

## Safeguards Phase 2 – Proposed Revisions Sections 600

### Mark-up From Safeguards ED-2

#### Part 4A – International Independence Standards for Audits and Reviews

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#### Section 600

#### Provision of Non-assurance Services to an Audit Client

##### Introduction

- 600.1 Firms are required to comply with the fundamental principles, be independent, and apply the conceptual framework set out in Section 120 to identify, evaluate and address threats to independence.
- 600.2 ~~Firms and network~~ firms might provide a range of non-assurance services to their audit clients, consistent with their skills and expertise. Providing non-assurance services to audit clients might create threats to compliance with the fundamental principles and threats to independence.
- 600.3 ~~This Section 600 sets out requirements and application material relevant to applying the conceptual framework to identify, evaluate and address threats to independence when providing non-assurance services to audit clients. The subsections that follow set out specific requirements and application material relevant to providing certain non-assurance services to audit clients and indicate the types of threats that might be created as a result. In some cases, these~~ Some of the subsections include requirements that expressly prohibit a firm or network firm from providing certain services to an audit client in certain circumstances because the threats created cannot be addressed by applying ~~eliminated or there can be no~~ safeguards ~~to reduce them to an acceptable level.~~

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#### Requirements and Application Material

##### General

- R600.4 ~~Before a firm or a network firm accepts an engagement to provide a non-assurance service to an audit client, the firm shall determine whether providing such a service would create a threat to independence.~~
- 600.4 A1 ~~The requirements and application material in this Section 600 assist the firms in analyzing certain types of non-assurance services and the related threats that might be created when a firm or network firm provides non-assurance services to an audit client.~~
- 600.4 A2 ~~New business practices, the evolution of financial markets and changes in information technology, are amongst the developments that make it impossible to draw up an all-inclusive list of non-assurance services that might be provided to an audit client. As a result, this the Code does not include an exhaustive listing of all non-assurance services that might be provided to an audit client.~~

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All Audit Clients

600.4 A3 Factors that are relevant in evaluating the level of any threats created by providing a non-assurance service to an audit client include:

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- The nature, scope and purpose of the service.
- ~~and~~ The degree of reliance, if any, that will be placed on the outcome of the ~~at~~ service as part of the audit.
- The legal and regulatory environment in which the service is provided.
- Whether the outcome of the service will affect matters reflected in the financial statements on which the firm will express an opinion, and, if so:
  - The extent to which the outcome of the service will have a material effect on the financial statements.
  - The degree of subjectivity involved in determining the appropriate amounts or treatment for those matters reflected in the financial statements.
  - ~~The extent of the audit client's involvement in determining significant matters of judgment.~~
- The level of expertise of the client's management and employees with respect to the type of service provided.
- The nature and extent of the impact of the service, if any, on the systems that generate information that form a significant part of the client's:
  - Accounting records or financial statements on which the firm will express an opinion.
  - Internal controls over financial reporting.
- Whether the audit client is a public interest entity. For example, providing a non-assurance service to an audit client that is a public interest entity might be perceived to result in a higher level of a threat.

600.4 A4 The subsections that follow include examples of more specific factors that are relevant in evaluating the level of any threats and also include example of actions that might address threats created by providing certain non-assurance services when those threats are not at an acceptable level.

Materiality in Relation to an Audit Client's Financial Statements

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600.5 A1- The subsections that follow refer to materiality in relation to an audit client's financial statements. The concept of materiality in relation to an audit is addressed in ISA 320, *Materiality in Planning and Performing an Audit and in relation to a review in ISRE 2400, Engagements to Review Historical Financial Information*. The determination of materiality involves the exercise of professional judgment and is impacted by both quantitative and qualitative factors. It is also affected by perceptions of the financial information needs of users.

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Multiple Non-assurance Services to an Audit Client

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600.6 A1 A firm or network firm might provide multiple non-assurance services to an audit client. When providing a non-assurance service to an audit client, in these circumstances the consideration of

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applying the conceptual framework requires the firm to consider any the combined effect of threats created by providing those other non-assurance services provided is relevant to the firm's evaluation of threats, audit client.

#### Avoiding Prohibition on Assuming Management Responsibilities

**R600.7** A firm or a network firm shall not assume a management responsibility for an audit client.

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600.7 A12 Management responsibilities involve controlling, leading and directing an entity, including making decisions regarding the acquisition, deployment and control of human, financial, technological, physical and intangible resources.

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600.7 A24 Providing a non-assurance service to an audit client creates self-review and self-interest threats if the firm or network firm assumes a management responsibility when performing the service. Assuming a management responsibility also creates a familiarity threat because the firm or network firm becomes too closely aligned with the views and interests of management.

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600.7 A3 Determining whether an activity is a management responsibility depends on the circumstances and requires the exercise of judgment. Examples of activities that would be considered a management responsibility include:

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- Setting policies and strategic direction.
- Hiring or dismissing employees.
- Directing and taking responsibility for the actions of employees in relation to the employees' work for the entity.
- Authorizing transactions.
- Controlling or managing bank accounts or investments.
- Deciding which recommendations of the firm or network firm or other third parties to implement.
- Reporting to those charged with governance on behalf of management.
- Taking responsibility for:
  - ~~For~~ The preparation and fair presentation of the financial statements in accordance with the applicable financial reporting framework.
  - ~~For~~ Designing, implementing, monitoring or maintaining internal control.

#### Providing advice and recommendations to assist management in discharging responsibilities

600.7 A4 Providing advice and recommendations to assist the management of an audit client in discharging its responsibilities is not assuming a management responsibility. (Ref: Para. R600.7 to 600.7 A3).

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**R600.8** To avoid the risk of assuming a management responsibility when providing any non-assurance services to an audit client, the firm ~~or a network firm~~ shall be satisfied that client management

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makes all judgments and decisions that are the proper responsibility of management. This includes ensuring that the client's management:

- (a) Designates an individual who possesses suitable skill, knowledge and experience to be responsible at all times for the client's decisions and to oversee the services. Such an individual, preferably within senior management, would understand:
  - (i) The objectives, nature and results of the services; and
  - (ii) The respective client and firm or network firm responsibilities.However, the individual is not required to possess the expertise to perform or re-perform the services.
- (b) Provides oversight of the services and evaluates the adequacy of the results of the service performed for the client's purpose.
- (c) Accepts responsibility for the actions, if any, to be taken arising from the results of the services.

#### Providing Non-Assurance Services to an Audit Client that Later Becomes a Public Interest Entity

**R600.9** A non-assurance service currently or previously provided by a firm or a network firm to an audit client does not compromise the firm's independence when the client becomes a public interest entity if:

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- (a) The previous non-assurance service complies with the requirements and application material of this sSection 600 that relate to audit clients that are not public interest entities;
- (b) Non-assurance services currently in progress that are not permitted under this sSection 600 for audit clients that are public interest entities are ended before, or as soon as practicable after, the client becomes a public interest entity; or and
- (c) The firm applies-addresses the conceptual framework to identify, evaluate and address any threats that are created.

#### Considerations for Certain Related Entities

**R600.10** This sSection 600 prohibits a firm or network firm from assuming management responsibilities or providing certain non-assurance services to audit clients. As an exception to those requirements, a firm or network firm may assume management responsibilities or provide non-assurance services that would otherwise be prohibited to the following related entities of the client on whose financial statements the firm will express an opinion:

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- (a) An entity that has direct or indirect control over the client;
  - (b) An entity with a direct financial interest in the client if that entity has significant influence over the client and the interest in the client is material to such entity; or
  - (c) An entity which is under common control with the client,
- provided that all of the following conditions are met:
- (i) The firm or a network firm does not express an opinion on the financial statements of the related entity;

- (ii) The firm or a network firm does not assume a management responsibility, directly or indirectly, for the entity on whose financial statements the firm will express an opinion;
- (iii) The services do not create a self-review threat because the results of the services will not be subject to audit procedures; and
- (iv) The firm addresses any other applies the conceptual framework to eliminate any threats created or reduce them to an acceptable level by providing such services.

## Subsection 601 – Accounting and Bookkeeping Services

### Introduction

- 601.1 ~~Firms and network firms~~ Providing accounting and bookkeeping services to an audit client might create a self-review threats.
- 601.2 In addition to the Subsection 601 sets out specific requirements and application material in this subsection, the requirements and application material in paragraphs 600.1 to R600.10 are relevant to applying the conceptual framework when providing an audit client with accounting and bookkeeping services. There are some circumstances in which This subsection includes requirements that prohibit firms and network firms from providing accounting and bookkeeping services to an audit clients in certain circumstances is expressly prohibited because the threats created in those circumstances cannot be addressed by applying eliminated or there can be no safeguards, to reduce them to an acceptable level. The requirements and application material set out in Section 600 are relevant to this subsection.

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### Requirements and Application Material

#### General

- 601.3 A1 Accounting and bookkeeping services comprise a broad range of services including:
- Preparing accounting records and financial statements.
  - Bookkeeping and Recording transactions and payroll services.
- 601.3 A2 Management is responsible for the preparation and fair presentation of the financial statements in accordance with the applicable financial reporting framework. These responsibilities include:
- Determining accounting policies and the accounting treatment in accordance with those policies.
  - Preparing or changing source documents or originating data, in electronic or other form, evidencing the occurrence of a transaction. Examples include:
    - Purchase orders.
    - Payroll time records.
    - Customer orders.
  - Originating or changing journal entries, ~~or determining~~ or approving the account classifications of transactions.

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601.3 A3 The audit process necessitates dialogue between the firm and the management of the audit client, which might involve:

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- Applying accounting standards or policies and financial statement disclosure requirements.
- Assessing the appropriateness of financial and accounting control and the methods used in determining the stated amounts of assets and liabilities.
- Proposing adjusting journal entries.

These activities are considered to be a normal part of the audit process and do not usually create threats so long as the client is responsible for making decisions in the preparation of accounting records and financial statements.

601.3 A4 Similarly, the client might request technical assistance on matters such as resolving account reconciliation problems or analyzing and accumulating information for regulatory reporting. In addition, the client might request technical advice on accounting issues such as the conversion of existing financial statements from one financial reporting framework to another. Examples include:

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- Complying with group accounting policies.
- Transitioning to a different financial reporting framework such as International Financial Reporting Standards.

Such services do not usually create threats provided neither the firm nor network firm does not assume a management responsibility for the client.

Accounting and Bookkeeping Services that are Routine or Mechanical

601.4 A1 Accounting and bookkeeping services that are routine or mechanical in nature require little or no professional judgment by the professional accountant. Some examples of these services are:

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- Preparing payroll calculations or reports based on client-originated data for approval and payment by the client.
- Recording recurring transactions for which amounts are easily determinable from source documents or originating data, such as a utility bill where the client has determined or approved the appropriate account classification.
- Calculating depreciation on fixed assets when the client determines the accounting policy and estimates of useful life and residual values.
- Posting transactions coded by the client to the general ledger.
- Posting client-approved entries to the trial balance.
- Preparing financial statements based on information in the client-approved trial balance and preparing related notes based on client-approved records.

### Audit Clients that Are Not Public Interest Entities

601.5 A1 ~~Examples of actions that might be safeguards to address the self-review threats created when providing accounting and bookkeeping services of a routine and mechanical nature to an audit client include:~~

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- Using professionals who are not audit team members to perform the ~~accounting and bookkeeping service.~~
- ~~If such services are performed by an audit team member, using a partner or senior professionals who is not an audit team member, with appropriate expertise to review the work performed. Having an appropriate professional who was not involved in providing the service review the audit work or service performed.~~

### Audit Clients that Are Not Public Interest Entities

R601.6 ~~A firm or a network firm shall not provide to an audit client that is not a public interest entity: services related to accounting and bookkeeping services including preparing financial statements on which the firm will express an opinion, or financial information which forms the basis of the such financial statements, on which the firm will express an opinion, unless:~~

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- (a) The services are of a routine or mechanical nature; and
- (b) The firm addresses any threats ~~that are~~ created by providing such services.

### Audit Clients that Are Public Interest Entities

R601.7 ~~Subject to paragraph R601.8, a firm or a network firm shall not provide to an audit client that is a public interest entity accounting and bookkeeping services including preparing financial statements on which the firm will express an opinion, or financial information which forms the basis of such the financial statements.~~

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R601.8 ~~As an exception to paragraph R601.7, a firm or network firm may provide accounting and bookkeeping services of a routine or mechanical nature for divisions or related entities of an audit client that is a public interest entity if the personnel providing the services are not audit team members and:~~

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- (a) The divisions or related entities for which the service is provided are collectively immaterial to the financial statements on which the firm will express an opinion; or
- (b) The services ~~relates~~ to matters that are collectively immaterial to the financial statements of the division or related entity.

## Subsection 602 – Administrative Services

### Introduction

602.1 ~~Providing administrative services to an audit client does not usually create a threat.~~

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602.2 ~~In addition to the Subsection 602 sets out specific application material in this subsection, the requirement and application material in paragraphs 600.1 to R600.10 are relevant to applying the conceptual framework when providing administrative services. The requirements and application material set out in Section 600 are relevant to this subsection.~~

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## Application Material

602.3 A1 Administrative services involve assisting clients with their routine or mechanical tasks within the normal course of operations. Such services require little to no professional judgment and are clerical in nature.

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602.3 A2 Examples of administrative services include:

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- Word processing services.
- Preparing administrative or statutory forms for client approval.
- Submitting such forms as instructed by the client.
- Monitoring statutory filing dates, and advising an audit client of those dates.

## Subsection 603 – Valuation Services

### Introduction

603.1 Providing valuation services to an audit client might create a self-review or advocacy threats.

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603.2 In addition to the Subsection 603 sets out specific requirements and application material in this subsection, the requirements and application material in paragraphs 600.1 to R600.10 are relevant to applying the conceptual framework when providing a valuation services to an audit client. This subsection includes requirements that prohibit firms and network firms from in some circumstances, providing certain valuations services to an audit clients in certain circumstances is expressly prohibited because the threats created cannot be addressed by applying eliminated or there can be no safeguards to reduce them to an acceptable level. The requirements and application material set out in Section 600 are relevant to this subsection.

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## Requirements and Application Material

### General

603.3 A1 A valuation comprises the making of assumptions with regard to future developments, the application of appropriate methodologies and techniques, and the combination of both to compute a certain value, or range of values, for an asset, a liability or for a business as a whole.

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603.3 A2 If a firm or network firm is requested to perform a valuation to assist an audit client with its tax reporting obligations or for tax planning purposes and the results of the valuation will not have a direct effect on the financial statements, the application material set out in paragraphs 604.102 A1 to 604.104 A54, relating to such services applies.

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603.43 A34 Factors that are relevant in evaluating the level of any self-review or advocacy threats created by providing valuation services to an audit client include:

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- The extent of the client's involvement in determining and approving the valuation methodology and other significant matters of judgment.
- The degree of subjectivity inherent in the item for valuations involving standard or established methodologies.
- Whether the valuation will have a material effect on the financial statements.
- The extent and clarity of the disclosures related to the valuation in the financial statements.



- The degree of dependence on future events of a nature that might create significant volatility inherent in the amounts involved.

603.34 A42 Examples of actions that might be safeguards to address such the self-review or advocacy threats created when providing valuation services to an audit client include:

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- Using professionals who are not audit team members to perform the valuation services service.
- Having an appropriate professional who was not involved in providing the valuation service review the audit work or valuation work service performed.

#### Audit Clients That Are Not Public Interest Entities

R603.45 A firm or a network firm shall not provide a valuation service to an audit client that is not a public interest entity if:

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- (a) The valuation involves a significant degree of subjectivity; and
- (b) The valuation will have a material effect on the financial statements on which the firm will express an opinion.

603.54 A1 Certain valuations do not involve a significant degree of subjectivity. This is likely to be the case when the underlying assumptions are either established by law or regulation, or are widely accepted and when the techniques and methodologies to be used are based on generally accepted standards or prescribed by law or regulation. In such circumstances, the results of a valuation performed by two or more parties are not likely to be materially different.

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#### Audit Clients That Are Public Interest Entities

R603.65 A firm or a network firm shall not provide a valuation services to an audit client that is a public interest entity if the valuation services would have a material effect, separately individually or in the aggregate, on the financial statements on which the firm will express an opinion.

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### Subsection 604 – Taxation Services

#### Introduction

604.1 Providing taxation services to an audit client might create a self-review or advocacy threats.

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604.2 In addition to the Subsection 604 sets out specific requirements and application material in this subsection, the requirements and application material in paragraphs 600.1 to R600.10 are relevant to applying the conceptual framework when providing a taxation service to an audit client. In some circumstances, This subsection includes requirements that prohibit firms and network firms from providing certain taxation services to an audit clients is expressly prohibited in certain circumstances because the threats created cannot be addressed by applying eliminated or there can be no safeguards, to reduce them to an acceptable level. The requirements and application material set out in Section 600 are relevant to this subsection.

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## Requirements and Application Material

### General

604.3 A1 Taxation services comprise a broad range of services, including:

- Tax return preparation.
- Tax calculations for the purpose of preparing the accounting entries.
- Tax planning and other tax advisory services.
- Assistance in the resolution of tax disputes.

While this subsection deals with each different types of taxation services described listed above separately under separate headings, in practice, the activities involved in providing tax\_ation services are often interrelated.

604.43 A2 Factors that are relevant in evaluating the level of any threats created by providing taxation services to audit clients include:

- The particular characteristics of the engagement.
- The level of tax expertise of the client's employees.
- The system by which the tax authorities assess and administer the tax in question and the role of the firm or network firm in that process.
- The complexity of the relevant tax regime and the degree of judgment necessary in applying it.

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### Tax Return Preparation

#### All Audit Clients

604.5 A1- Providing tax return preparation services does not usually create a threat.

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604.5 A2 Tax return preparation services involve:

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- Assisting clients with their tax reporting obligations by drafting and compiling information, including the amount of tax due (usually on standardized forms) required to be submitted to the applicable tax authorities.
- Advising on the tax return treatment of past transactions and responding on behalf of the audit client to the tax authorities' requests for additional information and analysis (for example, including providing explanations of and technical support for the approach being taken).

604.5 A3 Tax return preparation services are usually based on historical information and principally involve analysis and presentation of such historical information under existing tax law, including precedents and established practice. Further, the tax returns are subject to whatever review or approval process the tax authority considers appropriate.

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### Tax Calculations for the Purpose of Preparing Accounting Entries

#### General-All Audit Clients

604.6 A1 Preparing calculations of current and deferred tax liabilities (or assets) for an audit client for the

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purpose of preparing accounting entries that will be subsequently audited by the firm creates a self-review threat.

#### Audit Clients That Are Not Public Interest Entities

604.76 A24 In addition to the factors in paragraph 604.34 A2, a factors that is relevant in evaluating the level of such a any threat created by preparing tax calculations for the purpose of preparing accounting entries for an audit client is whether the calculation might have a material effect on the financial statements on which the firm will express an opinion, include:

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The complexity of the relevant tax law and regulation and the degree of judgment necessary in applying them.  
The materiality of the amounts to the financial statements.

#### Audit Clients That Are Not Public Interest Entities

604.67 A32 Examples of actions that might be safeguards to address self-review threats created when providing tax calculations for the purpose of preparing accounting entries for to an audit client that is not a public interest entity include:

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- Using tax professionals who are not audit team members to perform the tax calculations service.
- If the service is performed by an audit team member, using a professional with appropriate expertise who is not an audit team member to review the tax calculations.
- Having an appropriate professional who was not involved in providing the service review the audit work or service performed.

#### Audit Clients That Are Public Interest Entities

R604.78 A firm or a network firm shall not prepare tax calculations of current and deferred tax liabilities (or assets) for an audit client that is a public interest entity for the purpose of preparing accounting entries that are material to the financial statements on which the firm will express an opinion.

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#### **Tax Planning and Other Tax Advisory Services**

##### General All Audit Clients

604.89 A1 Providing tax planning and other tax advisory services might create a self-review or advocacy threat.

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604.89 A2 Tax planning or other tax advisory services comprise a broad range of services, such as advising the client how to structure its affairs in a tax efficient manner or advising on the application of a new tax law or regulation.

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604.840 A34 In addition to paragraph 604.34 A2, factors that are relevant in evaluating the level of any self-review or advocacy threat created by providing tax planning and other tax advisory services advice to audit clients include:

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- The degree of subjectivity involved in determining the appropriate treatment for the tax advice in the financial statements.

- Whether the tax treatment is supported by a private ruling or has otherwise been cleared by the tax authority before the preparation of the financial statements.  
 For example, whether the advice provided as a result of the tax planning and other tax advisory services ~~is~~:
  - Is clearly supported by tax authority or other precedent.
  - Is an established practice of
  - Has a basis in tax law that is likely to prevail.
- The extent to which the outcome of the tax advice will have a material effect on the financial statements.
- Whether the effectiveness of the tax advice depends on the accounting treatment or presentation in the financial statements and there is doubt as to the appropriateness of the accounting treatment or presentation under the relevant financial reporting framework.

604.810 A42 Examples of actions that might be safeguards to address such self-review or advocacy threats ~~created when providing tax planning and other tax advisory services~~ include:

- Using ~~tax~~ professionals who are not audit team members to perform the ~~tax~~ service.
- Having an appropriate professional, who was not involved in providing the ~~tax~~ service review the audit work or financial statement treatment service performed.
- Obtaining pre-clearance from the tax authorities.

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#### When Effectiveness of Tax Advice Is Dependent on a Particular Accounting Treatment or Presentation

**R604.911** A firm or a network firm shall not provide tax planning and other taxation advisory services to an audit client when the effectiveness of the tax advice depends on a particular accounting treatment or presentation in the financial statements and:

- The audit team has reasonable doubt as to the appropriateness of the related accounting treatment or presentation under the relevant financial reporting framework; and
- The outcome or consequences of the tax advice will have a material effect on the financial statements on which the firm will express an opinion.

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#### **Taxation Services Involving Valuations**

##### All Audit Clients

604.102 A1 Providing tax valuation services to an audit client might create ~~a~~ self-review or advocacy threats.

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604.102 A2 A firm or a network firm might perform a valuation for tax purposes only where the result of the valuation will not have a direct effect on the financial statements (that is, the financial statements are only affected through accounting entries related to tax). This would not usually create threats if the effect on the financial statements is immaterial or the valuation is subject to external review by a tax authority or similar regulatory authority.

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604.102 A3 If the valuation that is performed for tax purposes is not subject to ~~such~~ an external review and the effect is material to the financial statements, in addition to paragraph 604.34 A2, the following factors are relevant ~~in to~~ evaluating the level of any threat created by providing those services to an audit client:

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- The extent to which the valuation methodology is supported by tax law or regulation, other precedent or established practice.
- The degree of subjectivity inherent in the valuation.
- The reliability and extent of the underlying data.

604.103 A41 Examples of actions that might be safeguards to address self-review or advocacy threats when providing ~~taxation~~ services involving valuations ~~to an audit client~~ include:

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- Using ~~tax~~ professionals who are not audit team members to perform the service.
- Having an appropriate professional who was not involved in providing the service review the audit work or ~~the result of the tax service performed~~.
- Obtaining pre-clearance from the tax authorities.

604.104 A54 A firm or network firm might also perform a tax valuation to assist an audit client with its tax reporting obligations or for tax planning purposes where the result of the valuation will have a direct effect on the financial statements. In such situations, the requirements and application material set out in Subsection 603 relating to valuation services apply.

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#### Assistance in the Resolution of Tax Disputes

##### All Audit Clients

604.115 A1 Providing assistance in the resolution of tax disputes to an audit client might create ~~an self-review or advocacy or self-review threats~~.

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604.115 A2 A tax dispute might reach a point when the tax authorities have notified an audit client that arguments on a particular issue have been rejected and either the tax authority or the client refers the matter for determination in a formal proceeding, for example before a public tribunal or court.

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604.116 A3 In addition to paragraph 604.34 A2, factors that are relevant in evaluating the level of any self-review or advocacy threats created by assisting ~~in the resolution of tax disputes to~~ an audit client in the resolution of tax disputes include:

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- The role management plays in the resolution of the dispute.
- The extent to which the outcome of the dispute will have a material effect on the financial statements on which the firm will express an opinion.
- Whether the advice that was provided which is the subject of the tax dispute, ~~has been provided by either the firm or network firm~~.
- The extent to which the matter is supported by tax law or regulation, other precedent, or established practice.
- Whether the proceedings are conducted in public.

604.116 A4 Examples of actions that might be safeguards to address such self-review or advocacy threats ~~created by having a role in the resolution of tax disputes~~ include:

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- Using professionals who are not audit team members to perform the ~~tax~~ service.
- Having an appropriate professional, who was not involved in providing the service review the audit work or the service performed ~~financial statement treatment~~.

When Resolution of Tax Matter Involves Acting as An Advocate Before Public Tribunal and Amounts are Material

R604.126 A firm or a network firm shall not provide ~~taxation~~ services that involve assisting in the resolution of tax disputes to an audit client if:

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- (a) The services involve acting as an advocate for the audit client before a public tribunal or court in the resolution of a tax matter; and
- (b) The amounts involved are material to the financial statements on which the firm will express an opinion.

604.126 A12 Paragraph R604.126 does not preclude a firm or network firm from having a continuing advisory role in relation to the matter that is being heard before a public tribunal or court, for example:

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- Responding to specific requests for information.
- Providing factual accounts or testimony about the work performed.
- Assisting the client in analyzing the tax issues in the matter.

604.126 A24 What constitutes a “public tribunal or court” depends on how tax proceedings are heard in the particular jurisdiction.

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## Subsection 605 – Internal Audit Services

### Introduction

605.1 ~~The p~~Providing sion of internal audit services to an audit client might create a self-review threats.

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605.2 In addition to the ~~Subsection 605~~ sets out specific requirements and application material in this subsection, the requirements and application material in paragraphs 600.1 to R600.10 are relevant to applying the conceptual framework when providing an internal audit service to an audit client. ~~In some circumstances, This subsection includes requirements that prohibit firms and network firms from providing certain internal audit services is expressly prohibited to audit clients in certain circumstances because the threats created cannot be addressed eliminated or there can be no by applying safeguards, to reduce them to an acceptable level. The requirements and application material set out in Section 600 are relevant to this subsection.~~

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## Requirements and Application Material

### General

605.3 A1 Internal audit services involve assisting the audit client in the performance of its internal audit activities. Internal audit activities might include:

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- Monitoring of internal control – reviewing controls, monitoring their operation and recommending improvements to them.

- Examining financial and operating information by:
  - Reviewing the means used to identify, measure, classify and report financial and operating information.
  - Inquiring specifically into individual items including detailed testing of transactions, balances and procedures.
- Reviewing the economy, efficiency and effectiveness of operating activities including non-financial activities of an entity.
- Reviewing compliance with:
  - Laws, regulations and other external requirements.
  - Management policies, directives and other internal requirements.

605.3 A2 The scope and objectives of internal audit activities vary widely and depend on the size and structure of the entity and the requirements of management and those charged with governance.

Commented [IESBA73]: 290.190

#### All Audit Clients

R605.4 Paragraph R600.7 precludes a firm or a network firm from assuming a management responsibility when providing an internal audit service to an audit client. When providing an internal audit service to an audit client, the firm shall be satisfied that:

Commented [IESBA74]: 290.193

- (a) The client designates an appropriate and competent resource, preferably within senior management, to:
  - (i) Be responsible at all times for internal audit activities; and
  - (ii) Acknowledge responsibility for designing, implementing, monitoring and maintaining internal control.
- (b) The client's management or those charged with governance reviews, assesses and approves the scope, risk and frequency of the internal audit services;
- (c) The client's management evaluates the adequacy of the internal audit services and the findings resulting from their performance;
- (d) The client's management evaluates and determines which recommendations resulting from internal audit services to implement and manages the implementation process; and
- (e) The client's management reports to those charged with governance the significant findings and recommendations resulting from the internal audit services.

605.4 A1 Paragraph R600.7 precludes a firm or a network firm from assuming a management responsibility. Performing a significant part of the client's internal audit activities increases the possibility that firm or network firm personnel providing internal audit services will assume a management responsibility. If the firm's personnel assume a management responsibility when providing internal audit services to an audit client, the threat created cannot be eliminated or reduced to an acceptable level by applying a safeguard.

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605.4 A2 Examples of internal audit services that involve assuming management responsibilities include:

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- Setting internal audit policies or the strategic direction of internal audit activities.

- Directing and taking responsibility for the actions of the entity's internal audit employees.
- Deciding which recommendations resulting from internal audit activities to implement.
- Reporting the results of the internal audit activities to those charged with governance on behalf of management.
- Performing procedures that form part of the internal control, such as reviewing and approving changes to employee data access privileges.
- Taking responsibility for designing, implementing, monitoring and maintaining internal control.
- Performing outsourced internal audit services, comprising all or a substantial portion of the internal audit function, where the firm [or network firm](#):
  - Is responsible for determining the scope of the internal audit work; and
  - Might have responsibility for one or more of the matters noted above.

605.64 A34 When a firm uses the work of an internal audit function in an audit engagement, International Standards on Auditing require the performance of procedures to evaluate the adequacy of that work. Similarly, ~~When~~ a firm [or network firm](#) accepts an engagement to provide internal audit services to an audit client, the results of those services might be used in conducting the external audit. This creates a self-review threat because it is possible that the audit team will use the results of the internal audit service for purposes of the audit engagement without:

Commented [IESBA78]: 290.194

- (a) Appropriately evaluating those results; or
- (b) Exercising the same level of professional skepticism as would be exercised when the internal audit work is performed by individuals who are not members of the firm.

605.45 A54 Factors that are relevant in evaluating the level of ~~any self-review~~ threat created by providing internal audit services to an audit client include:

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- The materiality of the related financial statement amounts.
- The risk of misstatement of the assertions related to those financial statement amounts.
- The degree of reliance that the audit team will place on the work of the internal audit service, including in the course of an external audit.

605.45 A62 An example of an action that might be a safeguard to address ~~such a~~ self-review threats ~~created by providing internal audit services~~ is using professionals who are not audit team members to perform the ~~internal audit~~ service.

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#### Audit Clients that Are Public Interest Entities

R605.67 A firm or a network firm shall not provide internal audit services to an audit client that is a public interest entity, if the services relate to:

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- (a) A significant part of the internal controls over financial reporting;
- (b) Financial accounting systems that generate information that is, ~~separately individually~~ or in the aggregate, material to the client's accounting records or financial statements on which the firm will express an opinion; or



- (c) Amounts or disclosures that are, separately-individually or in the aggregate, material to the financial statements on which the firm will express an opinion.

## Subsection 606 – Information Technology Systems Services

### Introduction

- 606.1 Providing information technology (IT) systems services to an audit client might create a self-review threat.
- 606.2 In addition to the Subsection 606 sets out specific requirements and application material in this subsection, the requirements and application material in paragraphs 600.1 to R600.10 are relevant to applying the conceptual framework when providing an IT systems service to an audit client. In some circumstances, This subsection includes requirements that prohibit firms and network firms from providing certain IT systems services to audit clients in certain circumstances is expressly prohibited because the threats created cannot be addressed by applying eliminated or there can be no safeguards, reduce them to an acceptable level. The requirements and application material set out in Section 600 are relevant to this subsection.

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### Requirements and Application Material

#### General

- 606.3 A1 Services related to information technology IT systems include the design or implementation of hardware or software systems. The IT systems might:
- (a) Aggregate source data;
  - (b) Form part of the internal control over financial reporting; or
  - (c) Generate information that affects the accounting records or financial statements, including related disclosures.
- However, the IT systems might also involve matters that are unrelated to the audit client's accounting records or the internal control over financial reporting or financial statements.

Commented [IESBA84]: 290.196

#### All Audit Clients

- 606.3 A2 Paragraph R600.7 precludes a firm or a network firm from assuming a management responsibility. Providing the following IT systems services to an audit client does not usually create a threat as long as personnel of the firm or network firm do not assume a management responsibility:
- (a) Designing or implementing IT systems that are unrelated to internal control over financial reporting;
  - (b) Designing or implementing IT systems that do not generate information forming a significant part of the accounting records or financial statements;
  - (c) Implementing "off-the-shelf" accounting or financial information reporting software that was not developed by the firm or network firm, if the customization required to meet the client's needs is not significant; and
  - (d) Evaluating and making recommendations with respect to an IT system designed, implemented or operated by another service provider or the client.

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**R606.54** A firm or a network firm shall not provide an IT systems service to an audit client that is not a public interest entity if the service involves the design or implementation of IT systems that:

**Commented [IESBA86]:** 290.198, 290.199

Form a significant part of the internal control over financial reporting; or

Generate information that is significant to the client's accounting records or financial statements on which the firm will express an opinion;

unless appropriate policies and procedures are put in place ensuring When providing IT systems services to an audit client, the firm or network firm shall be satisfied that:

**Commented [IESBA87]:** 290.198, 290.199

- (a) The client acknowledges its responsibility for establishing and monitoring a system of internal controls;
- (b) The client assigns the responsibility to make all management decisions with respect to the design and implementation of the hardware or software system to a competent employee, preferably within senior management;
- (c) The client makes all management decisions with respect to the design and implementation process;
- (d) The client evaluates the adequacy and results of the design and implementation of the system; and
- (e) The client is responsible for operating the system (hardware or software) and for the data it uses or generates.

606.4 A1 Factors that are relevant in evaluating the level of any self-review threat created by providing IT systems services to an audit client include:

**Commented [IESBA88]:** New paragraph

- The nature of the services.
- The nature of IT systems and the extent to which they impact or interact with the client's accounting records or financial statements.
- The degree of reliance that will be placed on the particular IT systems as part of the audit.

606.4 A2 An example of an action that might be a safeguard to address such a self-review threats created when providing IT systems services to an audit client is using personnel professionals who are not audit team members to perform the service.

**Commented [IESBA89]:** 290.200

#### Audit Clients that Are Public Interest Entities

**R606.56** A firm or a network firm shall not provide IT systems services to an audit client that is a public interest entity if the services involve designing or implementing IT systems that:

**Commented [IESBA90]:** 290.201

- (a) Form a significant part of the internal control over financial reporting; or
- (b) Generate information that is significant to the client's accounting records or financial statements on which the firm will express an opinion.

## Subsection 607 – Litigation Support Services

### Introduction

607.1 Providing certain litigation support services to an audit client might create a self-review or advocacy

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threats.

- 607.2 ~~In addition to the Subsection 607 sets out specific application material in this subsection, the requirements and application material in paragraphs 600.1 to R600.10 are relevant to applying the conceptual framework when providing a litigation support service to an audit client. The application material set out in Section 600 is relevant to this subsection.~~

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## Application Material

### All Audit Clients

- 607.3 A1- Litigation support services might include activities such as:

- Assisting with document management and retrieval.
- Acting as a witness, including an expert witness.
- Calculating estimated damages or other amounts that might become receivable or payable as the result of litigation or other legal dispute.

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- 607.34 A2+ Factors that are relevant in evaluating the level of any self-review or advocacy threats created by providing litigation support services to an audit client include:

- The legal and regulatory environment in which the service is provided, for example, whether an expert witness is chosen and appointed by a court.
- The nature and characteristics of the service.
- The extent to which the outcome of the litigation support service will have a material effect on the financial statements on which the firm will express an opinion.

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- 607.34 A32 If a firm or a network firm provides a litigation support service to an audit client and the service involves estimating damages or other amounts that affect the financial statements on which the firm will express an opinion, the requirements and application material set out in Subsection 603 related to valuation services apply.

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## Subsection 608 – Legal Services

### Introduction

- 608.1 Providing legal services to an audit client might create a self-review or advocacy threats.

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- 608.2 ~~In addition to the Subsection 608 sets out specific requirements and application material in this subsection, the requirements and application material in paragraphs 600.1 to R600.10 are relevant to applying the conceptual framework when providing a legal service to an audit client. In some circumstances, This subsection includes requirements that prohibit firms and network firms from providing certain legal services to audit clients in certain circumstances. is expressly prohibited because the threats cannot be addressed by applying eliminated or there can be no safeguards to reduce them to an acceptable level. The requirements and application material set out in Section 600 are relevant to this subsection.~~

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## Requirements and Application Material

### General

608.3 A1- Legal services are defined as any services for which the individual providing the services must either:

Commented [IESBA98]: 290.204

- Have the required legal training to practice law; or
- Be admitted to practice law before the courts of the jurisdiction in which such services are to be provided.

### Legal Advisory Services

608.34 A24 Legal advisory services that support an audit client might create self-review and/or advocacy threats.

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608.34 A32 Depending on the jurisdiction, legal advisory services might include a wide and diversified range of service areas including both corporate and commercial services to audit clients, such as:

Commented [IESBA100]: 290.204

- Contract support.
- Supporting an audit client in executing a transaction.
- Mergers and acquisitions.
- Supporting and assisting ~~ance to an audit~~ client's internal legal departments.
- Legal due diligence and restructuring.

### All Audit Clients

608.35 A41 Factors that are relevant in evaluating the level of any self-review or advocacy threats created by providing legal advisory services to an audit client include:

Commented [IESBA101]: 290.205

- ~~The nature of the service.~~
- ~~Whether the service is provided by an audit team member.~~
- ~~The materiality of any matter in relation to the client's financial statements.~~
- ~~The complexity of the legal matter and the degree of judgment necessary to provide the service.~~

608.35 A52 Examples of actions that might be safeguards to address such self-review and advocacy threats created when providing legal advisory services include:

Commented [IESBA102]: 290.205

- Using professionals who are not audit team members to perform the service.
- Having an appropriate professional who was not involved in providing the legal advisory services review the audit work or the service performed any accounting treatment and any financial statement treatment.

### Acting as General Counsel

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R608.46 A partner or employee of the firm or the network firm shall not accept ~~serve an~~ appointment as General Counsel for legal affairs of an audit client.

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608.64 A1 The position of General Counsel is usually a senior management position with broad responsibility for the legal affairs of a company.

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#### Legal Services Involving Acting in an Advocacy Role

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608.75 A1 Acting in an advocacy role for an audit client in resolving a dispute or litigation might create advocacy and self-review threats.

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R608.86 A firm or a network firm shall not act in an advocacy role for an audit client in resolving a dispute or litigation when the amounts involved are material to the financial statements on which the firm will express an opinion.

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608.69 A1 Examples of actions that might be safeguards to address self-review and advocacy threats created when acting in an advocacy role for an audit client when the amounts involved are not material to the financial statements on which the firm will express an opinion include:

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- Using professionals who are not audit team members to perform the service.
- Having an appropriate professional who was not involved in providing the legal-services review the audit work or the service performed any accounting treatment and any financial statement treatment.

## Subsection 609 – Recruiting Services

### Introduction

609.1 Providing recruiting services to an audit client might create a self-interest, familiarity or intimidation threats.

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609.2 In addition to the Subsection 609 sets out specific requirements and application material in this subsection, the requirements and application material in paragraphs 600.1 to R600.10 are relevant to applying the conceptual framework when providing a recruiting services to an audit client. In some circumstances, This subsection includes requirements that prohibit firms and network firms from providing certain types of recruiting services to an audit clients in certain circumstances. is expressly prohibited because the threat cannot be addressed eliminated or there can be no by applying safeguards, to reduce them to an acceptable level. The requirements and application material set out in Section 600 are relevant to this subsection.

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## Requirements and Application Material

### General

609.3 A1— Recruiting services might include:

- Developing a job description.
- Sourcing or identifying potential candidates.
- Screening potential candidates for the role:
  - Reviewing the professional qualifications or competence of applicants and determining their suitability for the position.
  - Interviewing and selecting suitable candidates.

- Determining employment terms and negotiating details, such as salary, hours and other compensation.

609.3 A21 Paragraph R600.7 precludes a firm or a network firm from assuming a management responsibility. Providing the following services does not usually create a threats as long as personnel of the firm or network firm does not assume a management responsibility:

Commented [IESBA110]: 290.209

- Reviewing the professional qualifications of a number of applicants and providing advice on their suitability for the position.
- Interviewing candidates and advising on a candidate's competence for financial accounting, administrative or control positions.

#### All Audit Clients

R609.4 When a firm or network firm provides recruiting services to an audit client, the firm shall be satisfied that:

- (a) The client assigns the responsibility to make all management decisions with respect to the hiring of the candidate for position to a competent employee, preferably within senior management;
- (b) The client makes all management decisions with respect to the hiring process, including:
  - Evaluating the suitability of prospective candidates.
  - Determining employment terms and negotiating details.

609.53 A1 Factors that are relevant in evaluating the level of any self-interest, familiarity or intimidation threats created by providing recruiting services to an audit client include:

Commented [IESBA111]: 290.209

- The nature of the requested assistance.
- The role of the individual to be recruited.
- Any appearance of conflicts of interest or relationships of candidates to the firm providing the advice or services.

609.54 A2 An example of an action that might be a safeguard to address such self-interest, familiarity or intimidation threats created by providing recruiting services is using professionals who are not audit team members to perform the service.

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#### Types of Recruiting Services that are Prohibited

R609.65 Paragraph R600.7 precludes a firm or a network firm from assuming a management responsibility. When providing recruiting services to an audit client, the firm or the network firm shall not act as a negotiator on the client's behalf, unless the hiring decision is made by the client.

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R609.76 A firm or a network firm shall not provide a recruiting service to an audit client with respect to if the service relates to:

Commented [IESBA114]: 290.210

- (a) Searching for or seeking out candidates; or
  - (b) Undertaking reference checks of prospective candidates
- with respect to the following positions:

- (i) ~~a~~ director or officer of the entity; or
- (ii) ~~A member of~~ senior management in a position to exert significant influence over the preparation of the client's accounting records or the financial statements on which the firm will express an opinion
- ~~if the service involves:~~
- (a) ~~Searching for or seeking out candidates for such positions; and~~
- (b) ~~Undertaking reference checks of prospective candidates for such positions.~~

## Subsection 610 – Corporate Finance Services

### Introduction

- 610.1 ~~Providing corporate~~ finance services to an audit client might create ~~an advocacy or self-review or~~ advocacy threats.
- 610.2 ~~In addition to the~~ Subsection 610 sets out specific requirements and application material in this subsection, the requirements and application material in paragraphs 600.1 to R600.10 are relevant to applying the conceptual framework when providing a corporate finance services to an audit client. ~~This subsection includes requirements that prohibit firms and network firms from in some circumstances, providing corporate finance services in certain circumstances to an audit clients is expressly prohibited because the threats created cannot be addressed by applying eliminated or there can be no safeguards to reduce them to an acceptable level. The requirements and application material set out in Section 600 are relevant to this subsection.~~

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### Requirements and Application Material

#### General

- 610.3 A1 ~~Examples of corporate~~ finance services that might create a self-review or advocacy threat include:
- Assisting an audit client in developing corporate strategies.
  - Identifying possible targets for the audit client to acquire.
  - Advising on disposal transactions.
  - Assisting in finance raising transactions.
  - Providing structuring advice.
  - Providing advice on the structuring of a corporate finance transaction or on financing arrangements that will directly affect amounts that will be reported in the financial statements on which the firm will express an opinion.

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#### All Audit Clients

- 610.34 A12 ~~Factors that are~~ relevant in evaluating the level of any such threat created by providing corporate finance services to an audit client include:
- The degree of subjectivity involved in determining the appropriate treatment for the outcome or consequences of the corporate finance advice in the financial statements.

Commented [IESBA118]: 290.212

- The extent to which:
  - The outcome of the corporate finance advice will directly affect amounts recorded in the financial statements.
  - The amounts are material to the financial statements.
- Whether the effectiveness of the corporate finance advice depends on a particular accounting treatment or presentation in the financial statements and there is doubt as to the appropriateness of the related accounting treatment or presentation under the relevant financial reporting framework.

610.34 A32 Examples of actions that might be safeguards to address such advocacy or self-review or advocacy threats ~~created by providing a corporate finance service to an audit client~~ include:

Commented [IESBA119]: 290.212

- Using professionals who are not audit team members to perform the service.
- Having an appropriate professional who was not involved in providing the ~~corporate finance~~ service ~~advise the audit team on the service and review the~~ audit work or service performed. ~~accounting treatment and any financial statement treatment.~~

#### Types of Corporate Financial Services that are Prohibited

**R610.45** A firm or a network firm shall not provide corporate finance services to an audit client that involve promoting, dealing in, or underwriting the audit client's shares.

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**R610.56** A firm or a network firm shall not provide corporate finance advice to an audit client where the effectiveness of ~~corporate finance~~such advice depends on a particular accounting treatment or presentation in the financial statements on which the firm will express an opinion and:

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- (a) The audit team has reasonable doubt as to the appropriateness of the related accounting treatment or presentation under the relevant financial reporting framework; and
- (b) The outcome or consequences of the corporate finance advice will have a material effect on the financial statements on which the firm will express an opinion.