IESBA Post-Implementation Review (PIR) Survey
Structure of the IESBA Code

Introduction

This survey is only applicable to respondents that have adopted or use or benefit from the 2018 or later edition of the International Code of Ethics for Professional Accountants (including International Independence Standards) (the Code). Part 5 of the Code as contained in the International Ethics Standards for Sustainability Assurance (IESSA) is outside the scope of this survey and only becomes effective in December 2026.

1. The International Ethics Standards Board for Accountants (IESBA) is conducting a post-implementation review of the structure and drafting of the Code.

2. This survey seeks to obtain input from a broad range of stakeholders to enable the IESBA to determine:

   (a) Whether the restructuring of the Code through revising its structure and redrafting its provisions[1] has achieved its intended purpose by identifying:

      (i) Benefits from the restructuring of the Code; and

      (ii) Any practical challenges or questions regarding the understandability and usability of the Code, including whether it is being consistently understood and applied; and

   (b) What actions, if any, are needed by the IESBA to address identified matters.

3. The responses received will be analyzed for purposes of providing feedback to the IESBA and in developing recommendations for any actions.

4. The survey comment period starts on April 1 and ends on July 3.

Survey Responses to be Made Public

5. Unless confidentiality is specifically requested, respondents' submissions will be considered a matter of public record and will be posted to IESBA's website. Where confidentiality is requested, the IESBA Project Team will include such input in its analysis on an anonymized basis.

Survey Instructions

6. Respondents to the survey are asked to provide their responses only on the questions applicable to the stakeholder group to which they belong:

   - Part A — Demographic Information (All Respondents)
   - Part B — General Information (All Respondents)
   - Part C — Usability and Clarity of Language and Responsibility (All Respondents)

[1] The restructured Code was issued in April 2018.

- Part D — Clarity of Responsibility (Individual Professional Accountants in Public Practice, Accounting Firms, Regulators or Oversight Bodies, Professional Accountancy Organizations)

7. Respondents may respond to all questions or only selected questions or matters. All responses to this survey, whether complete or partial, will be accepted and considered as input for the IESBA Project Team's analysis.

8. Please read the overview of the structure and drafting enhancements which can be accessed here. The drafting guidelines that were adhered to in restructuring the IESBA Code can be accessed here.

Part A – Demographic Information (All Respondents)

9. Please indicate if you are responding as an individual or on behalf of your organization?

(a) If you are responding as an individual:

(i) Please indicate your jurisdiction

(ii) Approximate years of professional experience:

- Less than 5 years
- 5–10 years
- 11–20 years
- More than 20 years
-

n/a

(b) If you are responding on behalf of your organization, please indicate the geographical profile which best represents your situation, i.e., from which geographical perspective are you providing your responses?

- Global
- Regional *(Please specify)*
- Multiple jurisdictions *(Please specify)*
- Single jurisdiction *(Please specify)*

Single Jurisdiction - Australia

10. Please indicate the stakeholder group to which you belong, i.e., from which perspective are you providing your responses?

- Jurisdictional standard setters (JSS) *(Please indicate the users of your standards as a JSS,*

e.g., individual Professional Accountants in Public Practice (PAPPs), professional accountants in business (PAIBs) and/or accounting firms)

- Professional accountancy organizations (PAOs) *(Please indicate whether your members are PAPPs and/or PAIBs)*
- Regulators or oversight bodies *(Please indicate which of the following you regulate or oversee (select all that apply): PAPPs (including auditors), PAIBs, accounting firms (including audit firms), none of the above)*
- Individual professional accountants in public practice (PAPPs) and accounting firms
- Professional accountants in business (PAIBs)
- Other users or beneficiaries of the Code (Please specify) (e.g., investors or other users of financial statements, those charged with governance, academics)

Jurisdictional standard setters - *individual Professional Accountants in Public Practice (PAPPs), professional accountants in business (PAIBs) and accounting firms that are Members of the three professional bodies in Australia – Chartered Accountants Australia and New Zealand, CPA Australia and the Institute of Public Accountants.*

11. Please provide the following information and other contact information:

- Your organization's name, if any (if you are responding on behalf of an organization[2])
- Your name and job title / role
- Your email address
- Your jurisdiction

- Accounting Professional and Ethical Standards Board (APESB),
- Jacinta Hanrahan, Technical Director
- Jacinta.Hanrahan@apesb.org.au
- Australia

[2] If you respond on behalf of a global organization, the jurisdiction (or name of the country) in which you work. If you are responding on behalf of a global organization, please indicate “Global” as your jurisdiction.

Part B – General Information (All Respondents)

The revised structure and redrafted provisions of the IESBA Code from the Structure Project were integrated into the 2018 Revised and Restructured IESBA Code (Restructured Code).

Other revisions which were concurrently developed were integrated into the 2018 Restructured Code. Subsequent new or revised standards which were incorporated into later editions of the Code have all been structured and drafted consistently with the enhancements made in the Structure Project.

Accordingly, the following questions seek to understand the adoption status of the Restructured Code (2018 edition and onwards) in respondents' jurisdictions, relevant educational materials and guidance that have been issued or used by respondents, and the inquiries or questions related to the structure and drafting of the Restructured Code that have been commonly received or experienced by respondents.

Note:

In this survey, adoption (full or with modifications) refers to the formal acceptance and incorporation of the IESBA standards into your jurisdiction's national laws, regulations or professional requirements.

Convergence is where a jurisdiction aligns its national ethics (including independence) standards or provisions with the IESBA standards through a process that seeks to eliminate or minimize differences between the IESBA and national standards or provisions. This includes a process where an IESBA standard is used as a basis to develop the local standard or provisions.

Adoption status (Only for respondents that are JSS, PAOs, Regulators or Oversight Bodies, Individual PAPPs or Accounting Firms)

12. Has your jurisdiction adopted the Restructured Code (2018 edition and onwards)? *(Please choose the most representative answer*)

    (a) Yes, through full adoption with no modifications of the Code *(Please (i) specify the latest edition of the IESBA Code that has been adopted, e.g., 2018, 2024, etc., and (ii) provide the links to the local Code or the specific announcement of the adoption or issuance of the local Code)*

    (b) Yes, through adoption with modifications *(Please (i) specify the latest edition of the IESBA Code that has been adopted, e.g., 2018, 2024, etc.; (ii) describe the nature and reasons for the modifications; and (iii) provide links to the local Code or the specific announcement of the adoption or issuance of the local Code)*

    (c) No, the IESBA Code was used as a basis to develop the local Code (or equivalent provisions) which is converged with the IESBA Code *(Please (i) specify the latest edition of the IESBA Code that has been* Yes, through adoption with modifications *used to develop the local Code* (or equivalent provisions)*, e.g., 2018, 2024, etc.; (ii) provide links to the local Code* (or equivalent provisions) *or the specific announcement of the converged version of the IESBA Code); and (iii) describe the significant differences related to structure and drafting between the local provisions and the Code's provisions)*

    (d) There are provisions in relevant law or regulation or a different ethical framework that are at least as stringent as the Code's provisions *(Please (i) specify the edition of the IESBA Code against which the relevant law, regulation or local ethical framework is benchmarked, e.g., 2018, 2024, etc., and (ii) describe the significant differences related to structure and drafting*

between the local Code or provisions and the IESBA Code)

(e) Not adopted *(Please specify reasons. If there is a plan to adopt the IESBA Code, please provide details)*

If you have answered (a), (b) or (c), was the local Code translated? If yes, please indicate the language in which the local Code was translated.

(b) Yes, adopted with modifications.

APESB has adopted the restructured IESBA Code (2018 version) and all pronouncements issued to date (2025 amendments).

APESB's APES 110 Code of Ethics for Professional Accountants (including Independence Standards) is available here: Code of Ethics – Home

The modifications to APES 110 are set out in the Conformity with International Pronouncements of APES 110. These include:

- The title of APES 110 does not include the term 'International';
- The addition of a Scope and Application section in APES 110;
- Requirement paragraphs in APES 110 are in **bold-type** font;
- APES 110 generally refers to Members whereas the IESBA Code refers to professional accountants;
- Defined terms are in title case in APES 110;
- The addition of definitions prefixed as AUST in APES 110. The additional definitions are of AASB, Administration, ASQM 1, AUASB, Auditing and Assurance Standards, Australian Accounting Standards, Member, Professional Bodies and Professional Standards;
- The addition of paragraphs prefixed as AUST are to deal with applicable Australian laws and regulations, Australian Accounting Standards, Auditing and Assurance Standards, Accounting Professional & Ethical Standards, or to address specific matters in the Australian environment;
- APES 110 tailors the following IESBA defined terms to the Australian environment: Assurance Engagement, Audit Engagement, Director or Officer, Engagement Team, Financial Statements, Firm, Member in Public Practice, Public Interest Entity, and Review Engagement;
- The definition of Engagement Team in APES 110 does not exclude individuals within the client's internal audit function who provide direct assistance on an Audit Engagement as the AUASB has prohibited the use of direct assistance in Auditing and Assurance Standards ASA 610 *Using the Work of Internal Auditors* (*Compiled*) (April 2022) and ASSA 5000 *General Requirements for Sustainability Assurance Engagements* (January 2025);
- APES 110 uses the term 'NOCLAR' whereas the IESBA Code refers to 'non-compliance';
- APES 110 includes additional text in the section heading of Part 2 to indicate that the section includes employment relationships of Members in Public Practice;
- APES 110 mandates documentation of work performed for tax planning and related services in paragraphs AUST R280.23 and AUST R380.26.

- The defined term 'Engagement Team' in Part 3 of APES 110 is consistent with other APES pronouncements, including APES 320 *Quality Management for Firms that provide Non-Assurance Services*;
- For quality management of non-assurance services, APES 110 refers to APES 320 *Quality Management for Firms that provide Non-Assurance Services*;
- APES 110 does not include paragraphs 325.8 A4 and 5325.8 A4 of the IESBA Code to eliminate any confusion on the application of the cooling-off periods required by Sections 540 and 5540 of the Code and ASQM 2 *Engagement Quality Reviews*;
- Enhancing the clarity of provisions in Sections320and 360 by replacing some of the references to the Proposed Accountant, Existing Accountant or Predecessor Accountant with the term Member in Public Practice in APES 110;
- Paragraph AUST R400.24 in APES110 mandates Firms to determine whether additional entities are Public Interest Entities;
- The international requirements for audit partners and Key Sustainability Assurance Leaders not to be incentivised for selling non-assurance services to their Audit and Sustainability Assurance Clients has been broadened in paragraphs AUST R411.4 and AUST R5411.4 of APES 110 to ensure that audit partners and Key Sustainability Assurance Leaders are not incentivised for selling non-assurance services to an Auditor Sustainability Assurance Client of the Firm; and
- Subsections 604 and 5604 of APES110 mandates the documentation of factors considered and conclusions reached in determining that a tax service (including a tax advisory and tax planning service) provided by the Firm that performs the Audit Engagement or Sustainability Assurance Engagement is permissible (paragraphs AUST R604.4.1, AUST R604.12.1, AUST R5604.4.1 and AUST R5604.12.1) and provides guidance that the Firm will need a high level of confidence that the tax treatment has a basis in tax law that is likely to prevail (paragraphs AUST 604.4 A1.1, AUST604.12A2.1, AUST 5604.4 A1.1 and AUST 5604.12 A2.1).

Guidance and Educational Materials

For JSS, PAOs, Regulators or Oversight Bodies, and Accounting Firms only

13. What guidance or educational materials has your organization issued, or what programs has your organization developed, to support understanding of how to use the local Code or provisions? (*Select all that apply and provide links*)

- Technical guidance (e.g., FAQs)
- Education/training programs (e.g., webinars, CPD programs)
- Articles, publications or newsletters (e.g., updates about standards, case studies or illustrative examples)
- Other *(Please specify)*
- None

Technical guidance

- Whistleblowing & Confidentiality – APESB Technical Staff Publication

- Applying APESB pronouncements in COVID-19 circumstances
- Independence Guide – 5th Edition
- APES 110 Code Prohibitions
- APESB Audit Partner rotation requirements Technical Staff Q&As
- Mapping Table – Supplement to APES 110 restructured Code of Ethics (Nov 2018)

Education/training programs

- Provide presentations and participate in professional bodies training sessions. Refer to details at https://apesb.org.au/news-advocacy/speeches-and-presentations/

Articles, publications and newsletters

- E-newsletter published quarterly - https://apesb.org.au/news-advocacy/enews/

For individual PAPPs and PAIBs only

14. What guidance or educational materials have you received or accessed with respect to how to use the local Code or provisions? (*Select all that apply*)

- Technical guidance (e.g., FAQs)
- Education/training programs (e.g., webinars, CPD programs)
- Articles, publications or newsletters (e.g., updates about standards, case studies or illustrative examples)
- Other *(Please specify)*
- None

n/a

Other Support

For JSS, PAOs, Regulators or Oversight Bodies, and Accounting Firms only

15. Does your organization offer guidance to individual professional accountants, accounting firms, or other users on the application of the local Code or provisions if they seek such assistance? (*Select all that apply)*

- Ethics hotline or equivalent (e.g., for technical queries, application questions on how to use the local Code or provisions)
- Discussion forum (e.g., for sharing knowledge)
- Other *(Please specify)*

- None

Other

As a standard-setter, APESB can answer a query relating to our Standards, but we do not provide professional advice on the application of the Standards or opine on the conduct of individual accountants or firms.

For individual PAPPs and PAIBs

16. Do you have access to guidance on the application of the local Code or provisions in your jurisdiction if you seek such assistance? (*Select all that apply)*

- Ethics hotline or equivalent (e.g., for technical queries, application questions on how to use the local Code or provisions)
- Discussion forum (e.g., for sharing knowledge)
- Other *(Please specify)*
- None

n/a

Inquiries and Questions

For JSS, PAOs, Regulators or Oversight Bodies or Accounting Firms

17. Which inquiries or questions relating to the structure and drafting of the local Code or provisions has your organization commonly received? *(Please provide details, including from which stakeholder groups the inquiries or questions arose)*

APESB has not received common queries about the structure or drafting of APES 110. APESB occasionally receives questions about specific technical interpretations, generally relating to interactions with local laws and regulations.

Matters for the Board to consider or resolve are captured in the APESB Issues Register, available on the APESB website at: APESB_Issues_Register_March_2026.pdf

For individual PAPPs and PAIBs

18. Which specific structure or drafting matters pertaining to the local Code or provisions have you inquired or raised questions about? *(Please provide details)*

n/a

Part C – Usability and Clarity of Language and Responsibility (All Respondents)

The overview below provides brief background to the questions that follow regarding specific aspects of the restructuring or redrafting of the IESBA Code.

Building Blocks Approach

The Restructured Code has four Parts which are focused on all professional accountants (Part 1), professional accountants in business (Part 2), professional accountants in public practice (Part 3), independence for audit and review engagements (Part 4A), and independence for other assurance engagements (Part 4B).

A building blocks approach was applied whereby Part 1 applies to all professional accountants but is not repeated in subsequent Parts. Rather, the provisions in subsequent Parts are incremental in nature and build off Part 1.

Each Part includes various Sections to address specific topics. Each Section of the Restructured Code is structured, where appropriate, as follows:

- Introduction – sets out the subject matter addressed within the section and introduces the requirements and application material in the context of the conceptual framework.
- Requirements – establish general and specific obligations with respect to the subject matter addressed.
- Application material – provides context, explanations, suggestions for actions or matters to consider, illustrations and other guidance to assist in complying with the requirements.

To guide users in navigating the provisions in the Code, a “Guide to the Code” was added.

19. Is the building-blocks approach of the IESBA Code simple and clear, and does it help in navigating the Code?
    - Yes
    - Somewhat *(Please explain your response)*
    - No *(Please explain your response)*

Yes

APESB considers that the building-blocks approach has improved the structure and usability of the Code, particularly through clearer organisation and a clearer distinction between requirements and application material. This supports the general understanding of the Code.

APESB considers that while the building-blocks approach provides a clear structural foundation, its effectiveness could be improved by adding additional digital navigation tools to the digital versions of the IESBA Code.

Australian stakeholders have provided feedback to the APESB that in practice, professional accountants tend to rely more on search functions, contents pages and digital tools to locate relevant guidance, rather than navigating through the Code's structural framework.

Some stakeholders also raised concerns about the length and repetition within the Code, which can also create complexity, particularly for smaller firms and practices.

20. Is the "Guide to the IESBA Code" helpful in explaining how the Code is structured and should be applied?

- Yes
- Somewhat *(Please explain your response)*
- No *(Please explain your response)*

Yes

APESB considers that the "Guide to the IESBA Code" is useful in explaining the structure of the Code and supporting foundational understanding of how it is intended to be applied. It assists users in understanding the overall organisation of the Code and how different Parts and Sections relate to one another.

APESB also notes that enabling technologies in the e-Code environment, such as enhanced search functionality, hover-over definitions, and section-sharing features, further support users in efficiently navigating and locating relevant guidance.

Emphasizing Compliance with the Fundamental Principles and Applying the Conceptual Framework

To emphasize a professional accountant's responsibility to comply with the fundamental principles and apply conceptual framework:

- An overarching requirement was included in Sections 200, 300, 400 and 900; and
- Reference to the requirement to apply conceptual framework is included in the introductory sections of the remaining Sections within Parts 2, 3 and 4 of the Restructured Code.

21. Is it clear within each Section that a professional accountant (or firm as appropriate) has the responsibility to comply with the fundamental principles and apply the conceptual framework?

- Yes

- Somewhat *(Please explain your response)*
- No *(Please explain your response)*

Yes

APESB considers that it is generally clear in each Section that professional accountants are required to comply with the fundamental principles and apply the conceptual framework, as supported by explicit references in the Code. It is also noted that consistent application depends on users maintaining a holistic and principles-based approach.

Distinction Between Requirements and Application Material

To give more prominence to obligations set out in the Code (including specific prohibitions) and separate them from guidance or explanatory material, requirements are clearly distinguished from application material:

Requirements are designated with the letter "R" and, in most cases, include the word "shall". The word "shall" in the Code imposes an obligation on a professional accountant or firm to comply with the specific provision in which "shall" has been used. In some situations, the Code provides a specific exception to a requirement. In such situation, the provision is also designated with the letter "R" and is linked to the requirement to which they pertain by using the phrase "as an exception to."

Application material is designated with the letter "A." Such provisions will follow the requirement that they are explaining.

Requirements will not reference application material to avoid blurring the distinction between requirements and application material.

Scalability

The Restructured Code was organized to illustrate the Code's scalability by giving greater prominence to the overarching requirement to comply with the fundamental principles and apply the conceptual framework, followed by specific requirements.

Requirements that apply to firms when providing professional services to public interest entities (PIEs) are located after requirements that apply to other entities.

22. Does the IESBA Code's approach to delineating requirements ("R" paragraphs) from application material ("A" paragraphs) make it clear what a professional accountant's or firm's obligations are?

- Yes
- Somewhat *(Please explain your response)*
- No *(Please explain your response)*

Yes

APESB notes that Australian stakeholders consider the Code's approach to distinguishing requirements ("R" paragraphs) from application material ("A" paragraphs) effective at clearly setting out the obligations of professional accountants and firms.

The clear identification of requirements, together with the placement of application material immediately after the relevant requirements, was seen as helping users understand what is

mandatory and what is explanatory. This structure supports clearer and more direct interpretation of the Code in practice.

APESB considers that this approach appropriately reinforces the distinction between obligations and supporting guidance and supports a consistent understanding and application of the Code.

In the Australian Code APES 110, the requirements paragraphs are in bold type to make it absolutely clear which paragraphs are requirements.

23. Is it sufficiently clear that the Code is scalable and proportionate?

- Yes
- Somewhat *(Please explain your response)*
- No *(Please explain your response)*

Somewhat

APESB considers the Code to be generally well understood as scalable and proportionate, with principles intended to apply across organisations of all sizes. APESB also notes that scalability can be supported through practical guidance and case-based education, while maintaining that ethical principles apply consistently regardless of entity size.

Australian stakeholders provided feedback at a roundtable that some language and examples reflect larger organisational contexts and may not translate directly to smaller practices and businesses, particularly in areas such as escalation processes.

24. If your organization has responsibility to enforce compliance with the provisions of the Restructured Code, has the delineation of requirements and application material helped with enforceability?

- Yes
- Somewhat *(Please explain your response)*
- No *(Please explain your response)*
- N/A as do not enforce the provisions of the Restructured Code

n/a

Clarity of Language and Readability

The Restructured Code was redrafted to increase the clarity of language to improve its readability and understandability, including use of simpler and shorter sentences, simplifying complex grammatical structures, and avoiding legalistic and archaic terms.

Further, to minimize the risk of ambiguity and confusion through inconsistent use of terms, the IESBA agreed that:

- When the word “may” is used in the Code, it denotes permission to take a particular action in certain

circumstances, including as an exception to a requirement. It is not used to denote possibility.

- When the word “might” is used in the Code, it denotes the possibility of a matter arising, an event occurring or a course of action being taken.

25. Is the language used in the Code clear, readable and understandable?

- Yes
- Somewhat *(Please explain your response and provide examples with reference to specific provisions in the Code which you consider may not be clearly drafted)*
- No (*Please explain your response, and provide examples with reference to specific provisions in the Code which you consider are not clearly drafted)*

Yes

APESB considers that the language of the Code is generally clear and understandable. We encourage IESBA to continue supporting the development of guidance resources that would further assist consistent understanding and application across a range of practice settings.

APESB notes that Australian stakeholders generally consider the Code's language clear and understandable. However, feedback indicates that some terminology and examples may be more readily understood in larger organisational contexts than in smaller practices and businesses.

Australian stakeholders also noted that readability alone does not ensure effective understanding and application of the Code. Practical education and guidance, including the use of real-world scenarios that require professional judgement, were viewed as important complements to the language of the Code.

26. Is the language used in the Code easy to translate?

- Yes
- Somewhat *(Please explain your response and provide examples with reference to specific provisions in the Code which you consider may not be easy to translate)*
- No (*Please explain your response, and provide examples with reference to specific provisions in the Code which you consider are not easy to translate)*

N/a

Other Comments

None

27. Are there any other comments relating to the structure and drafting of the IESBA Code that the IESBA should consider as part of this PIR?

APESB received feedback from Australian stakeholders who generally supported the objectives of the restructuring project and viewed it as having improved the accessibility, organisation and clarity of the Code.

However, the stakeholders noted that further enhancements could improve the usability of the IESBA Code through better navigation, searchability, and clearer pathways to frequently accessed guidance. Consideration of users across different practice environments, including smaller practices, was also highlighted.

APESB supports maintaining the principles-based nature of the IESBA Code. Improvements in presentation and accessibility should not come at the expense of professional judgement or the holistic application of the conceptual framework.

APESB also considers that ongoing practical guidance and educational support, including real-world examples, would assist users in applying the Code in complex or judgement-based situations.

Part D – Clarity of Responsibility (For individual PAPPs, Accounting Firms, Regulators or Oversight Bodies, or PAOs)

The independence sections in the Restructured Code are included in the *International Independence Standards (IIS)* to emphasize its international application and enforceability.

The IIS comprise Part 4A – *Independence for Audit and Review Engagements* (i.e., Sections 400 to 899) and Part 4B – *Independence for Assurance Engagements Other than Audit and Review Engagements* (i.e., Sections 900 to 999).

In the IIS in Parts 4A and 4B, specific provisions relating to audits of entities that are not public interest entities (PIEs) and those relating to audits of PIEs are presented under separate headings titled:

- "All Audit Clients" to introduce provisions that apply in all circumstances and for all audits;
- "Audit Clients that are not Public Interest Entities" to introduce provisions that apply to audits of clients that are not PIEs; and
- "Audit Clients that are Public Interest Entities" to introduce provisions that apply to audits of PIEs only.

28. Is an individual PAPP's responsibility in relation to independence clear?

- Yes
- Somewhat *(Please explain your response)*
- No (*Please explain your response)*

Yes

From a Standards Setter's perspective, APESB has followed a public due process before incorporating any changes to the Australian Code. In circumstances where respondents have

raised valid concerns about aspects of the IESBA Code that require clarification from an Australian perspective, APESB has incorporated appropriate guidance in the Code, prefixed as "AUST".

APESB has an online Issues Register where stakeholders can report matters, and to date, no issues have been reported regarding the clarity of the requirements.

29. Is a firm's responsibility in relation to independence clear?

- Yes
- Somewhat *(Please explain your response)*
- No (*Please explain your response)*

Yes – From a Standards-Setters perspective, and refer to the response to Q28

30. Is a network firm's responsibility in relation to independence clear, and is that responsibility clearly distinguished from a firm's responsibility?

- Yes
- Somewhat *(Please explain your response)*
- No (*Please explain your response)*

Yes – From a Standards-Setters perspective, and refer to the response to Q28

End of Survey

Thank you for your valuable input. Your input will inform the IESBA's Post-Implementation Review and help the IESBA develop global ethics and independence standards that are user-friendly, understandable, capable of consistent application, and readily enforceable.