

## 2. (untitled)

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

Other, please specify:: Technical consultant to CPA firms

**Please provide the following contact information:**

**First Name**

Ralph

**Last Name**

Nach

**Job Title/Role**

Principal

**Email Address**

RNach@EpsteinNach.com

**Organization Name (if applicable)**

Epstein Nach LLC

**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?*

United States

**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?**

These are timely and forward-looking issues that should be a high priority due to the velocity of new developments and the need to stay ahead of the curve.

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

Very relevant and this should be given thoughtful consideration.

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

**B.4 Do you have any specific comments on this topic and, in particular, why**

***this topic should or should not be prioritized?***

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

This is very important. I remain convinced that independent auditors be banned from providing any tax-related services to clients for which independence is required. I hold this position because, in the US, these services are considered advocacy services. It is unreasonable to expect a CPA or firm of CPAs to be objective with respect to a client on whose behalf they are serving as an advocate.

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

Sounds like a worthy undertaking.

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

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

Documentation of the identification and resolution of ethics issues should be robust.

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

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?***

This should definitely be examined.

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

This merits attention.

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

Given the extent of changes, this should be performed.

***B.13 Do you have any specific comments on this topic and, in particular, why this topic should or should not be prioritized?***

This will be difficult to resolve globally due to different cultures and longstanding statutes in countries that are inconsistent.

***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.***

The inherent lack of independence in both listed and non-listed companies that arises because the auditee directly engages and compensates the auditor. I refer you to the writings of Professor Joshua Ronen. Joshua Ronen is a professor of accounting at New York University Stern School of Business. This issue deals with a longstanding systemic structural defect that, unless straightforwardly resolved, will banish the CPA profession to the same standing as the U.S. Ratings agencies that failed so miserably in the Great Recession. The auditor should be solely accountable to financial statement users.

***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.2 Emerging or newer models of service delivery
3. B.8 Documentation
4. B.6 Materiality
5. B.5 Tax planning and related services
6. B.12 Post-implementation review of the restructured Code

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.***

***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.***

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.***

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.***

8. (untitled)

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

Yes