

### EER Consultation Paper July 2020 (Introduction)

#### 0.1 Introduction supported

#### 3. Accounting Firms

##### GTI - Grant Thornton International Ltd

##### Introduction

We note that the introduction describes the intended audience as ‘practitioners carrying out EER assurance engagements.’ We are of the view that it is important to include in the introduction that, in explaining the concepts and requirements included in ISAE 3000 (Revised), the guidance assumes that practitioners already possess a base level of knowledge of performing assurance engagements.

We found Diagram 1 – Relationship Between the Stages of Engagement, Standard Requirements and this Guidance, particularly helpful as a navigational tool to the draft Guidance. The inclusion of hyperlinks in the table in the final Guidance would also be appreciated, as this would facilitate easier navigation. As noted in our response to Question 2 below, we would recommend a similar table is included in each of the other chapters as a means to navigate the content of that chapter.

#### 5. Member Bodies and Other Professional Organizations

##### SAICA - South African Institute of Chartered Accountants

Diagram 1 (on page 60) provides an excellent reference point on how the Draft Guidance relates to ISAE 3000 (Revised). This diagram provides a clear overview of how each section in the Draft Guidance fits into the various stages of the EER assurance life cycle.

#### 0.2 Introduction not supported

None

#### 0.3 Mixed views on Introduction

#### 2. National Auditing Standard Setters

##### AUASB - Australian Auditing and Assurance Standards Board

Determining the suitability of the criteria and considering the entity’s process to identify reporting topics are preconditions for acceptance and it is recommended that Diagram 1 reflects this accordingly.

##### Introduction:

The purpose of Diagram 1 is to provide much-needed connectivity between the stages of an assurance engagement, the requirements of ISAE 3000 and the chapters of this guidance. To assist with usability of Diagram 1 the AUASB suggests the following improvements, which effectively represent a re-structuring of the diagram to enhance the likelihood of its use:

Present it vertically with the stages of an EER assurance engagement clearly laid out on the left hand column of a 3-column table:

Column 1: EER Assurance Process Step-by-Step

Column 2: Guidance Chapter and Specific Examples

### Column 3: ISAE 3000 Requirements with Hyperlinks

To further enhance the flow of the guidance, the AUASB suggest reproducing the relevant rows from the table at the start of each chapter.

With regard to the section headed Nature of EER and Meaning of ‘EER Information’ and ‘EER Report’, the AUASB suggests replacing the word “consequences” in paragraph 5 as this points to risk rather the intended meaning. Words such as “impacts”, “value created” and “performance” are more commonly used in EER. For example, the first sentence could read: “EER encapsulates many different types of reporting that provide information about the financial and non-financial impacts of an entity’s activities.”

Whilst the AUASB commends the IAASB for its work to make the guidance framework neutral, reference to relevant frameworks would be useful to assurance practitioners and are conspicuous by their absence. For example, paragraph 7 would be more comprehensive and well-rounded through the mention of a range of reporting frameworks that a preparer may use, especially those at an international level, such as the GRI, the IIRC <IR> Framework and more.

The AUASB appreciates that the provision of hyperlinks to example EERs is fraught with challenges. However, perhaps a diplomatic way to provide assurance practitioners with a source of example EERs would be to provide hyperlinks to a number of reporting awards that include EER from around the world. Such as the Corporate Register Reporting Awards (CRR) out of the UK and the Australasian Reporting Awards (ARA) out of Australia.

### CAASB - Canadian Auditing and Assurance Standards Board

As suggested in paragraphs 24 and 25 of the Explanatory Memorandum, we support the hyperlinking of the guidance to the supplements and that Diagram 1 in the Introduction be linked to the Chapters within the guidance. This will enhance the ease of use of the document.

#### Nature of EER and Meaning of ‘EER Information’ and ‘EER Report’

Paragraph 6 explains EER information goes beyond financial information typically included in financial statements, and paragraph 7 explains that EER may be presented as a section in an annual report. While we agree that EER information may be included in an annual report, or a separate report, the guidance should clarify what standards apply in the following circumstance:

Audit or review of historical financial information that is required by an EER framework, standard or regulation and issued in a separate EER report. For example, an EER framework may include dollars spent on community investment. The guidance should clarify whether ISAE 3000 applies for auditing historical financial information included as EER information in an EER report, or whether ISA 805 applies, or both.

Our stakeholders noted operational information is common EER information because it is needed by entities for their operations, even if it is not required by an EER framework, standard or regulation. An example is water used during the period and this information may be presented as part of the entity’s annual report as defined under ISA 720 or in a separate EER report. The guidance should clarify that an entity’s operational information may be considered EER information, regardless of whether that operational information is part of a framework, standard or regulation. We note that if “Operational information” is added as a Subject in Table 1 of Appendix 2, the column “Example of available reporting frameworks or standards” would likely be blank, which would help reinforce that not all EER information has to be based on a framework.

Table 1 provides examples of assurance engagements on different types of underlying subject matters and whether the guidance is applicable or not. It should be referenced earlier in the guidance. We suggest it be moved from paragraph 15 up to this section of the guidance or the scope section of the Introduction.

Paragraph 7 defines EER report in the following statement:

“In this document, reference to an ‘EER report’ means EER information presented as one or more such section(s), report(s) or statement(s).”

We believe using the term ‘EER report’ in this way may be too constrictive as readers may assume the guidance only includes information contained in stand-alone reporting. This especially becomes an issue in later chapters, for instance Chapter 3 paragraph 85 which says “The preparer may propose a perimeter of the subject matter information which may be an entire EER report or only part(s) of an EER report in different circumstances.” It also made it difficult to see in later chapters when parts of the guidance were relevant to differently scoped engagements (e.g., assurance on specific key performance indicators, assurance on sections of an EER report, or assurance on an entire EER report). Clarity on the terminology used could help address this challenge. We suggest the sentence noted in paragraph 7 above be removed and that a careful review be performed of all instances of the use of ‘EER report’ and ‘EER information’ throughout the guidance to ensure that when ‘EER Report’ is used it is only used in the context of an entity issuing a whole report or statement such as a sustainability report, a corporate social responsibility statement, a public sector performance report, a value for money report, or a greenhouse gas statement.

#### Circumstances Commonly Encountered in Relation to EER Assurance Engagements

We agree with the statement in Paragraph 9 that there may be greater opportunity for management bias in the selection or development of criteria due to the wide range of frameworks available and the fact that the entity may develop its own criteria. We suggest adding a sentence to this paragraph that it is important the practitioner exercises professional skepticism in these engagements as management may be biased to choose a framework or certain criteria that shows the entity in a more favourable light.

We generally support the content of the Introduction. We support Diagram 1 and believe it provides an appropriate overview and gateway into the guidance.

#### IDW - Institut der Wirtschaftsprüfer

##### Appendix 1: Definitions

##### EER reporting process

We note our comments on the definition of the EER reporting process in paragraphs 66, 82, and chapter 5, of the guidance, which suggest that this definition needs to be revisited.

##### Financial Information

As noted in our comments on paragraph 6 of the guidance, this definition is not in line with the one in ISA 200 and should therefore be revised to be in line with ISA 200.

##### Substantive procedures

Since testing of controls is relevant only to reasonable assurance engagements, does this imply that there are no substantive procedures for limited assurance engagements? Are procedures to obtain an understanding or assess the risks of material misstatement in a reasonable assurance engagement (to the extent the latter are not tests of controls) substantive procedures? It appears to us that this definition is not

useful and should be deleted, particularly since the term is used only once in the guidance (paragraph 381) and could therefore be described there.

#### Introduction

3. The words “engender greater confidence in the credibility of EER reports” appears to confuse the concepts of confidence and credibility. We suggest rephrasing this more simply as “increase the credibility of EER reports” so as to not double up on confidence and credibility.
5. Since EER information often also includes prospective (also termed “forward-looking”) information, and information about the impact of events and conditions outside of the entity on the entity’s activities or position, the statement in the first sentence that EER provides information about the financial and non-financial consequences of an entity’s activities falls short of what EER information may include. The same applies to the following sentence in the guidance. We suggest that the paragraph be redrafted as follows to reflect this (note, in line with IAASB drafting conventions, the use of the word “or” is inclusive):

“... that provide information about the financial and non-financial consequences of an entity’s activities or of the impact of events and conditions outside of the entity on the entity’s activities or position. EER may also include information about the potential financial or non-financial consequences of the future activities of the entity or of the impact of future events and conditions outside of the entity on the entity’s future activities or position. These kinds of information (referred to in this document as ‘EER information’) may relate to current or future resources and relationships of the entity, or relate to the current or future wider well-being...”.

The definition of EER information in Appendix 1 of the guidance would need to be amended accordingly.

6. The description of financial information in this paragraph appears to relate to historical financial information – not prospective financial information. If this is the case, this needs to be clarified. If this is not the case, then clarification is needed that both historical and prospective financial information are covered, and the wording would need to be adjusted accordingly. Furthermore, the description of (historical) financial information in the second sentence is not in line with the definition thereof in ISA 200 13 (g), which subsumes transactions under events and limits the events to those that are economic. Through the use of the words “transactions and other events and circumstances” the description also suggests that transactions can be subsumed under “conditions” – not only events, does not address “circumstances” and extends the conditions to those that are beyond economic. We therefore suggest that the wording in this sentence be aligned with the definition in ISA 200.
7. The last phrase in the last sentence refers to EER information that “may be made available by the preparer in real time”. While this might be true, at this stage, neither the standard nor the guidance address how to deal with assurance on information provided in real time. For these reasons we suggest deleting this phrase.
13. The combination of the previous wording and positioning of the phrase “which would include EER assurance engagements” appears to suggest that audits or reviews of historical financial information include EER assurance engagements. We suggest starting a new sentence with “The Standard therefore governs EER assurance engagements”.
19. We are very concerned with the reference to Supplements A and B in this paragraph. In the IAASB system of pronouncements, pronouncements of greater authority do not refer to those of lesser

authority, because such reference may be taken to mean that by means of the reference the authority of the pronouncement with greater authority is being conferred upon the pronouncement with lesser authority. So, for example, IAASB standards do not refer to practice notes, and neither refer to further guidance. While the guidance has neither the authority of a standard nor practice note, because, as noted in this paragraph, the guidance can be used without the reference to the Supplements, but the reverse is not the case, the guidance has greater authority than the Supplements. For these reasons, and in particular given our concerns with Supplement A as noted elsewhere in our comment letter, we do not believe reference should be made from within the guidance to the Supplements. Rather, a document containing the guidance can make such reference as long as such reference is not within the guidance itself. We therefore suggest that paragraph 19 be moved to outside of the guidance itself and that all references within the guidance to the supplements be deleted.

20. In the table subsequent to this paragraph, the positioning of chapters 5, 6 and 7 needs to be changed in line with our structural comments in our Appendix 1 on the guidance.

### **NZAASB - New Zealand Auditing and Assurance Standards Board**

Some stakeholders suggested that clarifying the scope of the guidance with reference to what other assurance engagements are within the scope of ISAE 3000 (Revised) but are not within the scope of the guidance may also be helpful.

### **3. Accounting Firms**

#### **EYG - Ernst & Young Global Limited**

We believe that Diagram 1 in the introduction section does a successful job in illustrating how the EER Guidance aligns with the Standard.

Wording clarification and translation enhancements: We have identified several areas where the EER Guidance would benefit from clarification in the wording to help the practitioner to better and more clearly understand what was meant to be communicated. For example:

EER Guidance Introduction Section paragraph 7 contains the clause that an EER report contains EER information “that may be made available by the preparer in real time.” It is unclear what this means. Does it mean that the information is dynamic? If so, the practitioner may not be able to perform an assurance engagement, as the assured subject matter can change at any time. We recommend that this clause be clarified and include additional details around what effect this would have on the practitioner’s report.

There appear to be overly verbose sections, sentences and paragraphs in several places throughout the EER Guidance, which results in these areas either being unclear and/or being more likely to cause translation issues. We recommend that long sentences be challenged and suggest the use of bullets more often in order to be more effective and clearer. For example:

The introduction section paragraph 3 contains only one sentence with 68 words, which could be restructured to:

“The aim of the IAASB in issuing the Guidance is to promote consistent high-quality application to the Standard of EER Assurance engagements. This will:

Strengthen the influence of such engagements on the quality of EER reports

Enhance trust in the resulting assurance reports, and

Engender greater confidence in the credibility of EER reports so that they can be trusted and relied upon by their intended users."

## 5. Member Bodies and Other Professional Organizations

### AICPA - The American Institute of Certified Public Accountants

#### 1. Title and Scope of the Guidance

Paragraph 2 of the Introduction indicates that the objective of the Guidance is to assist practitioners in applying ISAE 3000 (Revised) to certain aspects of EER engagements for which practitioners commonly encounter challenges. The omission of the mention of ISAE 3000 (Revised) in the title of the Guidance is a shortcoming because it may cause readers to be uncertain about what the Guidance addresses and to assume that the Guidance addresses something other than engagements performed under ISAE 3000 (Revised). We believe it would be preferable to give the Guidance a more generic title, such as "Applying ISAE 3000 (Revised) In Certain Circumstances — Underlying Subject Matters That are Difficult to Measure or Evaluate and Criteria That Are Not Sufficiently Detailed," and to provide illustrations of such circumstances and guidance, beyond what is included in ISAE 3000 (Revised), on how a practitioner might address them.

#### 2. Specifying the Applicability of the Guidance

Appendix 2, "Extended External Reporting (EER) Assurance Phase 1 Feedback Statement" of the EM summarizes the responses to the questions posed to commenters in the February 2019 IAASB consultation paper "Extended External Reporting (EER) Assurance," and describes how the IAASB responded to those comments. Question 1 asks commenters whether the draft guidance adequately addresses the challenges for practitioners that have been identified as within the scope of the draft guidance developed in phase 1 and, if it does not, where and how the Guidance should be improved. The first response from commenters under Question 1 is "EER engagements should be defined so that it is clear to which engagements the guidance applies, and which engagements it is not intended to cover."

Question 1 assumes that "the scope of the draft guidance" has been made clear to readers; however, we believe it has not. In the column of Appendix 2 that identifies how the IAASB responded to this comment, the IAASB indicates that it added Table 1 "Types of EER Reports, Example Frameworks Used, and Whether Covered by this Guidance" in an appendix to the Guidance to help readers understand the applicability of the Guidance. Table 1 indicates, in part, that the Guidance does not apply to historical financial statements (which is stated in the first paragraph of ISAE 3000 (Revised)), applies to intellectual capital (interesting information, because it is a relatively new potential underlying subject matter for an assurance engagement), and applies to integrated reporting (an underlying subject matter that is undefined unless it is associated with a particular framework). We believe there is nothing distinctive about the items in this table that clarifies to which underlying subject matters the Guidance does or does not apply. For that reason, we believe the applicability of the Guidance should be described as follows:

This Guidance is intended to assist practitioners in applying ISAE 3000 (Revised) to assurance engagements in which

professional judgment and the exercise of professional skepticism is particularly important (paragraph 48)

measurement or evaluation of the underlying subject matter may be subject to considerable subjectivity, management bias, and estimation and evaluation uncertainties (paragraph 48)

the criteria for the measurement or evaluation of the underlying subject matter have not been established, have been developed by the entity, or are not sufficiently detailed (Chapter 4)

We believe it is unnecessary to specify which underlying subject matters are addressed by the Guidance, and that readers are better served if the applicability statement describes the nature of the challenges in applying ISAE 3000 that the Guidance is intended to address. In line with our previous comment about the title of the Guidance, the term “extended external reporting” is not found anywhere in the assurance literature and is probably intended to apply to “reporting” by the preparer rather than “reporting” by the practitioner.

In further support of our view concerning the limitations of the description of the applicability of the Guidance, we note that paragraph 1 of the Introduction to the Guidance indicates that the Guidance is intended to assist practitioners in performing assurance engagements in accordance with ISAE 3000 (Revised) on extended external reporting (hereafter ‘EER’). Paragraph 5 of the Introduction indicates that EER encapsulates many different types of reporting that provide information about the financial and non-financial consequences of an entity’s activities and that such information (referred to in this document as ‘EER information’) may be about the consequences of the entity’s activities for the entity’s own resources and relationships, or for the wider well-being of the economy, environment, or society, or both, or the service performance of a public sector or not-for-profit entity. Because paragraph 5 does not clearly define what is and is not an EER engagement, what is being said in paragraph 1 is that the Guidance assists practitioners in performing assurance engagements in accordance with ISAE 3000 on topics that can be reported on under ISAE 3000.

#### 8. Mapping of Paragraphs In ISAE 3000 To Related Chapters in the Guidance

Paragraph 20 of the Introduction to the Guidance is followed by Diagram 1, “Relationships Between Stages of Engagement, Standard Requirements, and this Guidance,” Paragraph 20 states the following:

Diagram 1 below provides an overview of all the aspects of the performance of an EER assurance engagement under the Standard (see green bands, rows and column headings). The diagram associates each of the requirements of the Standard (see green bands) and each chapter of this document (see brown boxes), with those aspects of the performance of an EER assurance engagement to which they relate. The diagram also indicates (see green arrows) the requirements of the Standard addressed by each chapter, and chapters that reference guidance in an earlier chapter. Those aspects of the performance of an EER assurance engagement and those requirements of the Standard that are not addressed in this document are shown in grey text.

We concur that the diagram references all the requirement paragraphs in ISAE 3000 (Revised). However, we find the diagram to be very confusing, particularly the formatting, for the following reasons:

- Five categories of requirements in ISAE 3000 (Revised) (quality control, ethical requirements, competence, professional judgement and professional skepticism, and documentation) that have no subcategories in the diagram, are each shown in separate green rows that extend across the width of the diagram. (The first 4 categories are at the top of the diagram and documentation is at the bottom of the diagram).
- In the fifth row are 2 categories of requirements (planning, and procedures to obtain sufficient appropriate evidence) that do have subcategories in the diagram, with the related subcategories shown as vertical outgrowths of the primary categories. The fifth row also contains 4 categories of requirements (conduct of assurance engagement, acceptance and continuance, forming the

assurance conclusion, and preparing the assurance report and other communications) that do not have subcategories.

- Brown boxes have been inserted either beside the primary category or following an arrow beneath the category or subcategory to indicate where the specified requirement is addressed in the Guidance.
- Requirement paragraphs in ISAE 3000 (Revised) that are not addressed in the Guidance are shown in grey font, which makes them difficult to see.

We do not understand the logic behind the formatting of the diagram. For the sake of readability, we suggest that the diagram be reformatted as shown below because we believe this alternative presentation is easier to follow.

Topic

Related Requirement Paragraph(s) in ISAE 3000

Related Chapter in the Guidance

Chapters in the Guidance That Reference Guidance in an Earlier Chapter

Quality Control

31-36

Not addressed in the Guidance

Not applicable

Ethical Requirements

20

Not addressed in the Guidance

Not applicable

Competence

31(b)-(c), 32(a), 39, 52(a), 53

Chapter 1, “Applying Appropriate Competence and Capabilities”

Not applicable

Professional Judgment and Professional Skepticism

37-38

Chapter 2, “Exercising Professional Skepticism and Professional Judgement”

Not applicable

Conduct of Assurance Engagement

14-19

Not addressed in the Guidance

Not applicable

Acceptance and Continuance

21-30

Chapter 3, “Determining Preconditions and Agreeing the Scope”

Chapter 11, “Addressing Qualitative EER Information”

Chapter 12, “Addressing Future Oriented EER Information”

Planning

40, 42-43

Not addressed in the Guidance

Not applicable

Understanding the Engagement Circumstances and the Likelihood or Risks of Material Misstatement

41, 44(a), 45, 46L/R, 47 L/R

Chapter 4, “Determining the Suitability and Availability of Criteria”

Chapter 5, “Considering the System of Internal Control”

Chapter 6, “Considering the Entity’s Process to Identify Reporting Topics”

Chapter 11

Chapter 12

Procedures to Obtain Sufficient Appropriate Evidence

Design

48L/R(a)

Chapter 8, “Obtaining Evidence”

Chapter 7, “Using Assertions”

Chapter 11

Chapter 12

Performance

48L/R(b), 49, 50-51

Chapter 8

Chapter 11

Chapter 12

Other

52-63

Not addressed in the Guidance

Not applicable

Forming the Assurance Conclusion

44(b), 64-66

Chapter 8

Chapter 9, “Considering the Materiality of Misstatements”

Chapter 11

Chapter 12

Preparing the Assurance Report, and Other Communications

67-70,

71-77, 78

Chapter 10, “Preparing the Assurance Report”

Pars 71-77, 78 are not addressed in the Guidance

Chapter 11

Chapter 12

Documentation

79-83

Not addressed in the Guidance

In paragraph 1 and throughout the Guidance, ISAE 3000 (Revised) is referred to as “the Standard.” We understand that the term “the Standard” is used because it is shorter, but even though that is the case, we believe it would be preferable to refer to ISAE 3000 (Revised) to retain the connection between the Guidance and ISAE 3000 (Revised), which provides a basis for the Guidance.

Paragraph 21 of the Introduction to the Guidance states, “The Guidance uses the terminology used in the Standard when the concepts being discussed are addressed in the Standard. When necessary, other terms are identified and explained in the Guidance and summarized in a list of terms set out in Appendix 1.” It would be helpful if a convention were used to identify new terms, such as the use of boldface italics when the term first appears. If the convention were used, paragraph 21 might be one place to identify the convention, although new terms are introduced in earlier paragraphs, for example, paragraphs 5 and 6 of the Introduction.

We suggest that the following edit be made to the first sentence in paragraph 4 of the Introduction:

The intended audience of the Guidance is practitioners carrying out EER assurance engagements in accordance with ISAE 3000 (Revised).

### **CPAA - CPA Australia**

Much of the referencing is also not intuitive. For example, by using “ISAE 3000” rather than “the Standard”, the term would be immediately understandable. Likewise, the abbreviations of “S” and “G” could be rethought or at least referenced under each diagram. Hyperlinks for each reference would aid in this understanding.

Terminology and references need to be written in plain English or, at the very least, terms which are not plain English must be defined and explained, particularly given the diverse engagements which this Guidance encompasses. Certain terminology and references are explained at the end of the introduction section, after they have already been used throughout the introduction. This is confusing as the references are not immediately intuitive. We suggest this section be moved closer to the start of the introduction before any of the references are used. In addition, we suggest consideration of more intuitive referencing. This would add some more characters to the document but would enable someone reading the Guidance to have no difficulty understanding the meaning of terms used. For example:

Replace “the Standard” with “ISAE 3000”

Replace “S.” with “ISAE 300 para.” – we estimate this appears 153 times

Replace “G.” with “para.” – we estimate that this appears 169 times

In contrast, the reference “Ch.” is more commonly used and should be widely recognized as “Chapter”.

Certain references are not cited in full in their first appearance, such as ISQC 1 (page 66).

Hyperlinking all of these references will further enhance the clearer referencing suggested above.

Whichever abbreviations are used, we note that Diagram 1 is not referenced in the same way as the “terminology and resources” section indicates, as it omits the “S” and “G” references denoting ISAE 3000 and the Guidance respectively. In addition to addressing this inconsistency, we suggest that all diagrams in the Guidance should be able to stand alone and would be easier to understand if they were each accompanied by a legend, which provided the meanings for any abbreviations, with full citations for standards or other documents, and any colour coding used in the diagram.

The proposed Guidance addresses the challenges for assurance engagements on EER very thoroughly, although we identify some areas for further refinement. These areas for further refinement or consideration are:

Scope of the EER engagement: The Introduction states that “EER encapsulates many different types of reporting that provide information about the financial and non-financial consequences of an entity’s activities” (p.57). However, we note that not all EER is limited to the boundaries of a particular “entity”. Instead, the EER may either focus on only one part of an entity or cut across a number of entities which may be contributing to that activity. For example, an abatement project in Australia to deliver abatements under the Emissions Reduction Fund to meet contracts with the Clean Energy Regulator, may be provided by multiple entities. Future assurance engagements which may be required on Modern Slavery Statements, which are required in Australia for entities with revenue of \$100 million or more. These statements are issued by an entity, but cover the activities of their supply chain. Therefore, we suggest that the “entity” be defined in broad terms to encompass a segment, location or activity stream within an entity, an entire entity or group of entities, segments of multiple unrelated entities or multiple entities in their entirety. The Guidance should clarify that the boundaries of the activity or entity/ies covered by the EER and related assurance need to be clearly identified in the scope of the engagement. The boundaries of the activity or entity/ies in turn need to align with a rational purpose for the engagement and the availability of evidence to cover the activities or entities within that boundary.

We suggest that paragraph 10 could include reference to a broader range of reporting, including integrated reports, modern slavery statements and carbon abatement information. It may also be helpful to reference some of the main reporting frameworks, such as the frameworks provided by the IIRC for integrated reporting, GRI for sustainability reporting and the Sustainability Accounting Standards Board (SASB).

## **0.4 No comment on introduction**

### **1. Investors and Analysts**

#### **ICGN - International Corporate Governance Network**

No comment on introduction

### **2. National Auditing Standard Setters**

#### **CNCC-CSOEC - Compagnie Nationale des Commissaires aux Comptes and Conseil Supérieur de l'Ordre des Experts-Comptables**

No comment on Introduction

#### **HKICPA - Hong Kong Institute of Certified Public Accountants**

No comment

#### **JICPA - Japanese Institute of Certified Public Accountants**

No comment

### **3. Accounting Firms**

#### **BDO - BDO International Limited**

No comments on Introduction

#### **CG - Crowe Global**

No comment on Introduction

#### **DTT - Deloitte Touche Tohmatsu Limited**

No comment on Introduction

#### **KPMG - KPMG Network**

No comment on introduction.

#### **PwC - PriceWaterhouseCoopers**

No specific comment on Introduction

#### **RSMI - RSM International Limited**

No comment on Introduction

### **4. Public Sector Organizations**

#### **AGA - Office of the Auditor General Alberta**

No comment

**AGNZ - Auditor-General of New Zealand**

No comment

**AGSA - Auditor-General of South African**

No additional comments

**GAO - United States Government Accountability Office**

GAO's

**5. Member Bodies and Other Professional Organizations**

**ACCA-CAANZ - Chartered Accountants Australia and New Zealand and Association of Chartered Certified Accountants**

No comment on Introduction

**AE - Accountancy Europe**

No comment

**Assirevi**

No comment on Introduction

**BICA - Botswana Institute of Chartered Accountants**

No comment

**BRLF - Australian Business Reporting Leaders Forum**

No comment on Introduction

**FACPCE - Federación Argentina de Consejos Profesionales de Ciencias Económicas**

No comment on Introduction

**FAR - Institute for the Accountancy Profession in Sweden**

No comment on Introduction

**GRI - Global Reporting Initiative**

No comment on Introduction

**IAAA - Inter-American Accounting Association**

No comment on introduction

**ICAS - Institute of Chartered Accountants Scotland**

No comments

**ICPAR - Institute of Certified Public Accountants of Rwanda**

No comment on Introduction

**ICPAU - Institute of Certified Public Accountants of Uganda**

No comment on Introduction

**IIA - Institute of Internal Auditors**

No comment on Introduction

**IIRC - International Integrated Reporting Council**

No comment on introduction

**ISCA - Institute of Singapore Chartered Accountants**

No comment on Introduction

**MIA - Malaysian Institute of Accountants**

No comment

**MICPA - Malaysian Institute of Certified Public Accountants**

No comment on Introduction

**SASB - Sustainability Accounting Standards Board**

No comment on Introduction

**SVI - Social Value International**

No comment on Introduction

**6. Academics**

**DEAKIN - Deakin University Integrated Reporting Centre**

No comment on Introduction.