The Auditor’s Responsibilities Relating to Other Information in Documents Containing or Accompanying Audited Financial Statements and the Auditor’s Report Thereon—Proposed International Standard on Auditing 720 (Revised)

[Marked from March 2011 IAASB Meeting]

(Effective for audits of financial statements for periods ending on or after [date])

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International Standard on Auditing (ISA) 720 (Revised), The Auditor’s Responsibilities Relating to Other Information in Documents Containing or Accompanying Audited Financial Statements and the Auditor’s Report Thereon, should be read in conjunction with ISA 200, Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with International Standards on Auditing.

Prepared by: Jessie Wong (August 2011)
Introduction

Scope of this ISA

1. This International Standard on Auditing (ISA) deals with the auditor’s responsibilities relating to other information (other than the audited financial statements and the auditor’s report thereon, and referred to as “other information” for the purpose of this ISA) in documents containing or accompanying audited financial statements and the auditor’s report thereon that are within the scope of this ISA.

2. Terms used to describe documents that include such other information may vary. However, only a document that displays all of the following key features is within the scope of this ISA: (Ref. Para. A1–A4)

(a) **Nature and purpose.** Contains or accompanies the audited financial statements and the auditor’s report thereon for purposes of providing further commentary aimed at enhancing the user’s understanding of:

   (i) The audited financial statements; or
   (ii) The entity, and its state of affairs;

(b) **Timing of availability.** Intended to be made available along with the initial release, typically annually, of the audited financial statements and the auditor’s report thereon; and

(c) **Intended users.** Same as the intended users of the audited financial statements.

3. The ISAs do not impose an obligation on the auditor to obtain assurance as to the accuracy, reliability or completeness of the other information in order to express a conclusion thereon. However, this ISA requires the auditor to read and consider the other information in light of the auditor’s understanding of the entity and its environment, and information acquired during the course of the audit. By doing so, the auditor may identify matters that:

   (a) Are relevant to the audit;
   (b) Have an effect on the credibility of the audited financial statements, and therefore the auditor’s report thereon; or
   (c) Have an effect on the credibility of the other information itself. This ISA sets out the auditor’s responsibilities in these cases.

4. The ISAs do not impose an obligation on the auditor to obtain assurance as to the accuracy, reliability or completeness of such other information sufficient to express a conclusion thereon. Notwithstanding this, law or regulation may require the auditor to specifically report on such other information. In these circumstances, those additional requirements are outside of the scope of this ISA the auditor determines and performs the procedures necessary to meet those additional requirements. Although this ISA does not apply in such circumstances, some of the procedures included in this ISA may be relevant.
The Nature of Other Information

4. Other information may be included, either by law, regulation, custom or voluntarily, in a document containing or accompanying audited financial statements and the auditor’s report thereon. Such information is issued by the entity for the purpose of providing further commentary to enhance the intended users’ understanding of the entity and its environment. (Ref: Para. A1–A2)

4.5. [Addressed in former ¶A4] This ISA does not apply to preliminary announcements of financial information and securities offering documents or other prospectuses. However, the auditor may be required by law, regulation or terms of contract to perform work on such documents. In these circumstances, this ISA may also be applied, adapted as necessary in the circumstances, to information in other documents containing or accompanying audited financial statements, such as those used in securities offerings or other prospectuses. (Ref: Para. A1–A2)

Effective Date

5.6. This ISA is effective for audits of financial statements for periods ending on or after [date].

Objectives

6.7. The objectives of the auditor are to:

(a) Read and consider the other information in documents containing or accompanying audited financial statements and the auditor’s report thereon that are within the scope of this ISA; and

(b) Evaluate and respond appropriately to matters identified that may materially affect those audited financial statements, and therefore the auditor’s report thereon, or the other information itself.

Definitions

7.8. For purposes of the ISAs, the following terms have the meanings attributed below:

(a) Other information – Information (other than the audited financial statements and the auditor’s report thereon) which is included, either by law, regulation, custom or voluntarily, in a document containing or accompanying audited financial statements and the auditor’s report thereon that is within the context scope of this ISA. (Ref: Para. A3–A8)

[A4] A document is within the scope of this ISA only if it is prepared and issued by the entity and displays all of the following key features. (Ref: Para. A5–A9)

1 Paragraph 8(a) of this ISA describes the key features of document(s) that are within the scope of this ISA.

2 ISA 200, Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with International Standards on Auditing, paragraph 2
(i) **Nature and purpose.** Either:

a. Contains or accompanies the audited financial statements and the auditor’s report thereon; or  

[Option A:]

b. Is prepared to accompany audited financial statements and the auditor’s report thereon, and:
   i. Has a primary purpose of providing further commentary aimed at enhancing the intended users’ understanding of: a. the audited financial statements; or b. the entity, and its environment, state of affairs; and  
   ii. Its subject matter is within the auditor’s understanding of the entity and its environment acquired during the course of the audit.]

[Option B:]

b. Is prepared to accompany audited financial statements and the auditor’s report thereon, and has a primary purpose of providing commentary to enhance the intended users’ understanding of the audited financial statements and the financial reporting process.]

(ii) **Timing of availability.** Intended to be made available to the intended users along with, or at about the same time as, the initial release, typically annually, of the audited financial statements and the auditor’s report thereon; and

(iii) **Intended users.** Same as the intended users of the audited financial statements.

(b) Misrepresentation of Matter(s) that affects other information – Either:

(i) A statement of fact in the other information that the auditor considers to be incorrect;  

(ii) A statement involving management judgment in the other information that the auditor considers to be unreasonable or inappropriate; or  

(iii) A statement presented in a way that the auditor considers to be misleading because it omits or obscures information necessary to properly understand a particular subject(s) addressed manner of presentation that the auditor considers may be misleading about a matter(s) in the other information, in light of the auditor’s understanding of the entity and its environment, or information acquired during the course of the audit.

The effect of such a matter(s) on the Misrepresentations of other information are considered to be material if they, individually or in the aggregate, it could reasonably be expected to influence the economic decisions of users taken on the basis of the other information and the audited financial statements. (Ref: Para. A10–A11)
Requirements

Obtaining, Reading and Considering Other Information

9. The auditor shall make appropriate arrangements with management or those charged with governance to obtain the other information prior to the date of the auditor’s report, documents that are within the scope of this ISA. (Ref: Para. A9–A13)

10. If it is not possible to obtain all the documents that are within the scope of this ISA other information—prior to the date of the auditor’s report, the auditor shall make appropriate arrangements with management or those charged with governance to obtain such other information before it is issued and in any case documents as soon as practicable and, in any case, prior to their issuance. (Ref: Para. A12–A13)

11. The auditor shall read and consider the other information in light of the auditor’s understanding of the entity and its environment, and information acquired during the course of the audit. (Ref: Para. A14–A19)

12. In addition, when considering financial data in the other information that is extracted from or capable of being reconciled to the audited financial statements, the auditor shall test the extraction or reconciliation of those items as the auditor considers appropriate in the circumstances perform procedures sufficient to determine whether it is necessary to revise the financial data in the other information or the corresponding items in the consistency of such items with the audited financial statements. (Ref: Para. A20–A21)

Evaluating and Responding to Matters Relating to the Audited Financial Statements

13. If the auditor identifies a matter(s) that leads the auditor to believe that the audited financial statements may be materially misstated, the auditor shall, through carrying out such procedures as required by perform procedures necessary under the ISAs, seek to determine whether the matter(s) causes the audited financial statements as a whole to be materially misstated.

14. If the auditor determines that the matter(s) causes the audited financial statements as a whole to be materially misstated and management refuses to revise the audited financial statements, the auditor shall carry out such procedures as required by the ISAs including either:

(a) Modifying the opinion in the auditor’s report in accordance with ISA 705 where the other information is obtained prior to the date of the auditor’s report; or

(b) Taking the appropriate actions in accordance with ISA 560 where the other information is obtained subsequent to the date of the auditor’s report.

ISA 705, Modifications to the Opinion in the Independent Auditor’s Report, paragraphs 6–28
ISA 560, Subsequent Events, paragraphs 10–17
Evaluating and Responding to Matters Relating to the Other Information

13.15. If the auditor identifies a matter(s) that leads the auditor to believe that may materially affect the other information may be materially misrepresented, the auditor shall discuss the matter(s) with management. (Ref: Para. A20/22)

15. The auditor shall, and if necessary by performing other procedures, shall determine whether individually or collectively the matter(s): (Ref: Para. A24–A242)

(a) Is not likely to materially affect the other information to be materially misrepresented including, where there are valid differences of judgment or opinion; or

(b) Cause the other information to be materially misrepresented.

Other Information Obtained Prior to the Date of the Auditor’s Report

14.16. If the auditor has determined that the matter(s) materially affects the other information, which was obtained prior to the date of the auditor’s report and to be materially misrepresented:

(a) If management agrees to correct the other information, the auditor shall determine that the correction has been made; or

(b) If management refuses to correct the other information, the auditor shall:

(i) [Moved to (ii) below] Not date the auditor’s report pending resolution of the matter; and

(ii) Communicate this matter to those charged with governance and request that such matter(s) be corrected; and-

(ii) [Moved from former (i) above] Not date the auditor’s report pending resolution of the matter.

15.17. If management and those charged with governance refuse to correct the other information is still not corrected at the request of the auditor, the auditor shall:

(a) Reevaluate the integrity of management and those charged with governance, and evaluate the effect that this may have on the reliability of the other information and audit evidence in general; and

(b) Take the appropriate action(s), which may including whether to withdrawing from the engagement, where withdrawal is possible under the applicable law or regulation. (Ref: Para. A254–A275)
16. If the auditor determines to continue with the engagement, the auditor shall include in the auditor’s report an Other Matter(s) paragraph describing the matter(s) that materially affect other information in accordance with ISA 706.5

Other Information Obtained after the Date of the Auditor’s Report

17. If the auditor has determined that the matter(s) materially affects the other information, that was obtained after the date of the auditor’s report, to be materially misrepresented:

(a) If management agrees to make the correction on the other information, the auditor shall:
   (i) Determine that the correction has been made; and
   (ii) If the other information has already been issued by the entity, review the steps taken by management to informed recipients of the correction to determine whether further action by the auditor is required; or
(b) If management refuses to correct the other information, the auditor shall communicate the matter(s) to those charged with governance, and request that such matter(s) be corrected.

18. If management and those charged with governance refuse to correct the other information is still not corrected at the request of the auditor, the auditor shall consider whether further take appropriate action to seek to prevent reliance on the auditor’s report may be necessary in the circumstances of the engagement. (Ref: Para. A28–A27)

Documentation

19. The auditor shall retain in the audit documentation a copy of the final agreement with management the version of the document(s) on which the auditor’s work effort under this ISA was performed and include a copy of this version in the audit documentation. (Ref: Para. A298–A3029)

Application and Other Explanatory Material

Scope of this ISA: The Nature of Other Information (Ref: Para. 24–5)

A1. Preliminary announcements of financial information are not within the scope of this ISA because, due to their nature, preliminary announcements do not contain audited financial statements, the auditor’s report thereon, and other information as defined in paragraph 8(a) of this ISA.

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5 ISA 706, Emphasis of Matter Paragraphs and Other Matter Paragraphs in the Independent Auditor’s Report, paragraph 8
A2. [Redrafted and moved from ¶A1 of extant ISA 720] Law or regulation may impose additional responsibilities on the auditor in relation to other information that are beyond the scope of this ISA. For example, some jurisdictions may require the auditor to apply specific procedures to certain of the other information, or to express a conclusion thereon, or to report on the other information or parts thereof.

A1. [Moved to ¶A9] The documents containing audited financial statements, the auditor’s report and other information as stated in paragraph 2 of this ISA are typically referred to as an annual report, although such documents may also be known by a different term.

A2. [2nd sentence redrafted and moved to ¶A10] Such other information may be presented as a document that is separate from, but intended to be provided to the intended users at the same time as the audited financial statements and the auditor’s report thereon, and in order to complement and supplement them (for the purpose of this ISA referred to as “accompanying the audited financial statements and auditor’s report”). Such documents may be referred to as, for example, management’s discussion and analysis, directors’ report, management report, corporate governance statement, and operating and financial review. In some cases, circumstances may result in a time lag between the issuance of the audited financial statements and the auditor’s report thereon, and the accompanying document containing other information. Notwithstanding the time lag, the document remains within the scope of this ISA because it is intended to accompany the audited financial statements and the auditor’s report thereon.

A3. [Redrafted and moved to ¶A11] A document that meets the criteria in paragraph 2 of this ISA is within the scope of this ISA, irrespective of the manner in which it is made available to the intended users. Such a document may be made available to the intended users in the form of printed hardcopy, or electronically including by posting on the entity’s website.

A4. [Addressed in ¶5] In addition to the documents referred to in paragraph 2 of this ISA, entities may prepare other documents that contain or accompany the audited financial statements or parts thereof, or the auditor’s report, but which do not display all the key features stated in paragraph 2 of this ISA. Such documents are not within the scope of this ISA. Examples of such documents include:

- Preliminary earnings releases.
- Offer documents for raising capital or other funds, for example, prospectuses.
- A press release or equivalent.
- Information contained in analyst briefings.

Definitions of Other Information (Ref: Para. 8(a))

Other Information (Ref: Para. 8(a))

A5. [Moved to ¶A6] In some cases, the applicable financial reporting framework may permit disclosures required under the framework to be located outside of the audited financial
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such information is covered by the audit, and does not constitute, other information for the purpose of this ISA.

A6. [Redrafted and moved to ¶A5] ISA 700\(^2\) indicates that, in some circumstances, unaudited supplementary information that is not required by the applicable financial reporting framework may be presented with, but should be clearly differentiated from, the audited financial statements. Such unaudited supplementary information falls within the definition of other information and is therefore within the scope of this ISA.

A3.2. Other information in a document that is within the scope of this ISA may be financial or non-financial in nature, and may be historical or prospective, and may include, for Examples of other information include, the following:

Financial

- Financial summaries or highlights
- Planned expenditures
- Segment information\(^6\)
- Financial ratios
- Selected quarterly financial data
- Financial key performance indicators
- Management commentary (see paragraph A4 of this ISA.)

Non-Financial

Management commentary on the entity and its state of affairs

- Names and profiles of officers and directors
- Employment data
- Descriptions of business model, strategy, risks, and outlook
- Governance statements

\(^6\) For example, International Financial Reporting Standard (IFRS) 7, Financial Instruments: Disclosures as at [date], paragraph B6, permits certain disclosures required by the IFRS to be either be given in the financial statements or incorporated by cross reference from the financial statements to some other statement, such as a management commentary or risk report, that is available to users of the financial statements on the same terms as the financial statements and at the same time.

\(^2\) ISA 700, Forming an Opinion and Reporting on Financial Statements, paragraphs 46–47 and A45–A51

\(^8\) ISA 501, Audit Evidence—Specific Considerations for Selected Items, deals with specific considerations by the auditor in obtaining sufficient appropriate audit evidence with respect to segment information in an audit of financial statements when, under the applicable financial reporting framework, the entity is required or permitted to disclose such information in the audited financial statements.
• Sustainability and corporate social responsibility information (such as environmental, labor practices and working conditions, and product responsibility information)
• Statements of internal control
• Non-financial key performance indicators

A48. The International Financial Reporting Standard (IFRS) Practice Statement on management commentary\(^9\) explains that management commentary provides users with historical explanations of the amounts presented in the financial statements, specifically the entity’s financial position, financial performance and cash flows. It also provides commentary on an entity’s prospects and other information not presented in the financial statements. Management commentary also serves as a basis for understanding management’s objectives and its strategies for achieving those objectives. Management commentary therefore constitutes other information for the purpose of this ISA.

A56. [Redrafted and moved from former ¶A6] ISA 700\(^{10}\) indicates that, in some circumstances, unaudited supplementary information that is presented with and clearly differentiated from not required by the applicable financial reporting framework may be presented with, but should be clearly differentiated from, the audited financial statements is dealt with in ISA 700.\(^{11}\) As explained in ISA 700,\(^{12}\) such unaudited supplementary information falls within the definition of other information and is therefore within the scope of this ISA.

A65. [Moved from former ¶A5] In some cases, the applicable financial reporting framework may permit disclosures required under the financial reporting framework to be located outside of the audited financial statements.\(^{13}\) Nevertheless, such disclosures are part of the audited financial statements information is covered by the audit, and therefore does not constitute, other information for the purpose of this ISA.

A7. eXtensible Business Reporting Language tagged data does not represent other information as contemplated in this ISA, because it is simply a machine-readable rendering of the data within the financial statements, rather than other information, as defined in paragraph 8(a).

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\(^{9}\) IFRS Practice Statement, *Management Commentary* as at December 2010.

\(^{10}\) ISA 700, *Forming an Opinion and Reporting on Financial Statements*, paragraphs 46–47 and A45–A51

\(^{11}\) ISA 700, *Forming an Opinion and Reporting on Financial Statements*, paragraphs 46–47 and A45–A51

\(^{12}\) ISA 700, paragraph A51

\(^{13}\) For example, *International Financial Reporting Standard (IFRS) 7, Financial Instruments: Disclosures* permits certain disclosures required by the IFRSs to be either be given in the financial statements or incorporated by cross-reference from the financial statements to some other statement, such as a management commentary or risk report, that is available to users of the financial statements on the same terms as the financial statements and at the same time.
Considerations Specific to Public Sector Entities

A89. In the public sector, examples of other information may include efficiency targets and other performance metrics including, for example, those relating to quality of services; and volume of work, efficiency targets and other performance metrics.

Misrepresentation of Other Information (Ref: Para. 8(b))

A10. For the purpose of this ISA, the term misrepresentation is used in the context of other information and is not intended to suggest linkages, if any, to the use of such a term in law, regulation or other professional standards.

A11. The manner of presentation of the other information may mislead intended users, for example, when it obscures important aspects of a matter(s) in the other information such that users may misunderstand the matter(s).

Obtaining, Reading and Considering Other Information

Documents Containing Audited Financial Statements and the Auditor’s Report Thereon (Ref: Para. 9)

A94. [Moved from former ¶A1] The documents containing audited financial statements, and the auditor’s report thereon and other information as stated described in paragraph 8(a)2 of this ISA are is typically referred to as an annual report, although such a documents may also be known by a different term.

Documents Accompanying Audited Financial Statements and the Auditor’s Report Thereon (Ref: Para. 9)

[The following redrafted and moved from former ¶A2]

[Option A:

A102. The subject matter of a document accompanying the audited financial statements and the auditor’s report thereon is essential to determining whether or not the document is within the scope of this ISA. Where the document has a primary purpose of providing commentary to enhance the intended users’ understanding of the entity and its environment (including the audited financial statements and the financial reporting process), and its subject matter is within the auditor’s understanding of the entity and its environment acquired during the course of the audit, such a document would generally be within the scope of this ISA. Examples include the following:

- Management’s discussion and analysis (or management report or operating and financial review)
- Directors’ report
- Corporate governance statement
- Internal control and risk assessment reports
A10a. Documents such as sustainability and corporate social responsibility reports may be within or outside of the scope of this ISA depending on their contents.

A10b. Where a document only addresses other subject matters, it is more likely that the document would be outside of the scope of this ISA because the information in these documents often extends beyond the auditor’s understanding of the entity and its environment acquired during the course of the audit. Examples include documents prepared and issued by the entity on the following:
- Diversity and equal opportunity
- Product responsibility
- Labor practices and working conditions
- Human rights

[Option B:

A10. The subject matter of a document accompanying the audited financial statements and the auditor’s report thereon is essential to determining whether or not the document is within the scope of this ISA. Where a document has a primary purpose of providing commentary to enhance the intended users’ understanding of audited financial statements and the financial reporting process, such a document would generally be within the scope of this ISA. Such documents may be known as, for example include the following:
- Management’s discussion and analysis (or management report or operating and financial review),
- Directors’ report,
- Corporate governance statement, and operating and financial review.
- Internal control and risk assessment reports

A10a. Documents that are generally considered to be outside the scope of this ISA are those whose primary purpose extends beyond the audited financial statements and the financial reporting process. Examples include documents prepared and issued by the entity on the following:
- Sustainability and corporate social responsibility
- Diversity and equal opportunity
- Product responsibility
- Labor practices and working conditions
- Human rights

A113. [Redrafted and moved from former ¶A3] Documents within the scope of this ISA may be made available to the intended users in the form of printed hardcopy, or electronically, including by posting on the entity’s website. Although the auditor is not expected to search the entity’s website for documents that are within the scope of the ISA,
A document that meets the criteria in paragraph 8(a)2 of this ISA is within the scope of this ISA, irrespective of the manner in which it is made available to the intended users.

Availability of Other Information (Ref: Para. 9–10)

A12. This ISA applies regardless of whether the other information is obtained by the auditor prior to, or after, the date of the auditor’s report. Obtaining the other information prior to the date of the auditor’s report is important as it enables revisions, if any, to be made to the audited financial statements or the auditor’s report, and corrections, if any, to be made to the other information prior to their issuance. An agreement with management as to when the other information will be available is desirable. The audit engagement letter may make reference to the agreement of management to make available to the auditor the other information in time to allow the auditor to complete the procedures required under this ISA.

A13. The auditor is not precluded from dating the auditor’s report if the auditor has not obtained the other information. Paragraphs 13–14(b), 15 and 19–20 of this ISA describe the auditor’s procedures when the other information is obtained after the date of the auditor’s report.

Reading and Considering the Other Information in Light of the Auditor’s Understanding (Ref: Para. 11)

A14. The auditor’s understanding of the entity and its environment, and information acquired during the course of the audit, forms the basis for the auditor’s consideration of the other information as required in this ISA. ISA 315\(^ {14} \) sets out the matters relating to the entity and its environment, including the entity’s internal control, for which the auditor is required to obtain an understanding for the purpose of the audit. Such matters include the following:

(a) The relevant industry, regulatory, and other external factors;
(b) The nature of the entity;
(c) The entity’s selection and application of accounting policies;
(d) The entity’s objectives and strategies;
(e) The measurement and review of the entity’s financial performance; and
(f) The entity’s internal control.

A15. A document that is within the scope of this ISA may include other information that extends beyond the auditor’s knowledge of the entity and its environment acquired in connection with the audit. In meeting the requirements of this ISA, the auditor is not required to seek to enhance their knowledge of the entity and its environment beyond that required for purposes of the audit.

\(^ {14} \) ISA 315, *Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment*, paragraphs A17–A104
A165. The auditor is required by ISA 200\textsuperscript{15} to plan and perform the audit with professional skepticism. Maintaining professional skepticism when reading and considering the other information includes, for example, recognizing that circumstances may exist that may raise doubt about the audited financial statements and other information, and possibly the competence, integrity, ethical values or diligence of management, or about its commitment to or enforcement of these.

**Responsibility for Reading and Considering Other Information** (Ref: Para. 110)

A176. In accordance with ISA 220,\textsuperscript{16} the engagement partner is required to take responsibility for the direction, supervision and performance of the audit engagement in compliance with professional standards and applicable legal and regulatory requirements. In the context of this ISA, the engagement partner identifies the individuals on the engagement team, including the engagement partner, to be assigned tasks relating to reading and considering the other information. Factors to consider may include whether the individuals to be assigned the tasks have the relevant knowledge to credibly consider the other information in light of the auditor’s understanding of the entity and its environment, or information acquired during the course of the audit.

A187. Typically, more experienced members of the engagement team would be assigned responsibility for other information that involves a greater amount of professional judgment. Similarly, less complex procedures involving a lower degree of judgment such as cross-checking of figures to the audited financial statements may be carried out by less experienced members of the engagement team.

A198. In the case of a group audit, there may be circumstances where the group engagement partner determines a need to engage the assistance of the component auditor.

**The Auditor’s Procedures Relating to Other Information Extracted from or Capable of Being Reconciled to Audited Financial Statements** (Ref: Para. 124)

A209. The auditor’s procedures to test the extraction or reconciliation of financial data in the other information that is extracted from or capable of being reconciled to the audited financial statements are aimed at determining the consistency of such items with the audited financial statements. Such tests may include the following:

- Agreeing financial data in the other information to the audited financial statements.
- Reviewing the financial data in the other information and testing management’s reconciliation of the items to the audited financial statements for material items.

A21. The auditor’s determination of the items that are appropriate in the circumstances to be reconciled or agreed to the audited financial statements is a matter of professional judgment. The

\textsuperscript{15} ISA 200, paragraph 15

\textsuperscript{16} ISA 220, *Quality Control for an Audit of Financial Statements*, paragraph 15(a)
Evaluating and Responding to Matters Relating to the Other Information (Ref: Para. 44–15)

A220. When reading and considering the other information, the auditor is not expected to substitute the auditor’s professional judgment for that of management and those charged with governance when dealing with matters requiring judgment that are the responsibilities of these parties. While it may be more difficult for the auditor to challenge management on a matter of judgment relating to such other information, there may be circumstances where the auditor may determine management assertions exist in the other information that are inconsistent with the auditor’s understanding of the entity and its environment, and information acquired during the course of the audit. Such a matter(s) may raise doubt about the audited financial statements and/or the other information.

A231. If the auditor identifies a matter(s) that leads the auditor to believe that the other information may be materially misrepresented, paragraph 15 of this ISA requires the auditor to discuss the matter(s) with management. The discussion with management may lead the auditor to conclude that the matter(s) does not materially affect the other information because management has provided further information or explanations including, for example, where there are valid differences of judgment or opinion. During the discussion, the auditor may consider that, due to the nature of such other information, the auditor may not be able to assess management’s responses to the auditor’s inquiries and accordingly the validity of management’s assertion. In such circumstances, the auditor would therefore not be able to determine whether the other information is materially misrepresented. In these cases, other procedures the auditor may consider taking include requesting management to consult with a qualified third party such as legal counsel or other experts.

A242. On the contrary, during the discussion with management, the auditor may obtain further information or explanations relating to the matter(s) raised that reinforces the auditor’s belief that the matter(s) may materially affect the other information may be materially misrepresented. In such cases, paragraph 15 of this ISA requires the auditor to determine whether and if so, to what extent of such other procedures are necessary, is guided by information obtained from the auditor’s evaluation of the results of the audit procedures already performed, and the auditor’s understanding of the entity and its environment, and information acquired during the course of the audit. During the discussion, the auditor may consider that, due to the nature of such other information, the auditor may not be able to assess management’s responses to the auditor’s inquiries and accordingly the validity of management’s assertion. In such circumstances, the auditor would therefore not be able to determine whether the other information is materially misrepresented. In these cases, other procedures the auditor may consider taking include...
requesting management to consult with a qualified third party such as legal counsel or other experts.

Other Information Obtained Prior to the Date of the Auditor’s Report (Ref: Para. 17(b))

A253. The auditor may base any decision on what further action to appropriate actions that the auditor may take include seeking advice from the auditor’s legal counsel. Further, law, regulation or other professional standards may require that the matter(s) be communicated by the auditor to the regulator or relevant professional body.

A264. The auditor may consider it appropriate to withdraw from the engagement, where withdrawal is appropriate and possible under the applicable law or regulation, for example, if the auditor has determined that management lacks integrity. The ISAs addresses relevant circumstances in which the auditor may determine that the auditor is unable to continue with the engagement. In these circumstances, the auditor follows the relevant requirements in ISA 705 are relevant.

Considerations Specific to Public Sector Entities

A275. In the public sector, withdrawal from the engagement or withholding the auditor’s report may not be options. In such cases, the auditor may issue a report to the legislature giving details of the matter(s) that materially affects the other information misrepresentation.

Other Information Obtained After the Date of the Auditor’s Report (Ref: Para. 49–20)

A287. In some cases, the auditor may believe that management, or those charged with governance, have failed to take the necessary steps to prevent reliance on the auditor’s report on financial statements previously issued by the entity despite the auditor’s prior notification that the auditor will take action to seek to prevent such reliance. In such cases, the auditor’s course of action depends upon the auditor’s legal rights and obligations. The auditor may consider it appropriate to seek legal advice.

Documentation (Ref: Para. 21)

A2928. In accordance with paragraph 21 of this ISA, the auditor makes the necessary arrangements with management regarding to obtain and retain the final version of the document(s) on which the auditor will be reading and considering for the purpose of complying with has performed work under this ISA. Such arrangements may include, for example, obtaining the version of the document(s) that has been approved by the board of

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18 ISA 705, paragraph 14
directors. The auditor may also consider whether to obtain a written representation from management regarding this matter.

A3029. A copy of the final version of the document(s) is agreed with management is included in the audit documentation so that, in cases where the document(s) is subsequently amended by the entity without the knowledge of the auditor, such documentation serves as a record of the version on which the auditor’s has performed the work effort as required by this ISA has been performed.