2. (untitled)

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

Representative of an IFAC member body

Please provide the following contact information:

First Name

Sara

Last Name

Orback

Job Title/Role

Secretary FAR Ethics Policy Group

Email Address

sara.orback@far.se

Organization Name (if applicable)

FAR

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?

Sweden

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?

FAR finds that this topic is of great importance. The above stated questions should be continually discussed and monitored. Knowing that the IESBA considers matters of how technology affects ethics is of great value to IFACs members.

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

As with B.2, FAR finds that the IESBA should prioritize this matter. Both B.1 and B.2 impacts on decisions made by firms, both strategically and everyday.

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

This issue is relevant for FAR, as Sweden is a member of the EU. FAR is of the opinion that the IESBA should as far as possible strive to accept national definitions of key concepts.

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

FAR does not find that the IESBA needs to give guidance on this subject, as those affected by it have functioning systems in place to deal with the issues involved.

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

FAR finds this to be an important subject that should be discussed and analysed.

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

FAR does not find this a topic that needs to be prioritized.

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

FAR does not find that this topic neees to be prioritized. This topic seems to relate more to clients than to PAs.

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

FAR does not find that documentation is a matter that the IESBA needs to prioritize. There should be no documentation requirement in the Code.

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

FAR does not find that this needs to 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?

FAR finds that optionality should not be eliminated. Guidance as to actions to stop the breach would be useful. How can a breach be mended? This should be a prioritized topic.

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

FAR has no specific comments, but finds that differences in the defintions of the Standards should be the same (and any differences that might be necessary should be highligted. This should be a prioritized topic as it would serve to simplify the application of the Code.

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

Even if it is not among the top 6, it is evidently important to review the restruction of the Code once it has been implemented.

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

FAR does not find that this is topic that needs to be prioritized at presence.

***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.**

FAR finds that there have been a great number of changes to the Code and the professional accountants
have a difficult time keeping up with constant new regulations. FAR finds that a topic that should be
prioritized by the IESBA is a general oversight of the contents of the Code and if some of the regulations
there are necessary. Could the Code be scaled down? Some regulations in the Code might have a greater
impact if they were not in the Code but in a seperate document. Should there be a Code with a core-
substance where the principal based approach prevails, complemented by other regulatory documents on
specific topics?

***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.10 Breach of the Code
4. B.11 Definitions and descriptions of terms
5. B.3 Concepts of "public interest entity" and "listed entity"
6. B.5 Tax planning and related services

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.**

Seaking international convergence should be a particularly priortized initiative.

***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.**

See answer under B.13. The IESBA should consider scaling down the Code, giving priority to the
fundamental principles and the principle based approach.

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.**

FAR finds that the development of the e-Code should be a top priority.

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.**

FAR would like to repeat that the IESBA should consider scaling down the Code. See previous answer under B.13.

8. (untitled)

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

Yes