remain and be the development of clear, practical, and globally applicable standards which should meet the expectations and needs of major stakeholders.

07. Accounting Firms

Forvis Mazars Global Limited (Mazars)

3 – Slightly decreasing in importance

We believe that the standard setting boards already receive diversity of feedback, what is less clear is how the SSBs weight the feedback they receive. There is a perception that feedback from certain stakeholders (e.g. monitoring group members) is given significantly more weight than that received from, for example, the audit profession. There have been examples where multiple responses from the profession, both firms and PAOs, have raised consistent messages but a single response from a regulator is given more weighting. It is important that the SSBs, despite the careful consideration and display of all feedback received as presented in issues papers, communicate the decision making process with greater transparency on how comments were weighted and balanced for all stakeholders – Some stakeholders would always consider that more standards is a good thing in principle, but without necessarily considering the wider costs and benefits of new requirements.

There has been a proliferation of roundtable discussions by the standards boards, in particular, IESBA in recent years and we question the value for money of this approach. Where roundtables are held, we would urge the boards to ensure multi stakeholder roundtables to enable a wider range of views to be discussed, and for stakeholders to better understand each other's perspectives, rather than separate roundtables for different types of stakeholders. Such multi-stakeholder roundtables have been successful in the past.

Diversity of views is also important on the standard setting boards themselves, including diversity of thought, experience, geography and professional backgrounds. That said, we believe that professional auditors

should have greater representation on the Boards to drive higher quality standard setting. Other standard setting bodies have a higher percentage of professional auditors on their Boards to ensure they are getting enough of that unique perspective and in-depth understanding of the application of the standards. Regulators, financial statement users and others bring their own unique perspectives, but do not always have the same consideration of balancing standard setting with cost-effectiveness and an appreciation of the auditor effort to adopt new standards.

09. Public Sector Organizations

Sanford Rich (NYC Board of Education Retirement System)

3 – Slightly decreasing in importance

While diversity of voices is important the focus of diversity goals is get diverse perspectives with a focus on the diverse stakeholders.

10. Member Bodies or Other Professional Accountancy Organizations

Belgian Institute of Tax Advisors and Accountants (ITAA)

3 – Slightly decreasing in importance

A lot of the professions and voices of emerging economies have already been added to the scope.

European Federation of Accountants and Auditors for SMEs (EFAA)

3 – Slightly decreasing in importance

EFAA considers the call for greater diversity of voices in standard setting to remain an important matter, although we assess its relative importance as slightly decreasing. The continued broad use and growing recognition of global standards have strengthened the foundations for international dialogue, while existing outreach efforts have already contributed to improved inclusiveness in the standard-setting process. Nevertheless, EFAA continues to support meaningful engagement with a wide range of stakeholders, including representatives from emerging economies and jurisdictions with differing market structures and levels of institutional development. Such engagement remains important to facilitate effective adoption and implementation of global standards and to ensure that standards and guidance remain relevant across diverse economic and regulatory contexts.

EFAA therefore encourages the SSBs to maintain inclusive outreach and consultation practices, while balancing the need for global consistency, proportionality, and operational feasibility in the development of standards and implementation guidance.

12. Others

Wenzel Reyes (MindBridge)

3 – Slightly decreasing in importance

09.04. 4 – Slightly increasing in importance

02. Users of Financial or Non-Financial Information

CFA Institute

4 – Slightly increasing in importance

Diversity is a virtue that is hard to disagree with. The conundrum is how it works with standard setting (i.e., standardization) which intentionally seeks to implement a degree of sameness. Different standards for different entities or differences in application of the standards reduces standardization, potentially to such a degree that comparability is lost (this is the well known and endlessly debated issue regarding principles vs. rules based standards). We welcome more voices and more input, but it will be an undertaking for the SSBs to manage that (i.e., how many board members is optimal, how many and how big are the advisory groups, how many sets of standards, and so on)

Goro Kumagai (The Securities Analysts Association of Japan)

4 – Slightly increasing in importance

Investment Company Institute

4 – Slightly increasing in importance

Continue efforts to engage with a broad range of stakeholders, including investors, preparers, regulators, and stakeholders from emerging economies.

Koei Otaki (SMBC Nikko securities Inc)

4 – Slightly increasing in importance

Takeshi Kimura (Nippon Life Insurance Company (Board Member, PRI) (Steering Committee Member, TISFD))

4 – Slightly increasing in importance

Broader inclusion of perspectives, particularly from emerging economies, can enhance legitimacy and adoption. However, such diversity should ultimately strengthen, rather than dilute, the coherence and comparability of global standards.

04. Those Charged With Governance

Kaori Ito (Yourmysyar Inc.)

4 – Slightly increasing in importance

The push for greater diversity of voices in standard-setting is likely to continue, reflecting broader expectations around inclusiveness and legitimacy. Its effectiveness, however, will depend less on the volume of input and more on the SSBs' ability to meaningfully interpret and integrate perspectives that operate within different professional and organizational languages.

05. Regulators and Oversight Authorities

Hellenic Accounting and Auditing Standards Oversight Board (HAASOB)

? See above B

4 – Slightly increasing in importance

Independent Regulatory Board for Auditors (IRBA)

4 – Slightly increasing in importance

Martina Morrissey (IAASA)

4 – Slightly increasing in importance

UK Financial Reporting Council (UK FRC)

4 – Slightly increasing in importance

Seeking a "diversity of voices" has always been highly important – this is something to be maintained rather than increasing in importance. Stakeholders from all economies have the opportunity to respond to the SSBs' public consultations. However, it is possible that some stakeholders in emerging economies may feel they get less attention in outreach activities. Increasing the diversity of geographical locations for physical outreach may help, although the costs will be a consideration. Increasing the opportunities for virtual participation in outreach could be a more cost-effective approach.

06. Jurisdictional and National Standards Setters (JSS)

Compagnie Nationale des Commissaires aux Comptes (CNCC) - Conseil National de l'Ordre des Experts Comptables (CNOEC)

4 – Slightly increasing in importance

As mentioned above, in the present geopolitical context, there is a high risk of fragmentation and of a lesser adoption of the standards. In order to fight against this risk, it is necessary that the elaboration of standards remains the fruit of a multilateral process within a multistakeholders' board with sufficient geographic diversity and also with a sufficient diversity of backgrounds. This requires that the composition of the Boards reflects the diverse components of the profession including SMPs and the diverse cultures, not only the anglo-saxon one.

Hong Kong Institute of Certified Public Accountants (HKICPA)

4 – Slightly increasing in importance

Inclusion of diverse stakeholder perspectives, particularly from emerging economies and smaller markets, remains important to the global relevance, operability and adoption of international standards. Over recent strategy periods, the SSBs have significantly expanded their regional outreach and engagement activities, which has strengthened the quality of input informing standard-setting decisions.

Looking ahead, the relative importance of this trend is expected to remain broadly stable rather than sharply increasing. Continued effort is nevertheless needed to ensure that voices from different jurisdictions, market sizes and stakeholder groups— including investors, preparers, SMEs, SMPs and sole practitioners—are meaningfully reflected in both standard setting and implementation discussions.

Practical steps such as targeted outreach, region-specific engagement channels and the use of illustrative examples or implementation materials reflecting different contexts may further support effective participation and adoption, without fundamentally changing the SSBs' existing engagement model. Maintaining this balanced approach will help ensure standards remain globally credible while being capable of consistent and proportionate application.

Instituto Mexicano de Contadores Públicos (IMCP)

4 – Slightly increasing in importance

As mentioned in response to question B2, our jurisdiction is moving forward to convergence and adoption of international standards, so we do not consider this topic to be of increasing importance.

Japanese Institute of Certified Public Accountants (JICPA)

It is important to ensure two-way communication with stakeholders, grounded in mutual understanding developed through clear explanation, consultation, and transparent feedback. The SSBs should clearly explain the background to each project, the objectives to be achieved, the need for the project, and the proposals being put forward. For example, in the area of ethics, the objective should not be the pursuit of independence as an end in itself, but rather securing the level of independence necessary to serve the public interest and support the sound functioning of capital markets. The SSBs should then actively seek input from a wide range of stakeholders, give due consideration to that input, and provide feedback in a transparent manner. In the area of ethics and independence in particular, we believe that a balanced approach to independence is essential, taking into account the role of professional accountants and the sound functioning of capital markets, rather than pushing independence to a purely formal or absolute extreme. Given that legal frameworks, market maturity, and practical circumstances differ significantly across jurisdictions, the aim should not be to build increasingly uniform and highly prescriptive requirements. Instead, after obtaining stakeholder views, it is important for the SSBs to articulate a balanced, principles-based direction that allows each jurisdiction to respond flexibly in light of its own circumstances.

4 – Slightly increasing in importance

New Zealand Auditing and Assurance Standards Board (NZAuASB)

4 – Slightly increasing in importance

STANDARDS ARE BEING USED BY A BROADER AND MORE DIVERSE PRACTITIONER BASE As assurance has expanded beyond financial information to encompass non-financial information, our standards are being used by a broader range of practitioners. This shift increases demand for implementation support, as standards are applied by users with varying levels of experience and different professional backgrounds. With multiple audiences relying on the standards and implementation resources, clear and accessible language becomes increasingly important so that key messages are interpreted consistently. This includes reflecting indigenous perspectives and cultural understandings of concepts such as risk, value, intergenerational impact, and cultural, environmental, and social impacts.

Different cultures may have different ideas about what builds trust and confidence, and may take a longer-term view to value and wealth creation, for example trust may be built first on relationships and personal values and interactions rather than through the use of an independent external third party. This may have an impact on ethical and independence considerations and behaviours.

EXPANDING STANDARDS CREATE SCALABILITY CHALLENGES FOR SMALLER AND LESS COMPLEX ENTITIES

As the audit, assurance, ethical and quality management standards have expanded in length, complexity and documentation requirements, they can be challenging to apply in a scalable way for smaller and less complex entities. For example the quality management standards are perceived as being harder to scale for smaller practitioners. This is particularly relevant in the New Zealand market as this is made up of a number of small to medium entities.

07. Accounting Firms

AFCA Desarrollos Profesionales

4 – Slightly increasing in importance

No hay espacios de manera facil en la actualidad de hoy.

BDO International Limited

4 – Slightly increasing in importance

Please see our earlier comments in respect of the need of both SSBs to be more agile and quicker to market changes in standards and issuance of guidance. While we do not underestimate the importance of including multiple voices as part of due process, there is a risk that this can be at the expense of providing guidance on a timely basis and could result in a due process which is unnecessarily long.

Both SSBs have already undertaken extensive consultations and roundtables/workshops in pursuit of information gathering. Our concern is that if this is broadened out even further, then both SSBs' Staff teams will need to spend longer working through comments with little to no perceived benefit.

It is important that this is managed appropriately – this should include:

- Ensuring that where network views are solicited that this input is obtained from network contacts (not from local firms)
 - There is clear due process – including how SSBs have responded or addressed the input provided to them during outreach
 - Summarised comments on the input provided by those taking part in outreach are captured and re-shared with those that took part in these outreach activities (with an opportunity to comment / correct the record).
- Of greater assistance would be having processes which are transparent, open and document 'how' different views have been responded to by both SSBs.

As noted in our initial comments (see Section III, Q4), both SSBs should identify better ways of working together which can in turn help drive stakeholder engagement/outreach activities in a more coordinated way. This can enable both SSBs to agree 'who' is invited, ensuring more coordination of use of experts to the roundtables rather than have both SSBs coordinate these activities separately resulting in stakeholder engagement fatigue. Doing this together will also mean a better-quality joint SSB response to the issue at hand.

Grant Thornton International Ltd (GTI)

4 – Slightly increasing in importance

Consistent with our response to Trends B.2 and B.3 – Changes in the Geopolitical and Regulatory Landscape, we recommend increased outreach with stakeholders, including users of financial statement and attest reports, investors, preparers, regulators, and practitioners, from both emerging and developed economies. This is important to meet the Public Interest Framework and to develop standards that are globally operable and can be consistently applied.

MAH, Chartered Accountants

4 – Slightly increasing in importance

PricewaterhouseCoopers International Limited (PWC)

Our approach to assessing importance

We assess this trend as broadly unchanged in importance relative to the current strategy period. Both SSBs have undertaken extensive regional and jurisdictional outreach in recent years, and we expect this level of engagement to continue as a core element of international standard setting. While diverse stakeholder input will remain important—particularly from investors, preparers and those charged with governance—we do not anticipate material shifts that would significantly alter the importance of this trend. We do, however, note the increasing importance of sufficient practitioner input throughout the standard setting lifecycle to ensure practical considerations are appropriately reflected and to avoid unintended operability issues.

Overarching comments

Given the growing role of technology across the reporting and assurance ecosystem, it will be important for the SSBs to maintain ongoing mechanisms for drawing on insights from technology experts. Timely and

sufficient practitioner input, particularly in rapidly evolving areas such as developments in use of agentic AI and broader digital transformation, will be especially important. We support the SSBs' engagement with jurisdictional standard setters and regulators and note the importance of periodically assessing representation from emerging economies to ensure stakeholder perspectives remain aligned across markets. The SSBs may also wish to consider enhancing the frequency and depth of interactions with the jurisdictional standard setters as well as the Forum of Firms and the GPPC.

Matters specific to the IESBA

The IESBA is currently exploring the potential extension of the Code's application through several active workstreams, including ethics standards for all preparers of sustainability information and profession-agnostic independence standards for sustainability assurance. These initiatives have the potential to bring within the scope of the Code individuals and entities that have not traditionally been subject to the IESBA's standards, and whose perspectives may not yet be well represented in the IESBA's consultation activities. We encourage the IESBA to ensure that its outreach in connection with these workstreams is sufficiently broad to capture the views of those who would be newly affected, including sustainability practitioners, technology professionals, and preparers of non-financial information. This will be essential to establishing a clear basis for proceeding with such workstreams and appropriate and proportionate boundaries for the Code's application and to securing broad-based support for the resulting standards.

4 – Slightly increasing in importance

RSM International Limited

4 – Slightly increasing in importance

We support efforts to increase the inclusion of emerging economies in the standard-setting process. This can provide valuable perspectives and enhance the relevance and scalability of standards. Greater diversity of input should be considered on all projects and may be beneficial, in areas such as The ISA for LCE. Involving emerging economies more actively in discussions may also support broader adoption of the international professional standards with minimal local modifications. As these economies continue to develop and become more complex, there may also be a need for additional implementation support and guidance to facilitate application of the standards.

09. Public Sector Organizations

Audit Board of Republic Indonesia

4 – Slightly increasing in importance

None

10. Member Bodies or Other Professional Accountancy Organizations

Malaysian Institute of Accountants (MIA Malaysia)

4 – Slightly increasing in importance

Our approach to assessing importance

Notwithstanding the selection indicated above, we view the prominence of this trend as largely stable when compared to the current strategic period. Both SSBs have, in recent years, conducted extensive outreach across various regions and jurisdictions. We anticipate this level of engagement will persist as a fundamental component of international standard-setting. While diverse input from stakeholders—especially investors, preparers, and those in governance roles—will remain crucial, we do not foresee significant shifts that would fundamentally alter this trend's overall importance. That said, we would highlight the increasing importance of meaningful practitioner input across the standard-setting lifecycle, to ensure that practical implementation considerations, scalability and proportionality are appropriately reflected, particularly for

SMPs and emerging economies. This may help mitigate the risk of unintended operability issues and support more consistent and effective application of the standards in practice.

Overarching comments

Given technology's increasingly pivotal role throughout the entire reporting and assurance ecosystem, it will be essential for the SSBs to maintain continuous channels for integrating insights from technology experts. Particularly in rapidly evolving domains like agentic AI and the broader digital transformation, ensuring timely and meaningful input from practitioners will be exceptionally important.

We also commend the SSBs' continued engagement with jurisdictional standard setters and regulators. We highlight the value of periodically assessing representation from emerging economies to ensure that stakeholder perspectives are comprehensively balanced across all markets. Furthermore, the SSBs might consider deepening and increasing the frequency of their interactions with jurisdictional standard setters, as well as with the Forum of Firms and the Global Public Policy Committee (GPPC).

Matters specific to the IESBA

The IESBA is presently exploring the expansion of the Code's reach through several active initiatives. These include developing ethics standards for all individuals involved in preparing sustainability information, and establishing independence standards for sustainability assurance that are agnostic to the profession. Such undertakings could potentially bring individuals and entities not traditionally governed by the IESBA's standards within the Code's scope. Their unique perspectives, however, may not yet be fully represented in current consultation activities. Consequently, we encourage the IESBA to ensure that its outreach efforts for these workstreams are sufficiently broad. This expansive engagement should actively seek the views of newly affected parties, including sustainability practitioners, technology professionals, and those who prepare non-financial information. This approach is fundamental to building a solid foundation for these workstreams, establishing appropriate and proportionate boundaries for the Code's application, and ultimately garnering widespread support for the resulting standards.

Polish Chamber of Statutory Auditors (PIBR)

4 – Slightly increasing in importance

11. Academics

European Accounting Association (EAA) Auditing, Assurance and Ethics Standard Committee

4 – Slightly increasing in importance

Kenichi Akiba (Waseda University)

4 – Slightly increasing in importance

Nicole Ratzinger-Sakel (University of Hamburg Business School)

4 – Slightly increasing in importance

12. Others

AIDS Committee of Toronto

There should definitely be more. Consensus leads to strength.

4 – Slightly increasing in importance

Cristian Emmanuel Munariz

I think the SSBs should address these issues through engagement with a broad range of stakeholders

4 – Slightly increasing in importance

Louise Willdridge (LBW Global)

4 – Slightly increasing in importance

09.05. 5 – Increasing in importance

02. Users of Financial or Non-Financial Information

First Nations Financial Management Board

5 – Increasing in importance

We support the calls for greater inclusions of diverse voices. However, we recommend re-framing the call for diverse voices slightly to include emerging economies AND marginalized communities, including Indigenous Peoples. It is without a doubt that Indigenous Peoples have been left out (at best) and specifically restricted (at most egregious) from participating in economic and financial discussions and decisions even where the associated outcomes have affected Indigenous Peoples. Pre-colonization, Canada's Indigenous Peoples had their own economies and even had words for things like "taxes". In modern times, Canada's Indigenous Peoples have their own orders of government which are rooted in their culture, traditions, languages and essential values. We urge the SSBs to seek Indigenous voices as they include more diversified voices in their work.

Impax Asset Management

5 – Increasing in importance

Impax encourages the SSBs to:

- Deepen engagement with stakeholders in emerging markets, including investors, preparers and regulators.
- Ensure standards and guidance are globally operable, scalable and sensitive to different market contexts.
- Avoid a "one-size-fits-all" approach that could inadvertently hinder adoption or quality of implementation.

Kei Tsuchiya (The Securities Analysts Association of Japan)

5 – Increasing in importance

I hold the same view as expressed in B1.

The European Federation of Investors and Financial Services Users (BETTER FINANCE)

Beyond expanding participation from emerging economies, engagement should include investors, consumer representatives, civil society organizations and end users of financial and sustainability information. Broader participation can improve both legitimacy and the practical effectiveness of standards.

5 – Increasing in importance

03. Preparers or Issuers of Financial Statements or Other Information

Ajinomoto Co., Inc.

5 – Increasing in importance

In emerging economies and growth markets, limitations in regulatory systems, human resources, and data infrastructure can make it difficult to respond at the same level as in more developed countries. Providing standards and transition approaches that take into account diverse practical environments would help promote the adoption and effective implementation of international standards.

Business Europe

5 – Increasing in importance

The boards should explore more effective ways of obtaining meaningful stakeholder input, including cooperation with regional and global outreach activities led by other standard setters and relevant organisations. It could be considered whether an assurance-related debate and/or outreach could be planned next to other events or meetings, hence reducing the travel costs for the participants and making the outreach more effective.

Another avenue to explore is whether more structured and accessible engagement formats, including shorter and more targeted online outreach, could help broaden participation. It is also important to recognise the increasingly diverse backgrounds of users, auditors and other assurance providers when designing future outreach and standards, underlining the potential in working together with other standard setters and/or relevant events.

Sevdalina Paskaleva

5 – Increasing in importance

05. Regulators and Oversight Authorities

Botswana Accountancy Oversight Authority (BAOA)

5 – Increasing in importance

No matters to highlight

Irish Auditing & Accounting Supervisory Authority (IAASA)

5 – Increasing in importance

While it is essential to the development of robust standards that the SSBs consider input from a broad range of stakeholders, it also needs to be recognised that different stakeholder groups may have differing perspectives and competing interests can arise.

In this context, the SSBs should ensure that stakeholder input is appropriately balanced and assessed, with a clear focus on maintaining the centrality of the public interest.

National Association of State Boards of Accountancy (NASBA)

5 – Increasing in importance

In addition to a greater diversity of voices, there should also be diversity of viewpoints, of thought and a tolerance for and seeking of opposing views.

Public Accountants and Auditors Board Zimbabwe (PAABZ)

We strongly are of the opinion that the global standard-setting process is currently designed for needs of high maturity markets and little consideration is given to the issues of emerging markets.

We acknowledge the developments in the past years to have representatives in the Boards as well as recognition of institutions representing emerging markets, however practitioners from emerging markets often find that global standards are becoming too complex for the local reality.

- The cost of compliance can be devastating for a small-firms.
- In smaller economies, where everyone in the business community knows each other, strict "independence" rules can be extremely difficult to apply in practice and standards sometimes do not provide sufficient guidelines.
- We therefore expect an increase in the ask for:
 - i. Scalability of standards without compromising quality.
 - ii. Implementation Support.
 - iii. Testing new standards in emerging markets before they are finalized, rather than just doing public consultations.

5 – Increasing in importance

Tokyo Stock Exchange

5 – Increasing in importance

There is a growing need to solicit diverse opinions—driven by factors such as the rise of emerging economies resulting from shifts in the balance of power and the emergence of new stakeholders due to the spread of new technologies. Consequently, situations may arise where it becomes necessary to make adjustments based on factors such as market development stage, level of contribution, and importance, in order to respect diverse views to the greatest extent possible and incorporate them into the standard-setting process.

06. Jurisdictional and National Standards Setters (JSS)

Auditing and Assurance Standards Board of Canada (AASBC)

- Broader engagement: The growing risk of increasingly complex standards and a perceived imbalanced focus on serving a narrower group of entities highlights the need for balanced and inclusive engagement. Prioritizing broad and diverse input from all key groups, including increased engagement with SMPs, without disproportionate influence by any single group, will help mitigate this risk.

5 – Increasing in importance

07. Accounting Firms

Alan Am

5 – Increasing in importance

Gats-Ratings Professionals

5 – Increasing in importance

Jack Schoeman (PWC)

5 – Increasing in importance

The main impact of this trend is the need to balance the technical leadership of the G7 with the practical realities of emerging economies. While developed markets often light the way on complex requirements, the SSBs' standards must remain scalable so they can be adopted and implemented globally without causing a divide. We do not need more legislation or more layers of regulation that make the rules even harder to follow. Instead the boards should ensure that the voices of developing nations are heard during the drafting phase to keep the end product functional for everyone. This is the only way to ensure the SSBs' framework

remains the global standard and bridges the expectation gap in a way that serves the public interest everywhere.

Piotr Witek (Moore Polska)

5 – Increasing in importance

10. Member Bodies or Other Professional Accountancy Organizations

Association of Chartered Certified Accountants (ACCA)

The importance of greater diversity of stakeholder perspectives is expected to increase, particularly given the global application of the SSBs' standards across a wide range of jurisdictions and practice environments.

Ensuring that a broad range of voices are appropriately reflected, including those from emerging economies and small- and medium-sized practices, is important to support the development of standards that are scalable, proportionate, and fit for purpose.

From an IAASB perspective, greater diversity of input may help address challenges relating to complexity and the applicability of standards across different types of entities and engagements.

From an IESBA perspective, it may support the global operability and acceptance of the Code, particularly in diverse legal and regulatory environments.

A more inclusive approach to stakeholder engagement may also contribute to improved adoption and implementation outcomes.

Overall, this trend highlights the importance of ensuring that stakeholder engagement processes continue to capture a balanced range of perspectives in a consistent and transparent manner.

5 – Increasing in importance

Chamber of Hungarian Auditors (MKVK)

5 – Increasing in importance

This trend is important because high-quality global standards need to reflect a wide range of legal, linguistic, cultural, and market contexts. Broader input from Europe, emerging economies, and smaller jurisdictions can improve operability and facilitate adoption and implementation.

Chartered Accountants Australia and New Zealand (CAANZ)

5 – Increasing in importance

We believe the SSBs should continue to seek feedback from diverse sources to produce the best outcomes in standard setting and maintain global adoption.

For the IAASB: While we support sector-neutral standards, we have received feedback that the IAASB could enhance its engagement with the public sector and consider additional mechanisms to obtain public sector input.

Consejo General de Economistas de España

5 – Increasing in importance

IAASB

There is a risk of not listening to all potential stakeholders or giving less weight to the participation, for example, of SMEs or less complex entities.

We propose to include the reference to the ISA for LCE in the text of the standards (HS) themselves, making visible that its inclusion within the regulatory framework not as an added development, but as part of the complete normative body

Malta Institute of Accountants (MIA Malta)

5 – Increasing in importance

SSBs should continue to seek input from technology experts and front line practitioners, particularly in fast changing areas such as AI and digital transformation. They should also regularly assess and strengthen their engagement with regulators and standard setters, including those from emerging economies, to ensure that the standard setting process remains inclusive and that stakeholder perspectives stay aligned with real world conditions.

Pavel Dimitrov (Union of Accountants in Bulgaria)

Greater diversity of voices is highly important for ensuring that global standards reflect the needs of all jurisdictions, including smaller economies, the public sector, SMEs, and emerging markets. A rating of 5 recognizes the strong value of broader participation while acknowledging that diversity must be balanced with due process, coherence, and the need for timely standard-setting.

5 – Increasing in importance

South African Institute of Chartered Accountants (SAICA)

Effective standard setting requires the deliberate inclusion of diverse perspectives in the Boards' agendas and due process. This includes representation from different jurisdictions, various participants in the financial reporting and assurance ecosystem, and firms of all sizes—ranging from large network firms to Small and Medium Practitioners (SMPs)—as well as other assurance providers, education and training providers, academia, regulators, and other stakeholders.

Audit committees, financial sector regulatory authorities, and Chief Financial Officer forums should be proactively engaged, as they represent key users of the audit product. Incorporating these voices is critical to ensuring that standards and related guidance are relevant, practicable, and responsive to the needs and expectations of those who rely on audit and assurance outcomes.

The SSBs should also place emphasis on enhancing their role within the broader global reporting ecosystem. In addition to developing high-quality standards, there may be value in supporting implementation and adoption more actively—particularly in jurisdictions where capacity or resources are still developing. There have been practical gaps and limitations in how consistently and effectively support has reached all stakeholders and jurisdictions. SAICA remains open to collaborate and work with the Boards in ensuring consistency in the application of the standards in the South African environment.

Greater diversity of stakeholder input is essential to:

- Ensure global applicability and adoption,
- Reflect challenges faced by emerging and developing economies, and
- Enhance the relevance and legitimacy of standards.

Without diverse input, the standards risk being perceived as regionally biased limiting uptake and effectiveness.

5 – Increasing in importance

12. Others

Eri Murakami (Wood Design Studio Inc.)

5 – Increasing in importance

Incorporate this into guidelines so that companies can apply it voluntarily, thereby enabling businesses in Japan's healthcare, design and manufacturing sectors to adopt it. Conduct negotiations and consultations.

Wai Man (Emily) Ho

5 – Increasing in importance

09.06. 6 – Strongly increasing in importance

02. Users of Financial or Non-Financial Information

International Corporate Governance Network (ICGN)

6 – Strongly increasing in importance

The SSBs should continue to broaden stakeholder input, including from emerging markets, but should also ensure that users of financial and non-financial information have a strong voice. Investors and other users are key beneficiaries of audit, assurance, ethics and independence standards, and their perspectives should be more directly embedded in outreach, standard-setting, implementation support, and post-implementation review.

Jane Wilson (Wilsojay Investments)

6 – Strongly increasing in importance

One hopes the Standards Boards will realize how severe climate censorship is and will begin to listen to other voices. It would be a mistake to listen to marginalised, petulant classes.

Jose Esposito (Credicorp Ltd.)

6 – Strongly increasing in importance

03. Preparers or Issuers of Financial Statements or Other Information

Ascendia EOOD

6 – Strongly increasing in importance

Stronger coordination with subject matter experts and Organizations in different areas - sustainability, risk management, cyber, forensic and etc.

Japan Business Federation – Keidanren

As with B-1

6 – Strongly increasing in importance

06. Jurisdictional and National Standards Setters (JSS)

Brazil Institute of Independent Auditors (IBRACON)

6 – Strongly increasing in importance

Consideration for the relationship between looking to emerging economics with the changes in the global environment – BRICS
importance on the global commerce, for example.

GLASS Group of Latin American Accounting Standard Setters (GLENIF)

- Seek diverse opinions to consider adjustments or new regulations.
- More inclusive and representative standardization processes; strengthening participation mechanisms. • Essential to determine the degree of need and applicability of the regulations.
- Inclusion of diverse perspectives, especially from emerging economies.
- National social safety nets (NSNs) can no longer rely solely on traditional experts; broader deliberative pluralism is needed.

6 – Strongly increasing in importance

Saudi Organization for Chartered and Professional Accountants (SOCPA)

6 – Strongly increasing in importance

07. Accounting Firms

Baker Tilly International

6 – Strongly increasing in importance

As economies such as Africa and Latin America continue to emerge, to maintain globally relevant standards, their voices must be heard. This could mean changes of emphasis and focus. Standards cannot be seen as developed by developed economies and imposed on emerging economies.

Krzysztof Burnos

6 – Strongly increasing in importance

Need for the simplification.

Kudos International

As stated earlier- this is vital. Randomly email and arrange meetings with SMPs globally that you do not currently engage in. reach out directly on linked in. use external agencies

6 – Strongly increasing in importance

Shreekant Prasad (Govindham Consultancy Services)

6 – Strongly increasing in importance

08. Sustainability Assurance Providers other Than Accounting Firms

Anum Atique (Islamic Non Banking Financial Institution)

6 – Strongly increasing in importance

Keung Ho Keung Ricky

6 – Strongly increasing in importance

10. Member Bodies or Other Professional Accountancy Organizations

Asociación Interamericana de Contabilidad (AIC)

6 – Strongly increasing in importance

Voces complementarias dentro de los entes regionales, gobiernos y sector de usuarios de la información financiera.

Institute of Public Accountants (IPA)

6 – Strongly increasing in importance

IPA is of the view that traditionally, larger economies are often the ones that have the resources and might to voice their views and influence proposed standards. This contrasts to the smaller and emerging economies that may not be in the position to do so.

We think that for the SSB to remain the pre-eminent standard-setting bodies for high quality standards for global adoption, it is important that the SSB makes a concerted effort to consult the emerging economies to ensure their voices are included.

Pan African Federation of Accountants (PAFA)

6 – Strongly increasing in importance

The increasing demand for broader and more inclusive participation in international standard-setting is a critical development for the legitimacy and effectiveness of the IAASB and IESBA.

From an African perspective, it is essential that the perspectives of emerging and developing economies, smaller jurisdictions, and diverse market participants are more systematically integrated into agenda-setting, technical development, and decision making processes.

This is not only a matter of representation, but also of effectiveness: greater diversity of voices improves the relevance, practicality, and global operability of standards, particularly in jurisdictions with different institutional capacities and economic structures.

Strengthened engagement with African PAOs, regulators, and regional bodies will enhance both the legitimacy and implementation success of standards, ensuring they better serve the global public interest.

11. Academics

Kiran Seth (Sunway University)

6 – Strongly increasing in importance

12. Others

Kazuhiro Yoshii (Securities Firm)

6 – Strongly increasing in importance

Mahmoud Bilal (Unimar)

6 – Strongly increasing in importance

09.07. Letters providing separate ratings for IAASB or IESBA

06. Jurisdictional and National Standards Setters (JSS)

Accounting Professional & Ethical Standards Board (APESB)

5 – Increasing in importance

Matters for the IESBA:

APESB notes that the public interest is best served when standard setting is informed by a balanced set of perspectives. APESB highlights that the newly established joint user group is a positive development; additional mechanisms may be required to ensure that diverse viewpoints, including those from the public sector, smaller jurisdictions, emerging markets and small and medium-sized practices, are systematically incorporated into the IESBA's work.

In APESB's view, strengthening the diversity of input into the standard-setting process will support more globally consistent outcomes, reduce the risk of fragmentation and enhance the credibility and applicability of the Code across a wide range of geopolitical and regulatory contexts.

Feedback from Australian stakeholders suggests that some perceive it as complex, despite its principles-based nature, and that there is an ongoing need for IESBA to ensure scalability, particularly for smaller practices and jurisdictions with varying levels of regulatory maturity. This was identified by Australian stakeholders as an ongoing challenge that IESBA should keep in mind when revising standards.

American Institute of Certified Public Accountants - Professional Ethics Executive Committee and Auditing Standards Board (AICPA PEEC & AICPA ASB)

IESBA and IAASB rating: 4

The following considerations are intended to help guide the SSBs in prioritizing the needs of the accounting profession as the primary stakeholders affected by the SSBs' standards:

- Strive for an appropriate weighting of perspectives in project selection and standard setting, giving due consideration to the substance of all input regardless of source. Remain unbiased regarding the source of input and give due consideration to the substance of all feedback.
- Though the public is the ultimate beneficiary of the SSBs' standards, the accounting profession is the primary user of SSB standards. It is important to ensure the standards remain practical and operable for professional accountants across diverse firm sizes.
- Increasing the number of perspectives is not as critical as the qualifications and technical experience of those providing perspectives.
- Strengthening the research rigor and evidence basis for SSB action should be a guiding element in respective outreach. More statistically rooted outreach and research can mitigate potential biases in outreach design, evidence collection and related analysis.
- More frequent and intentional outreach with JSSs is vital for the SSBs to achieve global acceptance and adoption of your standards.

4 – Slightly increasing in importance

Australian Auditing and Assurance Standards Board (AUASB)

5 – Increasing in importance

See B.2 above.

Institut der Wirtschaftsprüfer (IDW)

3 – Slightly decreasing in importance

There needs to be greater recognition of the impact of standard setting on the world's largest economies, whether traditionally established or more recently developed. There also appears to be an overemphasis on the voices of regulators and common law jurisdictions. At present, regulatory feedback appears to carry outsized influence in agenda-setting and in the development of requirements, with too little emphasis on day to day workability for professional accountants—particularly those in smaller firms and organizations. Any new requirements should be underpinned by clear, evidence-based analysis demonstrating a specific shortcoming in the Code or IAASB standards and a well-articulated public-interest case for change of global impact.

Nordic Federation of Public Accountants (NRF)

While diversity of perspectives is valuable, this is not a new concept; the boards have long engaged with a broad range of stakeholders, and it remains essential that they continue to do so.

At the same time, the primary objective must remain the development of clear, practical, and globally applicable standards that support high quality engagements and respond to the expectations and needs of major stakeholders — including, importantly, the accountancy and audit profession. Ensuring that the standards are usable across different firm sizes, business models, and jurisdictions is fundamental to their credibility and adoption.

In our view, the focus should therefore be on maintaining a balanced and inclusive approach to stakeholder engagement, while keeping the central purpose of standard setting firmly in view.

3 – Slightly decreasing in importance

07. Accounting Firms

Ernst & Young Global Limited (EY)

6 – Strongly increasing in importance

Given the accelerating pace of technological, regulatory, and geopolitical change, timely and direct input from practitioners will be increasingly important to ensure standards and guidance remain relevant, implementable, and responsive to emerging issues. However, as a result of the 2020 Monitoring Group reforms, practitioners' input has been reduced, diminishing the Boards' ability to receive perspectives from those uniquely positioned to provide real-time insight into how changes are affecting audit and assurance engagements in practice, where standards may require clarification, and where additional guidance could support consistent, high quality application.

The PIF requires balancing of viewpoints from diverse stakeholders. Without robust practitioner engagement, the evidentiary base is incomplete. Practitioners are a core stakeholder group and a primary source of implementation evidence. Where practitioner input is limited or not demonstrably reflected in outcomes, questions can arise as to whether the process fully meets the requirements of the PIF.

In parallel, it is equally important for the Boards to hear from those charged with governance (e.g., audit committees) the matters of greatest concern to them and how evolving expectations are influencing oversight and decision making. Enhanced engagement and coordination with established forums representing this perspective, such as the International Corporate Governance Network (ICGN) or the Asian Corporate Governance Association (ACGA), as well as the newly formed IAASB and IESBA Joint User Advisory Group (UAG), should help ensure standards and guidance continue to meet the needs of both the profession, and key stakeholders in the public interest.

KPMG International Limited

2 – Decreasing in importance

IAASB – 2 Decreasing in importance, IESBA – 2 Decreasing in importance

We expect the trend of "Greater Diversity of Voices Sought" to decrease in importance over the survey period, relative to other significant trends identified by the SSBs. Although we believe that ensuring a diversity of perspectives remains an important element of the SSBs' due process and stakeholder engagement, we consider that existing consultation mechanisms are generally appropriate.

In an increasingly uncertain and dynamic environment, we recommend that the SSBs give greater focus to using stakeholder input more strategically to support broad adoption and consistent implementation of the SSBs' standards across jurisdictions, rather than attempting to seek views of an ever broader stakeholder group. As discussed further at B2, this includes the need to understand any barriers, whether actual or perceived, to adoption and implementation of both IAASB standards and the IESBA Code.

In this context, the IESBA should also consider whether its outreach strategy aligns with the intended focus of its projects. While engagement with the Forum of Firms, regulators, and standard setters is appropriate given their influence and reach, there is value in ensuring the most relevant voices for the specific issues under examination are appropriately prioritized.

09. Public Sector Organizations

United States Government Accountability Office (GOA)

5 – Increasing in importance

We believe that greater outreach to practitioners in emerging economies is desirable. In economies where the concepts of accountability and assurance services are less mature, it may be challenging to adopt and adhere to standards that are overly lengthy and complicated. Increasing the diversity of voices heard in developing the standards should promote greater adoption of IAASB and IESBA standards.

10. Member Bodies or Other Professional Accountancy Organizations

Accountancy Europe (AE)

0 – I do not agree that this is a trend to be considered

While diversity of perspectives is valuable, this is not a new concept and should not be presented as such. There is already extensive engagement, including numerous roundtables and consultations.

The priority should not be more outreach, but more effectively use of the output. In particular, greater emphasis should be placed on properly analysing and reflecting the balance of stakeholders' feedback, including from the accountancy profession as the buy-in of those applying the standards is crucial.

There is also a need for more balanced and inclusive formats, such as multi-stakeholder discussions, which allow different perspectives to be heard and challenged in a single forum.

In addition, the board composition of SSBs should include a wide variety of stakeholders, including the profession. IAASB rating: 0 I do not agree that this is a trend to be considered IESBA rating: 0 I do not agree that this is a trend to be considered

Global Accountancy Alliance (GAA)

Combined Rating: 4

At present, regulatory feedback appears to carry outsized influence in agenda-setting and in the development of requirements given the PIF was developed by the Monitoring Group and in the prominence in which the Monitoring Group feedback is highlighted over the preponderance of other feedback. Any new requirements should be underpinned by clear, evidence-based analysis demonstrating a specific shortcoming in the standards and a well-articulated public-interest case for change with a global impact.

4 – Slightly increasing in importance

Institute of Chartered Accountants in England and Wales (ICAEW)

IAASB rating: 0

IESBA rating: 0

Although we have assigned scores of '0' as a standard-setting project, we highlight the need for the SSBs to:

- give equal weight to the views of the wider profession; and

- consider how to build on the (welcome) contributions of IFAC's SMPAG to capture the diversity of views available in the profession from other representatives of small and medium-sized practice.

ICAEW notes the extensive outreach and engagement undertaken by IESBA on a number of recent projects. It is not clear that further action is required in this area.

0 – I do not agree that this is a trend to be considered

Institute of Chartered Accountants of Scotland (ICAS)

4 – Slightly increasing in importance

Combined IESBA and IAASB – Rating - 4

We believe the issue is that insufficient consideration is being given to the voice of the accountancy profession whose members have to comply with the Code. This has been particularly noticeable since the introduction of the Monitoring Group's revisions to the standard setting board model.

We therefore believe that the SSBs should give greater weight to practitioner experience to counterbalance the risk of regulatory perspectives dominating the SSBs' agenda setting. Any new requirements should be supported by clear, evidence-based analysis of a specific deficiency in the Code/standards and a well-articulated public-interest case with global relevance.

International Federation of Accountants (IFAC)

4 – Slightly increasing in importance

IFAC supports greater diversity of voices in the SSBs' outreach and standard-setting processes. This should include not only greater geographic diversity, but also stronger representation of SME, SMP, preparer, practitioner, PAO, user and implementation perspectives.

Greater diversity of voices should be pursued to improve the quality, proportionality, scalability, adoptability, and operability of standards. It should not be limited to obtaining more comments from more jurisdictions. The SSBs should ensure that those most affected by standards are meaningfully engaged early in the process, before major projects are undertaken and before key technical directions are effectively settled.

In particular, IFAC believes the SSBs should strengthen input from stakeholders with practical experience applying standards in SME and SMP environments, as well as from jurisdictions with different levels of capacity and implementation maturity. This is essential to understanding whether standards are sufficiently scalable, understandable, cost-effective, and capable of consistent implementation across diverse environments.

For both the IAASB and IESBA, this means strengthening practical implementation input early in the standard-setting process, not only during exposure. For the IAASB, this is particularly relevant to standards intended to be scalable or applicable to less complex entities. For IESBA, it is relevant where the Code is intended to operate globally across different structures, markets, professional roles, and regulatory environments.

09.08. No rating provided but with comments

10. Member Bodies or Other Professional Accountancy Organizations

CPA Australia

0 – I do not agree that this is a trend to be considered

B.4 Greater diversity of voices sought:

Treat as an engagement and operability imperative—expand and rebalance outreach to include users, preparers, SMPs perspectives, and test scalability early. While the majority of practitioners operate in the SMP segment, these firms are often resource constrained and therefore unlikely to provide feedback directly. Instead, they rely on PAOs or bodies such as IFAC's SMP Advisory Group to represent their views through formal submissions to the SSBs. Accordingly, feedback received through an SMP lens should be given appropriate weight and not dismissed as a small qualitative sample (for example, "1 out of 20 responses" or a notional 5%).

The desired "response" is primarily process-oriented (how the SSBs develop and support standards), rather than new standards. Success should be measured through acceptance and implementability across jurisdictions and firm sizes.

09.09. No specific response

01. Monitoring Group

International Federation of Independent Audit Regulators (IFIAR)

International Organization of Securities Commissions (IOSCO) Committee

02. Users of Financial or Non-Financial Information

Sarasin & Partners

05. Regulators and Oversight Authorities

Canadian Public Accountability Board (CPAB)

Committee of European Auditing Oversight Bodies (CEAOB)

Public Company Accounting Oversight Board (PCAOB) – Views of the PCAOB Chief Auditor