



2 April 2026

To: **Members of the Hong Kong Institute of CPAs**  
**All other interested parties**

**INVITATION TO COMMENT ON INTERNATIONAL ETHICS STANDARDS BOARD  
FOR ACCOUNTANTS (IESBA)'S SURVEYS FOR POST-IMPLEMENTATION  
REVIEWS (PIR) OF NOCLAR STANDARD AND THE RESTRUCTURED CODE  
(SURVEYS)**

***Comments to be received:***  
***Survey on Restructured Code (by 3 June 2026)***  
***Survey on NOCLAR (by 30 June 2026)***

The Hong Kong Institute of Certified Public Accountants' (Institute) Ethics Committee (EC) is seeking comments on the Surveys which have been posted on the Institute's webpage for [Code of Ethics](#).

The IESBA invites stakeholders to participate in the two Surveys as part of its PIRs of the provisions of the Code addressing [Responding to Non-Compliance with Laws and Regulations \(NOCLAR\)](#), and the [Restructured Code](#).

The NOCLAR provisions in sections 260 and 360 of the *Code of Ethics for Professional Accountants (including International Independence Standards)* (Code) establish a response framework to guide professional accountants in how best to respond to actual or suspected NOCLAR committed by a client or employer, those working in a management or governance role within the client or employer, or others working for or under its direction, in the public interest.

The Restructured Code improves understanding and consistent application of the fundamental principles of ethics, facilitates global adoption and translation, and strengthens confidence in the Code as the international benchmark for ethical behavior in the accountancy profession.

The Surveys aim to assess whether the NOCLAR provisions and the Restructured Code are achieving their intended objectives by identifying benefits and implementation challenges, and to inform any actions the IESBA may need to take in response.

The Surveys will gather insights on:

- **Adoption** – whether and how the provisions have been adopted, including any modifications and reasons for such modifications;
- **Implementation** – challenges faced and lessons learned;
- **Enforcement** – enforcement responsibilities at the local level; and
- **Impact** – benefits and outcomes achieved and factors influencing success.

**HKICPA Analysis: Potential Impact of the IESBA's Surveys**

The Survey results will inform the IESBA's assessment of whether the NOCLAR provisions and the Restructured Code have achieved their intended purpose by identifying:

- Benefits from applying the NOCLAR provisions and the restructuring of the Code;
- Practical challenges or questions regarding (i) implementation of the NOCLAR provisions and (ii) the understandability and usability of the Code, including whether they are being consistently understood and applied.

Based on the findings, the IESBA will determine whether any further actions are necessary regarding these standards. It may conclude that no further action is required or take one or more of the following actions:

- Undertake further information-gathering;
- Initiate standard-setting; or
- Develop non-authoritative materials or other initiatives.

### **How to Comment on the Surveys**

In accordance with the Institute's due process, comments are invited from any interested party. Comments should be supported by specific reasoning and should be submitted in written form. To allow your comments to be considered, comments are requested by the due date shown above and should be sent by e-mail to: [commentletters@hkicpa.org.hk](mailto:commentletters@hkicpa.org.hk).

Comments will be acknowledged and may be made available for public review unless otherwise requested by the respondent.