

References to Other Workstreams**1. Coordination with IESBA****1. Monitoring Group****International Organization of Securities Commissions (IOSCO)**

An example of where others are contributing to the financial reporting system in this public interest area is the IESBA's Role and Mindset of a Professional Accountant project. From a public interest perspective, it is an auditor's responsibility to promote confidence and integrity of capital markets through the performance of high quality audits. Therefore, auditors having a mindset with an enhanced level of vigilance for both the risk of fraud and potential signs of fraud is imperative to audit quality and ultimately investor protection. This can also be true in connection with evaluating audit evidence received from management, where professional skepticism and a thoughtful risk-based evaluation (e.g., nature and significance of the account and related evidence obtained) is necessary. We believe that this can be achieved through, for example, application material that includes "triggering events" where an auditor's skepticism should be elevated and therefore the nature, timing, and extent of audit procedures are tailored in response to the risk identified.

2. Regulators and Audit Oversight Authorities**Committee of European Auditing Oversight Bodies (CEAOB)**

Coordination with IESBA

As with other standard-setting projects, we would like to highlight the importance of appropriate coordination between the IAASB and the IESBA. Changes to the ISAs, if any, should be mirrored to ensure consistency with the provisions of the IESBA Code and coordinated with IESBA.

Independent Regulatory Board for Auditors (IRBA)

The IESBA has just approved the Role and Mindset revisions to the Code which include a new requirement for professional accountants to have an "inquiring mind" and differentiate having an inquiring mind from the exercise of professional skepticism when performing audits, reviews and other assurance engagements. The implication of this is two-fold:

The new requirements may already contribute to the identification of fraud without the need to introduce a third mindset concept.

Introducing a third mindset concept further complicates the application and enforcement of application – both of which are already challenging to do under the current "professional skepticism" requirement.

Irish Auditing and Accounting Supervisory Authority (IAASA).pdf

As with other standard-setting projects, we would like to highlight the importance of appropriate coordination between the IAASB and the IESBA. Changes to the ISAs, if any, should be mirrored to ensure consistency with the provisions of the IESBA Code and coordinated with the IESBA.

4. Accounting Firms

Deloitte (DTTL).pdf

In October 2020, International Ethics Standards Board for Accountants released revisions to the International Code of Ethics for Professional Accountants to better promote the role and mindset expected of all professional accountants. Among other matters, the revisions require accountants to have an inquiring mind when undertaking their professional activities and emphasize the importance of being aware of the potential influence of bias in their judgments and decisions. DTTL recommends that the IAASB allow for these revisions to take effect (31 December 2021), monitor implementation, and then consider whether there is a need for further guidance specific to implementation within the auditing standards.

PKF International Limited (PKF)

Embarking on a joint project with IESBA to consider correlations between significant failures in the audit of fraud and going concern with breaches of the International Code of Ethics on such engagements.

6. Professional Accountancy and Other Professional Organizations

Center for Audit Quality (CAQ)

We believe current auditing requirements, including recent changes to auditing and ethical standards (e.g., the IESBA's revised International Code of Ethics for Professional Accountants [the Code] to promote the role and mindset of professional accountants), strike the appropriate balance between investor expectations of performance and costs to complete a financial statement audit. With respect to listed entities, we would recommend that the Board consider the differences in the broader financial reporting system in the United States and international jurisdictions and assess whether any potential new or revised requirements in the ISAs would achieve the objectives in the Discussion Paper without complementary systemic changes. As described earlier in our letter, SOX was enacted in 2002 in response to significant corporate frauds and has had profound effects on financial reporting in the United States. SOX enhanced requirements for all participants in the financial reporting system including management, those charged with governance and the auditor. Among other changes, we would highlight sections 301, 302, 404(a) and 404(b) as key sections that helped to shape the financial reporting landscape in the United States. Additional regulatory actions, such as the establishment of the SEC's Whistleblower Program, have placed greater attention on fraud detection to complement actions by auditors.

Confederation of Indian Industry (CII)

It is expected that uniform audit procedures are performed for all entities; however, IAASB may consider identifying more rigorous procedures in respect of public interest entities ('public interest entities' as defined under IESBA Code of Ethics for Professional Accountants). Also, this is where the expectation gap is most severely felt. As described earlier the enhancements are needed to the nature of evidence that is sought to provide 'reasonable assurance'. The changes should be made within ISAs. The objective of the changes is to enhance the relevance and effectiveness of the audit and accordingly, the ISAs is the best place to make the changes.

Federacion Argentina de Consejos Profesionales de Ciencias (FACP)

It is important that the outreach goes beyond professionals to address all potential users of financial statements and audit reports.

On the other hand, the IAASB and the IESBA should review the EEFF audit procedures and the provisions on skepticism and their application.

Institute of Chartered Accountants of Scotland (ICAS)

Importance of Corporate Culture

We firmly believe that leadership that promotes an organisational culture of honesty and ethical behaviour, is a key element of helping to prevent fraud. ICAS launched its the Power of One ethics initiative in 2015 that recognised the importance of ethical leadership. IESBA last year also published its final pronouncement on its Role and Mindset project that requires all professional accountants to adopt an “inquiring mind” and also places emphasis on professional accountants to encourage and promote an ethical culture in their respective organisations. It has to be remembered that professional accountants do not just work as auditors but rather in various roles throughout the financial reporting ecosystem. By placing greater focus on their responsibilities, e.g. the inquiring mind and not just accepting information at face value, professional accountants in business will also play a part in mitigating the risk of fraud within organisations. All of those involved in the corporate governance chain, including auditors, should have strong speak-up, listen-up, whistleblow programs in place that both encourage and protect those who make reports. Speak-up lines encourage matters to be flagged at an early stage which can prevent them from escalating into something far more serious.

Inter-American Accounting Association (IAA).pdf

We think so. Especially in the area of integrity, although the IESBA Code of Ethics is clear and forceful on this matter, due to the lack of disclosure on the part of the auditor, it is highly probable that many of the auditors are not properly complying with the prescriptions about this fundamental principle of the Code

The Institute for the Accountancy Profession in Sweden (FAR)

We also believe that the IAASB should monitor the implementation of new requirements by IESBA for the auditor to have an “inquiring mind” and be aware of their own potential bias when exercising professional scepticism.

8. Academics

Auditing Standards Committee of the Auditing Section of the American Accounting Association (ASC)

In addition, we encourage the IAASB’s ongoing collaboration with the IESBA and jurisdictional regulators regarding auditor independence. Although research reports mixed evidence on whether threats to independence (e.g., the provision of non-audit services, fee dependence, tenure) are associated with the propensity to report on going concern uncertainties (e.g., Blay and Geiger 2013; Hossain, Monroe, Wilson, and Jubb 2016; Wu, Hsu, and Haslam 2016; Hallman, Imdieke, Kim, and Pereira 2020), the consequences of reporting on going concern uncertainty for the client, shareholders, and the auditors themselves (see Geiger et al. 2019) make auditor independence critical to audit quality in this area.

2. Coordination with other Current IAASB Workstreams\1. Auditor Reporting Post-Implementation Review

1. Monitoring Group

International Organization of Securities Commissions (IOSCO)

Concurrent with the IAASB's Auditor Reporting project that concluded in 2015, we note that ISA 570 was revised. We question whether these revisions were sufficient to address the interactions between standards on auditing and the relevant financial reporting framework requirements (e.g. IFRS).

The connection between ISA 570.20 and IFRS resides in a July 2014 IFRS Interpretations Committee Agenda Decision (the AD) which concludes that the requirement to disclose significant judgments made by management (IAS 1.122) applies to going concern situations where there are mitigating factors which led to management's conclusion that there is no material uncertainty relating to the entity's ability to continue as a going concern. The interaction between these assurance requirements and IFRS reporting requirements has been documented in publications of the IAASB (Auditor Reporting on Going Concern, January 2015).

Based on our experience, we observe instances where the disclosures about these judgments are not provided. We further note that disclosures about the auditor evaluation of management's disclosures (as required by Paragraph 20, A24 and A25 of ISA 570) are also not commonly found in auditor reports. It is our view that the authority of the expectation contained in the AD, as well as the lack of a clear and strong connection to paragraph 20 of ISA 570, are the primary reasons for the lack of high-quality financial reporting in "close calls" situations. Given the substantial economic challenges in the current environment, we are concerned that preparers and auditors may not focus to an appropriate degree on these important disclosures and audit reporting requirements.

We request the IAASB to consider additional requirements in this area, and work with the IASB to a greater extent, to achieve a stronger connection between ISA 570 and IFRS that might be similar to what exists between ISA 570 and U.S. GAAP (Presentation of Financial Statements—Going Concern (Subtopic 205-40)).

We observed that at one stage of the Auditor Reporting project there was a proposed requirement that auditors be required to provide in their audit reports explicit statements addressing whether a material uncertainty that may cast significant doubt on the entity's ability to continue as a going concern had been identified, and the appropriateness of management's use of the going concern basis of accounting. As part of the ongoing implementation review and in light of current market conditions, the IAASB should consider whether requiring those explicit statements by the auditors would be in the public interest and meet the need of investors for further transparency as to whether there are material uncertainties regarding an entity's ability to continue as a going concern, and the appropriateness of the entity's financial reporting framework.

We support the continued efforts of the IAASB's Auditor Reporting Implementation project which can also be a mechanism to, not only inform and educate users but, solicit feedback as to the effectiveness of the current reporting model. Auditor reporting requirements as it relates to going concern is an important public interest matter, and the challenging economic environment resulting from the COVID-19 pandemic only serves to further emphasize the importance of revisiting the topic of the auditor's responsibility with respect to an entity's ability to continue as a going concern.

2. Regulators and Audit Oversight Authorities

Canadian Securities Administrators (CSA)

Auditor Requirements

We note that throughout most of the duration of the IAASB's auditor reporting project that was concluded in 2015, the suite of standards contained a proposed requirement for auditors to provide an explicit, direct statement about whether a material uncertainty had been identified, and the appropriateness of management's use of the going concern assumption. However, that proposed requirement was ultimately excluded from the final suite of standards. Given the current market conditions combined with the heightened public attention that the topic of going concern in financial statement audits continues to receive, we think that the IAASB should re-consider whether such disclosure should now be required. We think such disclosure would improve the quality of financial reporting and provide decision useful information to investors. Greater transparency in the auditor's report could also lead to different behaviors by management. For example, greater transparency may result in higher accountability as issuers may expect their judgements to be scrutinized more comprehensively.

Consideration of the Accounting Framework

We think that any changes to the auditing standards should be considered in tandem with the relevant responsibilities of issuers in the applicable accounting framework. In this regard, we note that the auditor's requirements for "close call" going concern situations in ISA 570 – Going Concern do not adequately align with the accounting and disclosure requirements in IFRS.

As part of the auditor reporting project that was concluded in 2015, the IAASB revised ISA 570 – Going Concern regarding the auditor's work effort in relation to the IFRS framework (i.e., auditors are required to evaluate the adequacy of disclosures in the "close call" situations in view of the requirements of the applicable financial reporting framework). However, because the requirement for issuers to disclose the close calls is only explicitly expressed in an IFRIC agenda decision (which has less prominence compared to the authoritative standards), we have found that some auditors do not adequately assess these disclosures and are concerned that entities may not be aware they need to provide them. Indeed, in the course of our regulatory reviews, we have observed limited instances of "close call" judgements disclosure in the financial statements. As a next step, we think that the IASB should revise the main body of IAS 1 – Presentation of financial statements to explicitly require close call significant judgements disclosure. We note that U.S. GAAP contains explicit requirements in this regard, and that the New Zealand Accounting Standards Board has proposed clarifications along these lines.

4. Accounting Firms

PricewaterhouseCoopers (PWC)

We believe the following matters could be addressed as part of the IAASB's AR PIR:

It would be helpful for the IAASB to resolve the implicit discrepancy between the extent of disclosure of the auditor's response when a material uncertainty relating to going concern section has been included (no requirement to describe how the matter was addressed) and a KAM on a going concern "close-call" i.e., where no material uncertainty exists (requiring more fulsome disclosure of the auditor's response).

For entities other than listed entities, when KAMs are not required to be included in the auditor's report, providing additional guidance to highlight the availability of using an emphasis of matter paragraph in the auditor's report to draw attention to disclosures in the financial statements that are considered fundamental

to users' understanding (in circumstances when events or conditions were identified but ultimately no material uncertainty was deemed to exist). In some respects, communication by the auditor in this manner would draw users' attention to these important disclosures.

6. Professional Accountancy and Other Professional Organizations

American Institute of Certified Public Accountants (AICPA)

Response: We believe that further discussion about the responsibilities for fraud or going concern in the auditor's report may become boilerplate and would not be meaningful or useful. Further, as noted in our response to IAASB question 2(d), we believe the IAASB should consider the results from the on-going post implementation review relating to the auditor reporting standards before proposing further changes to the auditor's report. Continued education efforts to help users of the financial statements to better understand the role of the auditor as it relates to fraud and going concern would likely be more effective. With regard to fraud, also see our response to IAASB question 2(d). With regard to going concern, also see our response to IAASB question 3(c).

South African Institute of Chartered Accountants (SAICA)

Certain jurisdictions such as the Netherlands and the UK have had extended reporting requirements on going concern. SAICA recommends that the IAASB should interact with the appropriate bodies in these jurisdictions to understand what impact such reporting has had on addressing the expectation gap and whether similar changes to ISAs would be useful. The IAASB should also gather responses from the recent Auditor reporting post-implementation review stakeholder survey to assess whether additional disclosures in the auditor's report are required by the stakeholders and respond accordingly.

2. Coordination with other Current IAASB Workstreams\2. Less complex entities

3. National Audit Standard Setters

Canadian Auditing and Assurance Standards Board (AASB)

Finally, the IAASB will need to consider how any future enhancements are scalable for audits of less-complex entities (LCE). In doing so, we encourage the IAASB to carefully consider potential implementation challenges for LCE audits.

4. Accounting Firms

Ernst and Young (EY)

Our comments and suggestions included in our response to Q2(a) are generally applicable to audits of all entities. However, as we note in our comments above, the use of forensic specialists should not be required for all audits. Rather, consideration could be given to establishing a requirement for the auditor to determine whether specialized skills and knowledge may be needed to identify and respond to fraud risks. However, a different approach may be appropriate for audits of less complex entities.

MHA Macintyre Hudson (MHA)

The LCE working party should address clear guidance and requirements for Less Complex Entities.

We are hopeful that the LCE Auditing Standard may address some of the concerns relating to SMEs relating to fraud and going concern.

It will be important that the LCE working party addresses fraud and going concern appropriately for the proposed auditing standard, and that these requirements are truly scaled to LCE stakeholder needs.

PricewaterhouseCoopers (PWC)

The proportionality and scalability of any changes proposed in this area are important factors that the Board will need to consider, recognising that an entity's system of internal control may be less formal and less mature in smaller and less complex entities.

6. Professional Accountancy and Other Professional Organizations

Accountancy Europe (AE)

Less Complex Entities (LCEs)

The current project on LCE should allow the IAASB to consider the specificities of such entities. It is important to remain principles-based and fully scalable given that LCE's control environment is often easy to comprehend, but not easy to test due to the limited segregation of duties and established procedures.

Belgian Institute of Registered Auditors (IBR-IRE)

With respect to going concern, the financial reporting frameworks should also evolve to enhance the informational value of any disclosure provided. In the context of non-public interest entities and particularly of less complex entities (LCE), this will ask a certain level of (financial) knowledge of the members of the board of directors and of management.

Institute of Chartered Accountants of Scotland (ICAS)

Consideration needs to be given to the different factors that apply to the audits of public interest entities and those which apply to small and medium sized entities. There is a need to ensure that any changes carefully consider the respective needs of, including their respective stakeholders, and are appropriately proportionate and scalable.

South African Institute of Chartered Accountants (SAICA)

Any future actions considered necessary in addressing the expectation gap must be considered in the context of scalability and, as such should take into account the work currently being undertaken by the IAASB on LCEs.

2. Coordination with other Current IAASB Workstreams\3. Professional Skepticism Working Group

6. Professional Accountancy and Other Professional Organizations

Institute of Singapore Chartered Accountants (ISCA)

In this regard, we wish to propose for the IAASB to embark on a project to develop a framework which solidifies the concept of professional skepticism. This may be done by extending upon the work of the IAASB Professional Skepticism Working Group to date.

2. Coordination with other Current IAASB Workstreams\4. ISA 540 - Auditing Accounting Estimates and Related Disclosures

3. National Audit Standard Setters

Malaysian Institute of Accountants (MIA)

Provide enhanced guidance for auditor's evaluation of the management's assessment with consideration to the enhancements made to ISA 540 (Revised) Auditing Accounting Estimates and Related Disclosures for auditing accounting estimates involving how the auditor considers the significant assumptions and data used in management's assessment, including with respect to evaluating management's plans for future actions and the ability to execute these actions, as well as whether consistency of the assumptions underpinning the going concern assessment with assumptions used in other areas (e.g. impairment analysis).

4. Accounting Firms

Ernst and Young (EY)

Enhancing the guidance for the auditor's evaluation of management's assessment with consideration to the enhancements made to ISA 540 (Revised) for auditing accounting estimates. When events or conditions are identified that may cast significant doubt on the entity's ability to continue as a going concern, management applies significant judgment and estimation in its assessment of going concern. Guidance could be enhanced related to how the auditor considers the significant assumptions and data used in management's assessment, including with respect to evaluating management's plans for future actions and the ability to execute these actions, as well as whether the assumptions used are consistent with related assumptions used in other areas of the financial statements (e.g. asset impairment analyses).

6. Professional Accountancy and Other Professional Organizations

American Institute of Certified Public Accountants (AICPA)

Also, post-implementation reviews, including those related to ISA 315 (Revised 2019), Identifying and Assessing the Risks of Material Misstatement, and ISA 540 (Revised), Auditing Accounting Estimates and Related Disclosures, are likely to be helpful to aid in identifying areas in the auditing standards that may not be implemented as intended and may need further clarification for the auditor.

We recommend that the IAASB consider performing a post implementation review to gather information about how effective the application material in ISA 540 (Revised) relating to professional skepticism has been. We also encourage the IAASB to include application material about professional skepticism specific to fraud and going concern to help improve consistency in the application of the requirements relating to these topics.

3. References to Other ISAs or Standards (which are not current IAASB projects)\1. ISQM 1

4. Accounting Firms

PKF International Limited (PKF)

Expanding the requirements of ISQM 1 by including firm-level quality objectives relating to the audit of fraud and going concern. For example, objectives might be set which require that responses be developed by firms which include targeted learning and development programs and specific requirements on the review of the audit of fraud and going concern by the Engagement Quality Reviewer on applicable engagements.

2. ISA 805 - Special considerations - Audits of Single Financial statements and specific elements, accounts or items of a financial statement

4. Accounting Firms

GTI

We are also of the view that consideration should be given to the application of the requirements of ISA 570 (Revised) when reporting on historical financial information other than a complete set of financial statements in accordance with ISA 805 (Revised). Such information is often prepared in accordance with a special purpose framework that has no explicit requirement related to going concern. The evaluation of the appropriateness of the going concern basis of accounting as a 'fundamental principle' in accordance with ISA 570 (Revised) paragraph 4 is then not clear; and ISA 570 (Revised) provides no guidance on this matter. For example, it is common for auditors to report on schedules of project expenses prepared in accordance with the cash basis of accounting (a special purpose framework in many jurisdictions). In such circumstances, many auditors conclude that the going concern basis of accounting is not a 'fundamental principle' because there is no impact on the recognition and measurement of expenses, i.e., the money has been spent, and because the reporting entity is a project, it is unrealistic to assess the going concern of a project. However, Appendix C of ISA 805 (Revised) has an illustrative example (Illustration 2) referring to going concern, which is confusing.

We recognise that the IAASB has previously devoted significant resources on this issue and recommend that consideration is given to performing targeted post implementation research, aimed at stakeholders, such as the National Standard Setters, to understand how this has been adopted in practice and whether it serves the public interest to require auditors to determine whether the going concern basis of accounting is a 'fundamental principle' when the financial reporting framework has no explicit requirement regarding going concern.

3. ISRE 2410

2. Regulators and Audit Oversight Authorities

Financial Reporting Council (FRC)

Further, we are currently consulting on revisions to ISRE (UK) 2410 to address a potential lack of clarity in relation to going concern when performing a review of interim financial information. We undertook this to ensure that the level of work carried out by auditors reflects wider expectations on going concern, particularly given recent high-profile corporate failings, and aligns with the requirements of revised ISA (UK) 570.

3. National Audit Standard Setters

Australian Auditing and Assurance Standards Board (AUASB)

The AUASB and NZAuASB have recently re-issued our equivalents of ISRE 2410 with the objective of aligning the auditor's review report to the year end auditor's report. As part of this, our intention was to include a description of the auditor's responsibility in relation to going concern in the auditor's review report, however we found it very difficult to articulate this in a concise manner without further exacerbating the expectation gap that exists on the scope of a limited review engagement. Through this we realised that there are differing views as to the auditor's current responsibility in ISRE 2410, and questions as to whether the current standard is fit for purpose.

New Zealand Auditing and Assurance Standards Board (NZAuASB).pdf

The NZAuASB explored ways to enhance the auditor's interim review report in detail as part of its domestic project to revise NZ SRE 2410. As part of this project, we sought views from all participants in the financial reporting ecosystem. While the project was focussed on interim review reports, a number of key themes emerging about communication of matters related to going concern are equally applicable to audits. These key themes include:

A caution against a lengthy section on going concern in all instances. Such an approach was likely to unbalance the report, overly focussing on going concern matters and possibly even exacerbating the expectation gap, given that there is already a misconception of a guarantee.

Preparers were especially concerned that such an approach may result in a self-fulfilling prophecy, making users nervous about going concern even in circumstances where going concern risks was low. If the IAASB were to develop further reporting requirements on going concern matters, it is important that such an approach not leave the user hanging, i.e., must conclude on the matter if you are highlighting the matter to the user.

A counter argument is that the auditor is not concluding on the ability of the entity to continue as a going concern, and should avoid a focus or wording that may imply as much

Listing procedures performed is not overly useful as users are most interested in whether the auditor found anything. The auditor is already required to report a material uncertainty related to going concern or a KAM in the close call situations.

4. Accounting Firms

PricewaterhouseCoopers (PWC)

See response to part (a). In addition, the IAASB should consider whether any changes to the reporting requirements under the ISRE standards may be appropriate in light of changes made to corporate reporting obligations within the overall ecosystem, in particular in respect of the identification and disclosure of material uncertainties.

4. No references to other ISAs or projects

1. Monitoring Group

Basel Committee on Banking Supervision (BCBS)

International Association of Insurance Supervisors (IAIS)

International Forum of Independent Audit Regulators (IFIAR)

2. Regulators and Audit Oversight Authorities

Botswana Accountancy Oversight Authority (BAOA)

Canadian Public Accountability Board (CPAB)

Independent Regulatory Board for Auditors (IRBA)

National Association of State Boards of Accountancy (NASBA)

3. National Audit Standard Setters

Compagnie Nationale des Commissaires aux Comptes (CNCC) and the Conseil Supérieur de l'Ordre des Experts-Comptables (CSOEC)

Hong Kong Institute of Certified Public Accountants (HKICPA)

Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)

Japanese Institute of Certified Public Accountants (JICPA)

Korean Institute of Certified Public Accountants (KICPA)

New Zealand Auditing and Assurance Standards Board (NZAuASB).pdf

Royal Netherlands Institute of Chartered Accountants (NBA)

4. Accounting Firms

BDO International Limited (BDO)

CohnReznick (CR)

Crowe (CG)

HLB International (HLB)

KPMG

Mazars (MAZ)

Mazars USA (MAZUSA)

MNP LLP (MNP)

Moore (MGN)

Nexia International (NI)

RSM International Limited (RSM)

SRA

5. Public Sector Organizations

Auditor General of South Africa (AGSA)

Australasian Council of Auditors General (ACAG)

New Zealand Auditor General (NZAG)

Office of the Auditor General of Canada (OAGC)

US Government Accountability Office (GAO)

6. Professional Accountancy and Other Professional Organizations

Belgian Institute of Registered Auditors (IBR-IRE)

Belgian National Chapter of Transparency International (BNCTI)

Botswana Institute of Chartered Accountants (BICA)

CFO Forum

Chartered Accountants Australia and NZ and ACCA - Joint (CAANZ-ACCA)

Confederation of Indian Industry (CII)

CPA Australia (CPAA)

European Audit Committee Leadership Network (EACLN)

Institute of Certified Public Accountants of Uganda (ICPAU)

Institute of Chartered Accountants in England and Wales (ICAEW)

Institute of Directors in South Africa's Audit Committee Forum (IoDSA ACF)

Institute of Singapore Chartered Accountants (ISCA)

Inter-American Accounting Association (IAA).pdf

International Air Transport Association (IATA)

International Federation of Accountants (IFAC).pdf

Kriton (KNL)

Malaysian Institute of Certified Public Accountants (MICPA)

Mexican Institute of Public Accountants (IMCP)

New York State Society of CPAs (NYSSCPA)

Pan African Federation of Accountants (PAFA)

PIRC

REA Auditores - Consejo General de Economistas (REA)

The Institute for the Accountancy Profession in Sweden (FAR)

Union of Chambers of Certified Public Accountants of Turkey (TURMOB)

Wirtschaftsprüferkammer (WPK)

7. Investors and Analysts

Corporate Reporting Users Forum (CRUF)

8. Academics

Auditing Standards Committee of the Auditing Section of the American Accounting Association (ASC)

9. Individuals and Others

Ahmed Al-Qawasmi (AAQ)

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Constantine Cotsilinis (CC)

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