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24 April 2026

## **The Evolving Role of the CFO: IESBA Extended Survey 2026 – Other Stakeholders**

Dear Gabriela,

We refer to the survey mentioned above on the evolving role of the CFO.

IDW has decided not to respond to the survey itself, but to share our views in this letter.

We do not consider that the evolving role of the CFO is a matter that IESBA should work on.

We acknowledge that the role of CFOs is evolving and that CFOs can be members of the audit and accounting profession to whom the IESBA Code of Ethics (the Code) applies. However, in our view, the Code in its current form is sufficient to support CFOs who are members of the profession in their ethical behavior.

GESCHÄFTSFÜHRENDER VORSTAND:  
Melanie Sack, WP StB, Sprecherin  
des Vorstands;  
Dr. Torsten Moser, WP;  
Dr. Daniel P. Siegel, WP StB

Amtsgericht Düsseldorf  
Vereinsregister VR 3850

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The CFO role cannot be consistently defined at a global level, nor is it necessarily assigned to a single individual. Some individuals perform a hybrid role, e.g. being a CFO and a CEO. In addition, not all CFOs globally are qualified professional accountants. There are jurisdictions that do not have PAIBs from which to source CFOs.

Non-PAIB individuals will not be subject to the IESBA Code - their employing organization may or may not have internal codes to which they are required to adhere. Thus, adherence to the Code by many CFOs will not be subject to any form of oversight.

Were IESBA to further a CFO-related project it could ultimately be detrimental to public trust in the recognized audit and accounting profession because such a project could appear to promise global consistency in ethical business behavior by all in CFO-type roles that IESBA is not in any position to deliver.

In addition, as we know that IESBA is conscious of its limited resources, we think that IESBA's resources should be spent on projects that are of actual value to the audit and accounting profession. It should be taken into account that the associated costs are justified by the benefits.

Yours sincerely,

Torsten Moser  
Executive Director

Sebastian Kuck  
Director European Affairs