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19 September 2014.

International Auditing and Assurance Standards Board (IAASB)
New York. Via uploading pdf/word files.

Honourable Members of the Board:

Re: *Proposed Changes to the International Standards on Auditing (ISAs)* Addressing Disclosures in the Audit of Financial Statements.

We wish to place on record our sincere admiration for the invaluable services the Board and staff continues to render for the auditing professionals around the globe.

We are also pleased to convey our impression of the proposed amendments in the IASs. Our views are submitted with utmost respect and dedicated to our professional colleagues who strive to uphold the dignity of the profession by not compromising on independence.

Overview of our presentation:

We have expressed our comments as: preliminary, specific, and additional.

Also, attached to the main comments is a full set of ED with changes marked therein; our objective being to convey what we mean by the use of plain English in the Board's publications. The text in **bold** are the changes made by us, and the *faded words in italics* - are those deleted to improve the readability of the original text.

1. Preliminary View:

The source of disclosures is the applicable regulatory framework; it defines what gets disclosed in the financial statements. There's no controversy when it's specific; but most of it is principle-based, leaving a huge room for the interpretation. What keeps on adding to the complexity for auditor is the reporting of information that is out of its comfort zone, i.e., out of the general ledger system and qualitative, especially in the audits of entities engaged in financial services.

The greatest of natural conflict of interest or preparer's bias needs to be recognized and acknowledged as a fundamental truth by the Board[1]. It is the preparers who

[1]We fully support and appreciate the requirement of faithful representation; its components requiring the financial information to be complete, neutral and free of error. IASB Framework Chapter 3, 2010. We consider these to be subject of interpretation. See p.23, DP.

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decides what gets disclosed according to their interpretation and how. The "how" meaning inter-alia its placement, format, language and tone. Its subjective and a matter of degree than absolute. An auditor should be therefore naturally skeptical because of this awareness of inherent conflict.

We candidly put it to you that the most preparers we have interacted with suffer from what we call "minimum disclosure syndrome". The preparers of accounts have the psyche of compliance with the minimum requirements only. The goal post is as high as the minimum requirement. It is the "minimum information" that is thought of as automatically ensuring a fair presentation[2]. Anything over and above is not mandatory and may well be avoided, not matter how relevant those facts may be for the fair presentation or overall understanding.[3]

A small Illustration will make it clear. The accounting policies are mentioned in one place but are ordinarily not cross-referenced with the specific note to aid user's understanding. When suggested, two simple questions were asked: is this required legally? Is anybody else doing it? The answer to both is negative, meaning no need to do it.

It also means that what is required to be disclosed by the regulations needs to be disclosed even if its irrelevant for fair presentation. You do not have the discretion to take it out on your own.

In pursuit of self-interests, often the overriding requirement of the fair presentation is sidestepped or ignored in favor of what is legally prescribed and practiced.

Financial statements are not prepared as an exercise in fair presentation for the users but more as a compliance exercise; its essence is what regulator demands and what preparers is ready to provide. The role of auditor is to make sure that disclosures are in line with minimum compliance and nothing significant has been omitted.

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[2] ISA 200 includes the definition of a fair presentation framework, which acknowledges explicitly or implicitly that, to achieve fair presentation of the financial statements, it may be necessary for management to provide disclosures beyond those specifically required by the framework (see paragraph 13(a)(i))

[3] The UK study refered to in para 18 of the DP refers to the increase in size of the Annual Report and attributes it to the increase in mandatory and voluntary disclosure. However, no further details of respective increases in each type of disclosure is there.

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Our profession has been uncomfortable discussing is the role of auditors in disclosures. Audit opinions challenging the inappropriate and inadequate disclosures by the preparers have been rare, and the ones which did were not the only ones in which such recourse was a proper one, in our admittedly limited professional career.

An unqualified audit opinion and the financial statements are therefore more an expression of consensus between the two. Auditors collaborate with the preparers in achieving what is proverbially: taming the beast without breaking the cane.

We take an unqualified audit opinion not necessarily as auditor being happy with the way the financial statements have been prepared and presented but as a tacit acquiesce that financial statements are in accordance with what is minimum permissible by the framework.

The auditor is as weak or strong as applicable financial reporting framework is. Lets say an entity prepares a cashflow statement by indirect method. The auditor believes that the said statement prepared by the direct method gives a better view. The preparers believe that they have been in compliance. Is there a way available for the auditor to express his view? Lets say, at the general meeting, a shareholder asks why the cashflow is not on direct basis and the standard response would be because this method is permissible for reporting and the preparers do not see any reason for change.

All of the above lead to the “expectation gap” which too is a fact.

It is perhaps the nature of the limitations that impair the process of accountability. There’s no firewall between those entrusted with the running of operations and those who prepare financial statements. There will always be more than one permissible method for doing something. Why one firm is appointed as auditors and not others will always be a recommendation not an explained decision. The interpretation version likely to prevail is most likely that of preparers, which may be toned to give a sense of ownership to auditor. The independence of auditors will always be an issue requiring standard-setters to do whatever best they can within these confines.

2. Specific Responses to the Questions in ED:

Our responses to the questions in the ED are as follows:

1. *Whether, in your view, the proposed changes to the ISAs are appropriate and sufficient for purposes of enhancing the focus of the auditor on disclosures and, thereby, will further support the proper application of current requirements in the ISAs?*

No. The proposed changes to the ISAs are appropriate (and relevant) to a certain extent but not sufficient. We congratulate the Board on picking up the right topic for discourse. We welcome and fully support the proposed changes.

The disclosures are necessary to inform users about judgments and assumptions made in the measurement of the line item, reasons for the judgments, facts, circumstances and the measurement uncertainty related to that line item.[4]

We are pleased that the topic of disclosure is given the importance it always deserved. We would rather prefer a separate standard than a patching job. We remain unconvinced by the reasons advanced for not having a separate standard on disclosure at this point[5]. If it is fundamental to the financial reporting and if its so complex, we need to address it with a dedicated standard.

What's missing is - the hierarchy of disclosures

Nature of Disclosure	Inside the G.L.System	Outside the G.L System
Quantitative	Low audit risk	High audit risk
Qualitative	High audit risk	Very high audit risk

and the associated risk of misstatement for the auditor. A formal identity of categories of disclosures[6] (see encl-1) or a framework of disclosures[7] is missing as much as different issues about audit evidence arise with different types of

[4] P.23, Discussion Paper The Evolving nature of financial reporting: Disclosures and its audit implications by IAASB.
[55] Para 31, Explanatory Memorandum
[6]See para 16 of the Discussion Paper as above.
[7] We agree with the efforts by accounting standard setters to develop a framework for disclosures. Such a framework would assist accounting standard setters in developing consistent, logical and balanced disclosure requirements. They would also assist preparers in the judgments that need to be made in applying disclosure requirements in practice.

disclosures[8]. Also, its limited in scope as management commentary, integrated reporting or reporting incorporated by cross reference are not within its scope.

2. *Are there any specific areas where, in your view, additional enhancement to either the requirements or guidance of the ISAs would be necessary for purposes of effective auditing of disclosures as part of a financial statement audit?*

The auditors are as weak as the applicable financial reporting framework: e.g.

1. ISAs consider an omission of an amount or disclosure as one of four circumstances that may result in misstatements.[9]

Propose a mechanism in the ISAs that recognizes an irrelevant but mandatory disclosure as not material. Deviation from regulatory framework is a material misstatement.[10]

2. Related parties disclosures is a high-risk audit area. In local environment, auditors come across so many situations which in substance require disclosure but fall in gray areas. For example, the CEO's brother is the sole service or material provider. The vendor imports and supplies raw material to the company by simply adding a mark-up on its own invoice. The service provider is a sister who adds a certain mark-up as per contract over and above the payroll costs and bills the company. These kind of schemes are placed for avoiding tax or as plain fraud in which close family and relatives, front mans, etc are involved. This area is too weak in terms of disclosures by the regulatory framework and for disclosures.

3. Recognize and address the risk of disclosure going wrong for auditor in

[8] See para 61-70 of the Dicussion Paper.
[9] ISA 450 Evaluations of misstatements identified during the audit. Para A1.
[10] The ISA 705 provides the following guidance about situations in which the inappropriateness or inadequacy of disclosures may result in a material misstatement (see paragraph A7):
(a) The financial statements do not include all of the disclosures required by the applicable financial reporting framework;

(b) The disclosures in the financial statements are not presented in accordance with the applicable financial reporting framework; or

(c) The financial statements do not provide the disclosures necessary to achieve fair presentation.

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financial service entities than non-financial ones.

The ISAs needs to reflect some facts clearly. The first that it's the management that decides what to disclose and how to disclose it. Secondly, the manner in which a disclosure is placed is also a responsibility of the management. Most of the important matters are given in the fine print. Thirdly, we are not clear about the recourse available to the auditor, if the disclosure is not made or made but not in the manner acceptable to the auditors.

We are not clear why the Board did not support aligning the assertions for presentation and disclosure with the IASB fundamental characteristics of financial information.

As international standard setting bodies the compatibility between the pronouncements of the Board with that of IASB is desirable. We would prefer if the disclosures are linked to the characteristics in the IASB framework.

3. *Whether, in your view, the proposed changes to the assertions will help appropriately integrate the work on disclosures with the audit work on the underlying amounts, thereby promoting an earlier and more effective audit of disclosures?*

Yes. However, the contemporary financial statements include a broad variety of disclosures, not all derived from the accounting system. It includes more forward-looking information, disclosures of sources of estimation uncertainty and models. The complexity of disclosures needs to keep pace with disclosures necessary to faithfully represent new and challenging subject areas such as financial instruments, business combinations and off-balance sheet financing.[11]

[11] See p.17 of the DP

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3. Additional Comments:

3.1 Virtually all entities in Pakistan prepare their financial statements in English only. This practice results in zero understanding of financial statements by a majority of users not familiar with the language no matter how great the disclosure are.

The impact of this observation is profound; in this country of 180 m only about 1 percent have any ability in English. Hence, the standard assumptions for a diligent user of financial statements are not applicable for a vast majority of this country.

The fact is that the accounting profession as a whole that prides itself for securing public trust and interest in financial reporting and accountability has not been able to address the financial information needs of a common person in the country. It also explains why we have a concentrated and narrow investor base, mainly in urban areas as this is where the literacy rate is relatively higher.

3.2 Use plain and simple English in the IASB communications. We call upon the Board to make a concerted effort to use plain and simple English in its written communications. Overlooking this aspect restricts the readership of EDs to very determined readers only and requires them to invest greater effort and time in understanding than commenting.

Thank you.

Sincerely,
Altaf Noor Ali
Chartered Accountants.

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Enclosure-1: See our response Q.No.1 of ED.

(Source: Discussion Paper: The Evolving Nature of Financial Reporting by IAASB Para 16)

IAASB - Categories of Disclosures in Contemporary Financial Statements. (See footnote)

1. Significant accounting policies—descriptions of the accounting policies adopted by the entity relevant to understanding the line items on the face of the financial statements and the basis of the accounting policies of the entity.
2. Components of line items—such as breakdowns of line items into smaller categories, movement analyses or other related information about a line item.
3. Factual information about the entity—such as addresses, names of group entities, composition of share capital and dividend payments.
4. Judgments and reasons—judgments made in the process of applying accounting policies and management decisions and reasons for the policies/decisions selected/made. Examples include disclosure of material uncertainties in relation to the going concern basis of accounting.
5. Assumptions/models/inputs—includes disclosures of material information relevant to the calculation of items in the financial statements, such as possible ranges of values, discount rates, effective interest rates and growth rates.
6. Sources of estimation uncertainty/sensitivity analysis disclosures—these are disclosures to enable users to understand the underlying measurement variability of an item in the financial statements. An example is value at risk disclosures or other types of sensitivity analyses.
7. Descriptions of internal processes—disclosures such as risk management policies and practices. An example is the disclosure of the policies and procedures for managing financial instrument risks.
8. Disclosure of the fair value of an amount recorded on the balance sheet using a different measurement basis—such as a requirement to disclose fair values for items measured using another measurement basis such as historical cost or amortized cost, for example the requirement to disclose the fair value of reclassified financial assets.
9. Objective-based disclosure requirements—these are overarching requirements that set out the objectives of the disclosures to be provided rather than require specific disclosures. Thus, preparers are expected to provide additional disclosures when compliance with the specific disclosure requirements in a standard will be insufficient for users to be able to understand the impact of particular transactions, other events and conditions on the entity‘s financial position and performance. See further discussion of this trend in paragraphs 29–33.

Proposed Changes to the International Standards on Auditing (ISAs)

Addressing Disclosures in the Audit of Financial Statements

IAASB

International Auditing
and Assurance
Standards Board™

This Exposure Draft was developed and approved by the International Auditing and Assurance Standards Board (IAASB).

The IAASB develops auditing and assurance standards and guidance for use by all professional accountants under a shared standard-setting process involving the Public Interest Oversight Board, which oversees the activities of the IAASB, and the IAASB Consultative Advisory Group, which provides public interest input into the development of the standards and guidance.

The objective of the IAASB is to serve the public interest by setting high-quality auditing, assurance, and other related standards and by facilitating the convergence of international and national auditing and assurance standards, thereby enhancing the quality and consistency of practice throughout the world and strengthening public confidence in the global auditing and assurance profession.

The structures and processes that support the operations of the IAASB are facilitated by the International Federation of Accountants (IFAC).

REQUEST FOR COMMENTS

This Exposure Draft, *Proposed Changes to the International Standards on Auditing (ISAs)–Addressing Disclosures in the Audit of Financial Statements*, was developed and approved by the International Auditing and Assurance Standards Board (IAASB).

The proposals in this Exposure Draft may be modified in light of comments received before being issued in final form. **Comments are requested by September 11, 2014.**

Respondents are asked to submit their comments electronically through the IAASB website, using the "Submit a Comment" link. Please submit comments in both a PDF and Word file. Also, please note that first-time users must register to use this feature. All comments will be considered a matter of public record and will ultimately be posted on the website. This publication may be downloaded free of charge from the IAASB website: www.iaasb.org. The approved text is published in the English language.

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EXPLANATORY MEMORANDUM

Introduction

1. This memorandum provides background to, and an explanation of, the Exposure Draft (ED), *Proposed Changes to the International Auditing Standards (ISAs)–Addressing Disclosures in the Audit of Financial Statements*. The International Auditing and Assurance Standards Board (IAASB) approved the proposed changes to the ISAs in March 2014 for exposure.

Background

2. Disclosures are a fundamental part of financial statements*,* **They are** seen as an *increasingly* important way *for preparers* to co**nvey***mmunicate* deeper insights about the entity's *financial position and financial performance than is possible through the* primary financial statements *alone*. Over the past decade, financial reporting disclosure requirements and practices have evolved. They now provide *more extensive* decision-useful information that is more detailed**. Disclosures** *and* often deal*s* with matters that are subjective such as**,** assumptions, models, alternative measurement bases and sources of estimation uncertainty. As these financial reporting disclosures continue to evolve, **the** challenge*s have arisen* **is** for preparers and auditors **to** *in* address*ing* new types of quantitative and non-quantitative information **and to balance it with concerns from stakeholders** *. At the same time, concerns have been raised by preparers, investors and auditors* that the resulting higher volume of note disclosures has, in some cases, increased the risk that useful or relevant information may be obscured.

3. Addressing financial reporting disclosures has always been an integral part of the audit of financial statements, and it is broadly recognized that the ISAs appropriately reflect the necessary risk-based approach to disclosures in the audit, for example by including explicit requirements for doing so throughout the ISAs. Nonetheless, recognizing the importance of disclosures in informing the decisions of users of audited financial statements, and in light of the feedback to the IAASB's January 2011 Discussion Paper, *The Evolving Nature of Financial Reporting: Disclosure and Its Audit Implications*,[1] the IAASB commenced a project in September 2012 to determine whether changes to the ISAs with respect to disclosures are required (through either new or revised requirements, or expanded application material to support the proper application of current requirements in the ISAs).

4. In agreeing to this project, the IAASB acknowledged the view that many of the issues around disclosures cannot be solved by the IAASB alone. Moving forward in areas such as materiality will require collaboration and cooperation between many interested stakeholders, including accounting standard setters, regulators, preparers and users, for an effective response. The IAASB therefore has had active liaison and outreach with such stakeholders. For example, the IAASB has contributed to related initiatives of the International Accounting Standards Board (IASB), such as its work on disclosure frameworks and materiality. *The IAASB will continue to closely follow relevant developments and activities of others to further inform its future activities*.

5. *Nevertheless, t***T**he IAASB considers there are areas in the ISAs where enhancements should be made now, *notwithstanding the uncertainty around the timing and outcome of the work of the accounting standard setters and others in this area.*

1 See IAASB's January 2012 *Feedback Statement* for a summary of responses to the Discussion Paper.

6. The *IAASB believes that the* proposed changes*, mainly to application material in the ISAs in order to further support the proper application of the standards' requirements, as set out* in the ED, are an appropriate response to the concerns raised about the need to clarify the expectations of auditors when auditing financial statement disclosures**. The proposed changes provide***, as well as to the need for* additional guidance to *assist* auditors in addressing the practical challenges arising from the evolving nature of disclosures. The proposals are also consistent with *the IAASB's assessment that* the ISA requirements *are sufficient* to meet the objectives stated in the standards.

7. **The proposed changes may also improve the quality of disclosures because of** *The IAASB also believes that its proposals, for example those intended to further enhance* the focus of the auditor on disclosures at the early stages of the audit**, resulting in similar emphasis** *, may also result in additional focus by companies* in the*ir* financial statement preparation process**.***, thereby improving the quality of disclosures*.

> ## Guide for Respondents
>
> The IAASB welcomes comments on all matters addressed in the Exposure Draft, but especially those identified in the Request for Comments below. Comments are most helpful when they refer to specific paragraphs, including the reasons for the comments, and make specific suggestions for any proposed changes to wording. When a respondent agrees with the proposals in the Exposure Draft (especially those calling for change in current practice), it will be helpful for respondents to say so as this cannot always be inferred when not stated.

Overview of the Proposed Changes, and Significant Matters

The Appendix to the Explanatory Memorandum highlights the main proposed changes to the ISAs included in the Exposure Draft. The following provides an overview of the proposed changes and, where relevant, significant matters addressed in their consideration.

Clarifying the Meaning of Disclosures: Proposed Change to ISA 200[2]

8. *The IAASB believes that where* **Revise the definition of "financial statements"** the term "financial statements" *is used in the ISAs it should be clarified that this is intended* to include all disclosures subject to audit**.** *and that such disclosures may be* found in the related notes, on the face of the financial statements, or incorporated by cross-reference *as allowable by some financial reporting frameworks*. **This revision will clarify** *By clarifying these matters in the ISAs, any inconsistency in application of the ISAs as to* which disclosures are included in the required work effort *will be alleviated. Accordingly, the IAASB proposed a revision to the definition of "financial statements" in ISA 200 to make this clear.*

9. In addition, the IAASB has also proposed a few changes in various ISAs to specifically refer to disclosures. The *IAASB is of the view that doing so has* benefits *that* outweigh the disadvantages of the occasional duplication.

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2 ISA 200, *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with International Standards on Auditing*

Guiding Auditors to Address Audit Considerations Relating to Disclosures Early in the Audit: Proposed Changes to ISAs 210,[3] 260,[4] 300[5]

10. *Respondents to the IAASB 2011 Discussion Paper, including both preparers and auditors, agreed that t***T**imely preparation and consideration of disclosures should be a key part of planning an effective audit. *Poor quality disclosures, including excessive or immaterial disclosures that may obscure understanding of important matters, can result when d***D**isclosures *are* prepared and audited relatively late in the financial reporting process **often result in poor quality disclosures primarily because***.* *In this regard, several respondents noted that* the data gathering and preparation process relating to **such** *many* disclosures is *often* **initiated** *started* late in the overall financial reporting process, and is **likely to be** *often* less formal and less structured than for information obtained from the general ledger system.

11. *The IAASB is of the view that the ISA requirements are sufficient to meet the objectives stated in the ISAs in relation to addressing disclosures in planning the audit. Nonetheless, the IAASB is proposing a***A**dditional guidance **is proposed** to help establish an appropriate focus on disclosures in the audit and encourage earlier auditor attention *on them during the audit process*. Proposed changes *to the ISAs* include new application material to:

- *Emphasize the importance of giving appropriate attention to, and planning adequate time for a***A**ddress*ing* disclosures in the same way as classes of transactions, events and account balances, and early consideration of matters such as significant new or revised disclosures.
- *Focus auditors* **Discuss with those charged with governance at the planning stage** *on additional* matters relating to disclosures *that may be discussed with those charged with governance, in particular* at the planning stage of the audit.
- Emphasize *that, when agreeing the terms of engagement, the auditor should emphasize* management's responsibility, early in the audit process, to make available information relevant to disclosures*.* **when agreeing the terms of engagement.**

Identifying, Assessing and Responding to Risks of Material Misstatement – Disclosure Considerations: Proposed Changes to ISAs 240,[6] 315,[7] 320[8] and 330[9]

12. Broadly speaking, the ISAs require that the auditor identify, assess, and respond to the risks of material misstatement, including at the assertion level for disclosures, whether due to error or fraud. However, concerns have been raised about whether sufficient attention is being given by the auditor to disclosures during the risk assessment and response process, and about the degree of consistency in audit procedures in this area. Further, there is a perception by some that current requirements in the ISAs are generally more focused on quantitative information in disclosures.

13. The *IAASB is of the view that the* **existing** requirements of the ISAs are sufficient *to meet the objectives stated in the ISAs in relation to* **for** assessing the risks of material misstatement with respect to

3 ISA 210, *Agreeing the Terms of Audit Engagements*

4 ISA 260 (Revised), *Communication with Those Charged with Governance*

5 ISA 300, *Planning an Audit of Financial Statements*

6 ISA 240, *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements*

7 ISA 315 (Revised), *Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment*

8 ISA 320, *Materiality in Planning and Performing an Audit*

9 ISA 330, *The Auditor's Responses to Assessed Risks*

disclosures. *Nonetheless, the IAASB believes* t**T**he ISAs may be **fortified** *enhanced* to improve the consistent and proper application of the requirements **to** *and thereby* encourage a more robust **disclosure-related** risk assessment *relating to disclosures*. Proposed changes *to the ISAs* include *new application material*:

- Expanding *the* guidance on matters to consider when *the auditor is*:
  - o Obtaining an understanding of the entity and its environment, including the entity's internal control, and
  - o Assessing the **disclosure-related** risks of material misstatement *for disclosures*, including *materiality* considerations for **what is material in** non-quantitative disclosures.
- *Highlighting disclosures, including examples of relevant matters, for consideration during the d***D**iscussion among the engagement team of the susceptibility of the entity's financial statements to material misstatement, including **that of** *from* fraud**, arising from disclosures with relevant examples.**.
- Revis**e***ing* the assertions for presentation and disclosure to promote *their more* consisten**cy.***t and effective use* – see *further discussion* **"assertions"** below.
- *Acknowledging, and g***G**iving prominence to, disclosures where the **source of** information is not *derived from* the accounting system*, and related considerations pertaining to this source of audit evidence* – see **"sources of information for disclosure "***further discussion* below.
- *In relation to materiality, c***C**larifying that the nature of potential misstatements in disclosures, in particular non-quantitative disclosures, is also relevant to the design of audit procedures to address the risks of material misstatement – see **"materiality for non-quantitative disclosures"** *further discussion* below.

Assertions

14. ISA 315 (Revised)[10] identifies the categories of assertions **for** *used by the auditor in considering the different types of* potential misstatements that may occur**; with** *. At present*, a separate category *of assertions is identified* for presentation and disclosure.

15. The *IAASB is of the view that the* auditor **is** *would be* encouraged to consider disclosures and undertake related audit procedures earlier in the audit if, when considering the assertions about classes of transactions and events and account balances, the auditor were to also consider the assertions for related disclosures. Accordingly, the IAASB proposes changes to ISA 315 (Revised) to integrate the relevant assertions relating to disclosures rather than keeping them as separate assertions. Application material has also been proposed to make clear that the same assertions would also apply, adapted as necessary, to disclosures that are not related to classes of transactions and events, or account balances.

16. The description of the assertion for presentation has also been updated for consistency with the evaluation of the presentation of the financial statements undertaken at the end of the audit.[11]

17. *In deliberating the topic of assertions,* **It was** *the IAASB* also considered whether to revise and enhance the descriptions of all of the assertions from how they are currently described. The I*AASB* conclu**sion***ded* **was to** *that it should* only propose changes for the assertions for presentation and disclosure **.** *as*

[10] ISA 315 (Revised), paragraph A124

[11] ISA 700, *Forming an Opinion and Reporting on Financial Statements,* paragraph 13(d)

*t***T**here **is** *has been* little evidence[12] to suggest that a more fundamental review of the assertions for classes of transactions and events, and account balances, is needed.

18. **It was** *The IAASB* also deliberated whether to better align the assertions for presentation and disclosure with the accounting standard setters' fundamental characteristics of financial information. The IAASB did not support pursuing this course, as those characteristics were established in the context of a different purpose than that of an audit. **It was** *The IAASB* also considered **to** combin**e***ing* the assertions for presentation and disclosure into one assertion *and simplifying the description. However, the IAASB did not support* this change **was not acceptable** as **concepts** *some of the* underlying **them** *concepts relating to presentation and disclosure* would not be as clear.

19. *The IAASB integrated t***T**he concept of the relevance of disclosures **was integrated** into the assertions, *as this is part of the evaluation required by* **(see** paragraph 13(d) of ISA 700**)** *. This is intended* to encourage the auditor to focus on the implications of irrelevant or excessive disclosures.

Sources of Information for Disclosures, and Sufficient Appropriate Audit Evidence

20. *As the financial reporting requirements for disclosures continue to evolve, the IAASB noted that some d***D**isclosures now include information from systems and processes that are not part of the general ledger system. *Respondents to the 2011 IAASB Discussion Paper acknowledged that s***S**uch disclosures pose some of the most challenging aspects of preparing and auditing disclosures**, including***. Such disclosed information includes*, for example, forward looking statements, descriptions of models used in fair value measurements, descriptions of risk exposures and other narrative disclosures. *Accordingly, the IAASB has included p***P**roposed changes to the ISAs *to* give prominence to these *other* sources of information **other than the general ledger system** to assist auditors to properly consider *the sources of* audit evidence for such items.

21. *Largely, the concerns relating to* **For certain disclosures, obtaining** sufficient appropriate audit evidence **is an issue that** stem from *underlying practical issues* **its** *of the* availability *of audit evidence for certain disclosures*. Further, some issues also relate to the audit of the underlying amounts in the financial statements.

22. The auditor is responsible for obtaining sufficient appropriate audit evidence, including for disclosures, on which to base the auditor's opinion. ISA 500[13] requires the auditor to design and perform audit procedures for the purposes of obtaining sufficient appropriate audit evidence.[14] *In light of the wide variety of disclosures, as well as the nature and extent of information that may be found in disclosures, the IAASB does not believe that m***M**odifications to the requirements or guidance in ISA 500 is **not** an appropriate or practical response because of the overarching nature of that standard **in the light of variety, nature and extent of disclosures**.

23. Concerns about the availability of audit evidence in **those** *some of the same* areas have also been identified in the *recently completed ISA Implementation* Monitoring project. **Those matters** *Consideration* will be given **considered by** *to this matter as* the IAASB **in its** deliberates its future *Strategy 2015–2019 and Work Program 2015–2016* later in 2014.

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12 In the recently completed ISA Implementation Monitoring Project, where respondents were able to comment on any areas within the ISA where they had issues or concerns, no feedback was received about the appropriateness of the assertions for classes of transactions and events, and account balances.

13 ISA 500, *Audit Evidence*

14 ISA 500, paragraph 6

Materiality for Non-Quantitative Disclosures

24. In deliberating its proposed changes to ISA 315 (Revised) in relation to further guidance on the auditor's assessment of the risks of material misstatement in disclosures, the IAASB also considered whether changes to ISA 320 should be made to require auditors to contemplate materiality for non-quantitative disclosures when planning, and performing, the audit.

25. The IAASB considered a possible change to ISA 320, to emphasize to auditors that t**T**he concept of materiality also applies to non-quantitative disclosures. **The change** *Such a change would* require**s** the auditor to make a preliminary determination of those disclosures that could reasonably be expected to influence the economic decisions of users. However, the IAASB agreed that such a change was intrinsically linked to some of the other issues identified in applying ISA 320 in practice.[15] The IAASB concluded that this issue should not therefore be addressed in ISA 320 in isolation.

26. *As noted in t***T**he *IAASB's recent consultation on its* Work Program 2015–2016*,* **of** the IAASB will continue to consider the need for review of ISA 320 [16] *during its future strategy period*. The prioritization of such a project will be considered, together with other important topics, as the IAASB deliberates its future Work Programs. *Nonetheless,* **Proposed** changes *have been proposed* in ISA 315 (Revised) (see paragraph 13) *to* clarify that the nature of potential misstatements in disclosures, including non-quantitative disclosures, is also relevant to the design of audit procedures to address the risks of material misstatement. The proposed changes to ISA 315 (Revised) also include illustrative examples of non-quantitative information that could be materially misstated.

Clarifying and Elaborating Expectations of Auditor when Evaluating Misstatements and Forming on Opinion: Proposed Changes to ISAs 450[17] and 700

Evaluating Misstatements in Disclosures

27. *Broadly speaking,* **The proposed changes require material** misstatements **in disclosures** identified during the audit *(other than those that are clearly trivial), including misstatements in disclosures, are required* to be accumulated and an assessment made about **its** *the* effect *of the misstatement*s, both individually and in aggregate, on the financial statements as a whole.[18] *However, c***C**hallenges in accumulating and evaluating misstatements in disclosures have been identified, in particular when and how they should be accumulated.

28. The *IAASB is of the view that the* requirements of the ISAs are sufficient to meet the objectives stated in the ISAs in relation to the accumulation and assessment of misstatements in disclosures identified during the audit. *However*, *the IAASB recognizes that a***A**dditional guidance on the accumulation and evaluation of the effect of misstatements in disclosures will help address some of the challenges in this area, as well as assist auditors in identifying more pervasive implications for the financial statements as a whole. Proposed changes to the ISAs include new application material:

15 In the recently completed ISA Implementation Monitoring project, various areas within ISA 320 were identified as requiring further IAASB attention, and it was suggested that a more fulsome revision of ISA 320 be undertaken, which would be beyond the scope of the Disclosures project.

16 The need for revision of ISA 320 may be further informed by the work of others in this area (such as the IASB). Once outputs from these projects are known the IAASB will reassess the need for revision of this standard.

17 ISA 450, *Evaluation of Misstatements Identified during the Audit*

18 ISA 450, paragraph 5

- To provide additional examples of misstatements in disclosures to highlight the types of misstatements that may be found in disclosures.
- To clarify that identified misstatements, including those in disclosures and irrespective of whether they occur in quantitative or non-quantitative information, need to be accumulated and evaluated for their effect on the financial statements.
- To provide examples of pervasive matters arising from misstatements in disclosures that may impact the understandability of the financial statements, including trends towards obscuring significant information in the financial statements by presenting duplicative or uninformative disclosures.

Evaluating the Presentation of the Financial Statements

29. ISA 700 requires a considered assessment of the financial statements as a whole, including, where appropriate, whether the financial statements achieve fair presentation. Some concern has been expressed about how robustly this evaluation is being performed by auditors, in part because of the perception that the ISAs do not clearly guide the auditor's work effort.

30. The IAASB considered the adequacy of the requirements and concluded that they are sufficient to meet the objectives stated in the ISAs in relation to evaluating the presentation of the financial statements, including the presentation of disclosures. Nevertheless, the IAASB has recognized that more guidance would be helpful for auditors to effectively and consistently evaluate the financial statements overall. Proposed changes to the ISAs include new material:
    - Emphasizing considerations about whether the accounting policies have been adequately disclosed.
    - Explaining what could be done to establish whether the information presented in the financial statements is relevant, reliable, comparable and understandable.
    - To assist in determining whether, in the view of the auditor, the financial statements achieve fair presentation (if applicable).

Related Considerations

Presentation of the Proposed Changes

31. The IAASB contemplated whether a *new* separate ISA addressing disclosures should be developed, rather than proposing changes to a number of ISAs. The IAASB believes that a holistic and integrated view on auditing disclosures should be taken throughout the financial statement audit. Accordingly, it concluded that the proposed changes should be made to the relevant ISAs. Further, the IAASB noted that a separate ISA would exacerbate concerns of repetition within the ISAs, and may imply that auditing disclosures is a separate exercise rather than an integral part of the audit; an outcome that would be contrary to the aims of the proposals.[19]

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[19] Periodically the IAASB issues Staff publications in relation to a topic or matter addressed within the ISAs. These documents are non-authoritative and are not a substitute for reading the standards and other authoritative material. The IAASB has used Staff publications in the past to provide an overview of how a particular topic or subject is addressed in a standard, particularly when that subject or matter is covered throughout a number of ISAs.

With respect to the topic of disclosures, the IAASB has commissioned Staff to develop a document to raise awareness of developments relating to disclosures, and to provide context to auditors by directing their attention to the requirements and guidance in the ISAs, including those in the ED, when addressing financial reporting disclosures as part of the financial

Conforming Amendments—ISA 800 series and Other

32. *The IAASB is currently undertaking a review of* ISA 800[20] and other standards in the ISA 800-series in the context of the auditor reporting project **are under review.**. *Although any r***R**evisions to ISA 800 *are likely to be limited, the IAASB, as appropriate,* will include any conforming amendments for auditing disclosures that may be necessary in the planned ED for the ISA 800-series.

33. The IAASB has reviewed other ISAs *not included in this ED, in particular in relation to the proposed changes for the definition of "financial statements," but also in relation to accounting systems where the information in disclosures is from systems or processes that are not part of the general ledger system. The IAASB has made changes for disclosures as appropriate that are reflected in this ED,* and is of the view that no other conforming amendments are needed.

Request for Comments

While the IAASB welcomes comments on all matters addressed in the Exposure Draft, the IAASB is seeking comments on the following specific matters:

1. Whether, in your view, the proposed changes to the ISAs are appropriate and sufficient for purposes of enhancing the focus of the auditor on disclosures and, thereby, will further support the proper application of current requirements in the ISAs?

2. Are there any specific areas where, in your view, additional enhancement to either the requirements or guidance of the ISAs would be necessary for purposes of effective auditing of disclosures as part of a financial statement audit?

3. Whether, in your view, the proposed changes to the assertions will help appropriately integrate the work on disclosures with the audit work on the underlying amounts, thereby promoting an earlier and more effective audit of disclosures?

In addition to the request for specific comments above, the IAASB is also seeking comments on the general matters set out below:

(a) *Preparers (including Small- and Medium-Sized Entities (SMEs)) and Other Users* —The IAASB invites comments on the proposed changes to the ISAs particularly with respect to the practical impacts, if any, of the proposed changes to the ISAs.

*(a)***(b)** *Developing Nations*—Recognizing that many developing nations have adopted or are in the process of adopting the ISAs, the IAASB invites respondents from these nations to comment on the proposed changes to the ISAs, in particular, on any foreseeable difficulties in applying these in a developing nation environment.

*(b)***(c)** *Translations*—Recognizing that many respondents may intend to translate the final changes to the ISAs for adoption in their own environments, the IAASB welcomes comments on potential translation issues respondents may note in reviewing the proposed changes to the ISAs.

statement audit. It is expected that this document will be finalized at the same time as the proposed changes to the ISAs are finalized. However, in the interim the IAASB will post a draft version of the document on its website for information purposes.

[20] ISA 800, *Special Considerations—Audits of Financial Statements Prepared in Accordance with Special Purpose Frameworks*

Effective Date—Recognizing that the proposed changes to the ISAs affect some of the same ISAs as other IAASB projects currently being finalized, the IAASB believes that to the extent possible, the effective date should be aligned with these other projects, namely the IAASB's Auditor Reporting project and the project to revise ISA 720.[21] Accordingly, the IAASB believes that an appropriate effective date for the standard would be 12–15 months after issuance of the final standards, but may be longer or shorter to align with the effective date of the revisions arising from the auditor reporting and ISA 720 projects. Earlier application would be permitted. The IAASB welcomes comment on whether this would provide a sufficient period to support effective implementation of the changes to the ISAs.

[21] ISA 720 (Revised), *The Auditor's Responsibilities Relating to Other Information*

Appendix

Disclosures—Affected ISAs and Summary of Proposed Changes

The following presents the ISAs affected by the proposed changes, as well as a summary of the key changes for each:

ISA 200, *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with International Standards on Auditing*	*To clarify that the d***D**efinition of **the term "**financial statements**" changed** in the ISAs **to** include*s* all disclosures. (See *proposed changes to ISA 200 commencing on* page 15)
ISA 210, *Agreeing the Terms of Audit Engagements*	*To highlight that it is beneficial for auditors to agree with* **The** Management**'s** *their* responsibilities relating to the preparation of disclosures, as well as providing access to information necessary for audit purposes**. These matters need to be reflected in the terms** . (See *proposed changes to ISA 210 commencing on* page 16)
ISA 240, *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements*	*To add emphasis for a***A**uditors to consider disclosures when assessing the risk of misstatement arising from fraud. (See *proposed changes to ISA 240 commencing* on page 23)
ISA 260 (Revised), *Communication with Those Charged with Governance*	*To encourage a***A**uditors to discuss matters relating to disclosures and the financial statements early in the audit process. (See *proposed changes to ISA 260 (Revised) commencing on* page 25)
ISA 300, *Planning an Audit of Financial Statements*	*To focus a***A**uditors **to** *on the* plan*ning* considerations related to disclosures earlier in the audit process. (See *proposed changes to ISA 300 commencing on* page 28)
ISA 315 (Revised), *Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment*	*To a***A**ssist auditors with more effectively and consistently identifying and assessing the risks of material misstatement in disclosures. (See *proposed changes to ISA 315 (Revised) commencing on* page 32)
ISA 320, *Materiality in Planning and Performing an Audit*	*To clarify that t***T**he nature of potential misstatements in disclosures is also relevant to the design of audit procedures to address the risks of material misstatement. (See *proposed changes to ISA 320 commencing on* page 44)
ISA 330, *The Auditor's Responses to Assessed Risks*	*To a***A**ssist auditors with more effectively responding to the risks of material misstatement in disclosures. (See *proposed changes to ISA 330 commencing on* page 46)
ISA 450, *Evaluation of Misstatements Identified during the Audit*	*To clarify that m***M**isstatements in disclosures are accumulated, and the effect of uncorrected misstatement, both individually and in aggregate, considered in light of the financial statements as a whole. (See *proposed changes to ISA 450 commencing on* page 49)
ISA 700, *Forming an Opinion and Reporting on Financial Statements*	*To provide guidance for the a***A**udit procedures when evaluating the presentation of the financial statements, including whether fair presentation has been achieved (if applicable). (See *proposed changes to ISA 700 commencing on* page 54)

EXPOSURE DRAFT

PROPOSED CHANGES TO THE INTERNATIONAL STANDARDS ON AUDITING – ADDRESSING DISCLOSURES IN THE AUDIT OF FINANCIAL STATEMENTS

The following includes extracts of extant standards with mark-up for proposed changes for Addressing Disclosures in the Audit of Financial Statements.

When relevant, proposed changes to the standards arising from the Auditor Reporting Exposure Draft[22] *and ISA 720 (Revised)* [23] *are shown for reference, and have been highlighted in grey. However, those proposed changes may change when the relevant standards are finalized.*

The footnote numbering in this document does not necessarily correlate with the footnotes as currently included in the extant ISAs.

ISA 200, *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with International Standards on Auditing*

Definitions

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

…

(f) Financial statements – A structured *representation* **reporting** of *historical* financial information **with relevant**, *including* ~~related~~ ~~notes~~ disclosures, *intended to* **conveying** *communicate* an entity's economic resources **and** *or* ~~obligations~~ claims against the entity at a **specific** point in time**,** or the changes therein for a period of time**, compiled under** *in accordance with* a financial reporting framework. Disclosures **means** *comprise* explanatory or descriptive information **regarding financial items appearing** on the face of **a** *the* financial statements, information in the related notes, or information incorporated by cross-reference **to another document.** *when permitted by the applicable financial reporting framework*. ~~The related notes ordinarily comprise a summary of significant accounting policies and other explanatory information.~~ The term "financial statements" **may** *ordinarily refers to a complete set of financial statements as determined by the requirements of the applicable financial reporting framework, but can* also refer to a single financial statement **with relevant disclosures**.

22 See the IAASB's July 2013 Exposure Draft, *Reporting on Audited Financial Statements; Proposed New and Revised International Standards on Auditing (ISAs)*

23 ISA 720 (Revised), *The Auditor's Responsibilities Relating to Other Information*, issued for re-exposure in April 2014

ISA 210, *Agreeing the Terms of Audit Engagements*

Requirements

Preconditions for an Audit

6. In order to establish whether the preconditions for an audit are present, the auditor shall: [NO CHANGE PROPOSED TO THE REQUIREMENT FOR DISCLOSURES]

   (a) Determine whether the financial reporting framework to be applied in the preparation of the financial statements is acceptable; and (Ref: Para. A2–A10)

   (b) Obtain the agreement of management that it acknowledges and understands its responsibility: (Ref: Para. A11–A14, A20)

      (i) For the preparation of the financial statements in accordance with the applicable financial reporting framework, including where relevant their fair presentation; (Ref: Para. A15)

      (ii) For such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error; and (Ref: Para. A16–A19)

      (iii) To provide the auditor with:

         a. Access to all information of which management is aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;

         b. Additional information that the auditor may request from management for the purpose of the audit; and

         c. Unrestricted access to persons within the entity from whom the auditor determines it necessary to obtain audit evidence.

…

Agreement on Audit Engagement Terms

…

10. Subject to paragraph 11, the agreed terms of the audit engagement shall be recorded in an audit engagement letter or other suitable form of written agreement and shall include: (Ref: Para. A22–A25) [NO CHANGE PROPOSED TO THE REQUIREMENT FOR DISCLOSURES]

    (a) The objective and scope of the audit of the financial statements;

    (b) The responsibilities of the auditor;

    (c) The responsibilities of management;

    (d) Identification of the applicable financial reporting framework for the preparation of the financial statements; and

    (e) Reference to the expected form and content of any reports to be issued by the auditor, including, if the auditor is not required to communicate key audit matters but intends to do so, a statement that the auditor intends to communicate key audit matters; and (Ref: Para. A23a)

(f) A~~a~~ statement that there may be circumstances in which a report may differ from its expected form and content.

***

Application and Other Explanatory Material

…

Preconditions for an Audit

…

Agreement of the Responsibilities of Management (Ref: Para. 6(b))

A11. An audit in accordance with ISAs is conducted on the premise that management has acknowledged and understands that it has the responsibilities set out in paragraph 6(b).[24] In certain jurisdictions, such responsibilities may be specified in law or regulation. In others, there may be little or no legal or regulatory definition of such responsibilities. ISAs do not override law or regulation in such matters. However, the concept of an independent audit requires that the auditor's role does not involve taking responsibility for the preparation of the financial statements or for the entity's related internal control, and that the auditor has a reasonable expectation of obtaining the information necessary for the audit (including information from systems or processes **other than the** *that are not part of the* general ledger system) in so far as management is able to provide or procure it. Accordingly, the premise is fundamental to the conduct of an independent audit. To avoid misunderstanding, agreement is reached with management that it acknowledges and understands that it has such responsibilities as part of agreeing and recording the terms of the audit engagement in paragraphs 9–12.

A12. The way in which the responsibilities for financial reporting are divided between management and those charged with governance will vary according to the resources and structure of the entity and any relevant law or regulation, and the respective roles of management and those charged with governance within the entity. In most cases, management is responsible for execution while those charged with governance have oversight of management. In some cases, those charged with governance will have, or will assume, responsibility for approving the financial statements or monitoring the entity's internal control related to financial reporting. In larger or public entities, a subgroup of those charged with governance, such as an audit committee, may be charged with certain oversight responsibilities.

A13. ISA 580 requires the auditor to request management to provide written representations that it has fulfilled certain of its responsibilities.[25] It may therefore be appropriate to make management aware that receipt of such written representations will be expected, together with written representations required by other ISAs and, where necessary, written representations to support other audit evidence relevant to the financial statements or one or more specific assertions in the financial statements.

A14. Where management will not acknowledge its responsibilities, or agree to provide the written representations, the auditor will be unable to obtain sufficient appropriate audit evidence.[26] In such circumstances, it would not be appropriate for the auditor to accept the audit engagement, unless

[24] ISA 200, paragraph A2

[25] ISA 580, *Written Representations*, paragraphs 10–11

[26] ISA 580, paragraph A26

law or regulation requires the auditor to do so. In cases where the auditor is required to accept the audit engagement, the auditor may need to explain to management the importance of these matters, and the implications for the auditor's report.

…

Agreement on Audit Engagement Terms

…

Audit Engagement Letter or Other Form of Written Agreement[27] (Ref: Para. 10–11)

A22. It is in the interests of both the entity and the auditor that the auditor sends an audit engagement letter before the commencement of the audit to help avoid misunderstandings with respect to the audit. In some countries, however, the objective and scope of an audit and the responsibilities of management and of the auditor may be sufficiently established by law, that is, they prescribe the matters described in paragraph 10. Although in these circumstances paragraph 11 permits the auditor to include in the engagement letter only reference to the fact that relevant law or regulation applies and that management acknowledges and understands its responsibilities as set out in paragraph 6(b), the auditor may nevertheless consider it appropriate to include the matters described in paragraph 10 in an engagement letter for the information of management.

Form and Content of the Audit Engagement Letter

A23. The form and content of the audit engagement letter may vary for each entity. Information included in the audit engagement letter on the auditor's responsibilities may be based on ISA 200. [28] Paragraphs 6(b) and 12 of this ISA deal with the description of the responsibilities of management. In addition to including the matters required by paragraph 10, an audit engagement letter may make reference to, for example:

- Elaboration of the scope of the audit, including reference to applicable legislation, regulations, ISAs, and ethical and other pronouncements of professional bodies to which the auditor adheres.
- The form of any other communication of results of the audit engagement.
- The requirement for the auditor to communicate key audit matters in the auditor's report in accordance with proposed ISA 701.[29]
- The fact that because of the inherent limitations of an audit, together with the inherent limitations of internal control, there is an unavoidable risk that some material misstatements may not be detected, even though the audit is properly planned and performed in accordance with ISAs.
- Arrangements regarding the planning and performance of the audit, including the composition of the engagement team.
- The expectation that management will provide written representations (see also paragraph A13).

[27] In the paragraphs that follow, any reference to an audit engagement letter is to be taken as a reference to an audit engagement letter or other suitable form of written agreement.

[28] ISA 200, paragraphs 3–9

[29] Proposed ISA 701, *Communicating Key Audit Matters in the Independent Auditor's Report*

- The expectation that management will provide access to all information *(of which management is aware) that is* relevant to the preparation of the financial statements**.**, *recognizing that t***T**his includes information from systems or processes **other than** *that are not part of* the general ledger system.
- The agreement of management to make available *to the auditor* draft financial statements, **with** *including* related disclosures, and **ready access to** all **sources** *information that is* relevant to the preparation of the financial statements ~~any accompanying other information~~ in time to allow the auditor to complete the audit in accordance with the proposed timetable.
- The agreement of management to inform the auditor of facts that may affect the financial statements, of which management may become aware during the period from the date of the auditor's report to the date the financial statements are issued.
- The basis on which fees are computed and any billing arrangements.
- A request for management to acknowledge receipt of the audit engagement letter and to agree to the terms of the engagement outlined therein.

…

***

Appendix 1

(Ref: Paras. A23–A24)

Example of an Audit Engagement Letter

The following is an example of an audit engagement letter for an audit of general purpose financial statements prepared in accordance with International Financial Reporting Standards. This letter is not authoritative but is intended only to be a guide that may be used in conjunction with the considerations outlined in this ISA. It will need to be varied according to individual requirements and circumstances. It is drafted to refer to the audit of financial statements for a single reporting period and would require adaptation if intended or expected to apply to recurring audits (see paragraph 13 of this ISA). It may be appropriate to seek legal advice that any proposed letter is suitable.

***

To the appropriate representative of management or those charged with governance of ABC Company:[30]

[*The objective and scope of the audit*]

You[31] have requested that we audit the financial statements of ABC Company, which comprise the balance sheet as at December 31, 20X1, and the income statement, statement of changes in equity and cash flow statement for the year then ended, and notes to the financial statements, including a summary of significant acco~~unting policies and other explan~~atory information. We are pleased to confirm our acceptance and our understanding of this audit engagement by means of this letter.

30 The addressees and references in the letter would be those that are appropriate in the circumstances of the engagement, including the relevant jurisdiction. It is important to refer to the appropriate persons – see paragraph A21.

31 Throughout this letter, references to "you," "we," "us," "management," "those charged with governance" and "auditor" would be used or amended as appropriate in the circumstances.

~~Our audit will be conducted with t~~The objectives of our audit are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our ~~expressing an~~ opinion ~~on the financial statements~~. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with International Standards on Auditing (ISAs) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

[*The responsibilities of the auditor*]

We will conduct our audit in accordance with ~~International Standards on Auditing (~~ISAs~~)~~. Those standards require that we comply with ethical requirements. ~~and~~ As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the planning and performing of the audit ~~to obtain reasonable assurance about whether the financial statements are free from material misstatement~~. ~~An audit also involves~~ We also:

- ~~performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of~~ Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- ~~In making our risk assessments, we~~ Obtain an understanding of ~~consider~~ internal control relevant to the ~~entity's preparation of the financial statements~~ audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control.[32] However, we will communicate to you in writing concerning any significant deficiencies in internal control relevant to the audit of the financial statements that we have identified during the audit.
- ~~An audit also includes evaluating~~ Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.~~, as well as~~
- ~~evaluating~~ Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

Because of the inherent limitations of an audit, together with the inherent limitations of internal control, there is an unavoidable risk that some material misstatements may not be detected, even though the audit is properly planned and performed in accordance with ISAs.

[*The responsibilities of management and identification of the applicable financial reporting framework (for purposes of this example it is assumed that the auditor has not determined that the law or regulation prescribes those responsibilities in appropriate terms; the descriptions in paragraph 6(b) of this ISA are therefore used).*]

[32] This sentence would be modified, as appropriate, in circumstances when the auditor also has responsibility to issue an opinion on the effectiveness of internal control in conjunction with the audit of the financial statements.

Our audit will be conducted on the basis that [management and, where appropriate, those charged with governance][33] acknowledge and understand that they have responsibility:

(a) For the preparation and fair presentation of the financial statements in accordance with International Financial Reporting Standards;[34]

(b) For such internal control as [management] determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error; and

(c) To provide us with:[35]

  (i) Access to all information of which [management] is aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;

  (ii) Additional information that we may request from [management] for the purpose of the audit; and

  (iii) Unrestricted access to persons within the entity from whom we determine it necessary to obtain audit evidence.

As part of our audit process, we will request from [management and, where appropriate, those charged with governance], written confirmation concerning representations made to us in connection with the audit.

In addition, we will request that management provide us with information about the document(s) that comprise the entity's [annual report],[36] the planned timing of the issuance of these documents, as well as providing us with the final version of these documents as soon as it is available and, if possible, prior to the date of our auditor's report.

We look forward to full cooperation from your staff during our audit.

[*Other relevant information*]

[*Insert other information, such as fee arrangements, billings and other specific terms, as appropriate*.]

[Reporting]

[*Insert appropriate reference to the expected form and content of the auditor's report, including if applicable, the reporting requirements regarding other information in accordance with ISA 720 (Revised).*[37,38]]

The form and content of our report may need to be amended in the light of our audit findings.

33 Use terminology as appropriate in the circumstances.

34 Or, if appropriate, "For the preparation of financial statements that give a true and fair view in accordance with International Financial Reporting Standards"

35 ~~See paragraph A23 for examples of other matters relating to management's responsibilities that may be included.~~

36 See the IAASB's July 2013 Exposure Draft, *Reporting on Audited Financial Statements; Proposed New and Revised International Standards on Auditing (ISAs)*

37 ISA 720 (Revised), *The Auditor's Responsibilities Relating to Other Information*

38 This paragraph is also subject to proposed changes arising from the Auditor Reporting project.

Please sign and return the attached copy of this letter to indicate your acknowledgement of, and agreement with, the arrangements for our audit of the financial statements including our respective responsibilities.

XYZ & Co.

Acknowledged and agreed on behalf of ABC Company by

(signed)

....
Name and Title
Date

ISA 240, *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements*

Requirements

Discussion among the Engagement Team

15. ISA 315 (Revised) requires a discussion among the engagement team members and a determination by the engagement partner of which matters are to be communicated to those team members not involved in the discussion.[39] This discussion shall place particular emphasis on how and where the entity's financial statements may be susceptible to material misstatement due to fraud, including how fraud might occur. The discussion shall occur setting aside beliefs that the engagement team members may have that management and those charged with governance are honest and have integrity. (Ref: Para. A10–A11) [NO CHANGE PROPOSED TO THE REQUIREMENT FOR DISCLOSURES]

…

***

Application and Other Explanatory Material

…

Discussion among the Engagement Team (Ref: Para. 15)

A10. Discussing the susceptibility of the entity's financial statements to material misstatement due to fraud with the engagement team:

- Provides an opportunity for more experienced engagement team members to share their insights about how and where the financial statements may be susceptible to material misstatement due to fraud.
- Enables the auditor to consider an appropriate response to such susceptibility and to determine which members of the engagement team will conduct certain audit procedures.
- Permits the auditor to determine how the results of audit procedures will be shared among the engagement team and how to deal with any allegations of fraud that may come to the auditor's attention.

A11. The discussion may include such matters as:

- An exchange of ideas among engagement team members about how and where they believe the entity's financial statements, including disclosures, may be susceptible to material misstatement due to fraud, how management could perpetrate and conceal fraudulent financial reporting, and how assets of the entity could be misappropriated.
- A consideration of circumstances that might be indicative of earnings management and the practices that might be followed by management to manage earnings that could lead to fraudulent financial reporting.
- A consideration of the risk that management may attempt to obscure information by presenting disclosures that are not clear and understandable.

[39] ISA 315 (Revised), paragraph 10

- A consideration of the known external and internal factors affecting the entity that may create an incentive or pressure for management or others to commit fraud, provide the opportunity for fraud to be perpetrated, and indicate a culture or environment that enables management or others to rationalize committing fraud.
- A consideration of management's involvement in overseeing employees with access to cash or other assets susceptible to misappropriation.
- A consideration of any unusual or unexplained changes in behavior or lifestyle of management or employees which have come to the attention of the engagement team.
- An emphasis on the importance of maintaining a proper state of mind throughout the audit regarding the potential for material misstatement due to fraud.
- A consideration of the types of circumstances that, if encountered, might indicate the possibility of fraud.
- A consideration of how an element of unpredictability will be incorporated into the nature, timing and extent of the audit procedures to be performed.
- A consideration of the audit procedures that might be selected to respond to the susceptibility of the entity's financial statements, including disclosures, to material misstatement due to fraud and whether certain types of audit procedures are more effective than others.
- A consideration of any allegations of fraud that have come to the auditor's attention.
- A consideration of the risk of management override of controls.

ISA 260 (Revised), *Communication with Those Charged with Governance*

Requirements

…

Matters to Be Communicated

The Auditor's Responsibilities in Relation to the Financial Statement Audit

14. The auditor shall communicate with those charged with governance the responsibilities of the auditor in relation to the financial statement audit, including that: [NO CHANGE PROPOSED TO THE REQUIREMENT FOR DISCLOSURES]

    (a) The auditor is responsible for forming and expressing an opinion on the financial statements that have been prepared by management with the oversight of those charged with governance; and

    (b) The audit of the financial statements does not relieve management or those charged with governance of their responsibilities. (Ref: Para. A9–A10)

Planned Scope and Timing of the Audit

15. The auditor shall communicate with those charged with governance an overview of the planned scope and timing of the audit, which includes communicating about the significant risks identified by the auditor. (Ref: Para. A11–A15) [NO CHANGE PROPOSED TO THE REQUIREMENT FOR DISCLOSURES]

…

***

Application and Other Explanatory Material

…

Planned Scope and Timing of the Audit (Ref: Para. 15)

A11. Communication regarding the planned scope and timing of the audit may:

(a) Assist those charged with governance to understand better the consequences of the auditor's work, to discuss issues of risk and the concept of materiality with the auditor, and to identify any areas in which they may request the auditor to undertake additional procedures; and

(b) Assist the auditor to understand better the entity and its environment.

A11a. Communicating significant risks identified by the auditor helps those charged with governance understand those matters and why they require special audit consideration. The communication about significant risks may assist those charged with governance in fulfilling their responsibility to oversee the financial reporting process.[*]

[*] When the final standard is issued, this paragraph will become paragraph A12 and all subsequent paragraphs will be renumbered accordingly.

A12. Matters communicated may include:^

- How the auditor proposes to address the significant risks of material misstatement, whether due to fraud or error.
- Assessed risks of material misstatement other than identified significant risks that are anticipated to have the greatest effect on the overall audit strategy or on the audit plan, including on the efforts of the engagement team.
- The auditor's approach to internal control relevant to the audit.
- The application of the concept of materiality in the context of an audit.[40]
- The nature and extent of specialized skill or knowledge needed to perform the planned audit procedures or evaluate the audit results, including the use of an auditor's expert.[41]
- The effect of significant changes to the applicable financial reporting framework or the entity's environment, financial condition or activities on the audit and the financial statements, including disclosures.

A13. Other planning matters that it may be appropriate to discuss with those charged with governance include:

- Where the entity has an internal audit function, how the external auditor and internal auditors can work in a constructive and complementary manner, including any planned use of the work of the internal audit function, and the nature and extent of any planned use of internal auditors to provide direct assistance.[42]
- The views of those charged with governance about ~~of~~:
  - o The appropriate person(s) in the entity's governance structure with whom to communicate.
  - o The allocation of responsibilities between those charged with governance and management.
  - o The entity's objectives and strategies, and the related business risks that may result in material misstatements.
  - o Matters those charged with governance consider warrant particular attention during the audit, and any areas where they request additional procedures to be undertaken.
  - o Significant communications between the entity and ~~with~~ regulators.
  - o Other matters those charged with governance consider may influence the audit of the financial statements.
- The attitudes, awareness, and actions of those charged with governance concerning (a) the entity's internal control and its importance in the entity, including how those charged with

^ Conforming amendments to this paragraph also were proposed in the Exposure Draft, Proposed ISA 720 (Revised), *The Auditor's Responsibilities Relating to Other Information in Documents Containing or Accompanying Audited Financial Statements and the Auditor's Report Thereon*. The IAASB will consider feedback from that consultation in determining whether such changes continue to be appropriate as it finalizes both proposed ISA 260 (Revised) and proposed ISA 720 (Revised).

[40] ISA 320, *Materiality in Planning and Performing an Audit*

[41] See ISA 620, *Using the Work of an Auditor's Expert*.

[42] ISA 610 (Revised), paragraph 18

governance oversee the effectiveness of internal control, and (b) the detection or possibility of fraud.

- The actions of those charged with governance in response to developments in accounting standards, corporate governance practices, exchange listing rules, and related matters~~.~~, and how they affect, for example, the overall presentation, structure and content of the financial statements, including the relevance, reliability, comparability and understandability of the financial statements.
- The responses of those charged with governance to previous communications with the auditor.
- Details of the documents comprising the other information that the entity intends to issue and when the documents are expected to be made available to the auditor.

A14. While communication with those charged with governance may assist the auditor to plan the scope and timing of the audit, it does not change the auditor's sole responsibility to establish the overall audit strategy and the audit plan, including the nature, timing and extent of procedures necessary to obtain sufficient appropriate audit evidence.

A15. Care is necessary ~~required~~ when communicating with those charged with governance about the planned scope and timing of the audit so as not to compromise the effectiveness of the audit, particularly where some or all of those charged with governance are involved in managing the entity. For example, communicating the nature and timing of detailed audit procedures may reduce the effectiveness of those procedures by making them too predictable.

ISA 300, *Planning an Audit of Financial Statements*

Requirements

Planning Activities

…

9. The auditor shall develop an audit plan that shall include a description of:

   (a) The nature, timing and extent of planned risk assessment procedures, as determined under ISA 315 (Revised).[43]

   (b) The nature, timing and extent of planned further audit procedures at the assertion level, as determined under ISA 330.[44]

   (c) Other planned audit procedures that are required to be carried out so that the engagement complies with ISAs. (Ref: Para. A12–A12b) [NO CHANGE PROPOSED TO THE REQUIREMENT FOR DISCLOSURES]

…

***

Application and Other Explanatory Material

Planning Activities

…

The Audit Plan (Ref: Para. 9)

A12. The audit plan is more detailed than the overall audit strategy in that it includes the nature, timing and extent of audit procedures to be performed by engagement team members. Planning for these audit procedures takes place over the course of the audit as the audit plan for the engagement develops. For example, planning of the auditor's risk assessment procedures occurs early in the audit process. However, planning the nature, timing and extent of specific further audit procedures depends on the outcome of those risk assessment procedures. In addition, the auditor may begin the execution of further audit procedures for some classes of transactions, account balances and disclosures before planning all remaining further audit procedures.

A12a. Determin**e**~~ing~~ the nature, timing and extent of planned risk assessment procedures, and ~~the further~~ audit procedures~~, as they~~ relate**d** to disclosures**.** **Disclosures vary in terms of** ~~is important in light of both the wide~~ range of information and the level of detail ~~that may be encompassed in those disclosures~~. Further, certain disclosures may contain information from systems or processes **other than a** ~~that are not part of the~~ general ledger system**.** ~~, which may also affect the assessed risks and the nature, timing and extent of audit procedures to address them.~~*

A12b. Consideration of disclosures early in the audit assists the auditor in giving appropriate attention to, and planning adequate time for, addressing disclosures in the same way as classes of transactions,

43 ISA 315 (Revised), *Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment*

44 ISA 330, *The Auditor's Responses to Assessed Risks*

* When the final standard is issued, this paragraph will become paragraph A13 and all subsequent paragraphs will be renumbered accordingly.

events and account balances. Early consideration may also help the auditor to determine the effects on the audit of:

- Significant new or revised disclosures required as a result of changes in the entity's environment, financial condition or activities (for example, a change in the required identification of segments and reporting of segment information arising from the acquisition of a significant new subsidiary);
- Significant new or revised disclosures arising from changes in the applicable financial reporting framework;
- The need for the involvement of an auditor's expert to assist with audit procedures related to particular disclosures (for example, disclosures related to pension or other retirement benefit obligations).
- Matters relating to disclosures that the auditor may wish to discuss with those charged with governance.[45]

Appendix

(Ref: Para. 7–8, A8–A11)

Considerations in Establishing the Overall Audit Strategy

This appendix provides examples of matters the auditor may consider in establishing the overall audit strategy. Many of these matters will also influence the auditor's detailed audit plan. The examples provided cover a broad range of matters applicable to many engagements. While some of the matters referred to below may be required by other ISAs, not all matters are relevant to every audit engagement and the list is not necessarily complete.

Characteristics of the Engagement

- The financial reporting framework on which the financial information to be audited has been prepared, including any need for reconciliations to another financial reporting framework.
- Industry-specific reporting requirements such as reports mandated by industry regulators.
- The expected audit coverage, including the number and locations of components to be included.
- The nature of the control relationships between a parent and its components that determine how the group is to be consolidated.
- The extent to which components are audited by other auditors.
- The nature of the business segments to be audited, including the need for specialized knowledge.
- The reporting currency to be used, including any need for currency translation for the financial information audited.
- The need for a statutory audit of standalone financial statements in addition to an audit for consolidation purposes.

[45] ISA 260 (Revised), *Communication with Those Charged with Governance*, paragraph A12

- Whether the entity has an internal audit function and, if so, whether, in which areas and to what extent, the work of the function can be used, or internal auditors can be used to provide direct assistance, for purposes of the audit.
- The entity's use of service organizations and how the auditor may obtain evidence concerning the design or operation of controls performed by them.
- The expected use of audit evidence obtained in previous audits, for example, audit evidence related to risk assessment procedures and tests of controls.
- The effect of information technology on the audit procedures, including the availability of data and the expected use of computer-assisted audit techniques.
- The coordination of the expected coverage and timing of the audit work with any reviews of interim financial information and the effect on the audit of the information obtained during such reviews.
- The availability of client personnel and data.

Reporting Objectives, Timing of the Audit, and Nature of Communications

- The entity's timetable for reporting, such as at interim and final stages.
- The organization of meetings with management and those charged with governance to discuss the nature, timing and extent of the audit work.
- The discussion with management and those charged with governance regarding the expected type and timing of reports to be issued and other communications, both written and oral, including the auditor's report, management letters and communications to those charged with governance.
- The discussion with management regarding the expected communications on the status of audit work throughout the engagement.
- Communication with auditors of components regarding the expected types and timing of reports to be issued and other communications in connection with the audit of components.
- The expected nature and timing of communications among engagement team members, including the nature and timing of team meetings and timing of the review of work performed.
- Whether there are any other expected communications with third parties, including any statutory or contractual reporting responsibilities arising from the audit.

Significant Factors, Preliminary Engagement Activities, and Knowledge Gained on Other Engagements

- The determination of materiality in accordance with ISA 320[46] and, where applicable:
    - o The determination of materiality for components and communication thereof to component auditors in accordance with ISA 600.[47]
    - o The preliminary identification of significant components and material classes of transactions, account balances and disclosures.

46 ISA 320, *Materiality in Planning and Performing an Audit*

47 ISA 600, *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*, paragraphs 21–23 and 40(c)

- Preliminary identification of areas where there may be a higher risk of material misstatement.
- The impact of the assessed risk of material misstatement at the overall financial statement level on direction, supervision and review.
- The manner in which the auditor emphasizes to engagement team members the need to maintain a questioning mind and to exercise professional skepticism in gathering and evaluating audit evidence.
- Results of previous audits that involved evaluating the operating effectiveness of internal control, including the nature of identified deficiencies and action taken to address them.
- The discussion of matters that may affect the audit with firm personnel responsible for performing other services to the entity.
- Evidence of management's commitment to the design, implementation and maintenance of sound internal control, including evidence of appropriate documentation of such internal control.
- Changes to the applicable financial reporting framework, such as changes in accounting standards, which may involve significant new or revised disclosures.
- Volume of transactions, which may determine whether it is more efficient for the auditor to rely on internal control.
- Importance attached to internal control throughout the entity to the successful operation of the business.
- The process(es) management uses to identify and prepare the disclosures required by the applicable financial reporting framework, including disclosures containing information from systems or processes that are not part of the general ledger system.
- Significant business developments affecting the entity, including changes in information technology and business processes, changes in key management, and acquisitions, mergers and divestments.
- Significant industry developments such as changes in industry regulations and new reporting requirements.
- ~~Significant changes in the financial reporting framework, such as changes in accounting standards.~~
- Other significant relevant developments, such as changes in the legal environment affecting the entity.

Nature, Timing and Extent of Resources

- The selection of the engagement team (including, where necessary, the engagement quality control reviewer) and the assignment of audit work to the team members, including the assignment of appropriately experienced team members to areas where there may be higher risks of material misstatement.
- Engagement budgeting, including considering the appropriate amount of time to set aside for areas where there may be higher risks of material misstatement.

ISA 315 (Revised), *Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment*

Requirements [NO CHANGES PROPOSED TO ANY REQUIREMENTS FOR DISCLOSURES]

Risk Assessment Procedures and Related Activities

5. The auditor shall perform risk assessment procedures to provide a basis for the identification and assessment of risks of material misstatement at the financial statement and assertion levels. Risk assessment procedures by themselves, however, do not provide sufficient appropriate audit evidence on which to base the audit opinion. (Ref: Para. A1–A5)

…

9. Where the auditor intends to use information obtained from the auditor's previous experience with the entity and from audit procedures performed in previous audits, the auditor shall determine whether changes have occurred since the previous audit that may affect its relevance to the current audit. (Ref: Para. A19–A20)

10. The engagement partner and other key engagement team members shall discuss the susceptibility of the entity's financial statements to material misstatement, and the application of the applicable financial reporting framework to the entity's facts and circumstances. The engagement partner shall determine which matters are to be communicated to engagement team members not involved in the discussion. (Ref: Para. A21–A23)

The Required Understanding of the Entity and Its Environment, Including the Entity's Internal Control

The Entity and Its Environment

11. The auditor shall obtain an understanding of the following:

    (a) Relevant industry, regulatory, and other external factors including the applicable financial reporting framework. (Ref: Para. A24–A29)

    (b) The nature of the entity, including:

        (i) its operations;

        (ii) its ownership and governance structures;

        (iii) the types of investments that the entity is making and plans to make, including investments in special-purpose entities; and

        (iv) the way that the entity is structured and how it is financed,

        to enable the auditor to understand the classes of transactions, account balances, and disclosures to be expected in the financial statements. (Ref: Para. A30–A34)

    (c) The entity's selection and application of accounting policies, including the reasons for changes thereto. The auditor shall evaluate whether the entity's accounting policies are appropriate for its business and consistent with the applicable financial reporting framework and accounting policies used in the relevant industry. (Ref: Para. A35)

    (d) The entity's objectives and strategies, and those related business risks that may result in risks of material misstatement. (Ref: Para. A36–A42)

(e) The measurement and review of the entity's financial performance. (Ref: Para. A43–A48)

…

The Entity's Internal Control

Components of Internal Control

Control environment

14. The auditor shall obtain an understanding of the control environment. As part of obtaining this understanding, the auditor shall evaluate whether:

    (a) Management, with the oversight of those charged with governance, has created and maintained a culture of honesty and ethical behavior; and

    (b) The strengths in the control environment elements collectively provide an appropriate foundation for the other components of internal control, and whether those other components are not undermined by deficiencies in the control environment. (Ref: Para. A76–A86)

…

The information system, including the related business processes, relevant to financial reporting, and communication

18. The auditor shall obtain an understanding of the information system, including the related business processes, relevant to financial reporting, including the following areas:

    (a) The classes of transactions in the entity's operations that are significant to the financial statements;

    (b) The procedures, within both information technology (IT) and manual systems, by which those transactions are initiated, recorded, processed, corrected as necessary, transferred to the general ledger and reported in the financial statements;

    (c) The related accounting records, supporting information and specific accounts in the financial statements that are used to initiate, record, process and report transactions; this includes the correction of incorrect information and how information is transferred to the general ledger. The records may be in either manual or electronic form;

    (d) How the information system captures events and conditions, other than transactions, that are significant to the financial statements;

    (e) The financial reporting process used to prepare the entity's financial statements, including significant accounting estimates and disclosures; and

    (f) Controls surrounding journal entries, including non-standard journal entries used to record non-recurring, unusual transactions or adjustments. (Ref: Para. A89–A93)

…

Control activities relevant to the audit

20. The auditor shall obtain an understanding of control activities relevant to the audit, being those the auditor judges it necessary to understand in order to assess the risks of material misstatement at the assertion level and design further audit procedures responsive to assessed risks. An audit does not require an understanding of all the control activities related to each significant class of

transactions, account balance, and disclosure in the financial statements or to every assertion relevant to them. (Ref: Para. A96–A102)

…

Identifying and Assessing the Risks of Material Misstatement

25. The auditor shall identify and assess the risks of material misstatement at:

    (a) the financial statement level; and (Ref: Para. A118–A121)

    (b) the assertion level for classes of transactions~~,~~ account balances, and disclosures, (Ref: Para. A122–A126)

    to provide a basis for designing and performing further audit procedures.

26. For this purpose, the auditor shall:

    (a) Identify risks throughout the process of obtaining an understanding of the entity and its environment, including relevant controls that relate to the risks, and by considering the classes of transactions, account balances, and disclosures in the financial statements; (Ref: Para. A127–A128c)

    (b) Assess the identified risks, and evaluate whether they relate more pervasively to the financial statements as a whole and potentially affect many assertions;

    (c) Relate the identified risks to what can go wrong at the assertion level, taking account of relevant controls that the auditor intends to test; and (Ref: Para. A129–A131)

    (d) Consider the likelihood of misstatement, including the possibility of multiple misstatements, and whether the potential misstatement is of a magnitude that could result in a material misstatement.

…

***

Application and Other Explanatory Material

Risk Assessment Procedures and Related Activities (Ref: Para. 5)

A1. Obtaining an understanding of the entity and its environment, including the entity's internal control (referred to hereafter as an "understanding of the entity"), is a continuous, dynamic process of gathering, updating and analyzing information throughout the audit. The understanding establishes a frame of reference within which the auditor plans the audit and exercises professional judgment throughout the audit, for example, when:

- Assessing risks of material misstatement of the financial statements;
- Determining materiality in accordance with ISA 320;[48]
- Considering the appropriateness of the selection and application of accounting policies, and the adequacy of financial statement disclosures;
- Identifying areas of the financial statements (including related disclosures) where special audit consideration may be necessary, for example, related party transactions, or the

[48] ISA 320, *Materiality in Planning and Performing an Audit*

appropriateness of management's use of the going concern assumption, or when considering the business purpose of transactions;

- Developing expectations for use when performing analytical procedures;
- Responding to the assessed risks of material misstatement, including designing and performing further audit procedures to obtain sufficient appropriate audit evidence; and
- Evaluating the sufficiency and appropriateness of audit evidence obtained, such as the appropriateness of assumptions and of management's oral and written representations.

…

Information Obtained in Prior Periods (Ref: Para. 9)

A19. The auditor's previous experience with the entity and audit procedures performed in previous audits may provide the auditor with information about such matters as:

- Past misstatements and whether they were corrected on a timely basis.
- The nature of the entity and its environment, and the entity's internal control (including deficiencies in internal control).
- Significant changes that the entity or its operations may have undergone since the prior financial period, which may assist the auditor in gaining a sufficient understanding of the entity to identify and assess risks of material misstatement.
- ~~Those particular types of t~~**T**ransactions and other events or account balances (and related disclosures) where the auditor experienced difficulty in performing the necessary audit procedures, for example due to their complexity.

A20. The auditor is required to determine whether information obtained in prior periods remains relevant, if the auditor intends to use that information for the purposes of the current audit. This is because changes in the control environment, for example, may affect the relevance of information obtained in the prior year. To determine whether changes have occurred that may affect the relevance of such information, the auditor may make inquiries and perform other appropriate audit procedures, such as walk-throughs of relevant systems.

Discussion among the Engagement Team (Ref: Para. 10)

A21. The discussion among the engagement team about the susceptibility of the entity's financial statements to material misstatement:

- Provides an opportunity for more experienced engagement team members, including the engagement partner, to share their insights based on their knowledge of the entity.
- Allows the engagement team members to exchange information about the business risks to which the entity is subject and about how and where the financial statements might be susceptible to material misstatement due to fraud or error.
- Assists the engagement team members to gain a better understanding of the potential for material misstatement of the financial statements in the specific areas assigned to them, and to understand how the results of the audit procedures that they perform may affect other aspects of the audit including the decisions about the nature, timing and extent of further audit procedures.

- Provides a basis upon which engagement team members communicate and share new information obtained throughout the audit that may affect the assessment of risks of material misstatement or the audit procedures performed to address these risks.

ISA 240 provides further requirements and guidance in relation to the discussion among the engagement team about the risks of fraud.[49]

A21a. As part of the discussion among the engagement team, consideration of the disclosure requirements of the applicable financial reporting framework assists in identifying early in the audit where there may be risks of material misstatement in relation to disclosures. Examples of matters the engagement team may discuss include:

- New financial reporting requirements that may result in significant new or revised disclosures;
- Changes in the entity's environment, financial condition or activities that may result in significant new or revised disclosures, for example, a significant business combination in the period under audit; and
- Disclosures for which obtaining sufficient appropriate audit evidence may have been difficult in the past.[*]

…

The Required Understanding of the Entity and Its Environment, Including the Entity's Internal Control

The Entity and Its Environment

Industry, Regulatory and Other External Factors (Ref: Para. 11(a))

…

Regulatory Factors

A26. Relevant regulatory factors include the regulatory environment. The regulatory environment encompasses, among other matters, the applicable financial reporting framework and the legal and political environment. Examples of matters the auditor may consider include:

- Accounting principles and industry-specific practices.
- Regulatory framework for a regulated industry, including requirements for disclosures.
- Legislation and regulation that significantly affect the entity's operations, including direct supervisory activities.
- Taxation (corporate and other).
- Government policies currently affecting the conduct of the entity's business, such as monetary, including foreign exchange controls, fiscal, financial incentives (for example, government aid programs), and tariffs or trade restrictions policies.
- Environmental requirements affecting the industry and the entity's business.

…

[49] ISA 240, paragraph 15

[*] When the final standard is issued, this paragraph will become paragraph A22 and all subsequent paragraphs will be renumbered accordingly.

Nature of the Entity (Ref: Para. 11(b))

A30. An understanding of the nature of an entity enables the auditor to understand such matters as:

- Whether the entity has a complex structure, for example, with subsidiaries or other components in multiple locations. Complex structures often introduce issues that may give rise to risks of material misstatement. Such issues may include whether goodwill, joint ventures, investments, or special-purpose entities are accounted for appropriately, and whether adequate disclosure of such issues in the financial statements has been made.
- The ownership, and ~~relations~~relationships between owners and other people or entities. Where the applicable financial reporting framework establishes related party requirements, ~~T~~this understanding assists the auditor in determining whether related party transactions have been appropriately identified, and accounted for, and adequately disclosed in the financial statements~~appropriately~~ in accordance with the framework. ISA 550[50] establishes requirements and provides guidance on the auditor's considerations relevant to related parties.

A31. Examples of matters that the auditor may consider when obtaining an understanding of the nature of the entity include:

- Business operations such as:

…

- Investments and investment activities such as:

…

- Financing and financing activities such as:

…

- Financial reporting practices such as:
    - o Accounting principles and industry-specific practices, including for industry-specific significant ~~categories~~ classes of transactions and events, account balances and related disclosures in the financial statements (for example, loans and investments for banks, or research and development for pharmaceuticals).
    - o Revenue recognition ~~practices~~. o

    Accounting for fair values.
    - o Foreign currency assets, liabilities and transactions.
    - o Accounting for unusual or complex transactions including those in controversial or emerging areas (for example, accounting for stock-based compensation).

A32. Significant changes in the entity from prior periods may give rise to, or change, risks of material misstatement.

…

[50] ISA 550, *Related Parties*

Components of Internal Control—Control Environment (Ref: Para. 14)

…

Effect of the Control Environment on the Assessment of the Risks of Material Misstatement

A80. Some elements of an entity's control environment have a pervasive effect on assessing the risks of material misstatement. For example, an entity's control consciousness is influenced significantly by those charged with governance, because one of their roles is to counterbalance pressures on management in relation to financial reporting that may arise from market demands or remuneration schemes. The effectiveness of the design of the control environment in relation to participation by those charged with governance is therefore influenced by such matters as:

- Their independence from management and their ability to evaluate the actions of management.
- Whether they understand the entity's business transactions.
- The extent to which they evaluate whether the financial statements, including disclosures, are prepared in accordance with the applicable financial reporting framework.

…

Components of Internal Control—The Information System, Including Related Business Processes, Relevant to Financial Reporting, and Communication

The Information System, Including Related Business Processes, Relevant to Financial Reporting (Ref: Para. 18)

A89. The information system relevant to financial reporting objectives, which includes the accounting system, consists of the procedures and records designed and established to:

- Initiate, record, process, and report entity transactions (as well as events and conditions) and to maintain accountability for the related assets, liabilities, and equity;
- Resolve incorrect processing of transactions, for example, automated suspense files and procedures followed to clear suspense items out on a timely basis;
- Process and account for system overrides or bypasses to controls;
- Transfer information from transaction processing systems to the general ledger;
- Capture information relevant to financial reporting for events and conditions other than transactions, such as the depreciation and amortization of assets and changes in the recoverability of accounts receivables; and
- Ensure information required to be disclosed by the applicable financial reporting framework is accumulated, recorded, processed, summarized and appropriately reported in the financial statements.

A89a. Information in the financial statements may **emanate** *contain information* from **sources (**systems or processes**) other than** *that are not part of* the general ledger system. These **sources (**systems or processes**)** may include:

- An entity's risk management system.
- *Production of v***V**aluation reports by experts relating to the disclosure of the fair value of a *n* **resource** *amount that is* recorded *on the balance sheet* at cost.

- ~~*Models or other calculations used to develop e*~~**E**stimates recognized or disclosed in the financial statements, including the underlying data and assumptions used in those models **or other calculations.**~~*, f*~~**F**or example, assumptions developed internally that may affect an asset's useful life, or that may be affected by factors outside the control of the entity, such as interest rate data.
- Sensitivity analyses derived from financial models to demonstrate that management has considered alternative assumptions

Components of Internal Control—Control Activities Relevant to the Audit (Ref: Para. 20)

…

A97. Control activities that are relevant to the audit are:

- Those that are required to be treated as such, being control activities that relate to significant risks and those that relate to risks for which substantive procedures alone do not provide sufficient appropriate audit evidence, as required by paragraphs 29 and 30, respectively; or
- Those that are considered to be relevant in the judgment of the auditor.

A98. The auditor's judgment about whether a control activity is relevant to the audit is influenced by the risk that the auditor has identified that may give rise to a material misstatement and whether the auditor thinks it is likely to be appropriate to test the operating effectiveness of the control in determining the extent of substantive testing.

A99. The auditor's emphasis may be on identifying and obtaining an understanding of control activities that address the areas where the auditor considers that risks of material misstatement are likely to be higher. When multiple control activities each achieve the same objective, it is unnecessary to obtain an understanding of each of the control activities related to such objective.

A99a. Control activities ~~*relevant to the audit*~~ may include controls ~~*established by management*~~ **to mitigate the** ~~*that address*~~ risks of material misstatement from disclosures not being prepared in accordance with the applicable financial reporting framework**.** ~~*, in addition to controls that address risks related to account balances and transactions*~~**.**

A100. The auditor's knowledge about the presence or absence of control activities obtained from the understanding of the other components of internal control assists the auditor in determining whether it is necessary to devote additional attention to obtaining an understanding of control activities.

Identifying and Assessing the Risks of Material Misstatement

Assessment of Risks of Material Misstatement at the Financial Statement Level (Ref: Para. 25(a))

A118. Risks of material misstatement at the financial statement level refer to risks that relate pervasively to the financial statements as a whole and potentially affect many assertions. Risks of this nature are not necessarily risks identifiable with specific assertions at the class of transactions, account balance, or disclosure level. Rather, they represent circumstances that may increase the risks of material misstatement at the assertion level, for example, through management override of internal control. Financial statement level risks may be especially relevant to the auditor's consideration of the risks of material misstatement arising from fraud.

A119. Risks at the financial statement level may derive in particular from a deficient control environment (although these risks may also relate to other factors, such as declining economic conditions). For example, deficiencies such as a ~~management's~~ lack of management competence or lack of oversight over the preparation of the financial statements (including disclosures) may have a more pervasive effect on the financial statements and may require an overall response by the auditor.

…

The Use of Assertions

A123. In representing that the financial statements are in accordance with the applicable financial reporting framework, management implicitly or explicitly makes assertions regarding ~~the~~ recognition, measurement, presentation and disclosure ~~of the various elements of financial statements and related disclosures~~.

A124. Assertions used by the auditor ~~to~~ in considering the different types of potential misstatements that may occur may fall into the following ~~three~~ categories ~~and may take the following forms~~:

(a) Assertions about classes of transactions and events, and related disclosures, for the period under audit:

(i) Occurrence—transactions and events that have been recorded or disclosed, have occurred, and such transactions and events pertain to the entity.

(ii) Completeness—all transactions and events that should have been recorded have been recorded,~~.~~ and all related disclosures that should have been included in the financial statements have been included.

(iii) Accuracy—amounts and other data relating to recorded transactions and events have been recorded appropriately, and related disclosures have been appropriately measured and described.

(iv). Presentation—transactions and events are appropriately aggregated or disaggregated and clearly described, and related disclosures are relevant and understandable in the context of the requirements of the applicable financial reporting framework.

~~(iv)~~(v) Cutoff—transactions and events have been recorded in the correct accounting period.

~~(v)~~(vi) Classification—transactions and events have been recorded in the proper accounts.

(b) Assertions about account balances, and related disclosures, at the period end:

(i) Existence—assets, liabilities, and equity interests exist.

(ii) Rights and obligations—the entity holds or controls the rights to assets, and liabilities are the obligations of the entity.

(iii) Completeness—all assets, liabilities and equity interests that should have been recorded have been recorded, and all related disclosures that should have been included in the financial statements have been included.

(iv) Accuracy, v~~V~~aluation and allocation—assets, liabilities, and equity interests ~~are~~ have been included in the financial statements at appropriate amounts and any resulting valuation or allocation adjustments ~~are~~ have been appropriately recorded, and related disclosures have been appropriately measured and described.

(v) Presentation—account balances are appropriately aggregated or disaggregated and clearly described, and related disclosures are relevant and understandable in the context of the requirements of the applicable financial reporting framework.

~~(c) Assertions about presentation and disclosure~~

~~(i) Occurrence and rights and obligations—disclosed events, transactions, and other matters have occurred and pertain to the entity.~~

~~(ii) Completeness—all disclosures that should have been included in the financial statements have been included.~~

~~(iii) Classification and understandability—financial information is appropriately presented and described, and disclosures are clearly expressed.~~

~~(iv) Accuracy and valuation—financial and other information are disclosed fairly and at appropriate amounts.~~

A124a. The assertions described in paragraph A124(a)–(b) above, adapted as appropriate, may also be used by the auditor in considering the different types of potential misstatements that may occur in disclosures not directly related to recorded classes of transactions, events, or account balances. As an example of such a disclosure, the entity may be required to describe its exposure to risks arising from financial instruments, including how the risks arise; the objectives, policies and processes for managing the risks; and the methods used to measure the risks.

A125. The auditor may use the assertions as described in paragraph A124(a)–(b) above or may express them differently provided all aspects described above have been covered. For example, the auditor may choose to combine the assertions about transactions and events, and related disclosures, with the assertions about account balances, and related disclosures.

…

Process of Identifying Risks of Material Misstatement (Ref: Para. 26(a))

A127. Information gathered by performing risk assessment procedures, including the audit evidence obtained in evaluating the design of controls and determining whether they have been implemented, is used as audit evidence to support the risk assessment. The risk assessment determines the nature, timing and extent of further audit procedures to be performed.

A128. Appendix 2 provides examples of conditions and events that may indicate the existence of risks of material misstatement, including risks of material misstatement relating to disclosures.

A128a. As explained in ISA 320, [51] materiality and audit risk are considered when identifying and assessing the risks of material misstatement in classes of transactions, account balances and disclosures. The auditor's determination of materiality is a matter of professional judgment, and is affected by the auditor's perception of the financial needs of users of the financial statements.[52]

A128b. The auditor's consideration of disclosures in the financial statements when identifying risks in accordance with paragraph 25(a) of this ISA includes non-quantitative disclosures, the misstatement of which could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements as a whole.

A128c. Depending on the circumstances of the entity and the engagement, examples of such disclosures that may be relevant when assessing the risks of material misstatement include disclosures about:

- Liquidity and debt covenants of an entity in financial distress.

[51] ISA 320, *Materiality in Planning and Performing an Audit*, paragraph A1

[52] ISA 320, paragraph 4

- Events or circumstances that have led to the recognition of an impairment loss.
- Key sources of estimation uncertainty, including assumptions about the future.
- The nature of a change in accounting policy, and other relevant disclosures required by the applicable financial reporting framework, where, for example, new financial reporting requirements are expected to have a significant impact on the financial position and financial performance of the entity.
- Share-based payment arrangements, including information about how any amounts recognized were determined, and other relevant disclosures.
- Related parties, and related party transactions.
- Sensitivity analysis intended to enable users to understand the underlying measurement uncertainty of a recorded or disclosed amount.

…

Appendix 2

(Ref: Para. A40, A128)

Conditions and Events That May Indicate Risks of Material Misstatement

The following are examples of conditions and events that may indicate the existence of risks of material misstatement~~.~~ in the financial statements, including in disclosures. The examples provided cover a broad range of conditions and events; however, not all conditions and events are relevant to every audit engagement and the list of examples is not necessarily complete.

- Operations in regions that are economically unstable, for example, countries with significant currency devaluation or highly inflationary economies.
- Operations exposed to volatile markets, for example, futures trading.
- Operations that are subject to a high degree of complex regulation.
- Going concern and liquidity issues including loss of significant customers.
- Constraints on the availability of capital and credit.
- Changes in the industry in which the entity operates.
- Changes in the supply chain.
- Developing or offering new products or services, or moving into new lines of business.
- Expanding into new locations.
- Changes in the entity such as large acquisitions or reorganizations or other unusual events.
- Entities or business segments likely to be sold.
- The existence of complex alliances and joint ventures.
- Use of off balance sheet finance, special-purpose entities, and other complex financing arrangements.
- Significant transactions with related parties.

- Lack of personnel with appropriate accounting and financial reporting skills.
- Changes in key personnel including departure of key executives.
- Deficiencies in internal control, especially those not addressed by management.
- Incentives for management and employees to engage in fraudulent financial reporting.
- Inconsistencies between the entity's IT strategy and its business strategies.
- Changes in the IT environment.
- Installation of significant new IT systems related to financial reporting.
- Inquiries into the entity's operations or financial results by regulatory or government bodies.
- Past misstatements, history of errors or a significant amount of adjustments at period end.
- Significant amount of non-routine or non-systematic transactions including intercompany transactions and large revenue transactions at period end.
- Transactions that are recorded based on management's intent, for example, debt refinancing, assets to be sold and classification of marketable securities.
- Application of new accounting pronouncements.
- Accounting measurements that involve complex processes.
- Events or transactions that involve significant measurement uncertainty, including accounting estimates, and related disclosures.
- Omission, or obscuring, of significant information in disclosures.
- Pending litigation and contingent liabilities, for example, sales warranties, financial guarantees and environmental remediation.

ISA 320, *Materiality in Planning and Performing an Audit*

Introduction

Materiality in the Context of an Audit

...

6. In planning the audit, the auditor makes judgments about ~~the size of~~ misstatements that will be considered material. These judgments provide a basis for:

   (a) Determining the nature, timing and extent of risk assessment procedures;

   (b) Identifying and assessing the risks of material misstatement; and

   (c) Determining the nature, timing and extent of further audit procedures.

   The materiality determined when planning the audit does not necessarily establish an amount below which uncorrected misstatements, individually or in the aggregate, will always be evaluated as immaterial. The circumstances related to some misstatements may cause the auditor to evaluate them as material even if they are below materiality. ~~Although i~~It is not practicable to design audit procedures to detect all misstatements that could be material solely because of their nature. However, consideration of the nature of potential misstatements in non-quantitative disclosures is relevant to the design of audit procedures to address risks of material misstatement. In addition, when evaluating the effect on the financial statements of all uncorrected misstatements, the auditor considers not only the size but also the nature of uncorrected misstatements, and the particular circumstances of their occurrence.~~, when evaluating their effect on the financial statements~~.[53]

…

Requirements

Determining Materiality and Performance Materiality When Planning the Audit

10. When establishing the overall audit strategy, the auditor shall determine materiality for the financial statements as a whole. If, in the specific circumstances of the entity, there is one or more particular classes of transactions, account balances or disclosures for which misstatements of lesser amounts than materiality for the financial statements as a whole could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements, the auditor shall also determine the materiality level or levels to be applied to those particular classes of transactions, account balances or disclosures. (Ref: Para. A2–A11)

11. The auditor shall determine performance materiality for purposes of assessing the risks of material misstatement and determining the nature, timing and extent of further audit procedures. (Ref: Para. A12)

…

***

[53] ISA 450, paragraph A16

Application and Other Explanatory Material

Determining Materiality and Performance Materiality When Planning the Audit

…

Materiality Level or Levels for Particular Classes of Transactions, Account Balances or Disclosures (Ref: Para. 10)

A10. Factors that may indicate the existence of one or more particular classes of transactions, account balances or disclosures for which misstatements of lesser amounts than materiality for the financial statements as a whole could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements include the following:

- Whether law, regulation or the applicable financial reporting framework affect users' expectations regarding the measurement or disclosure of certain items (for example, related party transactions, ~~and~~ the remuneration of management and those charged with governance, and sensitivity analysis for fair value accounting estimates with high estimation uncertainty).
- The key disclosures in relation to the industry in which the entity operates (for example, research and development costs for a pharmaceutical company).
- Whether attention is focused on a particular aspect of the entity's business that is separately disclosed in the financial statements (for example, ~~a newly acquired business~~ disclosures about segments or the acquisition of a significant new subsidiary).

A11. In considering whether, in the specific circumstances of the entity, such classes of transactions, account balances or disclosures exist, the auditor may find it useful to obtain an understanding of the views and expectations of those charged with governance and management.

ISA 330, *The Auditor's Responses to Assessed Risks*

Requirements

Audit Procedures Responsive to the Assessed Risks of Material Misstatement at the Assertion Level

6. The auditor shall design and perform further audit procedures whose nature, timing and extent are based on and are responsive to the assessed risks of material misstatement at the assertion level. (Ref: Para. A4–A8) [NO CHANGE PROPOSED TO THE REQUIREMENT FOR DISCLOSURES]

7. In designing the further audit procedures to be performed, the auditor shall: [NO CHANGE PROPOSED TO THE REQUIREMENT FOR DISCLOSURES]

   (a) Consider the reasons for the assessment given to the risk of material misstatement at the assertion level for each class of transactions, account balance, and disclosure, including:

      (i) The likelihood of material misstatement due to the particular characteristics of the relevant class of transactions, account balance, or disclosure (that is, the inherent risk); and

      (ii) Whether the risk assessment takes account of relevant controls (that is, the control risk), thereby requiring the auditor to obtain audit evidence to determine whether the controls are operating effectively (that is, the auditor intends to rely on the operating effectiveness of controls in determining the nature, timing and extent of substantive procedures); and (Ref: Para. A9–A18)

   (b) Obtain more persuasive audit evidence the higher the auditor's assessment of risk. (Ref: Para. A19)

…

Substantive Procedures

…

Substantive Procedures Related to the Financial Statement Closing Process

20. The auditor's substantive procedures shall include the following audit procedures related to the financial statement closing process:

   (a) Agreeing or reconciling the financial statements, including disclosures, with the underlying accounting records, and information from systems or processes that are not part of the general ledger system; and

   (b) Examining material journal entries and other adjustments made during the course of preparing the financial statements. (Ref: Para. A52)

…

Adequacy of Presentation and Disclosure

24. The auditor shall perform audit procedures to evaluate whether the overall presentation of the financial statements, including the related disclosures, is in accordance with the applicable financial reporting framework. (Ref: Para. A59) [NO CHANGE PROPOSED TO THE REQUIREMENT FOR DISCLOSURES]

…

Documentation

…

30. The auditor's documentation shall demonstrate that the financial statements, including disclosures, agree or reconcile with the underlying accounting records.

***

Application and Other Explanatory Material

Audit Procedures Responsive to the Assessed Risks of Material Misstatement at the Assertion Level

The Nature, Timing and Extent of Further Audit Procedures (Ref: Para. 6)

…

Responding to the Assessed Risks at the Assertion Level (Ref: Para. 7(a))

…

Timing

…

A14. Further relevant factors that influence the auditor's consideration of when to perform audit procedures include the following:

- The control environment.
- When relevant information is available (for example, electronic files may subsequently be overwritten or procedures to be observed may occur only at certain times).
- The nature of the risk (for example, if there is a risk of inflated revenues to meet earnings expectations by subsequent creation of false sales agreements, the auditor may wish to examine contracts available on the date of the period end).
- The period or date to which the audit evidence relates.
- The timing of the preparation of the financial statements, particularly for those disclosures that provide further explanation about amounts recorded in the balance sheet, income statement or cash flow statement.

…

Substantive Procedures (Ref: Para. 18)

…

Substantive Procedures Related to the Financial Statement Closing Process (Ref: Para. 20~~(b)~~)

A52. The nature, and also the extent, of the auditor's substantive procedures related to the financial statement closing process ~~examination of journal entries and other adjustments~~, depends on the nature and complexity of the entity's financial reporting process and the related risks of material misstatement.

…

Adequacy of Presentation and Disclosure (Ref: Para. 24)

A59. Evaluating the overall presentation of the financial statements~~, including the related disclosures,~~ relates to whether the ~~individual~~ financial statements, including disclosures, are presented in a manner that reflects:

- T~~t~~he appropriate classification and description of financial information and the underlying transactions and events~~,~~; and
- ~~t~~The appropriate form, arrangement, and content of the financial statements~~, and their~~ appended ~~notes.~~ This includes, for example, the terminology used as required by the applicable financial reporting framework, the amount level of detail ~~given,~~provided, the aggregation and disaggregation of amounts, and the classification of items in the financial statements, and the bases of amounts set forth.

ISA 450, *Evaluation of Misstatements Identified during the Audit*

Definitions

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

   (a) Misstatement – A difference between the reported amount, classification, presentation, or disclosure of a ~~reported~~ financial statement item and the amount, classification, presentation, or disclosure that is required for the item to be in accordance with the applicable financial reporting framework. Misstatements can arise from error or fraud. (Ref: Para. A1)

   When the auditor expresses an opinion on whether the financial statements are presented fairly, in all material respects, or give a true and fair view, misstatements also include those adjustments of amounts, classifications, presentation, or disclosures that, in the auditor's judgment, are necessary for the financial statements to be presented fairly, in all material respects, or to give a true and fair view.

Requirements [NO CHANGE PROPOSED TO THE REQUIREMENTS FOR DISCLOSURES]

Accumulation of Identified Misstatements

5. The auditor shall accumulate misstatements identified during the audit, other than those that are clearly trivial. (Ref: Para. A2–A3)

…

Evaluating the Effect of Uncorrected Misstatements

10. Prior to evaluating the effect of uncorrected misstatements, the auditor shall reassess materiality determined in accordance with ISA 320 to confirm whether it remains appropriate in the context of the entity's actual financial results. (Ref: Para. A11–A12)

11. The auditor shall determine whether uncorrected misstatements are material, individually or in aggregate. In making this determination, the auditor shall consider:

    (a) The size and nature of the misstatements, both in relation to particular classes of transactions, account balances or disclosures and the financial statements as a whole, and the particular circumstances of their occurrence; and (Ref: Para. A13–A17a, A19–A20)

    (b) The effect of uncorrected misstatements related to prior periods on the relevant classes of transactions, account balances or disclosures, and the financial statements as a whole. (Ref: Para. A18)

…

***

Application and Other Explanatory Material

Definition of Misstatement (Ref: Para. 4(a))

A1. Misstatements may result from:

   (a) An inaccuracy in gathering or processing data from which the financial statements are prepared;

(b) An omission of an amount or disclosure, including non-quantitative disclosures and objective–based disclosures required by certain financial reporting frameworks;[54]

(c) An incorrect accounting estimate arising from overlooking, or clear misinterpretation of, facts;

(d) Judgments of management concerning accounting estimates that the auditor considers unreasonable or the selection and application of accounting policies that the auditor considers inappropriate;

(e) An inappropriate classification, aggregation or disaggregation, of information; and

(f) For financial statements prepared in accordance with a fair presentation framework, the omission of disclosures beyond those specifically required by the framework that are necessary for fair presentation.

Examples of misstatements arising from fraud are provided in ISA 240.[55]

Accumulation of Identified Misstatements (Ref: Para. 5)

A2. The auditor may designate an amount below which misstatements would be clearly trivial and would not need to be accumulated because the auditor expects that the accumulation of such amounts clearly would not have a material effect on the financial statements. "Clearly trivial" is not another expression for "not material." Matters that are clearly trivial will be of a wholly different (smaller) order of magnitude than materiality determined in accordance with ISA 320, and will be matters that are clearly inconsequential, whether taken individually or in aggregate and whether judged by any criteria of size, nature or circumstances. When there is any uncertainty about whether one or more items are clearly trivial, the matter is considered not to be clearly trivial.

A2a. Misstatements in disclosures are also accumulated, and aggregated where appropriate, to assist the auditor in evaluating their **overall** effect on the *disclosures* and *the* financial statements *as a whole*. Although misstatements in non-quantitative disclosures cannot be aggregated in the same manner as misstatements of amounts, they are still evaluated individually, and collectively, with other misstatements.*

A3. To assist the auditor in evaluating the effect of misstatements accumulated during the audit and in communicating misstatements to management and those charged with governance, it may be useful to distinguish between factual misstatements, judgmental misstatements and projected misstatements.

- Factual misstatements are misstatements about which there is no doubt.
- Judgmental misstatements are differences arising from the judgments of management concerning accounting estimates, the selection or application of accounting policies, or disclosures, that the auditor considers unreasonable or inappropriate.~~, or the selection or application of accounting policies that the auditor considers inappropriate.~~

54 ~~For example, International Financial Reporting Standard 7, *Financial Instruments: Disclosures*, paragraph 42H states that~~ "an entity shall disclose any additional information that it considers necessary to meet the disclosure objectives in paragraph…"

55 ISA 240, *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements*, paragraphs A1–A6

* When the final standard is issued, this paragraph will become paragraph A3 and all subsequent paragraphs will be renumbered accordingly.

- Projected misstatements are the auditor's best estimate of misstatements in populations, involving the projection of misstatements identified in audit samples to the entire populations from which the samples were drawn. Guidance on the determination of projected misstatements and evaluation of the results is set out in ISA 530.[56]

…

Evaluating the Effect of Uncorrected Misstatements (Ref: Para. 10–11)

A11. The auditor's determination of materiality in accordance with ISA 320 is often based on estimates of the entity's financial results, because the actual financial results may not yet be known. Therefore, prior to the auditor's evaluation of the effect of uncorrected misstatements, it may be necessary to revise materiality determined in accordance with ISA 320 based on the actual financial results.

A12. ISA 320 explains that, as the audit progresses, materiality for the financial statements as a whole (and, if applicable, the materiality level or levels for particular classes of transactions, account balances or disclosures) is revised in the event of the auditor becoming aware of information during the audit that would have caused the auditor to have determined a different amount (or amounts) initially.[57] Thus, any significant revision is likely to have been made before the auditor evaluates the effect of uncorrected misstatements. However, if the auditor's reassessment of materiality determined in accordance with ISA 320 (see paragraph 10 of this ISA) gives rise to a lower amount (or amounts), then performance materiality and the appropriateness of the nature, timing and extent of the further audit procedures are reconsidered so as to obtain sufficient appropriate audit evidence on which to base the audit opinion.

A13. Each individual misstatement of an amount is considered to evaluate its effect on the relevant classes of transactions, account balances or disclosures, including whether the materiality level for that particular class of transactions, account balance or disclosure, if any, has been exceeded.

A13a. Evaluating whether misstatements in non-quantitative disclosures are material takes into account matters such as their effect on the relevant disclosure, as well as their overall effect on the financial statements as a whole. Incorrect descriptions of information about the objectives, policies and processes for managing capital could, for example, be material for entities with insurance and banking activities.

A14. If an individual misstatement is judged to be material, it is unlikely that it can be offset by other misstatements. For example, if revenue has been materially overstated, the financial statements as a whole will be materially misstated, even if the effect of the misstatement on earnings is completely offset by an equivalent overstatement of expenses. It may be appropriate to offset misstatements within the same account balance or class of transactions; however, the risk that further undetected misstatements may exist is considered before concluding that offsetting even immaterial misstatements is appropriate.[58]

A15. Determining whether a classification misstatement is material involves the evaluation of qualitative considerations, such as the effect of the classification misstatement on debt or other contractual covenants, the effect on individual line items or sub-totals, or the effect on key ratios. There may be

[56] ISA 530, *Audit Sampling*, paragraphs 14–15

[57] ISA 320, paragraph 12

[58] The identification of a number of immaterial misstatements within the same account balance or class of transactions may require the auditor to reassess the risk of material misstatement for that account balance or class of transactions.

circumstances where the auditor concludes that a classification misstatement is not material in the context of the financial statements as a whole, even though it may exceed the materiality level or levels applied in evaluating other misstatements. For example, a misclassification between balance sheet line items may not be considered material in the context of the financial statements as a whole when the amount of the misclassification is small in relation to the size of the related balance sheet line items and the misclassification does not affect the income statement or any key ratios.

A16. The circumstances related to some misstatements may cause the auditor to evaluate them as material, individually or when considered together with other misstatements accumulated during the audit, even if they are lower than materiality for the financial statements as a whole. Circumstances that may affect the evaluation include the extent to which the misstatement:

- Affects compliance with regulatory requirements;
- Affects compliance with debt covenants or other contractual requirements;
- Relates to the incorrect selection or application of an accounting policy that has an immaterial effect on the current period's financial statements but is likely to have a material effect on future periods' financial statements;
- Masks a change in earnings or other trends, especially in the context of general economic and industry conditions;
- Affects ratios used to evaluate the entity's financial position, results of operations or cash flows;
- Affects segment information presented in the financial statements (for example, the significance of the matter to a segment or other portion of the entity's business that has been identified as playing a significant role in the entity's operations or profitability);
- Has the effect of increasing management compensation, for example, by ensuring that the requirements for the award of bonuses or other incentives are satisfied;
- Is significant having regard to the auditor's understanding of known previous communications to users, for example, in relation to forecast earnings;
- Relates to items involving particular parties (for example, whether external parties to the transaction are related to members of the entity's management);
- Is an omission of information not specifically required by the applicable financial reporting framework but which, in the judgment of the auditor, is important to the users' understanding of the financial position, financial performance or cash flows of the entity; or
- Affects other information that will be communicated in the annual report~~ in documents containing the audited financial statements~~ (for example, information to be included in a "Management Discussion and Analysis" or an "Operating and Financial Review") that may reasonably be expected to influence the economic decisions of the users of the financial statements. ISA 720 (Revised) [59] deals with the auditor's responsibilities relating to ~~consideration of~~ other information~~, on which the auditor has no obligation to report, in documents containing audited financial statements~~.

[59] ISA 720 (Revised), *The Auditor's Responsibilities Relating to Other Information* ~~*in Documents Containing Audited Financial Statements*~~

These circumstances are only examples; not all are likely to be present in all audits nor is the list necessarily complete. The existence of any circumstances such as these does not necessarily lead to a conclusion that the misstatement is material.

A17. ISA 240[60] explains how the implications of a misstatement that is, or may be, the result of fraud ought to be considered in relation to other aspects of the audit, even if the size of the misstatement is not material in relation to the financial statements.

A17a. Misstatements in disclosures could be indicative of, for example:[*]

- Bias in management's judgments that results in misleading disclosures; or
- A trend towards duplicative or uninformative disclosures that may obscure significant information in the financial statements.

A18. The cumulative effect of immaterial uncorrected misstatements related to prior periods may have a material effect on the current period's financial statements. There are different acceptable approaches to the auditor's evaluation of such uncorrected misstatements on the current period's financial statements. Using the same evaluation approach provides consistency from period to period.

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[60] ISA 240, paragraph 35

[*] When the final standard is issued, this paragraph will become paragraph A18 and all subsequent paragraphs will be renumbered accordingly.

ISA 700, *Forming an Opinion and Reporting on Financial Statements*

Requirements

Forming an Opinion on the Financial Statements

10. The auditor shall form an opinion on whether the financial statements are prepared, in all material respects, in accordance with the applicable financial reporting framework.[61, 62]

11. In order to form that opinion, the auditor shall conclude as to whether the auditor has obtained reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error. That conclusion shall take into account:

    (a) The auditor's conclusion, in accordance with ISA 330, whether sufficient appropriate audit evidence has been obtained;[63]

    (b) The auditor's conclusion, in accordance with ISA 450, whether uncorrected misstatements are material, individually or in aggregate;[64] and

    (c) The evaluations required by paragraphs 12–15.

12. The auditor shall evaluate whether the financial statements are prepared, in all material respects, in accordance with the requirements of the applicable financial reporting framework. This evaluation shall include consideration of the qualitative aspects of the entity's accounting practices, including indicators of possible bias in management's judgments. (Ref: Para. A1–A3)

13. In particular, the auditor shall evaluate whether*, in view of the requirements of the applicable financial reporting framework*:

    (a) The financial statements ~~adequately~~ *appropriately* disclose the significant accounting policies *selected and applied*; (Ref: Para. A3a)

    (b) The accounting policies *selected and applied* are consistent with the applicable financial reporting framework and are appropriate;

    (c) The accounting estimates made by management are reasonable;

    (d) The information presented in the financial statements is relevant, reliable, comparable, and understandable; (Ref: Para. A3b)

    (e) The financial statements provide adequate disclosures to enable **a** *the intended* user*s* to understand the *effect of material transactions and events on the* information conveyed in the financial statements; and (Ref: Para. A4)

    (f) The terminology used in the financial statements, including the title of each financial statement, is appropriate.

14. When the financial statements are prepared in accordance with a fair presentation framework, the evaluation required by paragraphs 12–13 shall also include whether the financial statements achieve fair

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61 ISA 200, paragraph 11

62 Paragraphs 35–36 deal with the phrases used to express this opinion in the case of a fair presentation framework and a compliance framework respectively.

63 ISA 330, *The Auditor's Responses to Assessed Risks*, paragraph 26

64 ISA 450, *Evaluation of Misstatements Identified during the Audit*, paragraph 11

presentation. The auditor's evaluation as to whether the financial statements achieve fair presentation shall include consideration of: (Ref: Para A4a–A4c)

(a) The overall presentation, structure and content of the financial statements; and

(b) Whether the financial statements, including **disclosures** *the related notes, represent the underlying transactions and events in a manner that* achieve*s* fair presentation.

15. The auditor shall evaluate whether the financial statements adequately refer to or describe the applicable financial reporting framework. (Ref: Para. A5–A10)

…

***

Application and Other Explanatory Material

Qualitative Aspects of the Entity's Accounting Practices (Ref: Para. 12)

A1. Management makes a number of judgments about the amounts and disclosures in the financial statements.

A2. Proposed ISA 260 (Revised) contains a discussion of the qualitative aspects of accounting practices.[65] In considering the qualitative aspects of the entity's accounting practices, the auditor may become aware of possible bias in management's judgments. The auditor may conclude that the cumulative effect of a lack of neutrality, together with the effect of uncorrected misstatements, causes the financial statements as a whole to be materially misstated. Indicators of a lack of neutrality that may affect the auditor's evaluation of whether the financial statements as a whole are materially misstated include the following:

- The selective correction of misstatements brought to management's attention during the audit (for example, correcting misstatements with the effect of increasing reported earnings, but not correcting misstatements that have the effect of decreasing reported earnings).
- Possible management bias in ~~the~~ making ~~of~~ accounting estimates.

A3. ISA 540 addresses possible management bias in making accounting estimates.[66] Indicators of possible management bias do not constitute misstatements for purposes of drawing conclusions on the reasonableness of individual accounting estimates. They may, however, affect the auditor's evaluation of whether the financial statements as a whole are free from material misstatement.

Accounting Policies Appropriately Disclosed in the Financial Statements (Ref: Para. 13(a))

A3a. The auditor's evaluation of whether the financial statements appropriately disclose the significant accounting policies *selected and applied* includes consideration of matters such as the relevance of the accounting policies to the entity, and the clarity with which they have been presented.[*]

[65] Proposed ISA 260 (Revised), *Communication with Those Charged with Governance*, Appendix 2

[66] ISA 540, *Auditing Accounting Estimates, Including Fair Value Accounting Estimates, and Related Disclosures*, paragraph 21

[*] When the final standard is issued, this paragraph will become paragraph A4 and all subsequent paragraphs will be renumbered accordingly.

Information Presented in the Financial Statements Is Relevant, Reliable, Comparable and Understandable (Ref: Para. 13(d))

A3b. Evaluating the understandability and relevance of *the* information presented in the financial statements **means** *includes consideration of matters such as whether*:

- **Including disclosures in** *T***t**he financial statements **which** *, including disclosures,* are *appropriately classified and characterized, and* presented in a clear and concise manner, **and** *but* do not omit relevant information.
- **Removing** *The* disclosures **that** undermine the overall presentation of the financial statements by including information that is not relevant or that is presented in a manner that may obscure a proper understanding of the matters disclosed.
- **Placing** *The placement of* significant disclosures *gives appropriate* prominen**tly***ce to them* (for example, when there is perceived value of entity-specific information to users), and *whether the disclosures are appropriately* cross-referenced to draw attention to related matters, where appropriate.

Disclosure of the Effect of Material Transactions and Events on the Information Conveyed in the Financial Statements (Ref: Para. 13(e))

A4. It is common for financial statements prepared in accordance with a general purpose framework to present an entity's financial position, financial performance **changes in equity** and cash flows. ~~In such circumstances,~~ ~~the auditor evaluates~~ Evaluating whether the financial statements provide adequate disclosures to enable the intended users to understand the effect of material transactions and events *on the entity's financial position, financial performance and cash flows* includes consideration of such matters as *the extent to which the information in the financial statements is relevant and specific to the circumstances of the entity and whether the disclosures are adequate to assist the intended users to understand*:

- The nature and extent of the entity's potential assets and liabilities arising from transactions or events that do not meet the criteria for recognition (or the criteria for derecognition) established by the applicable financial reporting framework.
- The nature and extent of risks of material misstatement arising from transactions and events.
- The methods used and the assumptions and judgments made, and changes to them, that affect amounts presented or otherwise disclosed, including relevant sensitivity analyses.

Evaluating Whether the Financial Statements Achieve Fair Presentation (Ref: Para. 14)

A4a. Some financial reporting frameworks acknowledge explicitly or implicitly the concept of fair presentation.[67] A*s noted in paragraph 7(b) of this ISA, a* fair presentation[68] *financial reporting framework not only* requires compliance with the requirements of the framework, **and** *but also* acknowledges explicitly or implicitly that it may be necessary for management to provide disclosures beyond those specifically required by the **financial reporting** framework**, as noted in paragraph 7(b) of this ISA**.

For example, International Financial Reporting Standards (IFRSs) note that fair presentation requires the faithful representation of the effects of transactions, other events and conditions in accordance with the definitions and recognition criteria for assets, liabilities, income and expenses.

[67] See ISA 200, paragraph 13(a).

A4b. **Evaluating** *The auditor's evaluation about* whether the financial statements achieve fair presentation*, both in respect of presentation and disclosure,* is a matter of **auditor's** professional judgment. This evaluation takes into account matters such as the facts and circumstances of the entity, including changes thereto, based on the auditor's knowledge of the entity and the audit evidence obtained during the audit. The evaluation also includes consideration, for example, of the disclosures needed to achieve a fair presentation arising from matters that may be relevant to the economic decisions of the users of the financial statements, such as evolving financial reporting requirements or the changing economic environment.

A4c. **Auditor's professional judgement on** *Evaluating* whether the financial statements achieve fair presentation **may also** include*s, for example and as appropriate,* discussions with management and those charged with governance about their views on why a particular presentation was chosen, as well as alternatives that may have been considered. The discussions may include, for example:

- The degree to which the amounts in the financial statements are aggregated or disaggregated, and whether the presentation of amounts or disclosures obscures useful information, or results in misleading information.
- Consistency with appropriate industry practice, or whether any departures are relevant to the entity's circumstances and therefore warranted.

Description of the Applicable Financial Reporting Framework (Ref: Para. 15)

A5. As explained in ISA 200, the preparation of the financial statements by management and, where appropriate, those charged with governance requires the inclusion of an adequate description of the applicable financial reporting framework in the financial statements. [69] That description is important because it advises users of the financial statements of the framework on which the financial statements are based.

A6. A description that the financial statements are prepared in accordance with a particular applicable financial reporting framework is appropriate only if the financial statements comply with all the requirements of that framework that are effective during the period covered by the financial statements.

A7. A description of the applicable financial reporting framework that contains imprecise qualifying or limiting language (for example, "the financial statements are in substantial compliance with International Financial Reporting Standards") is not an adequate description of that framework as it may mislead users of the financial statements.

Reference to More than One Financial Reporting Framework

A8. In some cases, the financial statements may represent that they are prepared in accordance with two financial reporting frameworks (for example, the national framework and ~~International Financial Reporting Standards~~IFRSs). This may be because management is required, or has chosen, to prepare the financial statements in accordance with both frameworks, in which case both are applicable financial reporting frameworks. Such description is appropriate only if the financial statements comply with each of the frameworks individually. To be regarded as being prepared in accordance with both frameworks, the financial statements need to comply with both frameworks simultaneously and without any need for reconciling statements. In practice, simultaneous

[69] ISA 200, paragraphs A2–A3

compliance is unlikely unless the jurisdiction has adopted the other framework (for example, ~~International Financial Reporting Standards~~IFRSs) as its own national framework, or has eliminated all barriers to compliance with it.

A9. Financial statements that are prepared in accordance with one financial reporting framework and that contain a note or supplementary statement reconciling the results to those that would be shown under another framework, are not prepared in accordance with that other framework. This is because the financial statements do not include all the information in the manner required by that other framework.

A10. The financial statements may, however, be prepared in accordance with one applicable financial reporting framework and, in addition, describe in the notes to the financial statements the extent to which the financial statements comply with another framework (for example, financial statements prepared in accordance with the national framework that also describe the extent to which they comply with ~~International Financial Reporting Standards~~IFRSs. Such description is supplementary financial information and, as discussed in paragraph ~~47~~49, is considered an integral part of the financial statements and, accordingly, is covered by the auditor's opinion.

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