

**Proposed ISAE 3410<sup>1</sup>—  
Significant Issues Raised by Respondents on the Exposure Draft, the IAASB's  
Consideration of Significant Comments on Exposure and IAASB Task Force  
Recommendations**

**Background**

1. The project was approved by the International Auditing and Assurance Standards Board (IAASB) in December 2007.
2. Four international roundtables were held in 2008 and an issues paper, summarizing the matters raised, was presented to the IAASB in December 2008.
3. A Consultation Paper<sup>2</sup> was approved by the IAASB and issued in 2009. It was accompanied by a working draft of a standard dealing with reasonable assurance (RA) engagements only. The working draft received considerable support, but:
  - (a) There was strong support for expanding the scope of the proposed standard to also include limited assurance (LA) engagements; and
  - (b) A small number of other issues were identified as needing further refinement.
4. An exposure draft of proposed ISAE 3410 (ED), covering both RA and LA engagements, was approved in December 2010 and issued in January 2011 with a closing date for comments of June 10, 2011.
5. In December 2011, the Task Force presented the proposed amendments to Exposure Draft ISAE 3410 in response to the comments. The most significant area of comment related to the description of the procedures in the LA report. While expressing broad support for many of the, the IAASB pointed out a few areas in the revised draft ISAE which required further clarification. Deliberations around the Illustrative LA report were not conclusive, particularly relating to the description of procedures performed. The IAASB provided their comments on the requirements of proposed ISAE 3410 and the Illustrative LA report, however, due to time constraints the Application Material was not discussed.
6. To progress the project to finalization it was agreed that an IAASB teleconference would be held in January 2012 to allow for further input from the IAASB on the concerns identified with the illustrative LA report. The Task Force prepared revised illustrative LA reports and a related Issues Paper for the IAASB to address some of the concerns and comments raised in December 2011. This is discussed further in Section A below.
7. This paper sets out the significant matters raised by respondents to proposed ISAE 3410, the IAASB's consideration of the responses and the Task Force's proposals with respect to those matters.

---

<sup>1</sup> Proposed International Standard on Assurance Engagements (ISAE) 3410 *Assurance Engagements on Greenhouse Gas Statements*, issued January 2011

<sup>2</sup> Consultation Paper, *Assurance on a Greenhouse Gas Statement*, issued October 2009

## Overview of Responses

8. There were 41 responses to proposed ISAE 3410 distributed as follows. A list of respondents is included in the Appendix.
- 18 IFAC Member Bodies
  - 8 Accounting Firms
  - 4 Non-accounting GHG Assurers/Consultants/Organisations
  - 4 National Auditing/Assurance Standard Setters
  - 2 Regulators and Oversight Authorities
  - 2 Individuals
  - 1 National Standard Setters - Other
  - 1 Public Sector Auditors
  - 1 Other Professional Organizations
9. Proposed ISAE 3410 covers both RA and LA engagements. In general, respondents were highly supportive of proposed ISAE 3410 as it relates to RA engagements, with nearly all of the issues raised relating to LA engagements.
10. While a number of changes have been made to improve the proposed standard in response to comments made, including a change of emphasis with respect to the wording of LA reports, in general the approach adopted remains the same as in the exposure draft and is supported by the vast majority of respondents.

## Significant Matters

### A. Issues also Relevant to Other Projects

11. The intent of the Task Force is to focus on issues that are specific to proposed ISAE 3410. Crossover issues for other relevant projects have been considered in collaboration, where relevant, with other project Task Force's and are covered within each specific section. Other matters to note include:

#### *ISAE 3000*<sup>3</sup>

12. Proposed ISAE 3410 requires that a practitioner comply with the requirements of both this ISAE 3410 and ISAE 3000<sup>4</sup>, and has been written in the context of extant ISAE 3000. The exposure draft of revised ISAE 3000 (ED 3000) was issued in April 2011. The timeline for the project to revise ISAE 3000 has been modified to allow for other more urgent projects of the IAASB and is not expected to be finalized prior to December 2012.

---

<sup>3</sup> ISAE 3000, *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*

<sup>4</sup> ISAE 3410, para 14

13. The intention of the GHG Task Force is to seek the IAASB's approval at the March 2012 meeting to issue ISAE 3410 as a final standard, i.e., prior to approval of revised ISAE 3000. It is recognized that this will likely necessitate some conforming amendments to ISAE 3410 after it has been approved (as was flagged when it was exposed). It is noted that this is in line with the decision of the Board when proposed ISAE 3410 was issued and is, in the Task Force's view, in the public interest because:
- (a) The conforming amendments are likely to be reasonably minor in that they will involve points of detail, not principle, and will be few in number (as was the case with draft conforming amendments published with ED 3000).
  - (b) The earlier that ISAE 3410 is finalized, the sooner it will be that practitioners can start preparing for its implementation.
  - (c) The earlier that ISAE 3410 is finalized, the sooner it will be that the current standards "gap" can be filled on the basis that early adoption would be allowed.
  - (d) Firms have started to develop methodologies around the exposure draft and others have started to refer to it. This indicates the need to revise the draft on the basis of comments received and to issue the most relevant, up-to-date version as quickly as possible before the exposure draft becomes entrenched.
14. As previously noted, to comply with proposed ISAE 3410 the requirements of (extant) ISAE 3000 need to also be complied with. On exposure, concern was raised that practitioners would be unable to clearly identify the additional requirements of ISAE 3000 which would need to be complied with in an ISAE 3410 engagement. The Task Force performed a reconciliation between the requirements of both standards which has been presented as Appendix 3 of proposed Standard, with additional application material explaining the relationship with ISAE 3000 in paragraph A16.

*Professional Accountants*

15. The Explanatory Memorandum to the ED noted that the use of the ISAEs by assurance providers other than professional accountants in public practice was being considered by the IAASB in the context of revised ISAE 3000. As ISAE 3000 will be considered at a later time, this will be deliberated as part of that project.

**B. LA Report**

*Description of Procedures in the LA Report*

16. Respondents were asked if they thought the requirements and guidance regarding the summary of procedures in the practitioner's report would lead to effectively conveying to users the level of

assurance obtained by the practitioner.<sup>5</sup> Responses were mixed. 18 respondents<sup>6</sup> agreed with the approach taken in proposed ISAE 3410, but 11 respondents<sup>7</sup> indicated concerns, including:

- (a) The risk of “boilerplate” language<sup>8</sup>: While the Task Force acknowledges the risk that boilerplate language may develop, it also understands the difficulty for a standard to guard against this. No effective solutions were proposed by respondents to solve this problem. Proposals suggested included: (i) more examples, and (ii) a standard format report, both of which also run the risk of creating boilerplate language.
- (b) The risk that because LA reports are more detailed than RA reports, users may have the erroneous perception that LA conveys a higher level of assurance than RA.<sup>9</sup> The Task Force considers that the IAASB (and practitioners) are entitled to, and in fact must, expect that readers of assurance reports actually read those reports if they intend placing reliance on them. In that context, the Task Force draws the IAASB’s attention to the statement required by PROPOSED ISAE 3410 to *include a statement that the procedures performed vary in nature and are less in extent than in a reasonable assurance engagement, and that the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.*<sup>10</sup> This statement is unequivocal and could not reasonably be expected to leave a reader under the misconception that a LA engagement conveys more assurance than a RA engagement. For this reason the Task Force did not agree with the suggestion to require that RA and LA reports include an equally detailed summary of procedures.
- (c) The risk of confusion because: different situations are described similarly in the assurance report, leading to users having the perception that the level of assurance obtained is similar when in fact it is not; similar situations are described differently in the assurance report, leading to users having the perception that the level of assurance obtained is different when in fact it is not; or users simply being unable to understand a potentially vast array of differently reported procedures. It seems there are two possible causes for this problem:
  - (i) The inherent inability of users to understand potentially complex reports,<sup>11</sup> particularly if too much detail is included.<sup>12</sup> On the other hand, some respondents mentioned the benefit of transparency.<sup>13</sup>

---

<sup>5</sup> Question 5 in the Explanatory Memorandum to PROPOSED ISAE 3410.

<sup>6</sup> ACCA, CAASB, CIPFA, DTT, F. Irungu, ICAEW, ICAP, ICAS, ICPAS, IdW, JICPA, KPMG, LRQA, AOB, PwC, RACOPK, SAICA, TCR.

<sup>7</sup> APB, AAP, AICPA, AUASB, BDO, CGA, DHC, EY, GT, IRBA, RSM.

<sup>8</sup> AAP.

<sup>9</sup> APB, AICPA, DHC, FEE, (PwC specifically stated their opposition to this suggestion).

<sup>10</sup> ISAE 3410, para 73(h)(ii) (of the exposure draft)

<sup>11</sup> BDO, CGA, EY.

<sup>12</sup> ICAEW.

<sup>13</sup> ACCA, AUASB, APB, BDO, CAASB, DCH.

- (ii) How procedures are described:<sup>14</sup> A few of respondents pointed out the issue that the IAASB has discussed previously of users' perceptions of the level of procedures being affected by how practitioners describe their procedures (similar procedures described differently, or different procedures described similarly). Suggestions advanced for dealing with this were:
- To include in the requirements section the guidance in paragraph A136 (of the exposure draft) (or a variation thereof) for the summary to be "written in an objective way that allows intended users to understand the work done as the basis for the practitioner's conclusion. In most cases this will not involve detailing the entire work plan, but on the other hand it is important for it not to be so summarized as to be ambiguous, nor written in a way that is overstated or embellished."<sup>15</sup> The Task Force has amended the guidance in the illustrative LA report, and revised, for consistency, the requirements and guidance in the proposed standard.
  - To require the summary to include a note of the additional work that would be necessary to obtain RA.<sup>16</sup> The Task Force notes that this is permitted by ISAE 3000<sup>17</sup> and, in some cases, may be an effective way of communicating the level of assurance obtained. In the Illustrative LA report the Task Force has provided additional information on what was not performed in the customized examples.

17. In response to this, the Task Force prepared a revised illustrative LA report which was presented at the December 2011 meeting. The Board's views on the latter were mixed. Some IAASB members were of the view that the LA report should only include standardized procedures, with no ability to further tailor. Others were of the view that the LA report should allow the practitioner to use their professional judgment in describing the procedures. The IAASB agreed to a teleconference in January 2012 for the Task Force to obtain further input on the concerns raised.

18. For the January 2012 teleconference three options for the description of procedures in a LA report were identified by the Task Force:

- (a) A standardized approach, in which only common standardized procedures are listed, with the ability to delete a procedure if it was not performed because it was not relevant to the engagement; or
- (b) A customized approach - which included the same basic procedures as the standardized approach, but allowed for further detail to be provided on procedures performed; or
- (c) A free form approach, in which there are no standardized procedures listed. This approach would allow for more narrative on the nature and extent of the procedures performed.

---

<sup>14</sup> APB, AICPA, IRBA.

<sup>15</sup> APB.

<sup>16</sup> APB and NZICA, (PwC specifically stated their opposition to this suggestion).

<sup>17</sup> ISAE 3000, paragraph 49(i)(i).

The Task Force proposed that the final ISAE 3410 include two illustrative reports (options (a) and (b) above), which would enable practitioners to select the report most suitable to their circumstances.

19. While some Board members preferred the 'free-form' approach, the majority of members agreed with the Task Force that such an approach would add to the concerns that this type of report may result in some users (incorrectly) taking more assurance from a LA engagement than a RA engagement. This was also consistent with the responses received on the ED. It was therefore concluded that this type of approach would not be further pursued.
20. Some Board members had the view that there was significant overlap in the area of the standardized procedures in the two proposed reports, and the only difference between them was the 'customized' procedures that could be added. A suggestion was made by one Board member, and subsequently supported by several others, that only one customized illustrative LA report should be included, subject to further amendments on the description of the procedures. The Task Force agreed to further explore this option.
21. In further exploring this option, the Task Force concluded that the illustrative LA report as presented in the revised draft ISAE 3410 (Appendix 2, Illustration 2) achieves an appropriate balance between concerns that some users may take inappropriate assurance when the procedures are described, and the need for transparency, comparability and an understanding of the basis for the practitioner's conclusion. Moreover, this approach would be consistent with market practice and need (for example, regulatory need).
22. Some IAASB members also raised the issue that the general description in the illustrative LA report may appear to indicate RA-type procedures were performed. In response to this, the Task Force has revised the placement of the sentence which highlights that the procedures in a LA engagement are substantially less in scope than those for a RA engagement. The Task Force has also made some other minor adjustments to the standardized procedures listed but notes that in many cases the procedures vary in nature and/or are less in extent than in a RA engagement (see illustrative LA report). The example customized procedures have been amended to include procedures that might ordinarily have been performed had a RA engagement been undertaken.
23. A number of Board members questioned whether the two example customized procedures in the customized LA report were the only ones that could be listed separately. To further demonstrate procedures that could be included, a third example on the understanding of the control environment and information systems relevant to emissions quantification and reporting has been added.
24. In the application material amendments have been made based on the IAASB recommendations to make clear that:
  1. Customization is to elaborate on the standardized procedures already included.
  2. The description of the procedures should not appear to constitute an agreed upon procedures engagement, or that RA has been obtained.

*Other Matters Raised in the January 2012 Teleconference*

25. It was suggested that the “Independence and Quality Control” section be moved under the “Our Responsibilities” section. The placement of this paragraph has been discussed at previous IAASB meetings and it was agreed that the current placement is the most suitable place for this paragraph. The Task Force is of the view that leaving it as a separate section also highlights to users of the assurance report that the practitioner has had to comply with these requirements in order to carry out the engagement in accordance with ISAE 3410.
26. One Board member raised compliance with paragraph 49(i) of ISAE 3000 which requires “a summary of the work performed” to be included in the LA report. The Task Force is of the view that the illustrative LA report, as revised, continues to comply with this requirement.
27. The Task Force has also revised the requirements in paragraph 74(h(ii)) and application material in paragraphs A140 and A141 to ensure consistency with the illustrative LA report.
28. As this is an emerging and evolving area, and the Task Force believes further monitoring of the implementation of the standard, including the reports, will be important.

**Matter for CAG Consideration**

- Q1. Representatives of the CAG are asked whether they agree that the proposed illustrative LA report as presented in revised draft ISAE 3410 (Appendix 2, Illustration 2) should be included in its current form in the final ISAE 3410?

**C. Specific Differences Between RA and LA**

*Overview*

29. Respondents were asked whether, if the risk-based approach to LA engagements were adopted, they would agree with the specific differences between LA and RA engagements noted in proposed ISAE 3410.<sup>18</sup> While one respondent<sup>19</sup> thought the cumulative effect of differences would not result in a sufficiently rigorous approach to LA engagements, the vast majority of respondents<sup>20</sup> who addressed this question were in general agreement with the specific differences, although a number offered particular suggestions for changes. A number of changes, as noted in the marked-up draft, have been made to respond to comments made by respondents. The more significant proposals for change are discussed below.

---

<sup>18</sup> Question 3 in the Explanatory Memorandum to proposed ISAE 3410.

<sup>19</sup> GT.

<sup>20</sup> AAP, ACCA, AICPA, CIPFA, DTT, EY, FEE, F. Irungu, ICAEW, ICAS, ICAP, ICAPS, IRBA, JICPA, KPMG, LRQA, AOB, NBA, NZICA, PwC, RACOPK, RCM, SAICPA, TCR and WAO

### *Clarity*

30. Four respondents<sup>21</sup> thought proposed ISAE 3410 lacked sufficient clarity in distinguishing between procedures for LA and RA engagements. The Task Force has reviewed the proposed standard for clarity and made improvements where possible, but as the approach adopted is principles based rather than rules based and therefore relies considerably on the exercise of professional judgment in the particular circumstances of the engagement, the final ISAE will, potentially at least, be always open to this criticism.

### *Components of Internal Control*

31. Three respondents<sup>22</sup> argued that for LA engagements, as for RA engagements, the practitioner should be required to obtain an understanding of all the components of internal control, i.e., paragraph 22L (revised to 23L) should be identical to paragraph 22R (revised to 23R). One of these respondents<sup>23</sup> took this line of argument further and stated that both LA and RA engagements should require the same work to identify and assess the risks of material misstatement, arguing that “it is the nature and extent of the response to assessed risks which differs in a LA engagement as compared to a RA engagement.”
32. The Task Force notes that it would be a departure from current practice to require for all LA engagements that the practitioner (a) obtain an understanding of all the components of internal control, or (b) perform a risk assessment equal to an RA engagement. Further, it would impose significant additional costs which, in the Task Force's view, are both unnecessary and not justified in the face of the overwhelming support of both practitioners and all other categories of respondents for the approach in proposed ISAE 3410; an approach that has also been discussed at some length during the IAASB's deliberations prior to approving proposed ISAE 3410.

### *Design and Implementation of Controls*

33. Two respondents<sup>24</sup> argued that the approach to LA engagements should be changed to include a requirement equivalent to paragraph 23R (revised to 24R), which requires the practitioner to evaluate the design of controls and determine whether they have been implemented. A further respondent<sup>25</sup> argued that a change should be made to require the practitioner to evaluate design but not implementation.
34. The Task Force does not consider either of these changes to be necessary as “design and implementation” relate primarily to control activities and monitoring of controls, and the practitioner is not required to obtain an understanding of these two components of internal control in a LA engagement for the reasons discussed above.

---

<sup>21</sup> APB, AUASB, BDO, and IdW.

<sup>22</sup> AICPA, AUASB and GT.

<sup>23</sup> AUASB.

<sup>24</sup> IdW and NBA.

<sup>25</sup> GT.



### *Assertions*

35. Four respondents<sup>26</sup> argued that the assessment of risks should be at the assertion level for LA engagements, as it is for RA engagements.
36. While assertions may be used for LA engagements (which has now been made clearer by reference to paragraph A77 in paragraph 31L), the Task Force considers that to require this would impose an additional and unnecessary burden including, potentially, a documentation burden, as had been discussed at some length by the IAASB prior to approving the exposure draft.

### **D. Comparatives**

37. Some Board members and respondents to the ED were of the view that the existing application material on comparative information did not adequately address some of the complexities that could arise in this area. The Task Force has proposed further amendments to the requirements (in Paragraphs 60 to 61) and application material in paragraphs A115 to A120 to address the concerns raised.

### **E. 'Trigger Point' for Additional Procedures in a LA Engagement**

38. The 'trigger point' for additional procedures when the practitioner becomes aware that there may be a material error was not discussed at the December 2011 IAASB meeting. Respondents<sup>27</sup> to the ED generally agreed that the trigger point for additional procedures in a LA engagement, when the practitioner has identified a possible misstatement, was appropriate. Notwithstanding their agreement that the trigger point was appropriate, some respondents<sup>28</sup> noted that additional application material on the nature and extent of the additional procedures would be useful. A few respondents<sup>29</sup> did not agree with the trigger point as they either believed it was set at too low a level or that the requirements and related application material were not sufficiently clear.
39. The requirement in ISAE 3410<sup>30</sup> for additional procedures in a LA engagement if the practitioner becomes aware of a possible misstatement is consistent with the requirement in proposed ISRE 2400 (Revised)<sup>31</sup> and proposed ISAE 3000 (Revised).<sup>32</sup> Extant ISAE 3000 does not contain this requirement for LA engagements. Comments on the EDs for all three projects were discussed at a teleconference between the Task Force Chairs in January 2012. It was acknowledged that many respondents agreed with the requirement across all three projects, and that no changes to the

---

<sup>26</sup> AICPA, AUASB, GT and KPMG. IdW also state that "it is unclear to us how one can identify and assess risks of material misstatement for material types of emission and disclosure without using some kind of assertion concept," although they did not specifically argue for this, rather they argued for an ED-2400-type approach.

<sup>27</sup> AAP, AICPA, AUASB, CGA, CIPFA, DTT, EY, FEE, F.Irungu, GT, ICAEW, ICAP, ICAS, ICPAS, IRBA, JICPA, KPMG, AOB, RACOPK, RSM, SAICA, WAO

<sup>28</sup> AUASB, CGA, FEE, NBA

<sup>29</sup> BDO, TCR, LRQA, IDW, PwC

<sup>30</sup> ISAE 3410, para 47L

<sup>31</sup> Proposed ISRE 2400 (Revised), paragraphs 57-58

<sup>32</sup> Proposed ISAE 3000 (Revised), paragraph 41(c)

requirements were necessary. However, the ISAE 3410 and ISRE 2400 Task Forces have collaboratively developed subject specific additional application material in this area. (see paragraph A107). The ISAE 3000 Task Force will reconsider the need for application material when the project is further progressed.

**Matter for CAG Consideration**

Q2. Representatives of the CAG are asked whether there is sufficient application material to assist practitioners with understanding when additional procedures would be required once the possibility of a material misstatement has been identified in a LA engagement?

**F. Other Issues**

40. In December 2011, the IAASB discussed other matters in the revised draft ISAE 3410. The significant matters, together with the Task Force's recommendations have been detailed below:

- (a) Some members had noted that the flow of the paragraphs for "Understanding the Entity and its Environment and Identifying and Assessing the Risks of Material Misstatement" were confusing (Paragraphs 22 to 24). Although an assurance engagement is not linear but rather an iterative process, the Task Force agreed that some of the paragraphs could be moved to improve the flow.
- (b) The Task Force also made amendments to further clarify the differences in LA and RA procedures around internal control (in paragraph 23L). This was also responsive to the comments received on the ED.
- (c) An IAASB member noted that site visits were not mandatory for RA engagements and expressed the view that the execution of assurance procedures at sites would be an important part of an RA engagement. In the Task Force's view there are situations where performing assurance procedures at sites would not be necessary, effective or efficient and therefore do not believe that site visits should be made a mandatory procedure. They believe that the application material in paragraphs A70 to A73 sufficiently explains when it would be appropriate to obtain evidence on location at the sites.

**Matter for CAG Consideration**

Q3. Representatives of the CAG are asked whether there are any other matters that have not been considered by the Task Force but which should be taken into account in finalizing proposed ISAE 3410.

## Appendix

| LIST OF RESPONDENTS  |         |  |
|--|---------|--|
| #  | Abbrev. | Respondent (41)  |
| <b>Member Bodies (18)</b>  |         |  |
| 1.   | AAP     | Joint Response from Australian Accounting Profession - CPA Au, ICAA, NIA |
| 2.   | ACCA    | The Association of Chartered Certified Accountants                       |
| 3.   | AICPA   | American Institute of Certified Public Accountants                       |
| 4.   | CGA     | CGA-Canada   |
| 5.   | CICA    | Canadian Institute of Chartered Accountants                              |
| 6.   | CIPFA   | Chartered Institute of Public Finance and Accountancy                    |
| 7.   | DnR     | The Norwegian Institute of Public Accountants                            |
| 8.   | FEE     | Federation des Experts Comptables Europeens                              |
| 9.   | FSR     | Foreningen af Statsautoriserede Revisorer                                |
| 10.  | ICAEW   | The Institute of Chartered Accountants in England and Wales              |
| 11.  | ICAP    | Institute of Chartered Accountants of Pakistan                           |
| 12.  | ICAS    | The Institute of Chartered Accountants of Scotland                       |
| 13.  | ICJCE   | Instituto de Censores Jurados de Cuentas de España                       |
| 14.  | ICPAS   | Institute of Certified Public Accountants of Singapore                   |
| 15.  | IDW     | Institut der Wirtschaftsprüfer   |
| 16.  | JICPA   | The Japanese Institute of Certified Public Accountants                   |
| 17.  | NBA     | The Nederlandse Beroepsorganisatie van Accountants                       |
| 18.  | SAICA   | The South African Institute of Chartered Accountants                     |
| <b>Accounting Firms (8)</b>                                      |         |  |
| 19.  | BDO     | BDO Global Coordination B.V.   |
| 20.  | DTT     | Deloitte Touche Tohmatsu   |
| 21.  | EY      | Ernst & Young Global   |
| 22.  | GT      | Grant Thornton International   |
| 23.  | KPMG    | KPMG   |
| 24.  | PwC     | PricewaterhouseCoopers   |
| 25.  | RACOPK  | Riaz Ahmad and Company, Chartered Accountants                            |
| 26.  | RSM     | RSM International Limited  |
| <b>Non-accounting GHG Assurers/Consultants/Organisations (4)</b> |         |  |
| 27.  | DHC     | Douglas Hileman Consulting LLC (United States)                           |
| 28.  | LRQA    | Lloyd's Register Quality Assurance Ltd (United Kingdom)                  |
| 29.  | P&P     | Planet & Prosperity Ltd (United Kingdom)                                 |
| 30.  | TCR     | The Climate Registry (United States)                                     |
| <b>National Auditing/Assurance Standard Setters (4)</b>          |         |  |
| 31.  | APB     | Auditing Practices Board (United Kingdom)                                |
| 32.  | AUASB   | Australian Auditing and Assurance Standards Board                        |

|   |            |  |
|---|------------|--|
| 33.   | CAASB      | Canadian Auditing and Assurance Standards Board              |
| 34.   | NZICA      | New Zealand Institute of Chartered Accountants               |
| <b>Regulators and Oversight Authorities (2)</b> |            |  |
| 35.   | AOB        | Audit Oversight Board (Malaysia)                             |
| 36.   | IRBA       | Independent Regulatory Board for Auditors, South Africa      |
| <b>Individuals(2)</b>                           |            |  |
| 37.   | C. Barnard | Chris Barnard  |
| 38.   | F. Irungu  | Felicitas T Irungu   |
| <b>National Standard Setters - Other(1)</b>     |            |  |
| 39.   | ANSI       | American National Standards Institute                        |
| <b>Public Sector Auditors (1)</b>               |            |  |
| 40.   | WAO        | Wales Audit Office   |
| <b>Other Professional Organizations (1)</b>     |            |  |
| 41.   | IIA        | Interim Canadian Board of the Institute of Internal Auditors |