

2. (untitled)

1. From which perspective are you providing this feedback? [* Required where indicated]

Professional accountant in public practice

Please provide the following contact information:

First Name

Last Name

Job Title/Role

Email Address

Organization Name (if applicable)

2. In which country or jurisdiction do you or your organization work or serve? (If international, please indicate so; if a region of the world, please indicate which region)

If country, please select country?

New Zealand

OR if a region of the world, please indicate which region:

OR if international, please indicate by ticking the box:

3. (untitled)

B.1 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

this is becoming an area that should be prioritised.
some issues as auditors we see:

ethical issues around those accountants who receive commission, own shares in, or receive other benefits from accounting software providers for getting clients to sign up to particular software.

accountants refusing access to their accounting software to the auditors, when it is the client data contained in that software.

issues around accountant preparing year end financials on their own software, and not concurrently updating the clients accounting software

B.2 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

no comments

B.3 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

you should also refer to the New Zealand definition which is more broader.

B.4 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

no comments

B.5 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

no comments

B.6 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

materiality should be more fully defined across all standards.

B.7 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

audit firms dont require any more changes, we have had enough.

current auditing standards are sufficient in regards to communication, and should be left to the auditors judgement

B.8 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

it will only end up being an exercise of tick the box templates. no change required.

B.9 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

there is also an issue with employees being familiar with the client, eg audit manager, auditors working on a client for several years, consideration should be given to the whole audit team not just the employer.

4. (untitled)

B.10 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

no comments

B.11 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

definitely need to expand the definition of the term mployee.

i find that just because we are part of a network, does not mean there is any independence threat, in most cases we only share the same name, and have nothing to do with the other office day to day. it should be left to our judgement as to whether there is a threat and we should be given the opportunity to remove the threats as long as documentation is provided.

I note that it is common for the big 4 to provide other services to audit clients, more focus should be given to this and why they are allowed to do so.

B.12 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?

no comments

B.13 Do you have any specific comments on this topic and, in particular, why

this topic should or should not be prioritized?

no comments

Are there any trends, developments or issues not otherwise covered in this section that you would rank in your top six priorities? If so, please explain why.

no comments

Please rank your top six priorities among items B.1 to B.13 above (1 being highest and 6 being lowest).

1. B.1 Trends and developments in technology and innovation
2. B.6 Materiality
3. B.7 Communication with those charged with governance
4. B.3 Concepts of "public interest entity" and "listed entity"
5. B.2 Emerging or newer models of service delivery
6. B.11 Definitions and descriptions of terms

5. (untitled)

C.1 Do you have any comments on any of the above activities or initiatives? In particular, do you believe any of them should not be a strategic priority for the IESBA and, if so, why? Please be as specific as possible.

no comments

C.2 Are there any specific activities or initiatives you believe the IESBA should undertake to promote further adoption and more effective implementation of the Code? If so, please explain why.

no comments

6. (untitled)

D.1 Are there any particular matters you believe the IESBA should consider in relation to any one of these pre-existing commitments? Please be as specific as possible and explain your reasoning.

a firm should continue to be allowed to provide services in emergency situations.

furthermore, it should be left to our judgement as to whether or not our independence would be compromised if a network firm provided services to a listed client.

for example, we have a listed company who would like to engage the services of a network firm tax partner because of her experience in that field. under current rules, this is not allowed. However we would argue that the client should be allowed to engage the network partner; because: the audit team is based in another city, the tax partner does not own the audit firm or have anything to do with the audit team on a day to day basis. The only thing in common with the tax partners firm is the name. it would be beneficial to our client to engage an experienced tax expert. the team would treat the audit of the tax area as any other client and would not hesitate to question the client on any area of the tax calculation.

there would be no issue if this was not a listed entity.

therefore we see that as long as there is sufficient documentation over independence, our client should be allowed to use our network tax partner.

7. (untitled)

Section E: Any Other Strategic Matters

E.1 Are there any other matters of strategic importance not covered elsewhere in this survey or your earlier responses that you believe the IESBA should consider as it positions the Code for 2025? Please be as specific as possible.

nothing other than what has already been documented

8. (untitled)

3. Please confirm that you have completed all your responses?

Yes