

AGENDA PAPER

Item Number: 11
Date of Meeting: 26 March 2026
Subject: The Role of CFOs – Response to IESBA global stakeholder survey

Action Required **For Discussion** **For Noting** **For Information**

Purpose

To develop a Board response to the IESBA global stakeholder survey to inform its Role of CFOs project.

Background

The IESBA [Role of CFOs](#) workstream was established in September 2025. The project was developed to address the evolving nature of the finance leadership function and the emerging ethical challenges that accompany this evolution. The objectives of the project are to understand better:

- How the CFO role is evolving across industries, sectors, and jurisdictions;
- Whether this evolution has resulted in new or additional ethical challenges; and
- Whether the ethical framework in the IESBA Code remains clear, relevant and fit for purpose in supporting ethical decision-making in these environments.

As an initial evidence-gathering step, IESBA conducted a [CFO Pulse Survey](#) in 2025. The survey results provided preliminary insights into the diversity of professional backgrounds among CFOs and equivalent senior finance leaders.

These results also highlighted the need for broader stakeholder engagement to understand better how ethical decision-making operates in practice, the challenges CFOs face, and how professional ethical standards are applied across different jurisdictions and sectors.

In February 2026, IESBA launched [extended global stakeholder surveys](#) to gather a deeper and more globally representative understanding of:

- The ethical challenges CFOs (or equivalent senior finance roles), whether in business or in the public or non-profit sector, face;
- How effectively the IESBA Code supports ethical responsibilities and expectations; and
- Potential actions the IESBA could take, including guidance or other resources it could commission, to support and strengthen ethical leadership in finance functions.

Two surveys have been issued, with responses due to the IESBA by **24th April 2026**:

- **CFOs and equivalent senior finance leaders** survey (regardless of title or professional body membership); and
- **Other stakeholders** survey – including professional accountancy organisations, regulators, investors, audit committees, governance bodies, and academics.

Matters for Consideration

The purpose of this Board discussion is to consider APESB's response to the 'other stakeholder' survey issued by the IESBA. The relevant survey questions are provided in **Appendix A** to this Board paper. Technical Staff have also incorporated suggested draft responses for the Board's consideration and discussion.

Way forward

Technical Staff will finalise and submit APESB's response to the IESBA 'other stakeholder' survey, reflecting the views expressed at the meeting.

Staff Recommendation

The Board provide feedback on the IESBA survey questions to incorporate into an APESB response to the IESBA 'other stakeholder' survey.

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Date 6 March 2026

Appendix A – Relevant survey questions for Board response

Section 3: Perspectives on CFO Responsibilities and Ethical Context

Question 9

From your perspective, how has the CFO role evolved over the past five years? (Select all that apply)*

- Expanded to include risk management, compliance and/or internal controls
- Expanded to include sustainability/ESG reporting
- Expanded to include technology, data governance, and/or AI oversight
- Increased direct engagement with, or requirements to meet the needs of, investors, regulators, or other external stakeholders
- Increased focus on organizational culture and ethical leadership
- Largely unchanged
- Reduced in scope (please specify): *
- Other (please specify): *

Question 10

In your experience, have these changes resulted in new or additional ethical challenges for CFOs? *

- Yes (please specify): *

The evolution and expansion of the CFO role have introduced new and complex ethical challenges. In particular, in relation to risk management, technology and AI governance and sustainability/ESG reporting.

In many of these areas, regulatory and legislative frameworks are nascent, and expectations continue to change rapidly. As a result, CFOs are often required to exercise significant professional judgment in determining appropriate approaches to new challenges.

Responding to this rapidly evolving landscape can create uncertainty and pressure for CFOs, especially where guidance is limited and/or open to interpretation. In addition, CFOs are increasingly being required to take responsibility for decisions in these areas, which often have strategic, financial, and reputational implications. This responsibility increases the ethical responsibilities of the CFO role.

- Somewhat (please specify): *
- No
- Not sure

Question 11

What do you consider to be the most significant underlying causes of the ethical challenges CFOs face?* (Only answer this question if answered Yes or Somewhat to Question 10)

The most significant underlying causes of ethical challenges CFOs face are technology and AI. In this area, regulatory frameworks and internal governance processes are often unable to keep pace with the pace and scale of change. Subsequently, CFOs are being required to exercise significant judgment in areas where guidance is limited or evolving.

Further, CFOs are increasingly accountable for outputs generated by AI systems, and increased reliance on complex data systems and AI tools raises ethical concerns. In addition, commercial pressure to rapidly adopt new technologies for efficiency or competitive advantage can create tension with the need for controls and responsible implementation.

Question 12

Which ethical or governance frameworks typically apply to CFOs in your jurisdiction? (Select all that apply) *

- Corporate governance or stewardship codes
- National or industry-specific ethical requirements
- Codes of ethics set by PAOs
- Internal corporate codes of conduct
- The IESBA Code
- Legislative or regulatory requirements
- Not sure
- Other (please specify): *

Question 13

How effective are these ethical or governance frameworks in guiding CFOs through ethical dilemmas? * (Do not answer this question if answered Not sure to Question 12)

- Effective
- Partially effective
- Not effective
- Not sure

Question 14

In your experience, does a CFO's professional background influence how they identify and respond to ethical issues?*

Yes (please specify how): *

CFOs who come from an accounting background and who are members of a professional accounting body are bound by the IESBA Code or its Australian equivalent APES 110. As a result, they are typically familiar with the fundamental principles, the conceptual framework approach to identifying threats, and the importance of safeguards.

However, CFOs who do not come from an accounting background may not be subject to the same professional ethical framework or continuing professional development requirements. Given the expanding scope and complexity of the CFO role, this difference in background can influence how ethical risks are identified, assessed and addressed in practice.

Somewhat (please specify how): *

No

Not sure

Question 15

Do you/your organization place value on CFOs being members of a professional accounting body?*

Yes – this contributes meaningfully to confidence in ethical conduct:

Sometimes – depends on context

Rarely or not at all

Not sure

Section 4: Views on the IESBA Code and Related Ethical Expectations**Question 16**

How familiar are you with the IESBA Code and its relevance to CFOs?*

Very familiar

Somewhat familiar

Aware but not familiar

Not aware

Question 17

To what extent do you believe the IESBA Code provides sufficient practical guidance for CFOs to deal with ethical challenges? *

- Sufficient and practical
- Partially sufficient and/or practical – (please specify): *

Additional application guidance is needed on technology, data governance, and AI to support CFOs in navigating the rapidly evolving ethical challenges in these areas.

- Insufficient (please specify): *
- Not relevant (please specify): *
- Not sure

Question 18

Does the IESBA Code sufficiently promote ethical leadership and culture within finance functions?*

- Yes
- Somewhat (please specify): *

While the Code establishes important high-level principles, additional practical guidance would be valuable to help CFOs promote ethical leadership and culture. In particular, given the CFO's key role in influencing organisational culture, additional guidance and illustrative examples would help to strengthen the Code's practical relevance for CFOs.

- No (please specify): *
- Not sure

Question 19

Could the IESBA Code better support collaboration between CFOs, boards, audit committees, and external auditors, from an ethical perspective?*

- Yes (please specify): *

While the fundamental principles and the Conceptual Framework have universal application, the Code could more explicitly address how these principles operate in the context of interactions between CFOs, boards, audit committees, and external auditors. Given that ethical tensions often arise between these roles, for example, in areas involving judgment, disclosure and risk oversight, additional guidance would be beneficial.

For example, additional practical examples illustrating how the Conceptual Framework can be applied in situations involving disagreement, pressure or conflicting expectations among these parties would be beneficial.

- Somewhat (please specify): *
- No
- Not sure

Section 5: Future Guidance and IESBA Action

Question 20

Which additional materials or support would be most useful for CFOs? (Select all that apply)*

- Case studies or practical examples
- FAQs or short guidance notes
- Practice aids/implementation tools
- Webinars or workshops
- Awareness materials for boards and audit committees
- Additional materials are not required
- Other (please specify): *

Question 21

Which areas should the IESBA prioritize in any future work related to CFOs? (Select up to three)*

- Ethical leadership and culture
- Sustainability reporting and non-financial information
- Technology, data, and AI governance
- Pressure, incentives, and organizational dynamics
- Collaboration with those charged with governance
- Application of the IESBA Code for CFOs who are not professional accountants
- Not sure
- Other (please specify): *