

PROPOSED REVISION IN SA 600 FOR PUBLIC COMMENTS
SA 600 (REVISED), SPECIAL CONSIDERATIONS- AUDITS OF GROUP FINANCIAL STATEMENTS (INCLUDING THE WORK OF COMPONENT AUDITORS)

Public Consultation and Request for Comments

NFRA invites individuals and organisations to comment on all aspects of the proposals in respect of revision in SA 600 and, particularly, on the specific questions requested in this document. The revisions being proposed are to be applied to audits of Public Interest Entities (PIEs) that fall under Rule 3 of NFRA Rules 2018, **except Public Sector Enterprises, Public Sector Banks, Public Sector Insurance Entities, and their respective branches.**

It would be most helpful if the comments identify and clearly explain the issue or question to which they relate and if possible are supported by empirical data and a clear rationale. Those who disagree with any proposal are requested to describe their suggested alternative(s), supported by specific reasoning, and data as may be applicable.

It is requested that the comments in this regard to NFRA may be captioned as “Comments on proposed SA 600 (Revised)” for ease of reference.

The draft of the proposed SA 600 (Revised) can be accessed at link below:

<https://cdnbbsr.s3waas.gov.in/s3e2ad76f2326fbc6b56a45a56c59fafdb/uploads/2024/09/202409171313688475.pdf>

Last date for receiving the comments is **30 October 2024.**

Email	nfra-comments@nfra.gov.in captioned “Comments on proposed SA 600 (Revised)”
Postal	Captioned “Comments on proposed SA 600 (Revised)” to Secretary, National Financial Reporting Authority 7th-8th Floor, Hindustan Times House, 18-20, Kasturba Gandhi Marg, New Delhi 110001.

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Purpose of this Public Consultation

This note covers the background and rationale for NFRA seeking public consultation regarding changes proposed in SA 600-Using the work of Another Auditor, on the lines of the corresponding international standard, ISA 600 issued by the International Auditing and Assurance Standards Board (IAASB), pursuant to the decisions taken in the 17th Meeting of the National Financial reporting Authority, held on 26.08.2024 (the record notes/minutes of Authority Meetings are available on NFRA website under 'Disclosures' tab). This Standard is applied in case of audit of companies which have subsidiaries and associates, with the holding company being audited by a principal or main auditor and the subsidiaries and/or associates by 'other' or 'component' auditors. The standard outlines the responsibilities of the principal auditor vis a vis those of the component auditor. Some of the largest corporations and companies with significant exposure to capital markets, investors, creditors and thereby involving huge public interest, operate through a network of subsidiaries, joint ventures, branches and associates which makes the requirements of this standard very significant. The quality of audit opinion on the consolidated financial statements (CFS), which is relied upon by investors, creditors and other stakeholders, hinges in significant part on how robust this standard is and how it is applied by auditors in discharge of their audit responsibilities.

The revisions being proposed are to be applied to audits of Public Interest Entities (PIEs) that fall under Rule 3 of NFRA Rules 2018, *except Public Sector Enterprises, Public Sector Insurance Companies, Public Sector Banks and their respective branches.*

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Consultation Paper

1. Introduction

- 1.1 A high quality financial reporting framework is characterised by (a) Effective Independent High-Quality Accounting & Auditing Standards-setters, (b) High Quality Auditing Standards, (c) Active Regulatory Oversight, (d) Audit Firms with Effective Quality Controls World-wide and (e) Profession-wide Quality Assurance. The notification of the National Financial Reporting Authority (NFRA) in 2018 under Companies Act 2013 (CA 2013 or Act), as an independent standard setter and independent audit regulator, along with convergence of accounting standards (Ind AS) with the International Financial Reporting Standards (IFRS), were significant milestones in India's journey towards a high-quality financial reporting framework.
- 1.2 The Companies Act 2013 ushered in more financial discipline by according a 'Statutory' status to the Standards on Auditing (SAs) by way of incorporating following two sub-sections in section 143, which came into force from 01.04.2014.
- a) Sub-section 9 of section 143 which states that every auditor *shall* comply with the auditing standards.
- b) Sub-section 10 of Section 143 which states that the Central Government may prescribe the standards of auditing or any addendum thereto, as recommended by the Institute of Chartered Accountants of India (ICAI), in consultation with and after examination of the recommendations made by the National Financial Reporting Authority (NFRA).
- Proviso to above sub-section states that until the SAs are prescribed by the Central Government, the SAs or Standards specified by the ICAI shall be deemed to be auditing standards.*

2. Background

- 2.1 Presently, the SAs have not yet been notified under the Act, and as per the proviso to section 143(10) of the Act, the standards specified by the ICAI in 2009 are in force. NFRA vide its letter dated 20.07.2021 and 15.09.2021 had advised AASB, ICAI to review and update the entire set of auditing pronouncements in view of the changes in the statutory and legal framework in India. Ministry of Corporate Affairs (MCA) vide its letter dated 11.08.2021 also requested ICAI to submit a proposal to notify the SAs u/s 143 (10) of the Act. As per the ICAI, the Standards developed and promulgated by the Auditing and Assurance Standards Board (AASB) under the authority of the Council of the ICAI are in conformity with the corresponding International Standards (ISAs) issued by the International Auditing and Assurance Standards Board (IAASB).
- 2.2 ICAI submitted the drafts of 35 SAs (which included SA 600) to NFRA in November 2022. It was observed that the SAs proposed by ICAI for consideration of NFRA did not consider several changes that had been made to the ISAs over last several years. Consequent to NFRA review and further correspondence with ICAI, exposure drafts (EDs) in respect of certain SAs and Standards on Quality Management (on lines of the International Standard on Quality Management-ISQM) were issued by the ICAI. However, regarding revision in SA 600 - Using the work of Another Auditor, on the lines of the corresponding International Standard ISA 600, ICAI stated that it has not

adopted “ISA 600, Special Considerations — Audits of Group Financial Statements. (Including the Work of Component Auditors)”.

3. NFRA’s observations from enforcement cases relevant to the proposal

3.1 In course of its functioning and investigation into matters referred to NFRA by the Ministry of Corporate Affairs, GOI, Securities and Exchange Board of India, and cases taken up suo-moto by NFRA, the quality of audit in respect of Group audits (to which SA 600 is applicable) has been found to be severely deficient. In several cases of Public Interest Entities (PIEs), NFRA has observed severe deficiencies and lack of understanding on the part of the audit firms and auditors of their responsibilities in law, and improper application of the standards by the Principal and Other auditors. This has resulted in gross negligence and serious lack of due diligence by the auditors which is detrimental to the interests of the stakeholders in PIEs.

3.2 As examples, NFRA’s orders in cases of Group Audits involving various companies (Reliance Capital Limited, Reliance Home Finance Limited, Reliance Commercial Finance Limited (together alleged fraud of ₹ 29,000 Crores), Coffee Day Global Limited (alleged fraud of ₹ 3500 Crores), Dewan Housing and Finance Limited (alleged fraud of ₹ 34,000 Crores), and audit quality review of IL&FS (which collapsed with a debt of ₹ 90,000 Crores) etc., which are in public domain (NFRA website), can be referred. A brief of the cases and the observed deficiencies is placed at annex 1 which essentially shows an improper application of SA 600, wherein a mechanical reliance was placed by the Principal Auditor on the work of the Other Auditor without assessing the special circumstances that required additional audit procedures. Annex 1 clearly brings out disadvantage that the users of the financial statements of these PIEs have thus been put to. Across the above cases, there were several obvious indications of siphoning off of funds through subsidiaries including promoter-controlled subsidiaries, nonconsolidation of significant subsidiaries in the consolidated financial statements, nonperformance of adequate audit procedures in the identification, assessment and conclusions of risk of material misstatement, failure to verify related party transactions etc. On non-reporting of fraud, in an instance, the Principal Auditor stated that ‘they had no obligation to evaluate the fraud risk in any of the group companies’ and ‘they had no access to the books of the subsidiaries audited by the other auditors.’ On evergreening of loans, they stated that while various transactions were noted between the group companies there was no evergreening in the company they audited.

4. NFRA’s objective in proposing revision to SA 600 and NFRA’s obligations under law with respect to Standards Setting

4.1 Amongst other statutory functions of NFRA under CA 2013, section 132 (2) of CA 2013 states that “Notwithstanding anything contained in any other law for the time being in force, the National Financial Reporting Authority shall— (a) make recommendations to the Central Government on the formulation and laying down of accounting and auditing policies and standards for adoption by companies or class of companies or their auditors, as the case may be; ...”.

4.2 Rule 4 (1) of NFRA Rules 2018, further reinforces the importance of standard setting, and provides for the objective of NFRA, ‘*The Authority shall protect the public interest and interest of investors, creditors and others associated* with the companies

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and bodies corporate governed under rule 3 *by establishing high quality standards of accounting and auditing....”*.

- 4.3 Section 132 (2) (a) of CA 2013 read with Rule 4 (1) of NFRA Rules 2018 places establishment of high-quality standards of accounting and auditing in public interest as a core an obligation

of NFRA and grants NFRA wide powers of recommending such standards to Central Government for notification.

- 4.4 An analysis of the group legal entity structure of 100 listed companies in the large cap and midcap category (excluding Banks/Insurance Entities) (annex 2) indicates that operations of many of these entities are being carried out through a large number of separate components in the form of subsidiaries, joint ventures and associates. 23 of these 100 had over 50 such components and 76 of these 100 companies had overseas components. These kinds of operating structures coupled with the statutory requirements for preparation of consolidated financial statements and its mandatory audit requires the participation of audit firms or individual auditors other than the Group Auditor.

- 4.5 Also, a broad review of Group Auditors’ report of CFS of these 100 listed companies indicates a significant portion (above 50%) of net assets arising from the components; in case of 20 companies, the percentage is above 50%. Similarly, in case of 18 companies, the percentage of total assets and in case of 17 companies, the percentage of total revenue audited by component auditors was above 50% (annex 3).

- 4.6 Investor protection has also assumed greater importance today with there being 15.8 crore demat accounts which are growing at 24% per annum. The stake of retail investors through the route of Systematic Investment Plans (SIPs) of Mutual Funds is ever increasing. As of 30.06.2024, there are 19.10 Crore Mutual Funds investors. Latest data released by AMFI¹ indicates that assets under management (AUM) of Mutual Funds has reached a gigantic size of Rs 61.15 lakh crores as of 30.06.2024 as against Rs 24.25 crores five years ago. During last five years (June 2019 – June 2024) ² AUMs of Mutual Funds have depicted a growth rate of 152% as against 70% in Bank Deposits. Similarly, subscribers and assets under management (AUM) of National Pension Schemes, which is also a key stakeholder in Financial and Capital Markets, has grown significantly during the last five years. As per the bulletins of PFRDA³, AUM has increased from Rs 3.38 lakh crores to Rs 12.14 lakh crores and the number of subscribers has grown from to 7.46 lakhs to 71 lakhs. The instances of audit failure as detailed in para 3 above and massive losses which the shareholders, banks, and other stakeholders had to suffer, bring out the need and urgency of revising SA 600 in accordance with the global standard. The proposed revision will go a long way in protecting the interest of retail and other investors, creditors such as banks and other financial institutions, and foreign investors.

- 4.7 Internationally, successive revisions in ISA 600 have brought in greater responsibilities for the lead auditor. As SA 600 impacts audit quality in listed

¹ Monthly Report June 2024 of Association of Mutual Funds in India (AMFI)

² Governor, Reserve Bank of India on 19.07.2024

³ Pension Bulletins May 2024 & Aug 2014, Provident Fund Regulatory & Development Authority (PFRDA)

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companies, companies over certain financial thresholds, banking and insurance companies, all of which constitute public interest entities, its provisions need to stand the test of safeguarding overall ‘public interest’ and ‘trust’ in the financial sector in the country.

- 4.8 According to latest estimate by IMF, India will be contributing around 20% to the global economy over the next decade. Rating agencies like CRISIL, predict that by 2031 India will be

\$7 Tn economy. Over the next five years, the Indian economy is expected to surpass that of Japan and Germany and become 3rd largest economy and have the 3rd largest Capital Market as well. Volume of capital market activity has grown from Rs 1.47 lakh crores in June 2019 to over Rs 4.12 lakh crores⁴ as of June 2024.

- 4.9 Therefore, India’s aspiration and objective to become a developed nation (Viksit Bharat) by 2047 and a leading economy over the next decade or so necessitates vibrant and deep capital and financial markets attracting both domestic and international participants, which in turn needs a financial reporting framework including standards and codes that are comparable to prevailing global standards and best practices.

- 4.10 The recent OM of Cabinet Secretariat, GOI, dated 26 July 2024 reiterates the need for incorporation of global benchmarks and best practices while preparing notes for cabinet/cabinet committees, also conveyed through OM of Cabinet Secretariat, GOI, dated 19 July 2022. It states that “*at the stage of conceptualising/formulating proposals related to policy matters. Schemes, programmes, projects etc, Ministries/Departments should examine global benchmark and best practices on the subject concerned. The objective should be to suitably incorporate global best practices and standards in policies, schemes, programmes, projects etc*”.

- 4.11 Accordingly, and in keeping with NFRA’s obligations in law to protect public interest and the interest of investors, creditors etc., the Authority is proposing improvements in the quality and rigour of the SA 600 (with conforming adjustments across other Standards as will be applicable) on audit of group financial statements on the lines of prevailing global standards. In India, SA 600 was issued by the ICAI in 2002 and has not been revised ever since, even when the corresponding global standard has undergone significant changes in public interest, in 2009 and then in 2023.

- 4.12 **The primary reason for proposing adoption of a revised Standard for group audits is to help safeguard public interest and investor protection, and the need for a standards framework that is robust enough to meet the challenges posed by complex financial systems today. The inherent complexity of group structures, as brought out in annex 1, cannot be handled by the 2002 version of SA 600 and the related provisions across other standards.**

5. **Various Judicial and Parliamentary Committee pronouncements on need to converge with global standards, and recommendations of the Company Law Committee, 2022**

⁴ SEBI Bulletin June 2024

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- 5.1 Hon'ble Supreme Court⁵ of India while dealing with a question whether AS 22 is ultra vires the provisions of Companies Act, Income Tax Act and Constitution of India, has said as follows:

“57. India is an emerging economy. Globalization has helped India to achieve the GDP rate of around 8 to 9 per cent. However, with globalization, India is required

to face challenges in various forms. Corporate India has been acquiring companies in India and abroad. Indian companies are partners in joint ventures. They are part of international consortium. Therefore, Indian Accounting Standards (IAS) have to harmonize and integrate with International Accounting Standards by which harmonization of various accounting policies, practices and principles could take place.”

- 5.2 Hon'ble Supreme Court⁶ of India while dealing with a question of regulatory mechanism over multinational accounting firms had said the following,

“53. Accordingly, we issue the following directions:

(i).....The Committee may also consider the need for an appropriate legislation on the pattern of Sarbanes Oxley Act, 2002 and Dodd Frank Wall Street Reform and Consumer Protection Act, 2010 in US or any other appropriate mechanism for oversight of profession of the auditors....”

- 5.3 Hon'ble Delhi High Court⁷ while dealing with writ petitions of partners of Indian network firm of a MAF, **had emphasised the importance of global best practices** as can be seen from extract of judgment reproduced below. (Emphasis supplied) “109. There is an imminent need, therefore, for –

(a)....

(b) Undertaking a consultation in order to clearly set out as the framework in which multinational accounting firms, whose presence is also necessary in India, can operate. Such firms also contribute in bringing global best practices to India with immense opportunities for youngsters. They also render services to Indian businesses even at a global scale. Thus, the provisions relating to licensing agreements, brand usage etc., also need to be looked into.”

- 5.4 **The Parliamentary Standing Committees and Companies Bills (Emphasis supplied)**

⁵ 19.11.2017 J. K. Industries Ltd. & Anr vs Union Of India & Ors. Also refer para 9 of the said judgment. Hon'ble Supreme Court in 2018 in S. Sukumar versus The Secretary, Institute of Chartered Accountants of India and Hon'ble High Court of Delhi in 2024 in W.P.(C) 11944/2021 & CM APPL. 12020/2024 etc.

⁶ 23.02.2018 S. Sukumar versus The Secretary, Institute of Chartered Accountants of India and Hon'ble High Court of Delhi in 2024 in W.P.(C) 11944/2021 & CM APPL. 12020/2024 etc. ⁷ 03.07.2024 W.P.(C) 11944/2021 & CM APPL. 12020/2024 etc.

a) **Standing Committee on Finance – 21st Report of 15th Lok Sabha “Need for change**

3. ... In the light of this background, modernization of corporate regulation governing setting up and running of enterprises, structures for sharing risk and reward, governance and accountability to the investors and other stakeholders and structural changes in the law commensurate **with global standards** have become critical for the maintenance and enhancement of a vibrant corporate sector and business environment.

4.... **Many Indian companies have become global** and expanded their operations beyond Indian borders with a spate of mergers and acquisitions abroad. Thus, the corporate form has not only contributed significantly to the growth of the national economy, but has helped Indian entrepreneurs to carve out a place for themselves

in the world economy as well. In the backdrop of these developments, a need was felt to help sustain this growth by putting in place a **legal framework that would enable the Indian corporate sector to operate in an environment of best international practices in a globally competitive manner, while fostering a positive environment for investment and growth.**”

5.5 **Standing Committee on Finance – 57th Report of 15th Lok Sabha**

“Salient features of the Companies Bill 2011 (Page 17)

The Authority shall consider the International Financial Reporting Standards and other **internationally accepted accounting and auditing policies and standards** while making recommendations on such matters to the Central Government which will improve the competitiveness of our companies with other companies. The Authority is also proposed to be empowered with *quasi judicial* powers to ensure independent oversight over professionals.”

5.6 **Recommendations of the Company Law Committee, March 2022**

a) The Company Law Committee, 2022, which was chaired by the then Secretary, Corporate Affairs, GOI, and had members drawn from corporate sector, professionals, law and public policy, amongst its deliberations also held that the auditor of a holding company should comment on the true and fair view of each subsidiary company.

(d) The report states that the Committee discussed the issue of large number of cases of diversion of funds through subsidiary companies that are presently taking place and expressed the need for regulatory changes on this matter. The Committee viewed that since a holding company makes significant investment in its subsidiary companies, there should be proper oversight, especially on financial matters, of such subsidiary companies by the Board and the auditor of the holding company. The Committee was also informed about the existing auditing standards and practices. The Committee was of the view that suitable amendments may be required to ensure that the auditor of the holding company has been given assurance about the fairness of audit of each subsidiary company by the respective auditors. In addition, the auditor of the holding company may also be empowered to independently verify the accounts or part of accounts of any subsidiary company. The Committee stated that suitable amendments concerning these matters may be introduced after further examination and public consultation.

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6. Provisions in law relevant to the proposal

- 6.1 In India, preparation of and audit of annual financial statements of all companies is mandatory. S. 129 (3) of CA 2013 requires the company which has subsidiaries or associates to prepare Consolidated Financial Statements (CFS) in addition to its Separate Financial Statements under s.129 (1) and lay it before the annual general meeting of the company. S.143 (2) requires the auditor to audit every financial statement laid before the company in its general meeting.
- 6.2 S.143 of CA 2013 also deals with audit of branch office of a company either by the auditor of the company or any other person⁷ qualified to be to be an auditor of a company and appointed as such u/s 139 of CA 2013. Further, proviso to s.143 (1) empowers the auditor of a company to right of access to the records of all its subsidiaries and associate companies in relation to audit of CFS. S. 143 (3) (c) of CA 2013 states that the auditor's report shall also state whether the report on the accounts of any branch office of the company audited under sub-section (8) by a person other than a company's auditor has been sent to him under the proviso to that subsection **and the manner in which he has dealt with it in preparing his report**. Proviso to s. 143 (8) states that the branch auditor shall prepare a report on the accounts of the branch examined by him and send it to the auditor of the company who shall deal with it in his report **in such manner** as he considers necessary.
- 6.3 The provisions in CA 1956 were also similar, which are also referenced as SA 600 is of 2002 vintage. With respect to branch audits, s. 228 (3) (c) of CA 1956 stated that the branch auditor shall prepare a report on the accounts of the branch office examined by him and forward the same to the company's auditor who shall in preparing the auditor's report, deal with the same in such manner as he considers necessary. Section 227 (3) of CA 1956 deals with the contents of an audit report. S.227 (3) (bb) states that the auditor has to report on 'whether the report on the accounts of any branch office audited under section 228 by a person other than the company's auditor has been forwarded to him as required by clause (c) of sub-section (3) of that section and how he has dealt with the same in preparing the auditor's report'.

7. Key aspects of SA 600 which are at variance with ISA 600 (2002) and with provisions in law

- 7.1 SA 600 was issued by the ICAI in April 1995 and revised in September 2002. This revised version is stated to be generally consistent, in all material respects, with ISA 600 (2002). However, the SA 600 is different even from ISA 600 (2002) in significant aspects, as discussed below.
- (i) **Degree of Responsibility of the Principal Auditor vis a vis the Component Auditor**
- 7.2 **Division of responsibility was not a given in ISA 600 (2002); it was conditional.** ISA 600 (2002) stated that division of responsibility can arise *if the local regulations of some countries permit a principal auditor to base the audit opinion on the financial statements taken as a whole solely upon the report of another auditor regarding the audit of one or more components*.

⁷ In the case of foreign branch, it can be audited by an accountant or any other person duly qualified to act as an auditor of that branch in accordance with the laws of that foreign country.

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- 7.3 NFRA's review of the provisions in both the Acts i.e., current CA 2013 Act⁸ & erstwhile CA 1956 Act¹⁰, shows that the Acts do not require the Principal Auditor to issue his audit opinion *solely based* on the audit report of the branch auditors (See para 4.2 and 4.3 above).
- 7.4 SA 600 further provides that when the auditor delegates work to assistants or uses work performed by other auditors and experts, he will continue to be responsible for forming and expressing his opinion on financial information. However, he will be **entitled** to rely on work

performed by others, provided he exercises adequate skill and care *and is not aware of any reason to believe that he should not have so relied*. It states that the principal auditor *would not be responsible in respect of the work entrusted to the other auditors, except in circumstances which should have aroused his suspicion about the reliability of the work performed by the other auditors*.

- 7.5 The exception clauses provided for in the Standard, as given above in ***bold italics*** above, left a lot of discretion at the hands of the Principal Auditor and even in cases where components auditors reported fraud and issues related to going concern, Principal Auditors have tried to take shelter behind these clauses.
- 7.6 Hence, the Standards are required to be updated to bring in clarity in auditors' other obligations with respect to audit of Group entities.
- (ii) Assessment of Professional Competence of the Other Auditor**
- 7.7 Assessment of competence is hinged in SA 600 on the other auditor also being a CA. The SA states that the principal auditor should consider the professional competence of the other auditor in the context of a specific assignment *if the other auditor is not a member of the ICAI*.
- 7.8 Competence and capability encompass not just being a CA, but relevant experience, understanding and adhering to quality control framework, ethical considerations, amongst other competencies. Internationally⁹ also CPAs and such other professionals need to fulfil certain criteria that are laid down by the audit regulators in their countries (as seen in the US, UK, South Africa, Australia, Singapore etc) and must demonstrate competencies relevant to audit of PIEs, in addition to registration with the audit regulator.
- 7.9 Today as well, while qualification of CA is an eligibility condition for being appointed as an auditor, RBI, SEBI, IRDAI and CAG provide for other additional criteria like sectoral experience of firms, existence of specific skills sets, number of audit partners

⁸ s. 143 (8) and s. 143 (3) (c) of CA 2013 and Rule 12 of the Companies (Audit and Auditor) Rules 2014 ¹⁰ s. 228 (3) (c) and s.227(3)(bb) of CA 1956

⁹ As an example, Australia's competency standard can be viewed at

<https://download.asic.gov.au/media/3913960/auditing-competency-standard-final-august-2015.pdf>.

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and their experience, presence of information system auditors in audit teams, etc., as part of the empanelment/selection criteria for auditors, as illustrated below.

- a) Prudential Regulator for Banks and Financial Institutions viz. RBI, has laid down certain eligibility criteria such as minimum number of partners/professional staff, past experience of bank audits, standing of the firm, IS auditing skills etc.
 - b) Capital Market Regulator viz. SEBI, requires the statutory auditor of listed entity to be mandatorily subject to a peer review process of the ICAI and hold a 'Peer Review' Certificate issued by the Peer Review Board of the ICAI (this is a case of a CA reviewing the work of another CA)
 - c) Prudential Regulator for Insurance Entities viz. IRDAI, has also laid down certain eligibility criteria such as minimum number of partners/professional staff, past experience of bank audits, standing of the firm etc.
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7.10 In fact ISA 600 (2002) provided that even in the case when the principal auditor and other auditor are from affiliated firms, reliance on the competence of the other auditor was premised on some formal mechanisms, where ‘the principal auditor and the other auditor may have a continuing, formal relationship providing for procedures **such as periodic inter-firm review, tests of operating policies and procedures and review of working papers of selected audits.**’

(iii) Sharing of work papers

7.11 SA 600, as it exists today, does not permit review of work papers of component auditors by the principal auditor. Such review of work papers was part of the provisions in the then international standard (ISA 600 of 2002) as it is an important enabling provision for the group auditor to assess sufficiency of audit work performed by component auditors in support of the audit opinion expressed on the group financial statements, given the risks that present in case of such companies.

7.12 One of the reasons cited by ICAI in respect of why ISA 600 is not adopted in India is that the Standard requires sharing of work papers between auditors, and sharing of work papers is not permitted in Chartered Accountants Act 1949. In this regard the relevant provisions are as below.

- a) Clause (1) of the Second Schedule of the Act, PART I, Professional misconduct in relation to Chartered Accountants in Practice -states that a Chartered Accountant in Practice shall be deemed to be guilty of professional misconduct, “if he discloses confidential information acquired in the course of his professional engagement to any person other than his client so engaging him, without the consent of his client or otherwise than as required by any law for the time being in force”.
- b) This clause is not a bar to sharing work papers as SAs would be notified by the Government under s.143 (10) of CA 2013. At present too, the SAs issued by the ICAI have statutory status under s.143 (10) of CA 2013.

7.13 In respect of this issue, it is para 2.15.1.1 (v) of Code of Ethics (Revised 2020) issued by ICAI states that *an auditor is not required to provide the client or the other auditors of the same enterprise or its related enterprise such as a parent or a subsidiary, access to his audit working papers. The main auditors of an enterprise do not have right of access to the audit working papers of the branch auditors. In the case of a Company, the statutory auditor has to consider the report of the branch auditor and has a right to seek clarifications and/or to visit the branch if he deems it necessary to do so for the performance of the duties as auditor. An auditor can rely on the work of another auditor, without having any right of access to the audit working papers of the other auditor. For this purpose, the term ‘auditor’ includes ‘internal auditor’.*

7.14 These provisions are not consistent with CA 2013. Instead, as discussed in paras above, the principal auditor has right of access to all records that aid him in fulfilling his responsibility under section 143 of CA 2013 (s.227 of CA 1956).

7.15 Provisions regarding review of work papers are essential for overall quality of audit and investor protection and aid the principal auditor in seeking sufficient and appropriate evidence of work done by branch auditors, in support of the principal auditor’s overall opinion on the financial statements.

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8. Basis for revision of ISA 600- IAASB¹⁰- paramouncy of public interest issues

8.1 Internationally, the standard on use of Other Auditor's work was issued four decades ago in July 1981 by the International Auditing Practices Committee, the predecessor of the IAASB. It was known as 'International Auditing Guidelines'¹¹ (IAG) 5, Using the Work of an Other Auditor.¹⁴ In 2002, the IAASB renamed it as ISA 600, Using the Work of Another Auditor.

a) As part of Clarity Project, new standard on group audits viz. ISA 600, Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors) was developed and issued in 2009. Reportedly, it was developed in the wake of several significant frauds that involved multinational groups of companies, audited by multiple accounting firms¹².

b) The IAASB's project to revise the Standards began in 2015-16 when the feedback to IAASB Work Plan 2015-16 indicated issues and concerns relating to application of the ISA as well as auditor's performance. The concerns raised are summarised below¹³.

- Application in case of Letter box audits (Companies incorporated in one jurisdiction but all operations in other country), situation where access to information is restricted (associates, joint ventures) and where shared services centres are used.

- Auditors' Performance in relation to the extent of the group auditor's involvement in the work of the component auditor, communication between the group auditor and the component auditor, application of the concept of component materiality and identification of a component in complex situations.

- Inspection findings by audit regulatory bodies and audit oversight bodies have consistently highlighted issues with respect to firms' quality control, and audits of group financial statements. The International Forum of Independent Audit Regulators (IFIAR) 2015 Survey of Inspection Findings continues to identify matters relating to Group Audits and Quality Control as areas with higher numbers of inspection findings on public interest entities (PIE) audits (including but not limited to adequacy of supervision and review and engagement quality control reviews).¹⁴

8.2 The project of ISA 600 (Revised) was undertaken to:

¹⁰ <https://www.iaasb.org/consultations-projects/group-audits-isa-600>

¹¹ In 1990-91, the title of IAPC auditing pronouncements changed from International Auditing Guidelines to International Standards on Auditing to give more authoritative to the auditing standards. Refer footnote 55. ¹⁴ Page 10 of The IAPC's International Auditing Guidelines and its controversial IAG 13 on the auditor's report by Stephen A. Zeff

¹² Refer page 10 Evolution of Auditing Practice at Accounting Firms, PCAOB Release No. 2022-02 June 21, 2022 Planning and Supervision of Audits Involving Other Auditors and Dividing Responsibility for the Audit with Another Accounting Firm

¹³ Refer page 54 of the IAASB *Invitation to Comment, Enhancing Audit Quality in the Public Interest: A Focus on Professional Skepticism, Quality Control and Group Audits* (Dec. 2015)

¹⁴ Refer para 5 of IAASB (Main Agenda 2016) ENHANCING AUDIT QUALITY: PROJECT PROPOSAL FOR THE REVISION OF THE IAASB'S INTERNATIONAL STANDARDS RELATING TO QUALITY CONTROL AND GROUP AUDITS

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- a) Clarify the scope of the standard, including explaining whether ISA 600 (Revised) applies to shared service centres, non-controlled entities and entities with branches or division;
-
- b) Clarify the interaction of ISA 600 (Revised) with other ISAs, including ISA 220 (Revised), ISA 315 (Revised 2019) and ISA 330;
- c) Clarify how to address restrictions on access to people and information in a group audit, including restrictions on access to component management, those charged with governance of the component, component auditors, or information at the components;
- d) Clarify how the concepts of materiality and aggregation risk apply in a group audit;
- e) Strengthen the auditor's approach to planning and performance of a group audit by closer aligning the standard to the principles in ISA 315 (Revised 2019);
- f) Enhance the documentation requirements by clarifying what the group auditor may need to document in different situations;
- g) Emphasize the importance of professional skepticism in a group audit; and
- h) Reinforcing the need for robust communication and interactions during the audit.
- 8.3 The IAASB stated that it was mindful that the standard needs to be scalable and adaptable to a variety of circumstances. In light of the evolving and increasingly more complex environments and ongoing implementation challenges in applying these standards, IAASB concluded that taking action on the topics of quality control and group audits would therefore be in the public interest. In 2015, IAASB undertook projects to address revisions of ISQC 1, ISA 220 and ISA 600, and consideration of other outputs as necessary, on a priority basis. A combined project proposal for quality control and group audits was developed because of the intrinsic links and crossover issues, at both the firm and engagement level, and also because of the interaction between management of quality at the firm level (i.e., ISQC 1) and at the engagement level (i.e., ISA 220).
- 8.4 The most significant public interest issues sought to be addressed included:
- a) Fostering an appropriately independent and challenging skeptical mindset of the auditor—professional skepticism is a fundamental concept and core to audit quality.
- b) Enhancing documentation of the auditor's judgments
- c) Keeping the ISAs and ISQC 1 fit for purpose
- d) Encouraging proactive management of quality at the firm and engagement level— ISQC 1 and ISA 220
- e) Exploring transparency and its role in audit quality— how firms provide transparency about how they support and achieve effective quality management.
- 8.5 The IAASB also explored what more can be done in ISA 600 in relation to component materiality and the concept of **aggregation risk**. ISA 600 (Revised) defines **Aggregation Risk** as follows: *Aggregation risk exists in all audits of financial statements but is particularly important to understand and address in a group audit because there is a greater likelihood that audit procedures will be performed on classes of transactions, account balances or disclosures that are disaggregated across components. Generally, aggregation risk increases as the number of components increases at which audit procedures are performed separately, whether by*

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component auditors or other members of the engagement team. International Adoption

- 8.6 Pursuant to the issue of ISA 600 (Revised) by IAASB, major jurisdictions across the globe (UK, EU-almost all of its member states, South Africa, Australia, New Zealand, Brazil, Canada, Malaysia and Singapore) have adopted/converged with ISA 600 (Revised) (refer annex 4). In the US as well, the Public Company Accounting Oversight Board (PCAOB), which issues Auditing Standards applicable to PIEs in the US, provides for Auditing Standard AS 1201- Supervision

of the Audit Engagement, in which the lead auditor supervises the work of the other auditor. Very recently, it has approved additional provisions for division of responsibility through bringing in a Standard AS 1206, which in their note¹⁵ applies to infrequent and uncommon situations, such as for an equity method investment or a late-year acquisition of a company audited by another auditor. This standard, AS 1206, is a choice given to the lead auditor in the uncommon situations cited above, but even that is based on certain significant determination involving qualitative and quantitative attributes, including a determination which states that *'In addition, in an audit that involves referred-to auditors (see AS 1206), the participation of the engagement partner's firm ordinarily is not sufficient for it to serve as lead auditor if the referred-to auditors, in aggregate, audit more than 50 percent of the company's assets or revenues' (details can be seen using link in footnote 18).*

9. Consultation with SEBI, RBI and CAG and their in-principle agreement

- 9.1 SEBI, while conveying their in-principle agreement, stated that CA 2013 recognised the need for having an independent audit regulator for improving the quality of accounting and audit in India. The standards issue by independent audit regulators which are aligned with international standards would lead to improvements in regulatory framework governing audit firms and associate de ethical requirements, therefore leading to better quality audits of financial statements of listed entities. SEBI stated that given inherent deficiencies in SA 600 as pointed out in NFRA letter, it is crucial to update and bring the Indian Standard (SA 600) on par with global standards (ISA 600). SEBI cited relevance of provisions in ISA 600 to even limited review of the audit of entities/companies whose accounts are to be consolidated with the listed entity in accordance with the SEBI (LODR) regulations 2015 and SEBI Master Circular dated July 11, 2023.

- 9.2 RBI stated that they agree in principle with NFRA's proposal to revise SA 600 in line with international standards. RBI's feedback is also presented in para 12.7 below. CAG suggested wide stakeholder consultation and a graded approach in alignment of SA 600 with ISA 600 (Revised).

10 Discussion on apprehension of concentration of audit

- 10.1 Though the revisions are intended with overall public interest in view and with a view to close the observed regulatory gaps and loopholes, some concerns have been raised that in the application of the provisions of these standards, the principal auditors may potentially insist that their network entities be appointed as auditors of significant components, thereby leading to concentration of audit in select audit firms.

¹⁵ <https://pcaobus.org/about/rules-rulemaking/rulemaking-dockets/docket-042-proposed-amendmentsrelating-to-the-supervision-of-audits-involving-other-auditors-and-proposed-auditing-standard>

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- 10.2 **This is not an observed phenomenon and this line of thought undermines the right of the shareholders to appoint auditors or the role of the Audit Committees in the appointment of the auditors, as provided in Companies Act.**
- 10.3 **The apprehension that the revision in the Standards will lead to any kind of concentration is already mitigated in Law.** As per s.139 of CA 2013, the right of appointment of auditors vests with the shareholders. CA 2013 also entrusts the Audit Committees, under s.177, with making considered recommendations for appointment, remuneration and terms of appointment of auditors of the company, reviewing and monitoring auditor's independence and performance, and effectiveness of audit process.

Section 141 (3) (g) of CA 2013 places a bar on a Chartered Accountant from being appointed auditor if the auditor is holding appointment as auditor of more than twenty companies at the date of appointment or reappointment. Further, as per clause 8 of the ICAI Council Guidelines 2008¹⁶ there is ceiling of 30 company audits, whether in respect of private companies or other Companies excluding one person and dormant companies, per Chartered Accountant or per Partner in the firm.

- 10.4 **Moreover, the apprehension that this proposal may impact small and medium accounting and auditing firms on a large scale does not appear to be supported by any relevant data. On the contrary, the data obtained from CMIE and NSE, as explained below, suggests that any such apprehension is misplaced.**

The proposed revisions are to be applied to listed entities and PIEs under Rule 3 of NFRA Rules 2018, except Public Sector Banks, Public Sector Enterprises, Public Sector Insurance Companies and their subsidiaries respectively. At present, Rule 3 entities are audited by approximately 2500-3000 audit firms of whom 60-70 are big, medium sized audit firms and the majority are sole proprietorships or very small audit firms auditing one or two of these Public Interest Entities. Rule 3 entities itself comprise approximately 7850 companies, excluding PSBs and PSUs (source CMIE database).

A broad assessment of the number of subsidiaries and JVs etc of listed entities and unlisted entities in NFRA purview (excluding PSBs and PSUs), are approximately 24469 (CMIE data). This figure translates to approximately 1.5 percent of the total active companies which approximate 17,45,911 lakh (ref July 2024 bulletin of the Ministry of Corporate Affairs) which are required to be audited. Data from NSE (which sources data from MCA 21 and as available with NSE), states the number of listed holding companies and their subsidiaries/JVs/associates (listed and unlisted), is approximately 17,540. Therefore, the total number of entities under the NFRA domain and their subsidiaries (approximately) together account for only about 1.8% of the total active companies in the country.

Therefore, the above data from CMIE and NSE indicates that the proposed SA 600 (Revised) may impact a maximum of around 2 percent of the total approx. 17 lakh active companies, and the audit of around 98% of the companies may not be impacted by the revision in the Standard. In other words, there may not be any significant impact on the number of audits done by the small and medium audit firms. Therefore, the above data should put to rest any apprehension of audit concentration.

¹⁶ Refer page 154-156 of Code of Ethics -Volume II (Revised 2020)

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10.5 It is also relevant to recollect that the SA 220 already requires that *the engagement partner shall be satisfied that the engagement team, and any auditor's experts who are not part of the engagement team, collectively have the appropriate competence and capabilities to:*

(a) *Perform the audit engagement in accordance with professional standards and regulatory and legal requirements; and*

(b) *Enable an auditor's report that is appropriate in the circumstances to be issued.*

10.6 It is therefore logical and necessary that the same requirements of competency are present and evidenced in large multilocation, multinational audits and the audit quality requirements are commensurate with the risks involved. The proposed revision reiterates

requirements of SA 220¹⁷ and SA 315¹⁸ in respect of Group Audits and consequently the obligations and role of Principal Auditors. It cannot be the case that skill, competency and audit effort be commensurate with the audit of smaller subsidiaries or associates but are permitted to be diluted in case of large complex entities that carry a higher risk of audit failures which can have a cascading effect on other sectors of the economy.

While it is expected that to undertake audit of large multi-location multinational companies and big corporations, there is a need for audit firms to operate with institutional capacity and required competency, it also does not seem appropriate to assume that the requirement of quality will stifle capacity and opportunity. In fact, it has the potential to foster growth, innovation and synergies in audit capacity, promote a natural coming together of talent, and elevate quality of audit.

10.7 **In view of the above and in view of the significant public interest, the revision in SA 600 is sought to be brought in for audits of Listed companies and Public Interest Entities covered in Rule 3 of NFRA Rules 2018, except Public Sector Enterprises, Public Sector Insurance Entities and Public Sector Banks and their branches.**

11. Public Consultation and Request for Comments

The proposed revised Standard can be accessed at link below:

<https://cdnbbsr.s3waas.gov.in/s3e2ad76f2326fbc6b56a45a56c59fafdb/uploads/2024/09/202409171313688475.pdf>

Key aspects of the proposed changes are also indicated in annex 5. Comments are requested on the proposed revisions. NFRA also requests views/comments of stakeholders on specific questions mentioned below in relation to the key issues mentioned above.

The revisions being proposed are to be applied to audits of PIEs that fall under Rule 3 of NFRA Rules 2018, **except Public Sector Enterprises, Public Sector Insurance Companies, Public**

¹⁷ SA 220- Quality Control for an audit of financial statements.

¹⁸ SA 315 Identifying and Assessing the Risk of Material Misstatement Through Understanding the Entity and Its Environment

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Sector Banks and their respective branches. Comments will be most helpful if they identify and clearly explain the issue or question to which they relate and are supported by empirical data and a clear rationale. Those who disagree with a proposal are requested to describe their suggested alternative(s), supported by specific reasoning and examples, as far as possible. Last date to receive comments is 30 October 2024.

Question No.	Particulars
1	<i>This consultation paper provides a discussion of the reasons and benefits of improving auditing standards on audit of Group Financial Statements. Are there additional concerns or aspects that NFRA should seek to address or consider?</i>
2	<i>Is the proposed draft solution, SA 600 (Revised), in view of the risks and benefits outlined above? If not, why not, and are there any alternative approaches?</i>
3	<i>As the proposed SA 600 (Revised) converges with ISA 600 (Revised), application guidance is already available. However, are there any particular areas of the</i>

Question No.	Particulars
	<i>proposed SA 600 (revised) where more clarifications, application material and guidance will be needed?</i>
4	<i>Are there any other conforming or consequential amendments required in any other SAs, apart from those mentioned in the draft SA 600 (Revised), put out for public consultation?</i>
5	<i>The current proposal is to apply the revised requirements to audits of PIEs under Rule 3 of NFRA Rules 2018, except Public Sector Banks, Public Sector Insurance Companies, PSUs and their respective branches. What could be specific considerations in case of PSBs/PSUs/Pubic sector insurance companies and their branches that would need to be addressed going forward?</i>

The comments may be sent at:

Email	nfra-comments@nfra.gov.in captioned “Comments on proposed SA 600 (Revised)”
Postal	Captioned “Comments on proposed SA 600 (Revised)” to Secretary, National Financial Reporting Authority 7th-8th Floor, Hindustan Times House, 18-20, Kasturba Gandhi Marg, New Delhi 110001.

Annex 1

NFRA's experience in enforcement cases-Group Audits

(a) **DHFL**, a Non-Banking Finance Company, was allegedly involved in siphoning off of approximately ₹ 34,000 crore of public money by the promoter directors, reportedly through the use of a fictitious branch. DHFL operated through a network of around 250 branches across various States in India.

NFRA's investigation revealed that the Principal Auditor (i) did not identify non-consolidation of a subsidiary resulting in an understatement of liability by ₹1901 crore in the consolidated financial statement, (ii) did not identify deficiencies in internal control relating to the most critical activity of a financial institution i.e., appraisal and sanction of loans at the head office level and branch level, (iii) failed to understand the entity's operating structure, group-wide internal control, and (iv) did not perform adequate audit procedures in the identification, assessment and conclusions of Risk of Material Misstatement (RoMM), (v) failed to verify the Related Party Transactions (RPT), and more importantly did not identify the components to be audited. The audit opinion issued by him was therefore without sufficient basis. The Principal Auditor did not assess the legal validity of the appointment of the large number of branch auditors upon whose work he relied upon. The work done by the branch auditors, which were many¹⁹, was similarly found deficient in application of auditing standards.

(b) **The IL&FS group**, which consisted of around 250 subsidiaries (listed as well as unlisted), associates and joint ventures as on 31st March 2018, operated in the infrastructure sector. As per books of accounts, the group's revenue was around ₹17,672 Crore with total assets of ₹115,814 Crore and total external liabilities of ₹106,543 Crore as on 31 March 2018. It reported a net loss of ₹1886 Crore (consolidated) and a profit of ₹584 crore (standalone) for the said period. **The audit quality reports in respect of IL&FS, ITNL and IFIN have been published on NFRA website.** Significant key observations by NFRA relevant to this discussion included inadequate coordination/discussion with component auditors at most stages of audit, discrepancies in the number of components as per CFS and mandatory filings in MCA 21 which were not assessed by the auditors, non-assessment of inclusion of unaudited financial statements of some components in the CFS by Management. In respect of the latter, the principal auditor stated that "..... preparation of consolidated financial statements (CFS) is the responsibility of management and accordingly, use of component's unaudited financial statements, considering the non-availability of audited financial statements, was also decision of management. As

¹⁹ NFRA took disciplinary action against approx. 30 branch auditors involved in over 200 branch audits

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an auditor, we had no role to play in this regard. **As a holding company auditor, it is not in our realm to insist on the management that all components financial statements should be audited”.**

(c) SEBI had referred a case to NFRA of a **company that had filed false declarations** with Registrar of Companies, Hyderabad (‘RoC’ hereafter) in respect of its turnover. The company was neither registered by the Service Tax/GST department nor had filed any Service Tax or GST Returns and yet the auditor had certified such financial statements. The company had disclosed in its annual reports that they were engaged in the Software business, when it was in the business of construction. 100 % of the revenue of the company was being generated from its foreign branch for which an auditor was appointed who was based in a third country. NFRA’s examination revealed that there were significant violations in the financial statements with respect to revenue recognition policy, disclosures and foreign currency translations, no evidence of audit procedures performed by the principal auditor to conclude that the

work of the foreign branch auditor was in line with instructions conveyed by him. Responding to the charges, the principal auditor referred to the ICAI Code of Ethics and stated that —“**...The main auditors of an enterprise do not have right of access to the audit working papers of the branch auditors.** In the case of a Company, the statutory auditor has to consider the report of the branch auditor and has a right to seek clarifications and/or to visit the branch if he deems it necessary to do so for the performance of the duties as auditor..... Hence, from the above it can be inferred that appropriate procedures within the framework have been performed by us and there is no non-compliance.” In another instance the principal auditor stated that “...sampling in audit is matter of professional judgment as a parent auditor we had informed about the significant risks and materiality in the instructions which were sent to the branch auditor, the review and audit, sampling was carried out by the branch auditor with regards to each financial captions of the branch.....It must be noted that we had received an audited financial statement from the auditor in ...(foreign branch auditor), that audit report does not contain any negative remarks about the balances under question. **We, being the parent auditor, relied on the audit report sent by the Branch Auditor and that was well within the purview of the standards of auditing and Companies Act, 2013.** There is no breach of any Standards of Auditing or any Law for the time being in force. Further, it also must be noted that the audit evidence collected by the branch auditor, will be with the branch auditor, they cannot be found in the audit file of parent auditor.’

(d) **Reliance Commercial Finance (RCL) Limited-** As per the Consolidated Financial Statements for FY 2018-19, RCL had loans from Banks of around ₹12,000 crore and other external borrowings of around ₹32,000 crores, consisting of debentures, commercial papers and pass-through certificates. RCL was a Core Investment Company (CIC) investing primarily in its group companies. RCL used the above loans and borrowing to extend loans and investments to other group companies. Reliance Home Finance Limited (RHFL) and Reliance Commercial Finance Limited (RCFL) are subsidiaries of Reliance Capital Limited (RCL), which are consolidated in the financial statements of RCL. One of the joint auditors of RCL reported suspected fraud regarding loans and investments amounting to approximately ₹12,571 crore. Despite the reporting of suspected fraud and the resignation by the joint auditor who reported fraud, the other Joint Auditor did not perform adequate procedures as required by the SAs. The material misstatements in the financial statements due to inadequate provision, unjustified valuation of loans and irrational business practices were concurred by them. All three companies were facing going concern issues and suspected fraud. While the RHFL auditor had qualified its report, the RCFL auditor had issued a clean report with a paragraph on going concern. The RCL auditor, who was the principal

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auditor, simply quoted these two reports of the component auditors and then issued an unmodified opinion on the standalone financial statements and a qualified opinion on consolidated financial statement, basing his conclusion on the RHFL's modified opinion alone.

(e) **Coffee Day Enterprises Limited (CDEL)**- In respect of Audit of CFS of CDEL, the audit firm, the engagement partner (EP) and the Engagement Quality Control Partner (EQCR), did not perform appropriate additional audit procedures to obtain sufficient appropriate audit evidence to issue audit opinion on CFS. Though a substantial portion of financial information of the CFS was audited by the Other Auditors, the Principal Auditors did not properly evaluate whether their own participation was sufficient to be able to act as the Principal Auditor. The Auditors sought refuge in the provision of SA 600, relying on the work of auditors of the subsidiaries, while CDEL's investments in the subsidiaries of this company constituted a staggering figure of Rs 1,937 crores constituting 89% of the standalone balance sheet.

The additional procedures, wherever performed by the Principal Auditors, were also inadequate and deficient. The business rationale of unusually high amount of Rs 2,226 crores of the loans/advances given to a promoter-controlled entity which had no business connection with the listed company was not evaluated. CFS had Rs 842.49 crores of outstanding amounts receivable from this promoter held entity, a related party with very minimal business activities, but the Principal Auditors did not evaluate recoverability and the adequacy of the impairment allowance as per the applicable accounting standards; there was a pattern of diversion of funds of the listed entity, to promoters or entities controlled by the promoters through a web of intra group circular transfer of funds where the promoter held entity was used as a main conduit for transferring funds to promoter controlled entities. SA 600 provides that *principal auditor would normally be entitled to rely upon the work of component auditors unless there are special circumstances to make it essential for him to visit the component and/or examine the books of accounts and other records of the said component*. While NFRA noted that the company had diverted large amounts to its promoter entity (upwards of Rs 3500 crores) and the auditor had himself identified the matter of exposure of the group companies to the promoter company and recoverability of outstanding balances at year end as an important matter, the *auditor stated that he relied upon the work of component auditors as 'no such special circumstances came to his attention to trigger the requirement of SA 600'*

On non-reporting of fraud, the Principal Auditor stated that 'they had no obligation to evaluate the fraud risk in any of the group companies' and 'they had no access to the books of the subsidiaries audited by the other auditors'. On evergreening of loans, they stated that while various transactions were noted between the group companies there was no evergreening in the company they audited.

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Annex 2

Group Legal Entity Structure Overview of Top 100 Listed Companies (Source: Notes to Consolidated Financial Statements 31.03.2023)

Sr. No.	Company name	Category based on Market Cap	Total Subsidiaries, JVs & Associates	Total Subsidiaries	Total Associates	Total JVs	Total Overseas Subs, JVs & Associates
1	RELIANCE INDUSTRIES LTD	Large Cap	335	277	22	36	88
2	TATA CONSULTANCY SERVICES LTD.	Large Cap	52	52	0	0	46
3	HINDUSTAN UNILEVER LTD.,	Large Cap	15	14	0	1	2
4	INFOSYS LTD	Large Cap	98	98	0	0	94
5	ITC LTD	Large Cap	41	29	8	4	12
6	BHARTI AIRTEL LTD.	Large Cap	150	139	6	5	134
7	LARSEN & TOUBRO LIMITED	Large Cap	113	94	5	14	54
8	HCL TECHNOLOGIES LTD	Large Cap	124	124	0	0	115
9	ASIAN PAINTS LTD.	Large Cap	27	24	3	0	18
10	MARUTI SUZUKI INDIA LTD.	Large Cap	19	2	14	3	0
11	TITAN COMPANY LIMITED	Large Cap	10	9	1	0	6
12	ADANI ENTERPRISES LTD.	Large Cap	216	184	13	19	58
13	SUN PHARMACEUTICAL INDUSTRIES LTD.	Large Cap	59	59	0	0	46
14	ULTRATECH CEMENT LTD	Large Cap	14	6	7	1	3
15	AVENUE SUPERMARTS LIMITED	Large Cap	5	5	0	0	0
16	TATA MOTORS LTD.	Large Cap	105	90	13	2	83
17	OIL AND NATURAL GAS CORPORATION LTD	Large Cap	70	35	14	21	38
18	NTPC LIMITED	Large Cap	28	11	0	17	2
19	WIPRO LTD.,	Large Cap	66	65	1	0	57
20	MAHINDRA & MAHINDRA LTD.	Large Cap	124	96	12	16	49
21	POWER GRID CORPORATION OF INDIA LIMITED	Large Cap	54	42	0	12	1
22	ADANI PORTS AND SPECIAL ECONOMIC ZONE LTD	Large Cap	104	95	0	9	13

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23	COAL INDIA LIMITED	Large Cap	16	11	0	5	1
24	ADANI GREEN ENERGY LIMITED	Large Cap	128	126	1	1	58
25	LTIMINDTREE LIMITED	Large Cap	29	29	0	0	26
26	TATA STEEL LIMITED	Large Cap	190	146	20	24	137
27	BAJAJ AUTO LIMITED	Large Cap	7	7	0	0	5
28	JIO FINANCIAL SERVICES LIMITED	Large Cap	9	6	3	0	0
29	HINDUSTAN AERONAUTICS LIMITED	Large Cap	9	3	0	6	0
30	ADANI POWER LIMITED	Large Cap	13	13	0	0	0
31	HINDUSTAN ZINC LTD.,	Large Cap	5	4	0	1	0
32	PIDILITE INDUSTRIES LTD.	Large Cap	38	31	7	0	20
33	GRASIM INDUSTRIES LTD.,	Large Cap	26	8	6	12	6
34	TECH MAHINDRA LIMITED	Large Cap	102	91	11	0	86
35	BRITANNIA INDUSTRIES LTD.,	Large Cap	32	25	6	1	14

Sr. No.	Company name	Category based on Market Cap	Total Subsidiaries, JVs & Associates	Total Subsidiaries	Total Associates	Total JVs	Total Overseas Subs, JVs & Associates
36	GAIL (INDIA) LTD.	Large Cap	26	6	11	9	7
37	TRENT LTD [LAKME LTD]	Large Cap	9	6	2	1	1
38	MACROTECH DEVELOPERS LIMITED	Large Cap	45	24	21	0	24
39	POLYCAB INDIA LIMITED	Large Cap	9	8	0	1	1
40	ADANI TOTAL GAS LIMITED	Large Cap	4	2	0	2	0
41	TVS MOTOR COMPANY LTD.	Large Cap	24	16	8	0	10
42	APOLLO HOSPITALS ENTERPRISES LTD.,	Large Cap	26	20	4	2	2
43	REC LIMITED	Large Cap	17	1	16	0	0
44	MANKIND PHARMA LIMITED	Large Cap	40	32	5	3	4
45	MARICO LIMITED	Large Cap	16	16	0	0	13
46	SRF LTD.,	Large Cap	4	4	0	0	1
47	JINDAL STEEL & POWER LTD	Large Cap	89	83	2	4	61
48	BERGER PAINTS INDIA LTD	Large Cap	11	8	0	3	4
49	SAMVARDHANA MOTHERSON INTERNATIONAL LIMITED	Mid Cap	251	240	0	11	210
50	CG POWER AND INDUSTRIAL SOLUTIONS LIMITED	Mid Cap	19	19	0	0	15
51	ZYDUS LIFESCIENCES LIMITED	Mid Cap	45	45	0	0	30
52	JSW ENERGY LIMITED	Mid Cap	65	63	1	1	8
53	TUBE INVESTMENTS OF INDIA LTD	Mid Cap	26	24	1	1	18
54	BOSCH LTD	Mid Cap	5	2	2	1	0
55	MAX HEALTHCARE INSTITUTE LIMITED	Mid Cap	11	11	0	0	0

PROPOSED REVISION IN SA 600 FOR PUBLIC COMMENTS

SA 600 (REVISED), SPECIAL CONSIDERATIONS- AUDITS OF GROUP FINANCIAL STATEMENTS (INCLUDING THE WORK OF COMPONENT AUDITORS)

56	INDIAN HOTELS CO. LTD	Mid Cap	42	27	6	9	12
57	PI INDUSTRIES LIMITED	Mid Cap	8	6	1	1	1
58	ONE 97 COMMUNICATIONS LIMITED	Mid Cap	23	15	7	1	4
59	NHPC LIMITED	Mid Cap	8	6	0	2	0
60	VODAFONE IDEA LIMITED	Mid Cap	12	10	1	1	0
61	AUROBINDO PHARMA LTD.	Mid Cap	80	71	2	7	59
62	ASHOK LEYLAND LTD.,	Mid Cap	18	13	3	2	6
63	ASTRAL LIMITED	Mid Cap	7	4	2	1	2
64	BHARAT FORGE LTD	Mid Cap	17	12	3	2	4
65	BALKRISHNA INDUSTRIES LTD.,	Mid Cap	5	5	0	0	4
66	GODREJ PROPERTIES LIMITED	Mid Cap	80	34	46	0	46
67	L&T TECHNOLOGY SERVICES LIMITED	Mid Cap	9	9	0	0	5
68	ADANI WILMAR LIMITED	Mid Cap	6	3	0	3	0
69	M.R.F. LTD.,	Mid Cap	4	4	0	0	2
70	ADITYA BIRLA CAPITAL LTD	Mid Cap	20	17	3	0	0
71	BHARAT HEAVY ELECTRICALS LTD.,	Mid Cap	4	1	0	3	0
72	PERSISTENT SYSTEMS LIMITED	Mid Cap	30	30	0	0	0
73	CONTAINER CORPORATION OF INDIA LTD.	Mid Cap	16	4	2	10	1
Sr. No.	Company name	Category based on Market Cap	Total Subsidiaries, JVs & Associates	Total Subsidiaries	Total Associates	Total JVs	Total Overseas Subs, JVs & Associates
74	MPHASIS LIMITED	Mid Cap	35	35	0	0	32
75	APL APOLLO TUBES LIMITED	Mid Cap	6	6	0	0	2
76	OBEROI REALTY LIMITED	Mid Cap	24	14	0	10	0
77	NMDC LTD	Mid Cap	13	4	5	4	3
78	FSN E-COMMERCE VENTURES LIMITED	Mid Cap	14	13	1	0	3
79	HINDUSTAN PETROLEUM CORPORATION LTD	Mid Cap	20	4	3	13	1
80	DALMIA BHARAT LIMITED	Mid Cap	33	30	1	2	0
81	STEEL AUTHORITY OF INDIA LTD.,	Mid Cap	16	2	1	13	0
82	JINDAL STAINLESS LIMITED	Mid Cap	14	12	2	0	4
83	SUZLON ENERGY LTD.	Mid Cap	44	36	5	3	25
84	ACC LTD	Mid Cap	8	4	2	2	0
85	TORRENT POWER LIMITED	Mid Cap	17	17	0	0	0
86	UNO MINDA LIMITED	Mid Cap	38	22	4	12	6
87	GMR AIRPORTS INFRASTRUCTURE LIMITED	Mid Cap	106	86	6	14	26
88	ESCORTS KUBOTA LIMITED	Mid Cap	9	5	0	4	1
89	JUBILANT FOODWORKS LIMITED	Mid Cap	9	5	4	0	5

PROPOSED REVISION IN SA 600 FOR PUBLIC COMMENTS

SA 600 (REVISED), SPECIAL CONSIDERATIONS- AUDITS OF GROUP FINANCIAL STATEMENTS (INCLUDING THE WORK OF COMPONENT AUDITORS)

90	THE PHOENIX MILLS LTD.,	Mid Cap	41	36	5	0	0
91	KPIT TECHNOLOGIES LTD	Mid Cap	23	22	0	1	21
92	L&T FINANCE HOLDINGS LIMITED	Mid Cap	9	9	0	0	0
93	AIA ENGINEERING LTD.	Mid Cap	11	11	0	0	9
94	SONA BLW PRECISION FORGINGS LIMITED	Mid Cap	9	9	0	0	7
95	THERMAX LTD.	Mid Cap	27	25	2	0	16
96	COROMANDEL INTERNATIONAL LIMITED	Mid Cap	15	15	0	0	11
97	COFORGE LIMITED	Mid Cap	25	25	0	0	20
98	OIL INDIA LIMITED	Mid Cap	14	6	1	7	7
99	GUJARAT FLUORO CHEMICALS LIMITED	Mid Cap	9	8	0	1	6
100	RAIL VIKAS NIGAM LIMITED	Mid Cap	12	1	0	11	0

Annex 3

Extent of Participation/Responsibility of Component Auditors in a sample of top Listed Companies*Source of Data: Independent Auditors Report and CFS for 31.03.2023**@ Amount of Assets^{\$} Audited by Other Auditors/Total Assets x 100**# Amount of Revenue Audited by Other Auditors/Total Revenue from Operations x 100*

Company name	Category based on Market Cap	% Net Assets of Parent	% Net Assets of Components	% of assets audited by Other Auditors@	% of Revenue audited by Other Auditors#
THE PHOENIX MILLS LTD.,	Mid Cap	41.52	58.48	98.59	61.95
ADITYA BIRLA CAPITAL LTD	Mid Cap	63.96	36.04	97.36	100.49
COAL INDIA LIMITED	Large Cap	3.73	96.27	94.71	104.88
BAJAJ FINSERV LIMITED (31.12.2023)	Large Cap	11.31	88.69	90.98	75.19
ZYDUS LIFESCIENCES LIMITED	Mid Cap	77.87	22.13	87.01	66.38
TATA MOTORS LTD.	Large Cap	46.78	53.22	86.65	73.80
ADANI ENTERPRISES LTD.	Large Cap	26.00	74.00	78.31	50.56
AUROBINDO PHARMA LTD.	Mid Cap	66.71	33.29	69.50	65.97
TATA CHEMICALS LTD	Mid Cap	39.7	60.30	67.97	54.33
SUN PHARMACEUTICAL INDUSTRIES LTD.	Large Cap	40.00	60.00	66.71	33.14
ASHOK LEYLAND LTD.,	Mid Cap	98.50	1.50	65.43	17.57
HINDALCO INDUSTRIES LTD.	Large Cap	69.60	30.40	64.44	67.63
GRASIM INDUSTRIES LTD.,	Large Cap	37.53	62.47	63.53	27.16
MAHINDRA & MAHINDRA LTD.	Large Cap	76.92	23.08	62.31	32.77
LARSEN & TOUBRO LIMITED	Large Cap	80.08	19.92	56.65	24.35

PROPOSED REVISION IN SA 600 FOR PUBLIC COMMENTS

SA 600 (REVISED), SPECIAL CONSIDERATIONS- AUDITS OF GROUP FINANCIAL STATEMENTS (INCLUDING THE WORK OF COMPONENT AUDITORS)

OIL AND NATURAL GAS CORPORATION LTD	Large Cap	52.76	47.24	52.45	89.24
BHARAT FORGE LTD	Mid Cap	114.22	-14.22	50.12	65.00
STEEL AUTHORITY OF INDIA LTD.,	Mid Cap	95.24	4.76	46.96	38.25
ADANI PORTS AND SPECIAL ECONOMIC ZONE LTD	Large Cap	29.95	70.05	42.38	21.02
OIL INDIA LIMITED	Mid Cap	82.11	17.89	40.19	73.23
TVS MOTOR COMPANY LTD.	Large Cap	4.64	95.36	39.08	21.56
CIPLA LTD.,	Large Cap	105.26	-5.26	37.55	18.34
AIA ENGINEERING LTD.	Mid Cap	96.16	3.84	36.94	100.98
TATA STEEL LIMITED	Large Cap	130.77	-30.77	34.17	41.36
APL APOLLO TUBES LIMITED	Mid Cap	65.02	34.98	31.53	5.81
TUBE INVESTMENTS OF INDIA LTD	Mid Cap	72.00	28.00	31.37	9.50
MANKIND PHARMA LIMITED	Large Cap	104.69	-4.69	30.79	23.48
TECH MAHINDRA LIMITED	Large Cap	89.88	10.12	28.40	32.42
MARICO LIMITED	Large Cap	92.93	7.07	28.28	27.95
JIO FINANCIAL SERVICES LIMITED	Large Cap	21.08	78.92	26.94	0.00
COFORGE LIMITED	Mid Cap	17.55	82.45	26.10	8.39
CG POWER AND INDUSTRIAL SOLUTIONS LIMITED	Mid Cap	181.22	-81.22	25.75	7.86

Company name	Category based on Market Cap	% Net Assets of Parent	% Net Assets of Components	% of assets audited by Other Auditors@	% of Revenue audited by Other Auditors#
VARUN BEVERAGES LIMITED	Large Cap	84.17	15.83	23.36	26.38
APOLLO HOSPITALS ENTERPRISES LTD.,	Large Cap	106.02	-6.02	23.19	25.84
TORRENT PHARMACEUTICALS LTD.	Large Cap	98.85	1.15	22.76	28.94
HINDUSTAN PETROLEUM CORPORATION LTD	Mid Cap	85.90	14.10	22.24	0.00
SRF LTD.,	Large Cap	90.00	10.00	21.38	19.39
DLF LIMITED	Large Cap	74.84	25.16	20.32	17.78
RELIANCE INDUSTRIES LTD	Large Cap	66.92	33.08	20.22	68.91
NHPC LIMITED	Mid Cap	75.64	24.36	19.63	14.55
JINDAL STEEL & POWER LTD	Large Cap	104.00	-4.00	19.55	9.62
BERGER PAINTS INDIA LTD	Large Cap	96.18	3.82	19.54	11.36
ADANI POWER LIMITED	Large Cap	147.00	-47.00	18.95	0.45
NTPC LIMITED	Large Cap	92.01	7.99	18.85	8.72
PERSISTENT SYSTEMS LIMITED	Mid Cap	77.79	22.21	18.74	11.75
JSW STEEL LIMITED	Large Cap	54.99	45.01	18.56	14.99
KPIT TECHNOLOGIES LTD	Mid Cap	83.19	16.81	18.53	15.79
FSN E-COMMERCE VENTURES LIMITED	Mid Cap	118.47	-18.47	18.43	11.06
ASTRAL LIMITED	Mid Cap	98.82	1.18	18.41	10.62
PIDILITE INDUSTRIES LTD.	Large Cap	82.24	17.76	17.52	10.64

PROPOSED REVISION IN SA 600 FOR PUBLIC COMMENTS

SA 600 (REVISED), SPECIAL CONSIDERATIONS- AUDITS OF GROUP FINANCIAL STATEMENTS (INCLUDING THE WORK OF COMPONENT AUDITORS)

INDIAN HOTELS CO. LTD	Mid Cap	99.53	0.47	15.95	5.44
VEDANTA LIMITED	Large Cap	172.00	-72.00	15.84	9.26
THERMAX LTD.	Mid Cap	83.14	16.86	15.66	6.47
DALMIA BHARAT LIMITED	Mid Cap	34.05	65.95	14.87	9.45
BIOCON LTD.	Mid Cap	50.00	50.00	14.48	0.07
ASIAN PAINTS LTD.	Large Cap	94.80	5.20	11.64	8.95
GAIL (INDIA) LTD.	Large Cap	85.48	14.52	11.64	23.70
ONE 97 COMMUNICATIONS LIMITED	Mid Cap	97.05	2.95	11.10	7.75
L&T TECHNOLOGY SERVICES LIMITED	Mid Cap	0.92	99.08	10.71	15.71
SUZLON ENERGY LTD.	Mid Cap	1.29	98.71	10.64	3.18
POWER GRID CORPORATION OF INDIA LIMITED	Large Cap	92.57	7.43	10.33	5.20
BRITANNIA INDUSTRIES LTD.,	Large Cap	82.19	17.81	9.99	4.91
TATA POWER CO. LTD	Large Cap	25.43	74.57	9.80	19.61
MAHINDRA & MAHINDRA FINANCIAL SERVICES LIMITED	Mid Cap	88.54	11.46	9.21	14.35
DR. REDDY'S LABORATORIES LTD.,	Large Cap	87.92	12.08	9.12	13.41
INDIAN OIL CORPORATION LTD.	Large Cap	96.45%	99.04	8.74	10.86
JINDAL STAINLESS LIMITED	Mid Cap	95.73	4.27	8.29	11.61
ITC LTD	Large Cap	90.15	9.85	7.59	4.28
ADANI WILMAR LIMITED	Mid Cap	97.00	3.00	7.09	5.35
ULTRATECH CEMENT LTD	Large Cap	93.76	6.24	6.45	3.49
AJANTA PHARMA LTD.	Mid Cap	97.1	2.90	5.97	9.77

Company name	Category based on Market Cap	% Net Assets of Parent	% Net Assets of Components	% of assets audited by Other Auditors@	% of Revenue audited by Other Auditors#
SIEMENS LTD.,	Large Cap	95.34	4.66	5.87	8.77
LTIMINDTREE LIMITED	Large Cap	96.38	3.62	5.25	6.06
PI INDUSTRIES LIMITED	Mid Cap	95.91	4.09	5.00	4.50
CONTAINER CORPORATION OF INDIA LTD.	Mid Cap	99.27	0.73	3.18	1.50
DIVI'S LABORATORIES LTD.	Large Cap	99.19	0.81	2.99	6.64
COROMANDEL INTERNATIONAL LIMITED	Mid Cap	96.00	4.00	2.53	0.30
MACROTECH DEVELOPERS LIMITED	Large Cap	98.80	1.20	2.28	0.43
TITAN COMPANY LIMITED	Large Cap	94.97	5.03	2.27	0.98
BALKRISHNA INDUSTRIES LTD.,	Mid Cap	99.88	0.12	1.76	4.90
EICHER MOTORS LTD.	Large Cap	84.03	15.97	1.61	2.69
TRENT LTD [LAKME LTD]	Large Cap	115.66	-15.66	1.42	1.28
M.R.F. LTD.,	Mid Cap	98.64	1.36	1.42	1.89
ESCORTS KUBOTA LIMITED	Mid Cap	103.08	-3.08	1.05	2.01
TORRENT POWER LIMITED	Mid Cap	95.93	4.07	0.97	0.02

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SA 600 (REVISED), SPECIAL CONSIDERATIONS- AUDITS OF GROUP FINANCIAL STATEMENTS (INCLUDING THE WORK OF COMPONENT AUDITORS)

JUBILANT FOODWORKS LIMITED	Mid Cap	105.27	-5.27	0.82	0.00
HINDUSTAN UNILEVER LTD.,	Large Cap	99.40	0.60	0.52	0.90
ACC LTD	Mid Cap	99.84	0.16	0.47	0.01
AVENUE SUPERMARTS LIMITED	Large Cap	98.33	1.67	0.41	0.29
MAX HEALTHCARE INSTITUTE LIMITED	Mid Cap	95.00	5.00	0.33	0.10
POLYCAB INDIA LIMITED	Large Cap	98.54	1.46	0.32	0.28
SCHAEFFLER INDIA LIMITED	Mid Cap	100.00	0.00	0.29	0.34
RAIL VIKAS NIGAM LIMITED	Mid Cap	73.07	26.93	0.28	0.09
ADANI TOTAL GAS LIMITED	Large Cap	99.77	0.23	0.16	0.00
REC LIMITED	Large Cap	99.24	0.76	0.15	0.78
HAVELLS INDIA LIMITED	Large Cap	100.00	0.00	0.13	0.25
OBEROI REALTY LIMITED	Mid Cap	62.80	37.20	0.11	0.00
MARUTI SUZUKI INDIA LTD.	Large Cap	97.72	2.28	0.07	0.08
HINDUSTAN AERONAUTICS LIMITED	Large Cap	99.42	0.58	0.07	0.05
PETRONET LNG LTD.	Mid Cap	96.73	3.27	0.03	0.00
BOSCH LTD	Mid Cap	100.00	0.00	0.00	0.00
HINDUSTAN ZINC LTD.,	Large Cap	100.08	-0.08	0.00	0.02
HCL TECHNOLOGIES LTD	Large Cap	48.50	51.50	0.00	0.00
WIPRO LTD.,	Large Cap	60.20	39.80	0.00	0.00
DABUR INDIA LTD.	Large Cap	66.59	33.41	0.00	0.00
UNO MINDA LIMITED	Mid Cap	75.01	24.99	0.00	0.00
TATA CONSULTANCY SERVICES LTD.	Large Cap	76.39	23.61	0.00	0.00
ADANI GREEN ENERGY LIMITED	Large Cap	77.00	23.00	0.00	0.00
INFOSYS LTD	Large Cap	80.97	19.03	0.00	0.00
BHARTI AIRTEL LTD.	Large Cap	101.84	-1.84	0.00	0.00
3M INDIA LTD.	Mid Cap	148.00	-48.00	0.00	0.00

Annex 4

Adoption of ISA 600 internationally

Jurisdiction	Title of Standard issued
EU	EU Audit Regulations 2014 (Article 9) permits EU Commission to adopt ISAs as per Article 26 of EU Directive 2006/43/EC. Currently, EU Commission has not adopted ISAs but its Study Report of Oct 2022 ²⁰ indicate almost all of its 28 members having adopted ISAs issued by the IAASB which includes countries such as Belgium, Germany, Italy, Ireland, Netherlands, Sweden,, Norway etc.

²⁰ October 2022 Study on the Audit Directive (Directive 2006/43/EC as amended by Directive 2014/56/EU) and the Audit Regulation (Regulation (EU) 537/2014)

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U.K.	ISA (UK) 600 (Revised September 2022) https://www.frc.org.uk/library/standards-codes-policy/audit-assurance-and-ethics/auditing-standards/isa-uk600/
South Africa	Since April 2006, IRBA has adopted the International Engagement Standards issued by the IAASB, as published in the successive IAASB Handbooks of International Quality Control, Auditing, Assurance, and Ethics Pronouncements https://www.irba.co.za/guidance-to-ras/technical-guidance-for-auditors/auditing-standards-and-guides/handbooks-of-international-standards
Australia	ASA 600 Special Considerations—Audits of a Group Financial Report (Including the Work of Component Auditors) https://auasb.gov.au/standards-guidance/auasbstandards/auditing-standards/
New Zealand	ISA (NZ) 600 Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors) https://www.xrb.govt.nz/standards/assurancestandards/auditing-standards/
Brazil	Since 2005 CFC has adopted ISA, through a convergence process, as Brazilian auditing standards. The CFC and IBRACON, report that there is an ongoing system in place to incorporate new and revised ISA as they become available. As of 2022, the 2020 ISA version is being applied.
Canada	CAS 600, Special Considerations – Audits of Group Financial Statements (Including the Work of Component Auditors) https://www.cpacanada.ca/business-and-accountingresources/audit-and-assurance/canadian-auditing-standardscas/publications/cas-600-group-audits-have-changed

Jurisdiction	Title of Standard issued
Malaysia	ISA 600 (Revised), Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors). https://mia.org.my/wp-content/uploads/2022/09/ISA-600Revised-Standard-and-Conforming-Amendments.pdf

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Singapore	SSA 600 (Revised) Special Considerations – Audits of Group Financial Statements (Including the Work of Component Auditors) https://isca.org.sg/docs/default-source/audit-assurance/aastandards/ssa-600-(revised)(jul-23)bbc80c34b3574dd797a64e3dba6a58a5.pdf?sfvrsn=469f4146_2
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PROPOSED REVISION IN SA 600 FOR PUBLIC COMMENTS

SA 600 (REVISED), SPECIAL CONSIDERATIONS- AUDITS OF GROUP FINANCIAL STATEMENTS (INCLUDING THE WORK OF COMPONENT AUDITORS)

(Below is a summary. For complete details please refer to provisions in draft SA 600 Revised also put forth for public consultation)

1. Scope and Objectives

- (a) SA 600 (Revised) deals with special considerations that apply to an audit of group financial statements (GFS)²¹. More importantly, it deals with special considerations for the Group Auditor when another auditor/s called Component Auditor/s is/are involved in the audit of GFS. The requirements and guidance in this SA refer to, or expand on, the application of other relevant ISAs to a group audit, in particular SA 220 (Revised)²², SA 230, SA 300, SA 315 (Revised 2019), and SA 330. SA 600 (Revised) is intended for all group audits, regardless of size or complexity.
- (b) Group may be organized in variety of ways. For example, a group may be organized by legal or other entities (e.g., a parent and one or more subsidiaries, joint ventures, or investments accounted for by the equity method). Alternatively, the group may be organized by geography, by other economic units (including branches or divisions), or by functions or business activities.
- (c) A Component Auditor may be required by statute or regulation to express an opinion on the financial statements of a component e.g. CA 2013 requires audit of separate financial statements of every company which may need to be consolidated into GFS of its parent company. When a component auditor is also performing or has completed an audit of the component financial statements, the group auditor may be able to use audit work performed on the component financial statements, provided the group auditor is satisfied that such work is appropriate for purposes of the group audit. The Group Auditor is required to comply with the requirements of this SA before he decides to use that audit opinion on separate financial statements for the audit of GFS of the Parent.
- (d) This SA recognises the fact that group information system and its financial reporting process may not be aligned with entity's organisation structure. e.g., an entity may have branches but its financial reporting process may not be branch-wise but business division wise or geography wise. Therefore, the Group Auditor will have to apply judgment to determine the Components based on facts and circumstances and may consider a group of branches or even legal entities or shared service centres as Components for the purpose of this SA.
- (e) Objectives of this SA are to (a) determine whether to act as Group Auditor or not, (b) communicate with Component Auditors on the scope, timing, nature and extent of their work and (c) to obtain sufficient appropriate audit evidence about the financial information of the component and consolidation process to check whether GFS are prepared in accordance with the applicable financial reporting framework. These aspects are discussed in greater details in the ensuing paragraphs.

²¹ Group Financial Statements defined here and Consolidated Financial Statements defined in Ind AS 110, Consolidated Financial Statements are not the same. The former includes audit of F/S of Branches/Divisions of the same legal entity whereas the latter includes only consolidation of F/S two or more separate legal entities i.e., Parent and Subsidiaries.

²² In 2023, the ICAI had undertaken public consultation on four SAs viz. SA 220, SA 250, SA 315 and SA 540 and SQM 1 and 2 to revise those in line with the currently prevailing ISAs and ISQMs.

PROPOSED REVISION IN SA 600 FOR PUBLIC COMMENTS

SA 600 (REVISED), SPECIAL CONSIDERATIONS- AUDITS OF GROUP FINANCIAL STATEMENTS (INCLUDING THE WORK OF COMPONENT AUDITORS)

2. Group Auditor is Ultimately Responsible for Audit of GFS and Group Audit Report

- (a) The Group Engagement Partner remains ultimately responsible, and therefore accountable, for compliance with the requirements of this SA. Even when the Group Engagement Partner is permitted to delegate or assign certain tasks to other members of the Engagement Team, he continues to be ultimately responsible for managing and achieving the audit quality.
- (b) The Group Engagement Partner is required to sufficiently involved throughout the group audit and in the work of the Component Auditor.
- (c) The Group Auditor shall not refer to the work of Component Auditor in the Audit Report unless it is required by the law or regulation.

3. Acceptance and Continuance of Group Audit

- (a) Before accepting or continuing the group audit engagement, the group engagement partner shall determine whether appropriate audit evidence²³ can reasonably be expected to be obtained to provide a basis for forming an opinion on the group financial statements. In applying SA 210²⁴, the group auditor shall obtain the agreement of group management that it acknowledges and understands its responsibility to provide the engagement team with access to all information that is relevant audit of GFS and Unrestricted access to persons within the group from whom the engagement team determines it necessary to obtain audit evidence.
- (b) Terms of group audit engagement may require inclusion of additional matters such as unrestricted communication with Component Auditors, sharing of important communication between Component Management/TCWG and Component Auditors and between the entity/component and its regulators with the Group Auditor.

4. Overall Group Audit Strategy and Group Audit Plan

- (a) The group auditor is responsible for overall group audit strategy and group audit plan. In doing so, the Group Auditor is responsible for the following.
- (b) Determining components at which the audit work will be performed
- (c) Involvement of Component Auditor in the risk assessment procedures and designing the appropriate audit steps to respond to RoMM
- (d) Component Auditors compliance with Ethical requirements including Independence related. Group Engagement Partner is responsible to communicate ethical requirements including independence standards to the Component Auditors and obtain their confirmation of compliance thereof. These requirements from group audit perspectives could be different from the ones applicable to audit of components performed for local jurisdiction's statutory purposes. E.g. it will be necessary to communicate and obtain confirmation of with compliance requirements of Indian Standards & Codes to overseas component auditors involved in audit of GFS of Indian entity.

²³ As mentioned in pre-paras, NFRA has observed instances of audit firms, both Group Auditor and Component Auditor, withdrawing from audit engagements due to potential for inadequacy

²⁴ SA 210, *Agreeing the Terms of Audit Engagements*

PROPOSED REVISION IN SA 600 FOR PUBLIC COMMENTS

SA 600 (REVISED), SPECIAL CONSIDERATIONS- AUDITS OF GROUP FINANCIAL STATEMENTS (INCLUDING THE WORK OF COMPONENT AUDITORS)

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- (e) Engagement Resources- Component Auditors competence, capability & adequacy of time. Group Engagement Partner is required to evaluate the professional competence and capability such as skill sets, industry specific knowledge of the Component Auditors. Also, the availability of sufficient time of the Component Auditors for performing the component audits needs to be evaluated. Paragraphs A62-A71 provides guidance for the Group Engagement Partner's evaluation.
5. Engagement Performance
- (a) Group Engagement Partner is responsible for determining the nature, timing and extent of direction, supervision and review of the Component Auditors work. Paragraphs A72 - A77 provide detailed guidance in this regard. Paragraph A76 provides different ways in which the group auditor may take responsibility for directing, supervising and reviewing the work of component auditors. Paragraph A76 draws attention to requirement of SA 220 (Revised) regarding Group Engagement Partner's responsibility to review work papers of certain areas like significant matters and significant judgments of the Engagement Team.
6. Communications with Component Auditors
- (a) Group Auditor is required to communicate to the Component Auditor of the respective responsibilities and expectations. Paragraphs A78-87 lay down specific further guidance and emphasise timely and effective two-way communication between the Group Auditor and Component Auditors.
7. Understanding the Group and Its Environment, the Applicable Financial Reporting Framework and the Group's System of Internal Control (Para 30-36)
- (a) SA 600 (Revised) places obligations on the Group Auditor to comply with the requirements of SA 315 (Revised)²⁵ understand the Group's Operating Environment, Legal & Operating Structure, Business and Regulatory environment, Applicable Financial Reporting Framework, Group Internal Control, Consolidation Process etc. at Group Audit level. Para A88 to 107 provide comprehensive guidance and emphasise significance of understanding aspects such as group legal structure, business model, commonality of control, centralised activities like use of shared service centres, IT infrastructure, Group-wide instructions on financial reporting etc. This is a substantial improvement over the guidance available in current SA 600.
8. Where the Component Auditor is involved, the SA 600 (Revised) requires timely two-way communication of between two in relation to the following:
- a) Matters relating to risk of material misstatements to the group audit and GFS;
 - b) Related party relationships and transactions; and
 - c) Events or transactions that affect going concern of the group.
9. Group-wide Identification and Assessment of the Risks of Material Misstatement (RoMM). The Group auditor is responsible identifying and assessing the ROMM for the GFS and he shall

²⁵ SA 315 (Revised), IDENTIFYING AND ASSESSING THE RISKS OF MATERIAL MISSTATEMENT

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evaluate whether the procedures performed by both of them i.e., Group Auditor and Component Auditor. SA 600 (Revised) highlights the benefits of involvement of the Component Auditor's

in the process of identification and assessment of ROMM at Component level due to their direct knowledge and experience of the components they will be auditing.

10. Group Materiality and Component Performance Materiality. The Group Auditor shall determine, and also communicate to component auditor, the performance materiality and the threshold above which misstatements identified in the component financial information are to be communicated to the group auditor. Paragraphs A116 – 123 elaborate the concept of component performance materiality and provide guidance to address the aggregation risk.
11. Responding to ROMM (Para 37 -44). In some cases, there will be a need for further audit procedures to respond to ROMM either centrally (e.g. Shared Service Centres) or at individual component level. Responsibility to determine the nature, extent, timing and location where these procedures will be performed, will be that of the Group Auditor. There may be situations of a large number of components whose financial information is individually immaterial but material in the aggregate to the group financial statements. In such cases the Group Auditor his professional judgment for further audit procedures either centrally or at selected component level by using analytical review procedures or automated tools and techniques. In case of areas assessed as higher ROMM or as Significant Risk, the Group Auditor shall evaluate the appropriateness of the design and performance of those further audit procedures. Paragraphs A124 -139 provide comprehensive guidance in these audit areas.
12. Consolidation Process. The Group Auditor is responsible for evaluating
 - (a) completeness of the entities and business units included in the CFS as required under Applicable Financial Reporting Framework;
 - (b) completeness and appropriateness of consolidation adjustments and reclassifications for area such as intra-group balances/transactions, accounting policy differences and accounting period differences;
 - (c) possible management bias in management judgments; and
 - (d) whether the financial information audited and communicated by the Component Auditor is the one that is included in CFS.
13. Evaluating the Component Auditor's Communications and the Adequacy of Their Work (Para 45-48)
 - (a) The Group Auditor shall request and the component auditor shall communicate his findings on matters relevant to the conclusions on the group audit. Therefore, it is not just the component auditor's audit report on the F/S of the component but there are a number of specific areas, such as given below, upon which the component auditor shall communicate.
 - Whether Component Auditor has performed the procedures requested by the Group Auditor;
 - Whether the Component Auditor has complied with the relevant ethical requirements, including those related to independence, that apply to the group audit engagement;
 - Information about instances of non-compliance with laws or regulations;

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- Corrected and uncorrected misstatements of the component financial information identified by the Component Auditor;
 - Indicators of possible management bias;
 - Description of any deficiencies in the system of internal control identified in connection with the audit procedures performed; and
 - Fraud or suspected fraud involving component management, employees
14. The Group Auditor shall evaluate the need for review of additional documentation of the component auditor based on the following:
- (a) extent of Component Auditors involvement in the risk assessment procedures ;
 - (b) significant judgments made by and findings of the Component Auditors;
 - (c) competence and capabilities of the component auditor; and
 - (d) whether both of them subject to common policies and procedures for review of audit documentation.
15. The Group Auditor shall also determine whether additional audit procedures are required to be performed by either of them.
16. Evaluating the Sufficiency and Appropriateness of Audit Evidence Obtained (Para 51-52) and Documentation (Para 59)
- (a) One of the critical aspects in the evaluation of sufficiency and appropriateness of audit evidence is the supervision of audit work of Engagement Team and review of their work papers. SA 220 (Revised) requires the Engagement Partner to review the audit documentation.
 - (b) According to this SA, evaluation of sufficiency and appropriateness of audit evidence obtained by the Component Auditors can be based on the following:
 - Component Auditors' communication of overall findings and conclusions
 - Group Auditor's direction and supervision of the Component Auditors, and review of their work including review of their additional documentation
17. The Group Auditor's documentation shall include the following.
- (a) Significant matters relating to restrictions on access to information and people which were considered before accepting or continuing with the engagement or those arose subsequently.
 - (b) The basis for determining components, component performance materiality and clearly trivial amounts.
 - (c) Evaluation and determination of competence and capabilities of the competent auditor.
 - (d) Key elements of the group's internal control.
 - (e) The nature, timing and extent of the group auditor's direction and supervision of component auditors and the review of their work, including, review of additional documentation of component auditor.
 - (f) Communication with component auditor
 - (g) Evaluation of the findings and conclusion of the component auditor.
18. Group Audit documentation comprises the audit files of the group auditor and that of the component auditor. Group Auditor may provide specific instructions to component auditor regarding final assembly of audit files and their retention. However, Component auditor audit documentation ordinarily need not be replicated in the group auditor's audit file. The Group

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Auditor may decide to summarize, replicate or retain copies of certain component auditor documentation in the group auditor's audit file to supplement the description of a particular matter in communications from the Component Auditor, including the matters required to be communicated by SA 600 (Revised).

19. Communication with Group Management and Those Charged with Governance of the Group

The Group Auditor shall communicate with the TCWG of the group about the following:

- † Overview of the work performed at the components and nature/extent of group auditor's involvement in the component auditor's work;
 - † Areas of concern on the quality of the work of the component auditors;
 - † Scope limitations on the group audit; † Fraud or suspected fraud; and
 - † Deficiencies in the internal financial control.
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Introduction

Scope of this SA

1. The Standards on Auditing (SAs) apply to an audit of group financial statements (a group audit). This SA deals with special considerations that apply to a group audit, including in those circumstances when component auditors are involved. The requirements and guidance in this SA refer to, or expand on, the application of other relevant SAs to a group audit, in particular SA 220 (Revised),²⁶ SA 230,²⁷ SA 300,²⁸ SA 315 (Revised),²⁹ and SA 330.³⁰ (Ref: Para. A1–A2)
2. Group financial statements include the financial information of more than one entity or business unit through a consolidation process, as described in paragraph 14(k). The term consolidation process as used in this SA refers not only to the preparation of consolidated financial statements in accordance with the applicable financial reporting framework, but also to the presentation of combined financial statements, and to the aggregation of the financial information of entities or business units such as branches or divisions. (Ref: Para. A3–A5, A27)
3. As explained in SA 220 (Revised),³¹ this SA, adapted as necessary in the circumstances, may also be useful in an audit of financial statements other than a group audit when the engagement team includes individuals from another firm. For example, this SA may be useful when involving such an individual to attend a physical inventory count, inspect property, plant and equipment, or perform audit procedures at a shared service center at a remote location.

Groups and Components

4. A group may be organized in various ways. For example, a group may be organized by legal or other entities (e.g., a parent and one or more subsidiaries, joint ventures, or investments accounted for by the equity method). Alternatively, the group may be organized by geography, by other economic units (including branches or divisions), or by functions or business activities. In this SA, these different forms of organization are collectively referred to as “entities or business units.” (Ref: Para. A6)
5. The group auditor determines an appropriate approach to planning and performing audit procedures to respond to the assessed risks of material misstatement of the group financial statements. For this purpose, the group auditor uses professional judgment in determining the components at which audit work will be performed. This determination is based on the group auditor’s understanding of the group and its environment, and other factors such as the ability to perform audit procedures centrally, the presence of shared service centers, or the existence of common information systems and internal control. (Ref: Para. A7–A9)

Involvement of Component Auditors

6. SA 220 (Revised)³² requires the engagement partner to determine that sufficient and appropriate resources to perform the engagement are assigned or made available to the engagement team in a timely manner. In a group audit, such resources may include component auditors. Therefore, this SA requires the group auditor to determine the nature, timing and extent of involvement of component auditors.
7. The group auditor may involve component auditors to provide information, or to perform audit work, to fulfill the requirements of this SA. Component auditors may have greater experience with, and a more in-depth knowledge of, the components and their environments (including local laws and regulations, business practices, language, and culture) than the group auditor. Accordingly, component auditors can be, and often are, involved in all phases of the group audit. (Ref: Para. A10–A11)

²⁶SA 220 (Revised), *Quality Management for an Audit of Financial Statements*

²⁷SA 230, *Audit Documentation*

²⁸SA 300, *Planning an Audit of Financial Statements*

²⁹SA 315 (Revised), *Identifying and Assessing the Risks of Material Misstatement*

³⁰SA 330, *The Auditor’s Responses to Assessed Risks*

³¹SA 220 (Revised), paragraph A1

³²SA 220 (Revised), paragraph 25

(Applicable to PIEs under Rule 3 of NFRA Rules 2018 except PSUs, PSBs and PSIs and their branches)

8. Audit risk is a function of the risks of material misstatement and detection risk.³³ Detection risk in a group audit includes the risk that a component auditor may not detect a misstatement in the financial information of a component that could cause a material misstatement of the group financial statements, and that the group auditor may not detect this misstatement. Accordingly, this SA requires sufficient and appropriate involvement by the group engagement partner or group auditor, as applicable, in the work of component auditors and emphasizes the importance of two-way communication between the group auditor and component auditors. In addition, this SA explains the matters that the group auditor takes into account when determining the nature, timing and extent of the direction and supervision of component auditors and the review of their work. (Ref: Para. A12–A13)

Professional Skepticism

9. In accordance with SA 200,³⁴ the engagement team is required to plan and perform the group audit with professional skepticism and to exercise professional judgment. The appropriate exercise of professional skepticism may be demonstrated through the actions and communications of the engagement team, including emphasizing the importance of each engagement team member exercising professional skepticism throughout the group audit. Such actions and communications may include specific steps to mitigate impediments that may impair the appropriate exercise of professional skepticism. (Ref: Para. A14–A18)

Scalability

10. This SA is intended for all group audits, regardless of size or complexity. However, the requirements of this SA are intended to be applied in the context of the nature and circumstances of each group audit. For example, when a group audit is carried out entirely by the group auditor, some requirements in this SA are not relevant because they are conditional on the involvement of component auditors. This may be the case when the group auditor is able to perform audit procedures centrally or is able to perform procedures at the components without involving component auditors. The guidance in paragraphs A119 and A120 also may be helpful in applying this SA in these circumstances.

Responsibilities of the Group Engagement Partner and Group Auditor

11. The group engagement partner remains ultimately responsible, and therefore accountable, for compliance with the requirements of this SA. The term “the group engagement partner shall take responsibility for...” or “the group auditor shall take responsibility for...” is used for those requirements when the group engagement partner or group auditor, respectively, is permitted to assign the design or performance of procedures, tasks or actions to other appropriately skilled or suitably experienced members of the engagement team, including component auditors. For other requirements, this SA expressly intends that the requirement or responsibility be fulfilled by the group engagement partner or group auditor, as applicable, and the group engagement partner or group auditor may obtain information from the firm or other members of the engagement team. (Ref: Para. A29)

Effective Date

12. This SA is effective for audits of group financial statements for periods beginning on or after

Objectives

13. The objectives of the auditor are to:
- With respect to the acceptance and continuance of the group audit engagement, determine whether sufficient appropriate audit evidence can reasonably be expected to be obtained to provide a basis for forming an opinion on the group financial statements;
 - Identify and assess the risks of material misstatement of the group financial statements, whether due to fraud or error, and plan and perform further audit procedures to appropriately respond to those assessed risks;
 - Be sufficiently and appropriately involved in the work of component auditors throughout the group audit, including communicating clearly about the scope and timing of their work, and evaluating the results of that work; and

³³ SA 200, *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with Standards on Auditing*, paragraph A34 (A32 in existing SA 200).

³⁴SA 200, paragraphs 15–16

- (d) Evaluate whether sufficient appropriate audit evidence has been obtained from the audit procedures performed, including with respect to the work performed by component auditors, as a basis for forming an opinion on the group financial statements.

Definitions

14. For purposes of the SAs, the following terms have the meanings attributed below:

- (a) Aggregation risk – The probability that the aggregate of uncorrected and undetected misstatements exceeds materiality for the financial statements as a whole. (Ref: Para. A19)
- (b) Component – An entity, business unit, function or business activity, or some combination thereof, determined by the group auditor for purposes of planning and performing audit procedures in a group audit. (Ref: Para. A20)
- (c) Component auditor – An auditor who performs audit work related to a component for purposes of the group audit. A component auditor is a part of the engagement team³⁵ for a group audit. (Ref: Para. A21–A23)
- (d) Component management – Management responsible for a component. (Ref: Para. A24)
- (e) Component performance materiality – An amount set by the group auditor to reduce aggregation risk to an appropriately low level for purposes of planning and performing audit procedures in relation to a component.
- (f) Group – A reporting entity for which group financial statements are prepared.
- (g) Group audit – The audit of group financial statements.
- (h) Group auditor – The group engagement partner and members of the engagement team other than component auditors. The group auditor is responsible for:
 - (i) Establishing the overall group audit strategy and group audit plan;
 - (ii) Directing and supervising component auditors and reviewing their work;
 - (iii) Evaluating the conclusions drawn from the audit evidence obtained as the basis for forming an opinion on the group financial statements.
- (j) Group audit opinion – The audit opinion on the group financial statements.
- (k) Group engagement partner – The engagement partner³⁶ who is responsible for the group audit. (Ref: Para. A25)
- (l) Group financial statements – Financial statements that include the financial information of more than one entity or business unit through a consolidation process. For purposes of this SA, a consolidation process includes: (Ref: Para. A26–A28)
 - (i) Consolidation, proportionate consolidation, or an equity method of accounting;
 - (ii) The presentation in combined financial statements of the financial information of entities or business units that have no parent but are under common control or common management; or
 - (iii) The aggregation of the financial information of entities or business units such as branches or divisions.
- (m) Group management – Management responsible for the preparation of the group financial statements.
- (n) Group performance materiality – Performance materiality³⁷ in relation to the group financial statements as a whole, as determined by the group auditor.

15. Reference in this SA to “the applicable financial reporting framework” means the financial reporting framework that applies to the group financial statements.

³⁵SA 220 (Revised), paragraph 12(d)

³⁶SA 220 (Revised), paragraph 12(a)

³⁷SA 320, *Materiality in Planning and Performing an Audit*, paragraphs 9 and 11

Requirements

Leadership Responsibilities for Managing and Achieving Quality on a Group Audit

16. In applying SA 220 (Revised),³⁸ the group engagement partner is required to take overall responsibility for managing and achieving quality on the group audit engagement. In doing so, the group engagement partner shall: (Ref: Para. A29–A30)
- (a) Take responsibility for creating an environment for the group audit engagement that emphasizes the expected behavior of engagement team members. (Ref: Para. A31)
 - (b) Be sufficiently and appropriately involved throughout the group audit engagement, including in the work of component auditors, such that the group engagement partner has the basis for determining whether the significant judgments made, and the conclusions reached, are appropriate given the nature and circumstances of the group audit engagement.

Acceptance and Continuance

17. Before accepting or continuing the group audit engagement, the group engagement partner shall determine whether sufficient appropriate audit evidence can reasonably be expected to be obtained to provide a basis for forming an opinion on the group financial statements. (Ref: Para. A32–A35)
18. If, after the acceptance or continuance of the group audit engagement, the group engagement partner concludes that sufficient appropriate audit evidence cannot be obtained, the group engagement partner shall consider the possible effects on the group audit. (Ref: Para. A36)

Terms of the Engagement

19. In applying SA 210,³⁹ the group auditor shall obtain the agreement of group management that it acknowledges and understands its responsibility to provide the engagement team with: (Ref: Para. A37)
- (a) Access to all information of which group management is aware that is relevant to the preparation of the group financial statements such as records, documentation and other matters;
 - (b) Additional information that the engagement team may request from group management or component management for the purpose of the group audit; and
 - (c) Unrestricted access to persons within the group from whom the engagement team determines it necessary to obtain audit evidence.

Restrictions on Access to Information or People Outside the Control of Group Management

20. If the group engagement partner concludes that group management cannot provide the engagement team with access to information or unrestricted access to persons within the group due to restrictions that are outside the control of group management, the group engagement partner shall consider the possible effects on the group audit. (Ref: Para. A38–A46)

Restrictions on Access to Information or People Imposed by Group Management

21. If the group engagement partner concludes that: (Ref: Para. A43–A46)
- (a) It will not be possible for the group auditor to obtain sufficient appropriate audit evidence due to restrictions imposed by group management; and
 - (b) The possible effect of this limitation will result in a disclaimer of opinion on the group financial statements, the group engagement partner shall either:
 - (i) In the case of an initial engagement, not accept the engagement, or, in the case of a recurring engagement, withdraw from the engagement, when withdrawal is possible under applicable law or regulation; or

³⁸SA 220 (Revised), paragraph 13

³⁹SA 210, *Agreeing the Terms of Audit Engagements*, paragraphs 6(b) and 8(b)

(Applicable to PIEs under Rule 3 of NFRA Rules 2018 except PSUs, PSBs and PSIs and their branches)

- (ii) When law or regulation prohibit an auditor from declining an engagement or when withdrawal from an engagement is not otherwise possible, having performed the audit of the group financial statements to the extent possible, disclaim an opinion on the group financial statements.

Overall Group Audit Strategy and Group Audit Plan

- 22. In applying SA 300,⁴⁰ the group auditor shall establish, and update as necessary, an overall group audit strategy and group audit plan. In doing so, the group auditor shall determine: (Ref: Para. A47–A50) (a) The components at which audit work will be performed; and (Ref: Para. A51)

⁴⁰ SA 300, paragraphs 7–10A (Paragraph 6-10 in existing SA 300)
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- (b) The resources needed to perform the group audit engagement, including the nature, timing and extent to which component auditors are to be involved. (Ref: Para. A52–A56)

Considerations When Component Auditors Are Involved

23. In establishing the overall group audit strategy and group audit plan, the group engagement partner shall evaluate whether the group auditor will be able to be sufficiently and appropriately involved in the work of the component auditor. (Ref: Para. A57)
24. As part of the evaluation in paragraph 23, the group auditor shall request the component auditor to confirm that the component auditor will cooperate with the group auditor, including whether the component auditor will perform the work requested by the group auditor. (Ref: Para. A58)

Relevant Ethical Requirements, Including Those Related to Independence

25. In applying SA 220 (Revised),⁴¹ the group engagement partner shall take responsibility for: (Ref: Para. A59–A60, A87)
- (a) Component auditors having been made aware of relevant ethical requirements that are applicable given the nature and circumstances of the group audit engagement; and
 - (b) Confirming whether the component auditors understand and will comply with the relevant ethical requirements, including those related to independence, that apply to the group audit engagement.

Engagement Resources

26. In applying SA 220 (Revised),⁴² the group engagement partner shall: (Ref: Para. A61–A68)
- (a) Determine that component auditors have the appropriate competence and capabilities, including sufficient time, to perform the assigned audit procedures at the component; and
 - (b) If information about the results of the monitoring and remediation process or external inspections related to the component auditor has been provided by the group auditor’s firm or has otherwise been made available to the group engagement partner, determine the relevance of such information to the group auditor’s determination in paragraph 26(a).
27. The group auditor shall obtain sufficient appropriate audit evidence relating to the work to be performed at the component without involving the component auditor if:
- (a) The component auditor does not comply with the relevant ethical requirements, including those related to independence, that apply to the group audit engagement;⁴³ or (Ref: Para. A69–A70)
 - (b) The group engagement partner has serious concerns about the matters in paragraphs 23–26. (Ref: Para. A71)

Engagement Performance

28. In applying SA 220 (Revised),⁴⁴ the group engagement partner shall take responsibility for the nature, timing and extent of direction and supervision of component auditors and the review of their work, taking into account: (Ref: Para. A72–A77)
- (a) Areas of higher assessed risks of material misstatement of the group financial statements, or significant risks identified in accordance with SA 315 (Revised); and
 - (b) Areas in the audit of the group financial statements that involve significant judgment.

Communications with Component Auditors

29. The group auditor shall communicate with component auditors about their respective responsibilities and the group auditor’s expectations, including an expectation that communications between the group auditor and component auditors take place at appropriate times throughout the group audit. (Ref: Para. A78–A87)

⁴¹SA 220 (Revised), paragraph 17

⁴²SA 220 (Revised), paragraphs 25–26

⁴³SA 200, paragraph 14

⁴⁴SA 220 (Revised), paragraph 2

Understanding the Group and Its Environment, the Applicable Financial Reporting Framework and the Group's System of Internal Control

30. In applying SA 315 (Revised),⁴⁵ the group auditor shall take responsibility for obtaining an understanding of the following: (Ref: Para. A88–A92)
- (a) The group and its environment, including: (Ref: Para. A93–A95)
 - (i) The group's organizational structure and its business model, including:
 - a. The locations in which the group has its operations or activities;
 - b. The nature of the group's operations or activities and the extent to which they are similar across the group; and
 - c. The extent to which the group's business model integrates the use of information technology (IT);
 - (ii) Regulatory factors impacting the entities and business units in the group; and
 - (iii) The measures used internally and externally to assess the financial performance of the entities or business units;
 - (b) The applicable financial reporting framework and the consistency of accounting policies and practices across the group; and
 - (c) The group's system of internal control, including:
 - (i) The nature and extent of commonality of controls; (Ref: Para. A96–A99, A102)
 - (ii) Whether, and if so, how, the group centralizes activities relevant to financial reporting; (Ref: Para. A100– A102)
 - (iii) The consolidation process used by the group, including sub-consolidations, if any, and consolidation adjustments; and
 - (iv) How group management communicates significant matters that support the preparation of the group financial statements and related financial reporting responsibilities in the information system and other components of the group's system of internal control to management of entities or business units. (Ref: Para. A103–A105)

Considerations When Component Auditors Are Involved

31. The group auditor shall communicate to component auditors on a timely basis: (Ref: Para. A106)
- (a) Matters that the group auditor determines to be relevant to the component auditor's design or performance of risk assessment procedures for purposes of the group audit;
 - (b) In applying SA 550,⁴⁶ related party relationships or transactions identified by group management, and any other related parties of which the group auditor is aware, that are relevant to the work of the component auditor; and (Ref: Para. A107)
 - (c) In applying SA 570 (Revised),⁴⁷ events or conditions identified by group management or the group auditor that may cast significant doubt on the group's ability to continue as a going concern that are relevant to the work of the component auditor.
32. The group auditor shall request component auditors to communicate on a timely basis:
- (a) Matters related to the financial information of the component that the component auditor determines to be relevant to the identification and assessment of the risks of material misstatement of the group financial statements, whether due to fraud or error;
 - (b) Related party relationships not previously identified by group management or the group auditor; and (Ref: Para. A107)
 - (c) Any events or conditions identified by the component auditor that may cast significant doubt on the group's ability to continue as a going concern.

⁴⁵SA 315 (Revised), paragraphs 19–27

⁴⁶SA 550, *Related Parties*, paragraph 17

⁴⁷SA 570 (Revised), *Going Concern*

Identifying and Assessing the Risks of Material Misstatement

33. In applying SA 315 (Revised),⁴⁸ based on the understanding obtained in paragraph 30, the group auditor shall take responsibility for the identification and assessment of the risks of material misstatement of the group financial statements, including with respect to the consolidation process. (Ref: Para. A108–A113)

Considerations When Component Auditors Are Involved

34. In applying SA 315 (Revised),⁴⁹ the group auditor shall evaluate whether the audit evidence obtained from the risk assessment procedures performed by the group auditor and component auditors provides an appropriate basis for the identification and assessment of the risks of material misstatement of the group financial statements. (Ref: Para. A114–A115)

Materiality

35. In applying SA 320⁵⁰ and SA 450,⁵¹ when classes of transactions, account balances or disclosures in the group financial statements are dSAggregated across components, for purposes of planning and performing audit procedures, the group auditor shall determine:
- (a) Component performance materiality. To address aggregation risk, such amount shall be lower than group performance materiality. (Ref: Para. A116–A120)
 - (b) The threshold above which misstatements identified in the component financial information are to be communicated to the group auditor. Such threshold shall not exceed the amount regarded as clearly trivial to the group financial statements. (Ref: Para. A121)

Considerations When Component Auditors Are Involved

36. The group auditor shall communicate to the component auditor the amounts determined in accordance with paragraph 35. (Ref: Para. A122–A123)

Responding to the Assessed Risks of Material Misstatement

37. In applying SA 330,⁵² the group auditor shall take responsibility for the nature, timing and extent of further audit procedures to be performed, including determining the components at which to perform further audit procedures and the nature, timing and extent of the work to be performed at those components. (Ref: Para. A124–A139)

Consolidation Process

38. The group auditor shall take responsibility for designing and performing further audit procedures to respond to the assessed risks of material misstatement of the group financial statements arising from the consolidation process. This shall include: (Ref: Para. A140)
- (a) Evaluating whether all entities and business units have been included in the group financial statements as required by the applicable financial reporting framework and, if applicable, for designing and performing further audit procedures on sub-consolidations;
 - (b) Evaluating the appropriateness, completeness and accuracy of consolidation adjustments and reclassifications; (Ref: Para. A141)
 - (c) Evaluating whether management’s judgments made in the consolidation process give rise to indicators of possible management bias; and
 - (d) Responding to assessed risks of material misstatement due to fraud arising from the consolidation process.

⁴⁸SA 315 (Revised), paragraphs 28–34

⁴⁹SA 315 (Revised), paragraph 35

⁵⁰SA 320, paragraph 11

⁵¹SA 450, *Evaluation of Misstatements Identified During the Audit*, paragraph 5

⁵²SA 330, paragraphs 6–7

(Applicable to PIEs under Rule 3 of NFRA Rules 2018 except PSUs, PSBs and PSIs and their branches)

39. If the financial information of an entity or business unit has not been prepared in accordance with the same accounting policies applied to the group financial statements, the group auditor shall evaluate whether the financial information has been appropriately adjusted for purposes of preparing and presenting the group financial statements.
40. If the group financial statements include the financial information of an entity or business unit with a financial reporting period-end that differs from that of the group, the group auditor shall take responsibility for evaluating whether appropriate adjustments have been made to that financial information in accordance with the applicable financial reporting framework.

Considerations When Component Auditors Are Involved

41. When the group auditor involves component auditors in the design or performance of further audit procedures, the group auditor shall communicate with the component auditor about matters that the group auditor or component auditor determine to be relevant to the design of responses to the assessed risks of material misstatement of the group financial statements.
42. For areas of higher assessed risks of material misstatement of the group financial statements, or significant risks identified in accordance with SA 315 (Revised), on which a component auditor is determining the further audit procedures to be performed, the group auditor shall evaluate the appropriateness of the design and performance of those further audit procedures. (Ref: Para. A142)
43. When component auditors perform further audit procedures on the consolidation process, including on sub-consolidations, the group auditor shall determine the nature and extent of direction and supervision of component auditors and the review of their work. (Ref: Para. A143)
44. The group auditor shall determine whether the financial information identified in the component auditor's communication (see paragraph 45(a)) is the financial information that is incorporated in the group financial statements.

Evaluating the Component Auditor's Communications and the Adequacy of Their Work

45. The group auditor shall request the component auditor to communicate matters relevant to the group auditor's conclusion with regard to the group audit. Such communication shall include: (Ref: Para. A144)
 - (a) Identification of the financial information on which the component auditor has been requested to perform audit procedures;
 - (b) Whether the component auditor has performed the work requested by the group auditor;
 - (c) Whether the component auditor has complied with the relevant ethical requirements, including those related to independence, that apply to the group audit engagement;
 - (d) Information about instances of non-compliance with laws or regulations;
 - (e) Corrected and uncorrected misstatements of the component financial information identified by the component auditor and that are above the threshold communicated by the group auditor in accordance with paragraph 36; (Ref: Para. A145)
 - (f) Indicators of possible management bias;
 - (g) Description of any deficiencies in the system of internal control identified in connection with the audit procedures performed;
 - (h) Fraud or suspected fraud involving component management, employees who have significant roles in the group's system of internal control at the component or others where the fraud resulted in a material misstatement of the component financial information;
 - (i) Other significant matters that the component auditor communicated or expects to communicate to component management or those charged with governance of the component;
 - (j) Any other matters that may be relevant to the group audit, or that the component auditor determines are appropriate to draw to the attention of the group auditor, including exceptions noted in the written representations that the component auditor requested from component management; and
 - (k) The component auditor's overall findings or conclusions. (Ref: Para. A146)
46. The group auditor shall:

(Applicable to PIEs under Rule 3 of NFRA Rules 2018 except PSUs, PSBs and PSIs and their branches)

- (a) Discuss significant matters arising from communications with the component auditor, including those in accordance with paragraph 45, with the component auditor, component management or group management, as appropriate; and
 - (b) Evaluate whether communications with the component auditor are adequate for the group auditor's purposes. If such communications are not adequate for the group auditor's purposes, the group auditor shall consider the implications for the group audit. (Ref: Para. A147)
47. The group auditor shall determine whether, and the extent to which, it is necessary to review additional component auditor audit documentation. In making this determination, the group auditor shall consider: (Ref: Para. A148–A149)
- (a) The nature, timing and extent of the work performed by the component auditor;
 - (b) The competence and capabilities of the component auditor as determined in accordance with paragraph 26(a); and (c) The direction and supervision of the component auditor and review of their work.
48. If the group auditor concludes that the work of the component auditor is not adequate for the group auditor's purposes, the group auditor shall determine what additional audit procedures are to be performed, and whether they are to be performed by a component auditor or by the group auditor.

Subsequent Events

49. In applying SA 560,⁵³ the group auditor shall take responsibility for performing procedures, including, as appropriate, requesting component auditors to perform procedures, designed to identify events that may require adjustment of, or disclosure in, the group financial statements. (Ref: Para. A150)

Considerations When Component Auditors Are Involved

50. The group auditor shall request the component auditors to notify the group auditor if they become aware of subsequent events that may require adjustment of, or disclosure in, the group financial statements. (Ref: Para. A150)

Evaluating the Sufficiency and Appropriateness of Audit Evidence Obtained

51. In applying SA 330,⁵⁴ the group auditor shall evaluate whether sufficient appropriate audit evidence has been obtained from the audit procedures performed, including from the work performed by component auditors, on which to base the group audit opinion. (Ref: Para. A151–A155)
52. The group engagement partner shall evaluate the effect on the group audit opinion of any uncorrected misstatements (whether identified by the group auditor or communicated by component auditors) and any instances when there has been an inability to obtain sufficient appropriate audit evidence. (Ref: Para. A156)

Auditor's Report

53. The auditor's report on the group financial statements shall not refer to a component auditor, unless required by law or regulation to include such reference. If such reference is required by law or regulation, the auditor's report shall indicate that the reference does not diminish the group engagement partner's or the group engagement partner's firm's responsibility for the group audit opinion. (Ref: Para. A157–A158)

Communication with Group Management and Those Charged with Governance of the Group

Communication with Group Management

54. The group auditor shall communicate with group management an overview of the planned scope and timing of the audit, including an overview of the work to be performed at components of the group. (Ref: Para. A159)
55. If fraud has been identified by the group auditor or brought to its attention by a component auditor (see paragraph 45(h)), or information indicates that a fraud may exist, the group auditor shall communicate this on a timely basis to the appropriate

⁵³SA 560, *Subsequent Events*, paragraphs 6–7

⁵⁴SA 330, paragraph 26

level of group management in order to inform those with primary responsibility for the prevention and detection of fraud of matters relevant to their responsibilities. (Ref: Para. A160)

56. A component auditor may be required by statute, regulation or other reasons to express an audit opinion on the financial statements of an entity or business unit that forms part of the group. In that case, the group auditor shall request group management to inform management of the entity or business unit of any matter of which the group auditor becomes aware that may be significant to the financial statements of the entity or business unit, but of which management of the entity or

business unit may be unaware. If group management refuses to communicate the matter to management of the entity or business unit, the group auditor shall discuss the matter with those charged with governance of the group. If the matter remains unresolved, the group auditor, subject to legal and professional confidentiality considerations, shall consider whether to advise the component auditor not to issue the auditor's report on the financial statements of the entity or business unit until the matter is resolved. (Ref: Para. A161–A162)

Communication with Those Charged with Governance of the Group

57. The group auditor shall communicate the following matters with those charged with governance of the group, in addition to those required by SA 260 (Revised)⁵⁵ and other SAs: (Ref: Para. A163)
- (a) An overview of the work to be performed at the components of the group and the nature of the group auditor's planned involvement in the work to be performed by component auditors. (Ref: Para. A164)
 - (b) Instances when the group auditor's review of the work of a component auditor gave rise to a concern about the quality of that component auditor's work, and how the group auditor addressed the concern.
 - (c) Any limitations on the scope of the group audit, for example, significant matters related to restrictions on access to people or information.
 - (d) Fraud or suspected fraud involving group management, component management, employees who have significant roles in the group's system of internal control or others when the fraud resulted in a material misstatement of the group financial statements.

Communication of Identified Deficiencies in Internal Control

58. In applying SA 265,⁵⁶ the group auditor shall determine whether any identified deficiencies in the group's system of internal control are required to be communicated to those charged with governance of the group or group management. In making this determination, the group auditor shall consider deficiencies in internal control that have been identified by component auditors and communicated to the group auditor in accordance with paragraph 45(g). (Ref: Para. A165)

Documentation

59. In accordance with SA 230,³² the audit documentation for a group audit engagement needs to be sufficient to enable an experienced auditor, having no previous connection with the audit, to understand the nature, timing and extent of audit procedures performed, the evidence obtained, and the conclusions reached with respect to significant matters arising during the group audit. In applying SA 230,⁵⁷ the group auditor shall include in the audit documentation: (Ref: Para. A166–A169, A179–A182)
- (a) Significant matters related to restrictions on access to people or information within the group that were considered before deciding to accept or continue the engagement, or that arose subsequent to acceptance or continuance, and how such matters were addressed.
 - (b) The basis for the group auditor's determination of components for purposes of planning and performing the group audit. (Ref: Para. A170)
 - (c) The basis for the determination of component performance materiality, and the threshold for communicating misstatements in the component financial information to the group auditor.

⁵⁵SA 260 (Revised), *Communication with Those Charged with Governance*

⁵⁶ SA 265, *Communicating Deficiencies in Internal Control to Those Charged with Governance and Management* ³²

SA 230, paragraph 8

⁵⁷SA 230, paragraphs 1–3, 9–11, A6–A7 and Appendix
SA 600 (REVISED)

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- (d) The basis for the group auditor's determination that component auditors have the appropriate competence and capabilities, including sufficient time, to perform the assigned audit procedures at the components. (Ref: Para. A171)
- (e) Key elements of the understanding of the group's system of internal control in accordance with paragraph 30(c);
- (f) The nature, timing and extent of the group auditor's direction and supervision of component auditors and the review of their work, including, as applicable, the group auditor's review of additional component auditor audit documentation in accordance with paragraph 47. (Ref: Para. A172–A178)
- (g) Matters related to communications with component auditors, including:
 - (i) Matters, if any, related to fraud, related parties or going concern communicated in accordance with paragraph 32.
 - (ii) Matters relevant to the group auditor's conclusion with regard to the group audit, in accordance with paragraph 45, including how the group auditor has addressed significant matters discussed with component auditors, component management or group management.
- (h) The group auditor's evaluation of, and response to, findings or conclusions of the component auditors about matters that could have a material effect on the group financial statements.

Application and Other Explanatory Material

Scope of this SA (Ref: Para. 1–2)

- A1. This SA also deals with the special considerations for the group engagement partner or group auditor, as applicable, in applying the requirements and guidance in SA 220 (Revised), including for the direction and supervision of component auditors and the review of their work.
- A2. ISQM 1³⁴ addresses the engagements for which an engagement quality review is required to be performed. ISQM 2³⁵ deals with the appointment and eligibility of the engagement quality reviewer and the engagement quality reviewer's responsibilities relating to performing and documenting an engagement quality review, including for a group audit.
- A3. An entity or business unit of a group may also prepare its own group financial statements that incorporate the financial information of those entities or business units it encompasses (that is, a sub-group). This SA applies to an audit of the group financial statements of such sub-groups performed for statutory, regulatory or other reasons.
- A4. A single legal entity may be organized with more than one business unit, for example, a company with operations in multiple locations, such as a bank with multiple branches. When those business units have characteristics such as separate locations, separate management, or separate information systems (including a separate general ledger) and the financial information is aggregated in preparing the single legal entity's financial statements, such financial statements meet the definition of group financial statements because they include the financial information of more than one entity or business unit through a consolidation process.
- A5. In some cases, a single legal entity may configure its information system to capture financial information for more than one product or service line for legal or regulatory reporting or other management purposes. In these circumstances, the entity's financial statements are not group financial statements because there is no aggregation of the financial information of more than one entity or business unit through a consolidation process. Further, capturing separate information (e.g., in a sub-ledger) for legal or regulatory reporting or other management purposes does not create separate entities or business units (e.g., divisions) for purposes of this SA.

Groups and Components (Ref: Para. 4–5)

- A6. The group's information system, including its financial reporting process, may or may not be aligned with the group's organizational structure. For example, a group may be organized according to its legal structure, but its information system may be organized by function, process, product or service (or by groups of products or services), or geographic locations for management or reporting purposes.
- A7. Based on the understanding of the group's organizational structure and information system, the group auditor may determine that the financial information of certain entities or business units may be considered together for purposes of planning and performing audit procedures. For example, a group may have three legal entities with similar business characteristics, operating in the same geographical location, under the same management, and using a common system of internal control, including the information system. In these circumstances, the group auditor may decide to treat these three legal entities as one component.
- A8. A group may also centralize activities or processes that are applicable to more than one entity or business unit within the group, for example through the use of a shared service center. When such centralized activities are relevant to the group's

³⁴ Standard on Quality Management (SQM) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*

³⁵ SQM 2, *Engagement Quality Reviews*

financial reporting process, the group auditor may determine that the shared service center is a component.

- A9. Another consideration that may be relevant to the group auditor's determination of components is how management has determined operating segments in accordance with the disclosure requirements of the applicable financial reporting framework.³⁶

Involvement of Component Auditors (Ref: Para. 7–8)

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- A10. Component auditors may perform an audit of the financial statements of a component, whether for statutory, regulatory or other reasons, particularly when a component is a legal entity. When a component auditor is also performing or has completed an audit of the component financial statements, the group auditor may be able to use audit work performed on the component financial statements, provided the group auditor is satisfied that such work is appropriate for purposes of the group audit. In addition, component auditors may adapt the work performed on the audit of the component financial statements to also meet⁵⁸ the needs of the group auditor. In any event, the requirements of this SA apply, including those relating to the direction and supervision of component auditors and the review of their work.
- A11. In accordance with SA 220 (Revised),⁵⁹ the engagement partner is required to determine that the approach to direction, supervision and review is responsive to the nature and circumstances of the audit engagement. Paragraph A76 provides examples of different ways in which the group engagement partner may take responsibility for directing and supervising component auditors and reviewing their work, and may be helpful in circumstances when the group auditor plans to use the audit work from an audit of component financial statements that has already been completed.
- A12. As explained in SA 200,⁶⁰ detection risk relates to the nature, timing and extent of the auditor's procedures that are determined by the auditor to reduce audit risk to an acceptably low level. Detection risk is a function not only of the effectiveness of an audit procedure but also the application of that procedure by the auditor. Therefore, detection risk is influenced by matters such as adequate planning, the assignment of appropriate resources to the engagement, the exercise of professional skepticism, and the supervision and review of the audit work performed.
- A13. Detection risk is a broader concept than aggregation risk as described in paragraphs 14(a) and A19. In a group audit, there may be a higher probability that the aggregate of uncorrected and undetected misstatements may exceed materiality for the group financial statements as a whole because audit procedures may be performed separately on the financial information of components across the group. Accordingly, component performance materiality is set by the group auditor to reduce aggregation risk to an appropriately low level.

Professional Skepticism (Ref: Para. 9)

- A14. SA 220 (Revised)⁶¹ provides examples of the impediments to the exercise of professional skepticism at the engagement level, including unconscious auditor biases that may impede the exercise of professional skepticism when designing and performing audit procedures and evaluating audit evidence. SA 220 (Revised) also provides possible actions that the engagement team may take to mitigate impediments to the exercise of professional skepticism at the engagement level.
- A15. Requirements and relevant application material in SA 315 (Revised),⁶² SA 540 (Revised)⁶³ and other SAs address the exercise of professional skepticism, and include examples of how documentation may help provide evidence of the auditor's exercise of professional skepticism.
- A16. All members of the engagement team are required to exercise professional skepticism throughout the group audit. The group auditor's direction and supervision of engagement team members, including component auditors, and the review of their work, may inform the group auditor about whether the engagement team has appropriately exercised professional skepticism. A17. The exercise of professional skepticism in a group audit may be affected by matters such as the following:
- Component auditors in different locations may be subject to varying cultural influences, which may affect the nature of the biases to which they are subject.

⁵⁸See, for example, Indian Accounting Standards (Ind AS) 108, *Operating Segments*

⁵⁹SA 220 (Revised), paragraph 30(b)

⁶⁰SA 200, paragraph A45 **Para A42-A43 of SA**

⁶¹SA 220 (Revised), paragraphs A34–A36

⁶²SA 315 (Revised), paragraph A238

⁶³SA 540 (Revised), *Auditing Accounting Estimates and Related Disclosures*, paragraph A11

- The complex structure of some groups may introduce factors that give rise to increased susceptibility to risks of material misstatement. In addition, an overly complex organizational structure may be a fraud risk factor in accordance with SA 240⁶⁴ and therefore may require additional time or expertise to understand the business purpose and activities of certain entities or business units.

- The nature and extent of intra-group transactions (e.g., transactions that involve multiple entities and business units within the group or multiple related parties), cash flows or transfer pricing agreements may give rise to additional complexities. In some cases, such matters may also give rise to fraud risk factors.

- When the group audit is subject to tight reporting deadlines imposed by group management, this may put pressure on engagement team members when completing the work assigned. In these circumstances, the engagement team may need to take additional time to appropriately question management's assertions, make appropriate judgments, or appropriately review the audit work performed.

A18. The exercise of professional skepticism by the group auditor includes remaining alert for inconsistent information from component auditors, component management and group management about matters that may be significant to the group financial statements.

Definitions

Aggregation Risk (Ref: Para. 14(a))

A19. Aggregation risk exists in all audits of financial statements, but is particularly important to understand and address in a group audit because there is a greater likelihood that audit procedures will be performed on classes of transactions, account balances or disclosures that are disaggregated across components. Generally, aggregation risk increases as the number of components increases at which audit procedures are performed separately, whether by component auditors or other members of the engagement team.

Component (Ref: Para. 14(b))

A20. The group auditor uses professional judgment in determining components at which audit work will be performed. Paragraph A7 explains that the financial information of certain entities or business units may be considered together for purposes of planning and performing audit procedures. However, the group auditor's responsibility for the identification and assessment of the risks of material misstatement of the group financial statements encompasses all of the entities and business units whose financial information is included in the group financial statements.

Component Auditor (Ref: Para. 14(c))

A21. References in this SA to the engagement team include the group auditor and component auditors. Component auditors may be from a network firm, a firm that is not a network firm, or the group auditor's firm (e.g., another office within the group auditor's firm).

A22. In some circumstances, the group auditor may perform centralized testing on classes of transactions, account balances or disclosures, or may perform audit procedures related to a component. In these circumstances, the group auditor is not considered a component auditor.

A23. Paragraph 24 requires the group auditor to request the component auditor to confirm that the component auditor will cooperate with the group auditor, including whether the component auditor will perform the work requested by the group auditor. Paragraph A58 provides guidance for circumstances in which the component auditor is unable to provide such a confirmation.

Component Management (Ref: Para. 14(d))

A24. Component management refers to management responsible for the financial information or other activity (e.g., processing of transactions at a shared service center) at an entity or business unit that is part of the group. When the group auditor considers the financial information of certain entities or business units together as a component or determines that a shared service center is a component (see paragraphs A7–A8), component management refers to the management that is responsible for the financial information or transaction processing that is subject to the audit procedures being performed in relation to that component. In some circumstances, there may not be separate component management and group management may be directly responsible for the financial information or other activities of the component.

⁶⁴SA 240, *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements*, Appendix 1

Group Engagement Partner (Ref: Para. 14(j))

A25. When joint auditors conduct a group audit, the joint engagement partners and their engagement teams collectively constitute the “group engagement partner” and “engagement team” for the purposes of the SAs. This SA does not, however, deal with the relationship between joint auditors or the work that one joint auditor performs in relation to the work of the other joint auditor for purposes of the group audit.

Group Financial Statements (Ref: Para. 2, 14(k))

A26. The requirements for the preparation and presentation of the group financial statements may be specified in the applicable financial reporting framework, which may therefore affect the determination of the financial information of entities or business units to be included in the group financial statements. For example, some frameworks require the preparation of consolidated financial statements when an entity (a parent entity) controls one or more other entities (e.g., subsidiaries) through majority ownership interest or other means. In some cases, the applicable financial reporting framework includes separate requirements for, or may otherwise permit, the presentation of combined financial statements. Examples of circumstances in which the presentation of combined financial statements may be permitted include entities that have no parent but are under common control or entities under common management.

A27. The term “consolidation process” as used in this SA is not intended to have the same meaning as “consolidation” or “consolidated financial statements” as defined or described in financial reporting frameworks. Rather, the term “consolidation process” refers more broadly to the process used to prepare group financial statements.

A28. The detailed aspects of the consolidation process vary from one group to another, depending on the group’s structure and information system, including the financial reporting process. However, a consolidation process involves considerations such as the elimination of intra-group transactions and balances and, when applicable, implications of different reporting periods for entities or business units included in the group financial statements.

Leadership Responsibilities for Managing and Achieving Quality on a Group Audit (Ref: Para. 11, 16)

A29. It may not be possible or practical for the group engagement partner to solely deal with all requirements in SA 220 (Revised), particularly when the engagement team includes a large number of component auditors located in multiple locations. In managing quality at the engagement level, SA 220 (Revised)⁶⁵ permits the engagement partner to assign the design or performance of procedures, tasks or actions to other members of the engagement team to assist the engagement partner. Accordingly, the group engagement partner may assign procedures, tasks or actions to other members of the engagement team and these members may assign procedures, tasks or actions further. In such circumstances, SA 220 (Revised) requires that the engagement partner shall continue to take overall responsibility for managing and achieving quality on the audit engagement.

A30. Policies or procedures established by the firm, or that are common network requirements or network services,⁶⁶ may support the group engagement partner by facilitating communication between the group auditor and component auditors and supporting the group auditor’s direction and supervision of those component auditors and the review of their work.

A31. SA 220 (Revised)⁶⁷ explains that a culture that demonstrates a commitment to quality is shaped and reinforced by the engagement team members as they demonstrate expected behaviors when performing the engagement. In addressing the requirement in paragraph 16(a), the group engagement partner may communicate directly to other members of the engagement team (including component auditors) and reinforce this communication through personal conduct and actions (e.g., leading by example).

Acceptance and Continuance

Determining Whether Sufficient and Appropriate Audit Evidence Can Reasonably Be Expected to Be Obtained (Ref: Para. 17–18)

A32. In determining whether sufficient appropriate audit evidence can reasonably be expected to be obtained, the group engagement partner may obtain an understanding of matters such as:

- The group structure, including both the legal and organizational structure.

⁶⁵SA 220 (Revised), paragraph 15

⁶⁶SQM 1, paragraphs 48–52

⁶⁷SA 220 (Revised), paragraph A28

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Activities that are significant to the group, including the industry and regulatory, economic and political environments in which those activities take place.

- The use of service organizations.
- The use of shared service centers.
- The consolidation process.
- Whether the group auditor:
 - Will have unrestricted access to those charged with governance of the group, group management, those charged with governance of the component, component management and component information, including of those components that are accounted for by the equity method; and
 - Will be able to perform necessary work on the financial information of the components when applicable.
- Whether sufficient and appropriate resources are assigned or will be made available.

A33. In the case of an initial group audit engagement, the group auditor's understanding of the matters in paragraph A32 may be obtained from:

- Information provided by group management;
- Communication with group management;
- Communication with those charged with governance of the group; and
- When applicable, communication with component management or the predecessor auditor.

A34. For a recurring engagement, the ability to obtain sufficient appropriate audit evidence may be affected by significant changes in, for example:

- The group structure (e.g., acquisitions, disposals, joint ventures, reorganizations, or changes in how the group financial reporting system is organized).
- Components' activities that are significant to the group.
- The composition of those charged with governance of the group, group management, or key management of components for which audit procedures are expected to be performed.
- The group auditor's understanding of the integrity and competence of group or component management.
- The applicable financial reporting framework.

A35. There may be additional complexities with obtaining sufficient appropriate audit evidence in a group audit when components are located in jurisdictions other than the group auditor's jurisdiction because of cultural and language differences, and different laws or regulations. For example, law or regulation may restrict the component auditor from providing documentation outside of its jurisdiction, or war, civil unrest or outbreaks of disease may restrict the group auditor's access to relevant component auditor audit documentation. Paragraph A180 includes possible ways to address these situations.

A36. Restrictions may be imposed after the group engagement partner's acceptance of the group audit engagement that may affect the engagement team's ability to obtain sufficient appropriate audit evidence. Such restrictions may include those affecting:

- The group auditor's access to component information, management or those charged with governance of components, or the component auditors (including relevant audit documentation sought by the group auditor) (see paragraphs 20 and 21); or
- The work to be performed on the financial information of components.

Paragraphs A45–A46 explain the possible effect of such restrictions on the auditor's report on the group financial statements.

Agreeing the Terms of Audit Engagements (Ref: Para. 19)

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A37. SA 210⁶⁸ requires the auditor to agree the terms of the audit engagement with management or those charged with governance, as appropriate. The terms of engagement identify the applicable financial reporting framework. Additional

⁶⁸ SA 210, paragraph 9 and 10(d)

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matters that may be included in the terms of a group audit engagement include:

- Communications between the group auditor and component auditors should be unrestricted to the extent possible under laws or regulations;
- Important communications between component auditors and those charged with governance of the component or component management, including communications on significant deficiencies in internal control, should be communicated to the group auditor;
- Communications between regulatory authorities and entities or business units related to financial reporting matters that may be relevant to the group audit should be communicated to the group auditor; and
- The group auditor should be permitted to perform work, or request a component auditor to perform work, at the component.

Restrictions on Access to Information or People (Ref: Para. 20–21)

A38. Restrictions on access to information or people do not eliminate the requirement for the group auditor to obtain sufficient appropriate audit evidence.

A39. Access to information or people can be restricted for many reasons, such as restrictions imposed by component management, laws or regulations or other conditions, for example, war, civil unrest or outbreaks of disease. Paragraph A180 describes how the group auditor may be able to overcome restrictions on access to component auditor audit documentation.

A40. In some circumstances, the group auditor may be able to overcome restrictions on access to information or people, for example:

- If access to component management or those charged with governance of the component is restricted, the group auditor may request group management or those charged with governance of the group to assist with removing the restriction or otherwise request information directly from group management or those charged with governance of the group.
- If the group has a non-controlling interest in an entity that is accounted for by the equity method, the group auditor may determine whether provisions exist (e.g., in the terms of joint venture agreements, or the terms of other investment agreements) regarding access by the group to the financial information of the entity and request group management to exercise such rights.
- If the group has a non-controlling interest in an entity that is accounted for by the equity method and the group has representatives who are on the executive board or are members of those charged with governance of the noncontrolled entity, the group auditor may inquire whether they can provide financial and other information available to them in these roles.

A41. If the group has a non-controlling interest in an entity that is accounted for by the equity method and the group auditor's access to information or people at the entity is restricted, the group auditor may be able to obtain information to be used as audit evidence regarding the entity's financial information, for example:

- Financial information that is available from group management, as group management also needs to obtain the non-controlled entity's financial information in order to prepare the group financial statements.
- Publicly available information, such as audited financial statements, public disclosure documents, or quoted prices of equity instruments in the non-controlled entity.

It is a matter of professional judgment, particularly in view of the assessed risks of material misstatement of the group financial statements and considering other sources of information that may corroborate or otherwise contribute to audit evidence obtained, whether the auditor can obtain sufficient appropriate audit evidence.⁶⁹

A42. If the group has a non-controlling interest in an entity that is accounted for by the equity method and access to information or people at the entity is restricted, the group auditor may consider whether such restrictions are inconsistent with group management's assertions regarding the appropriateness of the use of the equity method of accounting.

A43. When the group auditor is unable to obtain sufficient appropriate audit evidence due to restrictions on access to information or people, the group auditor may:

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Communicate the restrictions to the group auditor's firm to assist the group auditor in determining an appropriate course of action. For example, the group auditor's firm may communicate with group management about the restrictions and encourage group management to communicate with regulators. This may be useful when restrictions affect multiple audits in the jurisdiction or by the same firm, for example, because of war, civil unrest or outbreaks of disease in a major economy.

- Be required by law or regulation to communicate with regulators, listing authorities, or others, about the restrictions.

A44. Restrictions on access may have other implications for the group audit. For example, if restrictions are imposed by group management, the group auditor may need to reconsider the reliability of group management's responses to the group auditor's inquiries and whether the restrictions call into question group management's integrity.

Effect of Restrictions on Access to Information or People on the Auditor's Report on Group Financial Statements (Ref: Para. 20–21)

A45. SA 705 (Revised)⁷⁰ contains requirements and guidance about how to address situations when the group auditor is unable to obtain sufficient appropriate audit evidence. Appendix 1 contains an example of an auditor's report containing a qualified group audit opinion based on the group auditor's inability to obtain sufficient appropriate audit evidence in relation to a component that is accounted for by the equity method.

Law or Regulation Prohibit the Group Engagement Partner from Declining or Withdrawing from an Engagement (Ref: Para. 20–21)

A46. Law or regulation may prohibit the group engagement partner from declining or withdrawing from an engagement. For example, in some jurisdictions the auditor is appointed for a specified period of time and is prohibited from withdrawing before the end of that period. Also, in the public sector, the option of declining or withdrawing from an engagement may not be available to the auditor due to the nature of the mandate or public interest considerations. In these circumstances, the requirements in this SA still apply to the group audit, and the effect of the group auditor's inability to obtain sufficient appropriate audit evidence is addressed in SA 705 (Revised).

Overall Group Audit Strategy and Group Audit Plan

The Continual and Iterative Nature of Planning and Performing a Group Audit (Ref: Para. 22)

A47. As explained in SA 300,⁷¹ planning is not a discrete phase of an audit, but rather a continual and iterative process that often begins shortly after (or in connection with) the completion of the previous audit and continues until the completion of the current audit engagement. For example, due to unexpected events, changes in conditions, or audit evidence obtained from

⁶⁹SA 330, paragraph 7(b)

⁷⁰SA 705 (Revised), *Modifications to the Opinion in the Independent Auditor's Report*

⁷¹SA 300, paragraph A2

- risk assessment or further audit procedures, the group auditor may need to modify the overall group audit strategy and group audit plan, and the resulting planned nature, timing and extent of further audit procedures, based on the revised consideration of assessed risks. The group auditor may also modify the determination of the components at which to perform audit work as well as the nature, timing and extent of the component auditors' involvement. SA 300⁷² requires the auditor to update and change the overall audit strategy and audit plan as necessary during the course of the audit.

Establishing the Overall Group Audit Strategy and Group Audit Plan (Ref: Para. 22)

A48. In an initial group audit engagement, the group auditor may have a preliminary understanding of the group and its environment, the applicable financial reporting framework and the entity's system of internal control based on information obtained from group management, those charged with governance of the group and, when applicable, communication with component management or the predecessor auditor. In a recurring group audit engagement, the group auditor's preliminary understanding may be obtained through prior period audits. This preliminary understanding may assist the group auditor in developing initial expectations about the classes of transactions, account balances and disclosures that may be significant.

A49. The group auditor may also use information obtained during the engagement acceptance and continuance process in establishing the overall group audit strategy and group audit plan, for example, in relation to the resources needed to perform the group audit.

A50. The process of establishing the overall group audit strategy and group audit plan and initial expectations about the classes of

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⁷²SA 300, paragraph 10 (Paragraph 9 in existing SA 300)
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transactions, account balances and disclosures that may be significant at the group financial statement level may assist the group auditor in developing a preliminary determination of matters such as:

- Whether to perform audit work centrally, at components or a combination thereof; and
- The nature, timing and extent of audit work to be performed with respect to the financial information of components (e.g., design and perform risk assessment procedures, further audit procedures, or a combination thereof).

Components at Which to Perform Audit Work (Ref: Para. 22(a))

A51. The determination of components at which to perform audit work is a matter of professional judgment. Matters that may influence the group auditor's determination include, for example:

- The nature of events or conditions that may give rise to risks of material misstatement at the assertion level of the group financial statements that are associated with a component, for example:
 - Newly formed or acquired entities or business units. ○ Entities or business units in which significant changes have taken place. ○ Significant transactions with related parties.
 - Significant transactions outside the normal course of business. ○ Abnormal fluctuations identified by analytical procedures performed at the group level, in accordance with SA 315 (Revised).⁷³
- The disaggregation of significant classes of transactions, account balances and disclosures in the group financial statements across components, considering the size and nature of assets, liabilities and transactions at the location or business unit relative to the group financial statements.
- Whether sufficient appropriate audit evidence is expected to be obtained for all significant classes of transactions, account balances and disclosures in the group financial statements from audit work planned on the financial information of identified components.
- The nature and extent of misstatements or control deficiencies identified at a component in prior period audits.
- The nature and extent of the commonality of controls across the group and whether, and if so, how, the group centralizes activities relevant to financial reporting.

Resources (Ref: Para. 22(b))

A52. Matters that influence the group auditor's determination of the resources needed to perform the group audit and the nature, timing and extent to which component auditors are to be involved are a matter of professional judgment and may include, for example:

- The understanding of the group, the components within the group at which audit work is to be performed and whether to perform work centrally, at components or a combination thereof.
- The knowledge and experience of the engagement team. For example, component auditors may have greater experience and a more in-depth knowledge than the group auditor of the local industries in which components operate, local laws or regulations, business practices, language and culture. In addition, the involvement of auditor's experts may be needed on complex matters.
- The initial expectations about the potential risks of material misstatement.
- The amount or location of resources to allocate to specific audit areas. For example, the extent to which components are dispersed across multiple locations may impact the need to involve component auditors in specific locations.
- Access arrangements. For example, when the group auditor's access to a component in a particular jurisdiction is restricted, component auditors may need to be involved.
- The nature of the components' activities, including their complexity or specialization of operations.

⁷³SA 315 (Revised), paragraph 14(b)

- The group’s system of internal control, including the information system in place, and its degree of centralization. For example, the involvement of component auditors may be more likely when the system of internal control is decentralized.
- Previous experience with the component auditor.

A53. Component auditors may be involved in different phases of an audit, for example, component auditors may design or perform:

- Risk assessment procedures; and
- Procedures to respond to the assessed risks of material misstatement.

A54. The nature, timing and extent to which component auditors are to be involved depends on the facts and circumstances of the group audit engagement. Often component auditors will be involved in all phases of the audit, but the group auditor may decide to involve component auditors only in a certain phase. When the group auditor does not intend to involve component auditors in risk assessment procedures, the group auditor may still discuss with component auditors whether there are any significant changes in the business or the system of internal control of the component that could have an effect on the risks of material misstatement of the group financial statements.

A55. SA 300⁷⁴ requires the engagement partner and other key members of the engagement team to be involved in planning the audit. When component auditors are involved, one or more individuals from a component auditor may be key members of the engagement team and therefore involved in planning the group audit. The involvement of component auditors in planning the audit draws on their experience and insight, thereby enhancing the effectiveness and efficiency of the planning process. The group engagement partner uses professional judgment in determining which component auditors to involve in planning the audit. This may be affected by the nature, timing and extent to which the component auditors are expected to be involved in designing and performing risk assessment or further audit procedures.

A56. As described in ISQM 1,⁷⁵ there may be circumstances when the fee quoted for an engagement is not sufficient given the nature and circumstances of the engagement, and it may diminish the firm’s ability to perform the engagement in accordance with professional standards and applicable legal or regulatory requirements. The level of fees, including their allocation to component auditors, and the extent to which they relate to the resources required, may be a special consideration for group audit engagements. For example, in a group audit, the firm’s financial and operational priorities may place constraints on the determination of the components at which audit work will be performed, as well as the resources needed, including the involvement of component auditors. In such circumstances, these constraints do not override the group engagement partner’s responsibility for achieving quality at the engagement level or the requirements for the group auditor to obtain sufficient appropriate audit evidence on which to base the group audit opinion.

Considerations When Component Auditors Are Involved

Sufficient and Appropriate Involvement in the Work of the Component Auditor (Ref: Para. 23–24)

A57. In evaluating whether the group auditor will be able to be sufficiently and appropriately involved in the work of the component auditor, the group auditor may obtain an understanding of whether the component auditor is subject to any restrictions that limit communication with the group auditor, including with regard to sharing audit documentation with the group auditor. The group auditor may also obtain an understanding about whether audit evidence related to components located in a different jurisdiction may be in a different language and may need to be translated for use by the group auditor.

A58. If the component auditor is unable to cooperate with the group auditor, the group auditor may:

- Request the component auditor to provide its rationale.
- Be able to take appropriate action to address the matter, including adjusting the nature of the work requested to be performed. Alternatively, in accordance with paragraph 27, the group auditor may need to obtain sufficient appropriate audit evidence relating to the work to be performed at the component without involving the component auditor.

Relevant Ethical Requirements, Including Those Related to Independence (Ref: Para. 25)

A59. When performing work at a component for a group audit engagement, the component auditor is subject to ethical

⁷⁴SA 300, paragraph 5 – (Paragraph 4 in existing SA 300)

⁷⁵SQM 1, paragraph A74

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requirements, including those related to independence, that are relevant to the group audit engagement. Such requirements may be different from or in addition to those applying to the component auditor when performing an audit on the financial statements of an entity or business unit that is part of the group for statutory, regulatory or other reasons in the component auditor's jurisdiction.

A60. In making the component auditors aware of relevant ethical requirements, the group auditor may consider whether additional information or training for component auditors is necessary regarding the provisions of the ethical requirements that are relevant to the group audit engagement.

Engagement Resources (Ref: Para. 26)

A61. SA 220 (Revised)⁷⁶ requires the engagement partner to determine that sufficient and appropriate resources to perform the engagement are assigned or made available to the engagement team in a timely manner. When sufficient or appropriate resources are not made available in relation to work to be performed by a component auditor, the group engagement partner may discuss the matter with the component auditor, group management or the group auditor's firm and may subsequently request the component auditor or the group auditor's firm to make sufficient and appropriate resources available.

Competence and capabilities of the component auditors

A62. SA 220 (Revised)⁷⁷ provides guidance regarding matters the engagement partner may take into consideration when determining the competence and capabilities of the engagement team. This determination is particularly important in a group audit when the engagement team includes component auditors. SA 220 (Revised)⁷⁸ indicates that the firm's policies or procedures may require the firm or the engagement partner to take different actions from those applicable to personnel when obtaining an understanding of whether a component auditor from another firm has the appropriate competence and capabilities to perform the audit engagement.

A63. Determining whether component auditors have the appropriate competence and capabilities is a matter of professional judgment and is influenced by the nature and circumstances of the group audit engagement. This determination influences the nature, timing and extent of the group engagement partner's direction and supervision of the component auditor and the review of their work.

A64. In determining whether component auditors have the appropriate competence and capabilities to perform the assigned audit procedures at the component, the group engagement partner may consider matters such as:

- Previous experience with or knowledge of the component auditor.
- The component auditor's specialized skills (e.g., industry-specific knowledge).
- The degree to which the group auditor and component auditor are subject to a common system of quality management, for example, whether the group auditor and a component auditor:
 - Use common resources to perform the work (e.g., audit methodologies or IT applications);
 - Share common policies or procedures affecting engagement performance (e.g., direction, supervision and review of work or consultation);
 - Are subject to common monitoring activities; or ○ Have other commonalities, including common leadership or a common cultural environment.
- The consistency or similarity of:
 - Laws or regulations or legal system; ○ Language and culture; ○ Education and training;
 - Professional oversight, discipline, and external quality assurance; or ○ Professional organizations and standards.

⁷⁶SA 220 (Revised), paragraph 25

⁷⁷SA 220 (Revised), paragraph A71

⁷⁸ SA 220 (Revised), paragraph A24 - same

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- Information obtained about the component auditor through interactions with component management, those charged with governance, and other key personnel, such as internal auditors.

A65. The procedures to determine the component auditor's competency and capability may include, for example: •

An evaluation of the information communicated by the group auditor's firm to the group auditor, including:

- The firm's ongoing communication related to monitoring and remediation, in circumstances when the group auditor and component auditor are from the same firm.⁷⁹
 - Information from the network about the results of the monitoring activities undertaken by the network across the network firms.⁸⁰
 - Information obtained from professional body(ies) to which the component auditor belongs, the authorities by which the component auditor is licensed, or other third parties.
- Discussing the assessed risks of material misstatement with the component auditor.
 - Requesting the component auditor to confirm their understanding of the matters referred to in paragraph 25 in writing.
 - Discussing the component auditor's competence and capabilities with colleagues in the group engagement partner's firm that have worked directly with the component auditor.
 - Obtaining published external inspection reports.

A66. The group engagement partner's firm and the component auditor may be members of the same network and may be subject to common network requirements or use common network services.⁸¹ When determining whether component auditors have the appropriate competence and capabilities to perform work in support of the group audit engagement, the group engagement partner may be able to depend on such network requirements, for example, those addressing professional training or recruitment, or that require the use of audit methodologies and related implementation tools. In accordance with ISQM 1,⁸² the firm is responsible for designing, implementing and operating its system of quality management, and the firm may need to adapt or supplement network requirements or network services to be appropriate for use in its system of quality management.

Using the work of an auditor's expert

A67. SA 220 (Revised)⁸³ requires the engagement partner to determine that members of the engagement team, and any auditor's external experts who are not part of the engagement team, collectively have the appropriate competence and capabilities, including sufficient time, to perform the audit engagement. If an auditor's expert is used by a component auditor, the group engagement partner may need to obtain information from the component auditor. For example, the group auditor may discuss with the component auditor the component auditor's evaluation of the competence and capabilities of the auditor's expert.

Automated tools and techniques

A68. When determining whether the engagement team has the appropriate competence and capabilities, the group engagement partner may take into consideration such matters as the expertise of the component auditor in the use of automated tools and techniques. For example, as described in SA 220 (Revised),⁸⁴ when the group auditor requires component auditors to use specific automated tools and techniques when performing audit procedures, the group auditor may communicate with component auditors that the use of such automated tools and techniques need to comply with the group auditor's instructions.

Application of the Group Auditor's Understanding of a Component Auditor (Ref: Para. 27)

⁷⁹SQM 1, paragraph 47

⁸⁰SQM 1, paragraph 51(b)

⁸¹SQM 1, paragraphs A19, A175

⁸²SQM 1, paragraph 48–49

⁸³SA 220 (Revised), paragraph 26

⁸⁴SA 220 (Revised), paragraph A65

A69. SA 220 (Revised)⁸⁵ requires the engagement partner to take responsibility for other members of the engagement team having been made aware of relevant ethical requirements that are applicable given the nature and circumstances of the audit

engagement, and the firm's related policies or procedures. This includes the firm's policies or procedures that address circumstances that may cause a breach of relevant ethical requirements, including those related to independence, and the responsibilities of members of the engagement team when they become aware of breaches. The firm's policies or procedures also may address breaches of independence requirements by component auditors, and actions the group auditor may take in those circumstances in accordance with the relevant ethical requirements. In addition, relevant ethical requirements or law or regulation may also specify particular communications to those charged with governance in circumstances when breaches of independence requirements have been identified.⁸⁶

A70. If there has been a breach by a component auditor of the relevant ethical requirements that apply to the group audit engagement, including those related to independence, and the breach has not been satisfactorily addressed in accordance with provisions of the relevant ethical requirements, the group auditor cannot use the work of that component auditor.

A71. Serious concerns are those concerns that in the group auditor's professional judgment cannot be overcome. The group engagement partner may be able to overcome less than serious concerns about the component auditor's professional competency (e.g., lack of industry-specific knowledge), or the fact that the component auditor does not operate in an environment that actively oversees auditors, by the group auditor being more involved in the work of the component auditor or by directly performing further audit procedures on the financial information of the component.

Engagement Performance (Ref: Para. 28)

A72. SA 220 (Revised)⁸⁷ requires the engagement partner to determine that the nature, timing and extent of direction, supervision and review is planned and performed in accordance with the firm's policies or procedures, professional standards and applicable legal and regulatory requirements, and is responsive to the nature and circumstances of the audit engagement and the resources assigned or made available to the engagement team. For a group audit, the approach to direction, supervision and review will generally include a combination of addressing the group auditor's firm policies or procedures and group audit engagement-specific responses.

A73. For a group audit, particularly when the engagement team includes a large number of component auditors that may be located in multiple locations, the group engagement partner may assign the design or performance of procedures, tasks or actions to other members of the engagement team to assist the group engagement partner in fulfilling the responsibility for the nature, timing and extent of the direction and supervision of component auditors and the review of their work (see also paragraph 11).

A74. If component auditors are from a firm other than the group auditor's firm, the firm's policies or procedures may be different, or different actions may need to be taken, respectively, in relation to the nature, timing and extent of direction and supervision of those members of the engagement team, and the review of their work. In particular, firm policies or procedures may require the firm or the group engagement partner to take different actions from those applicable to members of the engagement team within the firm or the network (e.g., in relation to the form, content and timing of communications with component auditors, including the use of group auditor instructions to component auditors). SA 220 (Revised) provides examples of actions that may need to be taken in such circumstances.⁸⁸

A75. The nature, timing and extent of direction and supervision of component auditors and review of their work may be tailored based on the nature and circumstances of the engagement and, for example:

- The assessed risks of material misstatement. For example, if the group auditor has identified a component that includes a significant risk, an increase in the extent of direction and supervision of the component auditor and a more detailed review of the component auditor's audit documentation may be appropriate.
- The competence and capabilities of the component auditors performing the audit work. For example, if the group auditor has no previous experience working with a component auditor, the group auditor may communicate more

⁸⁵SA 220 (Revised), paragraph 17

⁸⁶SA 260 (Revised), paragraph A31

⁸⁷SA 220 (Revised), paragraph 30

⁸⁸SA 220 (Revised), paragraph A24–A25

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detailed instructions, increase the frequency of discussions or other interactions with the component auditor, or assign more experienced individuals to oversee the component auditor as the work is performed.

- The location of engagement team members, including the extent to which engagement team members are dispersed across multiple locations, including when service delivery centers are used.
- Access to component auditor audit documentation. For example, when law or regulation precludes component auditor audit documentation from being transferred out of the component auditor's jurisdiction, the group auditor may be able to review the audit documentation at the component auditor's location or remotely through the use of technology, when not prohibited by law or regulation (see also paragraphs A179–A180).

A76. There are different ways in which the group engagement partner may take responsibility for directing and supervising component auditors and reviewing their work, for example:

- Communications with component auditors throughout the course of the group audit, including communications required by this SA.
- Meetings or calls with component auditors to discuss identified and assessed risks, issues, findings and conclusions.
- Reviews of the component auditor's audit documentation in person or remotely when permitted by law and regulation.
- Participating in the closing or other key meetings between the component auditors and component management.

A77. In applying SA 220 (Revised),⁸⁹ the group engagement partner is required to review audit documentation at appropriate points in time during the audit engagement, including audit documentation relevant to the group audit relating to:

- Significant matters;
- Significant judgments, including those relating to difficult or contentious matters identified during the audit engagement, and the conclusions reached; and
- Other matters that, in the engagement partner's professional judgment, are relevant to the engagement partner's responsibilities.

The review of such audit documentation by the group engagement partner often takes place during the course of the group audit, including the review of relevant component auditor audit documentation (also see paragraph A148).

Communications with Component Auditors (Ref: Para. 29)

A78. Clear and timely communication between the group auditor and the component auditors about their respective responsibilities, along with clear direction to the component auditors about the nature, timing and extent of the work to be performed and the matters expected to be communicated to the group auditor, helps establish the basis for effective two-way communication. Effective two-way communication between the group auditor and the component auditors also helps to set expectations for component auditors and facilitates the group auditor's direction and supervision of them and the review of their work. Such communication also provides an opportunity for the group engagement partner to reinforce the need for component auditors to exercise professional skepticism in the work performed for purposes of the group audit.

A79. Other factors that may also contribute to effective two-way communication include:

- Clarity of the instructions to the component auditor, particularly when the component auditor is from another firm and may not be familiar with the policies or procedures of the group auditor's firm.
- A mutual understanding that the component auditor may discuss the audit work requested to be performed, based on the component auditor's knowledge and understanding of the component.
- A mutual understanding of relevant issues and the expected actions arising from the communication process.
- The form of communications. For example, matters that need timely attention may be more appropriately discussed in a meeting rather than by exchanging emails.
- A mutual understanding of the person(s) from the group auditor and component auditors who have responsibility for managing communications regarding particular matters.

⁸⁹SA 220 (Revised), paragraphs 31, A92–A93

- The process for the component auditor to take action and report back on matters communicated by the group auditor.

A80. The communications between the group auditor and component auditors depend on the facts and circumstances of the group audit engagement, including the nature and extent of involvement of the component auditors and the degree to which the group auditor and component auditors are subject to common systems of quality management or common network requirements or network services.

Form of communications

A81. The form of the communications between the group auditor and component auditors may vary based on factors such as the nature of the audit work the component auditors have been requested to perform, and the extent to which communication capabilities are integrated into the audit tools used for the group audit.

A82. The form of communications also may be affected by such factors as:

- The significance, complexity or urgency of the matter.
- Whether the matter has been or is expected to be communicated to group management and those charged with governance of the group.

A83. Communication between the group auditor and the component auditor may not necessarily be in writing. However, the group auditor's verbal communications with the component auditors may be supplemented by written communication, such as a set of instructions regarding the work to be performed, when the group auditor wants to give particular attention to, or promote a mutual understanding about, certain matters. In addition, the group auditor may meet with the component auditor to discuss significant matters or to review relevant parts of the component auditor's audit documentation.

A84. Paragraph 45 requires the group auditor to request the component auditor to communicate matters relevant to the group auditor's conclusion with regard to the group audit. As explained in paragraph A146, the form and content of the component auditor's deliverables are influenced by the nature and extent of the audit work the component auditor has been requested to perform.

A85. Regardless of the form of communication, the documentation requirements of this and other SAs apply.

Timing of communications

A86. The appropriate timing of communications will vary with the circumstances of the engagement. Relevant circumstances may include the nature, timing and extent of work to be performed by the component auditor and the action expected to be taken by the component auditor. For example, communications regarding planning matters may often be made early in the audit engagement and, for an initial group audit, may be made as part of agreeing the terms of the engagement.

Non-compliance with laws or regulations (Ref: Para. 25, 29)

A87. In applying SA 250 (Revised),⁹⁰ the group engagement partner may become aware of information about non-compliance or suspected non-compliance with laws or regulations. In such circumstances, the group engagement partner may have an obligation under relevant ethical requirements, laws or regulations, to communicate the matter to the component auditor.⁹¹ The obligation of the group engagement partner to communicate non-compliance or suspected non-compliance may extend to auditors of the financial statements of entities or business units for which an audit is required by statute, regulation or for another reason, but for which no audit work is performed for purposes of the group audit.

Understanding the Group and Its Environment, the Applicable Financial Reporting Framework and the Group's System of Internal Control (Ref: Para. 30) A88. SA 315 (Revised)⁹² contains requirements and guidance regarding the auditor's responsibility to obtain an understanding of the entity and its environment, the applicable financial reporting framework, and the entity's system of internal control. Appendix 2 of this SA provides examples of matters related to internal control that may be helpful in obtaining an understanding of the system of internal control in the context of a group environment, and expands on how SA 315 (Revised) is to be applied to an audit of group financial statements.

⁹⁰SA 250 (Revised), *Consideration of Laws and Regulations in an Audit of Financial Statements*

⁹¹See, for example, Paragraphs R360.17 and R360.18 of the Code of Ethics (Revised 2019)

⁹²SA 315 (Revised), paragraphs 19–27, A50–A183

A89. The understanding of the group and its environment, the applicable financial reporting framework, and the group's system of internal control may be obtained through communications with:

- Group management, component management or other appropriate individuals within the entity, including individuals within the internal audit function (if the function exists) and individuals who have knowledge of the group's system of internal control, accounting policies and practices, and the consolidation process;
- Component auditors; or
- Auditors that perform an audit for statutory, regulatory or other reasons of the financial statements of an entity or business unit that is part of the group.

A90. Obtaining an understanding of the group, identifying risks of material misstatement and assessing inherent risk and control risk may be performed in different ways depending on preferred audit techniques or methodologies and may be expressed in different ways. Accordingly, when component auditors are involved in the design and performance of risk assessment procedures, the group auditor may need to communicate its preferred approach with component auditors or provide instructions.

Engagement Team Discussion (Ref: Para. 30)

A91. In applying SA 315 (Revised),⁹³ the group engagement partner and other key engagement team members are required to discuss the application of the applicable financial reporting framework and the susceptibility of the group's financial statements to material misstatement. The group engagement partner's determination of which members of the engagement team to include in the discussion, and the topics to be discussed, is affected by matters such as initial expectations about the risks of material misstatement and the preliminary expectation of whether to involve component auditors.

A92. The discussion provides an opportunity to:

- Share knowledge of the components and their environments, including which components' activities are centralized.
- Exchange information about the business risks of the components or the group, and how inherent risk factors may affect susceptibility to misstatement of classes of transactions, account balances and disclosures.
- Exchange ideas about how and where the group financial statements may be susceptible to material misstatement due to fraud or error. SA 240⁹⁴ requires the engagement team discussion to place particular emphasis on how and where the entity's financial statements may be susceptible to material misstatement due to fraud, including how fraud may occur.
- Identify policies followed by group or component management that may be biased or designed to manage earnings that could lead to fraudulent financial reporting.
- Consider known external and internal factors affecting the group that may create an incentive or pressure for group management, component management, or others to commit fraud, provide the opportunity for fraud to be perpetrated, or indicate a culture or environment that enables group management, component management, or others to rationalize committing fraud.
- Consider the risk that group or component management may override controls.
- Discuss fraud that has been identified, or information that indicates existence of a fraud.
- Identify risks of material misstatement relevant to components where there may be impediments to the exercise of professional skepticism.
- Consider whether uniform accounting policies are used to prepare the financial information of the components for the group financial statements and, if not, how differences in accounting policies are identified and adjusted (when required by the applicable financial reporting framework).
- Share information about risks of material misstatement of the financial information of a component that may apply more broadly to some, or all, of the other components.

⁹³SA 315 (Revised), paragraph 17

⁹⁴SA 240, paragraph 16

- Share information that may indicate non-compliance with national laws or regulations, for example, payments of bribes and improper transfer pricing practices.
- Discuss events or conditions identified by group management, component management or the engagement team, that may cast significant doubt on the group's ability to continue as a going concern.
- Discuss related party relationships or transactions identified by group management or component management, and any other related parties of which the engagement team is aware.

The Group and Its Environment (Ref: Para. 30 (a))

A93. An understanding of the group's organizational structure and its business model may enable the group auditor to understand such matters as:

- The complexity of the group's structure. A group may be more complex than a single entity because a group may have several subsidiaries, divisions or other business units, including in multiple locations. Also, a group's legal structure may be different from the operating structure, for example, for tax purposes. Complex structures often introduce factors that may give rise to increased susceptibility to material misstatements, such as whether goodwill, joint ventures or special-purpose entities are accounted for appropriately and whether adequate disclosures have been made.
- The geographic locations of the group's operations. Having a group that is located in multiple geographical locations may give rise to increased susceptibility to material misstatements. For example, different geographical locations may involve different languages, cultures and business practices.
- The structure and complexity of the group's IT environment. A complex IT environment often introduces factors that may give rise to increased susceptibility to material misstatements. For example, a group may have a complex IT environment because of multiple IT systems that are not integrated due to recent acquisitions or mergers. Therefore, it may be particularly important to obtain an understanding of the complexity of the security over the IT environment, including vulnerability of the IT applications, databases, and other aspects of the IT environment. A group may also use one or more external service providers for aspects of its IT environment.
- Relevant regulatory factors, including the regulatory environment. Different laws or regulations may introduce factors that may give rise to increased susceptibility to material misstatements. A group may have operations that are subject to a high degree of complex laws or regulations in multiple jurisdictions, or entities or business units in the group that operate in multiple industries that are subject to different types of laws or regulations.
- The ownership, and relationships between owners and other people or entities, including related parties. Understanding the ownership and relationships can be more complex in a group that operates across multiple jurisdictions and when there are changes in ownership through formation, acquisition, disposal or joint venture. These factors may give rise to increased susceptibility to material misstatements.

A94. Obtaining an understanding of the degree to which the group's operations or activities are similar may help to identify similar risks of material misstatement across components and design an appropriate response.

A95. The financial results of entities or business units are ordinarily measured and reviewed by group management. Inquiries of group management may reveal that group management relies on certain key indicators to evaluate the financial performance of the group's entities and business units and take action. The understanding of such performance measures may help to identify:

- Areas where there is increased susceptibility to material misstatements (e.g., due to pressures on component management to meet certain performance measures).
- Controls over the group's financial reporting process.

The Group's System of Internal Control

The Nature and Extent of Commonality of Controls (Ref: Para. 30(c)(i))

A96. Group management may design controls that are intended to operate in a common manner across multiple entities or business units (i.e., common controls). For example, group management may design common controls for inventory management, which operate using the same IT system and that are implemented across all entities or business units in the group. Common controls may exist in each component of the group's system of internal control, and they may be implemented at different levels within the group (e.g., at the level of the consolidated group as a whole, or for other levels of aggregation within the group). Common controls may be direct controls or indirect controls. Direct controls are controls that are precise enough to address risks of material misstatement at the assertion level. Indirect controls are controls that support direct controls.⁷³

A97. Understanding the components of the group's system of internal control includes understanding the commonality of the controls within those components across the group. In understanding the commonality of a control across the group, considerations that may be relevant include whether:

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⁷³ 315 (Revised), paragraph A5

- The control is designed centrally and is required to be implemented as designed (i.e., without modification) at some or all components;
- The control is implemented and, if applicable, monitored by individuals with similar responsibilities and capabilities at all the components where the control is implemented;
- If a control uses information from IT applications, the IT applications and other aspects of the IT environment that generate the information are the same across the components or locations; or
- If the control is automated, it is configured in the same way in each IT application across the components.

A98. Judgment may often be needed to determine whether a control is a common control. For example, group management may require that all entities and business units perform a monthly evaluation of the aging of customers' accounts that is generated from a specific IT application. When the aging reports are generated from different IT applications or the implementation of the IT application differs across entities or business units, there may be a need to consider whether the control can be determined to be common. This is because of differences in the design of the control that may exist due to the existence of different IT applications (e.g., whether the IT application is configured in the same manner across components, and whether there are effective general IT controls across different IT applications).

A99. Consideration of the level at which controls are performed within the group (e.g., at the level of the consolidated group as a whole or for other levels of aggregation within the group) and the degree of centralization and commonality may be important to the understanding of how information is processed and controlled. In some circumstances, controls may be performed centrally (e.g., performed only at a single entity or business unit), but may have a pervasive effect on other entities or business units (e.g., a shared service center that processes transactions on behalf of other entities or business units within the group). The processing of transactions and related controls at a shared service center may operate in the same way for those transactions being processed by the shared service center regardless of the entity or business unit (e.g., the processes, risks and controls may be the same regardless of the source of the transaction). In such cases, it may be appropriate to identify the controls and evaluate the design and determine the implementation of the controls, and, if applicable, test operating effectiveness, as a single population.

Centralized Activities (Ref: Para. 30(c)(i)–(ii))

A100. Group management may centralize some of its activities, for example financial reporting or accounting functions may be performed for a particular group of common transactions or other financial information in a consistent and centralized manner for multiple entities or business units (e.g., when the initiation, authorization, recording, processing, or reporting of revenue transactions is performed at a shared service center).

A101. Obtaining an understanding of how centralized activities fit into the overall group structure, and the nature of the activities undertaken, may help to identify and assess risks of material misstatement and appropriately respond to such risks. For example, controls at a shared service center may operate independently from other controls, or they may be dependent upon controls at an entity or business unit from which financial information is derived (e.g., sales transactions may be initiated and authorized at an entity or business unit, but the processing may occur at the shared service center).

A102. The group auditor may involve component auditors in testing the operating effectiveness of common controls or controls related to centralized activities. In such circumstances, effective collaboration between the group auditor and component auditors is important as the audit evidence obtained through testing the operating effectiveness of common controls or controls related to centralized activities supports the determination of the nature, timing and extent of substantive procedures to be performed across the group.

Communications About Significant Matters that Support the Preparation of the Group Financial Statements (Ref: Para. 30(c)(iv))

A103. Group entities or business units may use a financial reporting framework for statutory, regulatory or other reasons that is different from the financial reporting framework used for the group's financial statements. In such circumstances, an understanding of group management's financial reporting processes to align accounting policies and, when relevant, financial reporting period-ends that differ from that of the group, enables the group auditor to understand how adjustments, reconciliations and reclassifications are made, and whether they are made centrally by group management or by the entity or business unit.

Instructions by group management to entities or business units

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A104. In applying SA 315 (Revised),⁹⁵ the group auditor is required to understand how group management communicates significant matters that support the preparation of the group financial statements. To achieve uniformity and comparability of financial information, group management may issue instructions (e.g., communicate financial reporting policies) to the entities or business units that include details about financial reporting processes or may have policies that are common across the group. Obtaining an understanding of group management's instructions may affect the identification and assessment of the risks of material misstatement of the group financial statements. For example, inadequate instructions may increase the likelihood of misstatements due to the risk that transactions are incorrectly recorded or processed, or that accounting policies are incorrectly applied.

A105. The group auditor's understanding of the instructions or policies may include the following:

- The clarity and practicality of the instructions for completing the reporting package.
- Whether the instructions:
 - Adequately describe the characteristics of the applicable financial reporting framework and the accounting policies to be applied;
 - Address information necessary to prepare disclosures that are sufficient to comply with the requirements of the applicable financial reporting framework, for example, disclosure of related party relationships and transactions, and segment information;
 - Address information necessary for making consolidation adjustments, for example, intra-group transactions and unrealized profits, and intra-group account balances; and
 - Include a reporting timetable.

Considerations When Component Auditors Are Involved (Ref: Para. 31–32)

A106. During the course of the group audit, the group auditor may communicate the matters in paragraph 31 to other component auditors, if these matters are relevant to the work of those component auditors. Paragraph A144 includes examples of other matters that may need to be communicated timely in the course of the component auditor's work.

A107. The nature of related party relationships and transactions may, in some circumstances, give rise to higher risks of material misstatement of the financial statements than transactions with unrelated parties.⁹⁶ In a group audit there may be a higher risk of material misstatement of the group financial statements, including due to fraud, associated with related party relationships when:

- The group structure is complex;
- The group's information systems are not integrated and therefore less effective in identifying and recording related party relationships and transactions; and
- There are numerous or frequent related party transactions between entities and business units.

Planning and performing the audit with professional skepticism, as required by SA 200,^{97,98} is therefore particularly important when these circumstances exist.

Identifying and Assessing the Risks of Material Misstatement (Ref: Para. 33)

A108. The process to identify and assess the risks of material misstatement of the group financial statements is iterative and dynamic, and may be challenging, particularly when the component's activities are complex or specialized, or when there are many components across multiple locations. In applying SA 315 (Revised),⁷⁷ the auditor develops initial expectations about the potential risks of material misstatement and an initial identification of the significant classes of transactions, account balances and disclosures of the group financial statements based on their understanding of the group and its environment, the applicable financial reporting framework and the group's system of internal control.

⁹⁵SA 315 (Revised), paragraph 25(b)

⁹⁶SA 550, paragraph 2

⁹⁷SA 200, paragraph 15

⁹⁸ (Revised), paragraph A126
SA

A109. The initial expectations about the potential risks of material misstatement take into account the auditor's understanding of the group, including its entities or business units, and the environments and industries in which they operate. Based on the initial expectations, the group auditor may, and often will, involve component auditors in risk assessment procedures as they may have direct knowledge and experience with the entities or business units that may be helpful in understanding the activities and related risks, and where risks of material misstatement of the group financial statements may arise in relation to those entities or business units.

A110. For identified risks of material misstatement at the assertion level, the group auditor is required to take responsibility for assessing inherent risk. Such assessment involves assessing the likelihood and magnitude of misstatement, which takes into account how, and the degree to which:⁹⁹

- Inherent risk factors affect the susceptibility of relevant assertions to misstatement.
- The risks of material misstatement at the group financial statement level affect the assessment of inherent risk for risks of material misstatement at the assertion level.

A111. Based on the risk assessment procedures performed, the group auditor may determine that an assessed risk of material misstatement of the group financial statements only arises in relation to financial information of certain components. For example, the risk of material misstatement relating to a legal claim may only exist in entities or business units that operate in a certain jurisdiction or in entities or business units that have similar operations or activities.

A112. Appendix 3 sets out examples of events and conditions that, individually or together, may indicate risks of material misstatement of the group financial statements, whether due to fraud or error, including with respect to the consolidation process.

Fraud

A113. In applying SA 240,¹⁰⁰ the auditor is required to identify and assess the risks of material misstatement of the financial statements due to fraud, and to design and perform further audit procedures whose nature, timing and extent are responsive to the assessed risks of material misstatement due to fraud at the assertion level. Information used to identify the risks of material misstatement of the group financial statements due to fraud may include the following:

- Group management's assessment of the risk that the group financial statements may be materially misstated due to fraud.
- Group management's process for identifying and responding to the risks of fraud in the group financial statements, including any specific fraud risks identified by group management, or classes of transactions, account balances, or disclosures for which a risk of fraud is higher.
- Whether there are particular components that are more susceptible to risks of material misstatement due to fraud.
- Whether any fraud risk factors or indicators of management bias exist in the consolidation process.
- How those charged with governance of the group monitor group management's processes for identifying and responding to the risks of fraud in the group, and the controls group management has established to mitigate these risks.
- Responses of those charged with governance of the group, group management, appropriate individuals within the internal audit function (and when appropriate, component management, the component auditors, and others) to the group auditor's inquiry about whether they have knowledge of any actual, suspected, or alleged fraud affecting a component or the group.

Considerations When Component Auditors Are Involved (Ref: Para. 34)

A114. When the group auditor involves component auditors in the design and performance of risk assessment procedures, the group auditor remains responsible for having an understanding of the group and its environment, the applicable financial reporting framework and the group's system of internal control to have a sufficient basis for the identification and assessment of the risks of material misstatement of the group financial statements in accordance with paragraph 33.

⁹⁹SA 315 (Revised), paragraph 31

¹⁰⁰SA 240, paragraphs 26, 31

A115. When the audit evidence obtained from the risk assessment procedures does not provide an appropriate basis for the identification and assessment of the risks of material misstatement, SA 315 (Revised)¹⁰¹ requires the auditor to perform additional risk assessment procedures until audit evidence has been obtained to provide such a basis.

Materiality

Component Performance Materiality (Ref: Para. 35(a))

A116. Paragraph 35(a) requires the group auditor to determine component performance materiality for each of the components where audit procedures are performed on financial information that is disaggregated. The component performance materiality amount may be different for each component. Also, the component performance materiality amount for an individual component need not be an arithmetical portion of the group performance materiality and, consequently, the aggregate of component performance materiality amounts may exceed group performance materiality.

A117. This SA does not require component performance materiality to be determined for each class of transactions, account balance or disclosure for components at which audit procedures are performed. However, if, in the specific circumstances of the group, there is one or more particular classes of transactions, account balances or disclosures for which misstatements of lesser amounts than materiality for the group financial statements as a whole could reasonably be expected to influence the economic decisions of users taken on the basis of the group financial statements, SA 320¹⁰²¹⁰³ requires a determination of the materiality level or levels to be applied to those particular classes of transactions, account balances or disclosures. In these circumstances, the group auditor may need to consider whether a component performance materiality lower than the amount communicated to the component auditor may be appropriate for those particular classes of transactions, account balances or disclosures.⁸²

A118. The determination of component performance materiality is not a simple mechanical calculation and involves the exercise of professional judgment. Factors the group auditor may take into account in setting component performance materiality include the following:

- The extent of disaggregation of the financial information across components (e.g., as the extent of disaggregation across components increases, a lower component performance materiality ordinarily would be appropriate to address aggregation risk). The relative significance of the component to the group may affect the extent of disaggregation (e.g., if a single component represents a large portion of the group, there likely may be less disaggregation across components).
- Expectations about the nature, frequency, and magnitude of misstatements in the component financial information, for example:
 - Whether there are risks that are unique to the financial information of the component (e.g., industry-specific accounting matters, unusual or complex transactions).
 - The nature and extent of misstatements identified at the component in prior audits.

A119. To address aggregation risk, paragraph 35(a) requires component performance materiality to be lower than group performance materiality. As explained in paragraph A118, as the extent of disaggregation across components increases, a lower component performance materiality amount ordinarily would be appropriate to address aggregation risk. In some circumstances, however, component performance materiality may be set at an amount closer to group performance materiality because there is less aggregation risk, such as when the financial information for one component represents a substantial portion of the group financial statements. When determining component performance materiality for a noncontrolling interest in an entity that is accounted for by the equity method, the group auditor may take into account the group's ownership percentage and the share of the investee's profits and losses.

A120. In some cases, further audit procedures may be performed by the group auditor or a component auditor on a significant class of transactions or significant account balance as a single population (i.e., not disaggregated across components). In such cases, group performance materiality often will be used for purposes of performing these procedures.

¹⁰¹SA 315 (Revised), paragraph 35

¹⁰²SA 320, paragraphs 10 and A11–A12

¹⁰³ 0, paragraph A13
SA

“Clearly Trivial” Threshold (Ref: Para: 35(b))

A121. The threshold for communicating misstatements to the group auditor is set at an amount equal to, or lower than, the amount regarded as clearly trivial for the group financial statements. In accordance with SA 450,¹⁰⁴ this threshold is the amount below which misstatements would not need to be accumulated because the group auditor expects that the accumulation of such amounts clearly would not have a material effect on the group financial statements.

Considerations When Component Auditors Are Involved

Communicating Component Performance Materiality (Ref: Para. 36)

A122. In some cases, it may be appropriate for the group auditor to involve the component auditor in determining an appropriate component performance materiality amount, in view of the component auditor’s knowledge of the component and potential sources of misstatement of the component financial information. In this regard, the group auditor also may consider communicating group performance materiality to the component auditor to support collaboration in determining whether component performance materiality, in relation to group performance materiality, is appropriate in the circumstances.

A123. Component performance materiality is based, at least in part, on expectations about the nature, frequency, and magnitude of misstatements in the component financial information. Therefore, ongoing communication between the component auditor and the group auditor is important, particularly if the number and magnitude of misstatements identified by the component auditor are higher than expected.

Responding to the Assessed Risks of Material Misstatement (Ref: Para. 37)

Performing Further Audit Procedures

Performing Further Audit Procedures Centrally

A124. Further audit procedures may be designed and performed centrally if the audit evidence to be obtained from performing further audit procedures on one or more significant classes of transactions, account balances or disclosures in the aggregate will respond to the assessed risks of material misstatement, for example, if the accounting records for the revenue transactions of the entire group are maintained centrally (e.g., at a shared service center). Factors that may be relevant to the auditor’s determination of whether to perform further audit procedures centrally include, for example:

- The level of centralization of activities relevant to financial reporting.
- The nature and extent of commonality of controls.
- The similarity of the group’s activities and business lines.

A125. The group auditor may determine that the financial information of several components can be considered as one population for the purpose of performing further audit procedures, for example, when transactions are considered to be homogeneous because they share the same characteristics, the related risks of material misstatement are the same, and controls are designed and operating in a consistent way.

A126. When further audit procedures are performed centrally, component auditors may still be involved. For example, when the group has multiple shared service centers, the group auditor may involve component auditors in the performance of further audit procedures for these shared service centers.

Performing Further Audit Procedures at the Component Level

A127. In other circumstances, procedures to respond to the risks of material misstatement of the group financial statements that are related to the financial information of a component may be more effectively performed at the component level. This may be the case when the group has:

- Different revenue streams;

¹⁰⁴SA 450, paragraph A3

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- Multiple lines of business;
- Operations across multiple locations; or
- Decentralized systems of internal control.

A128. A group may be comprised of a large number of components whose financial information is individually immaterial but material in the aggregate to the group financial statements. Circumstances such as these in which the significant classes of transactions, account balances or disclosures in the group financial statements are dSAggregated over a large number of components may present additional challenges for the group auditor in planning and performing further audit procedures.

A129. In some cases, it may be possible to obtain sufficient appropriate audit evidence by performing further audit procedures centrally on these significant classes of transactions, account balances or disclosures (e.g., if they are homogeneous, subject to common controls and access to appropriate information can be obtained). The further audit procedures may also include substantive analytical procedures in accordance with SA 520.¹⁰⁵ Depending on the circumstances of the engagement, the financial information of the components may be aggregated at appropriate levels for purposes of developing expectations and determining the amount of any difference of recorded amounts from expected values in performing the substantive analytical procedures. The use of automated tools and techniques may be helpful in these circumstances.

A130. In other cases, it may be necessary to perform further audit procedures at selected components to address the risks of material misstatement of the group financial statements. The determination of the components at which audit procedures are to be performed, and the nature, timing and extent of further audit procedures to be performed at the selected components, are matters of professional judgment. In these circumstances, introducing an element of unpredictability in the components selected for testing also may be helpful in relation to the risks of material misstatement of the group financial statements due to fraud (also see paragraph A136).

The Nature and Extent of Further Audit Procedures

A131. In response to the assessed risks of material misstatement, the group auditor may determine the following scope of work to be appropriate at a component (with the involvement of component auditors, as applicable):

- Design and perform further audit procedures on the entire financial information of the component;
- Design and perform further audit procedures on one or more classes of transactions, account balances or disclosures; or
- Perform specific further audit procedures.

A132. Although the group auditor takes responsibility for the nature, timing and extent of further audit procedures to be performed, component auditors can be, and often are, involved in all phases of the group audit, including in the design and performance of further audit procedures.

Design and Perform Further Audit Procedures on the Entire Financial Information of the Component

A133. The group auditor may determine that designing and performing further audit procedures on the entire financial information of a component is an appropriate approach, including when:

- Audit evidence needs to be obtained on all or a significant proportion of a component's financial information to respond to the assessed risks of material misstatement of the group financial statements.
- There is a pervasive risk of material misstatement of the group financial statements due to the existence of events or conditions at the component that may be relevant to the group auditor's evaluation of group management's assessment of the group's ability to continue as a going concern.

Design and Perform Further Audit Procedures on One or More Classes of Transactions, Account Balances or Disclosures

A134. The group auditor may determine that designing and performing further audit procedures on one or more particular classes of transactions, account balances, or disclosures of the financial information of a component is an appropriate approach to address assessed risks of material misstatement of the group financial statements. For example, a component may have limited operations but holds a significant portion of the land and buildings of the group or has significant tax balances.

Perform Specific Further Audit Procedures

A135. The group auditor may determine that designing and performing specific further audit procedures on the financial information of a component is an appropriate approach, such as when audit evidence needs to be obtained for one or more relevant assertions only. For example, the group auditor may centrally test the class of transaction, account balance or disclosure and may require

¹⁰⁵SA 520, *Analytical Procedures*

the component auditor to perform specific further audit procedures at the component (e.g., specific further audit procedures related to the valuation of claims or litigation in the component's jurisdiction or the existence of an asset).

Element of Unpredictability

A136. Incorporating an element of unpredictability in the type of work to be performed, the entities or business units at which procedures are performed and the extent to which the group auditor is involved in the work, may increase the likelihood of identifying a material misstatement of the components' financial information that may give rise to a material misstatement of the group financial statements due to fraud.¹⁰⁶

Operating Effectiveness of Controls

A137. The group auditor may rely on the operating effectiveness of controls that operate throughout the group in determining the nature, timing and extent of substantive procedures to be performed at either the group level or at the components. SA 330¹⁰⁷ requires the auditor to design and perform tests of controls to obtain sufficient appropriate audit evidence as to the operating effectiveness of those controls. Component auditors may be involved in designing and performing such tests of controls.

A138. If deviations from controls upon which the auditor intends to rely are detected, SA 330¹⁰⁸ requires the auditor to make specific inquiries to understand these matters and their potential consequences. If more deviations than expected are detected as a result of testing the operating effectiveness of the controls, the group auditor may need to revise the group audit plan. Possible revisions to the group audit plan may include:

- Requesting additional substantive procedures to be performed at certain components.
- Identifying and testing the operating effectiveness of other relevant controls that are designed and implemented effectively.
- Increasing the number of components selected for further audit procedures.

A139. When the operating effectiveness of controls is tested centrally (e.g., controls at a shared service center or testing of common controls), the group auditor may need to communicate information about the audit work performed to the component auditors. For example, when a component auditor is requested to design and perform substantive procedures on the entire financial information of the component, or design and perform substantive procedures on one or more classes of transactions, account balances or disclosures, the component auditor may discuss with the group auditor about the control testing performed centrally to determine the nature, timing and extent of the substantive procedures.

Consolidation Process

Consolidation Procedures (Ref: Para. 38)

A140. The further audit procedures on the consolidation process, including sub-consolidations, may include:

- Determining that the necessary journal entries are reflected in the consolidation; and
- Evaluating the operating effectiveness of the controls over the consolidation process and responding appropriately if any controls are determined to be ineffective.

Consolidation Adjustments and Reclassifications (Ref: Para. 38(b))

A141. The consolidation process may require adjustments and reclassifications to amounts reported in the group financial statements that do not pass through the usual IT applications, and may not be subject to the same controls to which other financial information is subject. The group auditor's evaluation of the appropriateness, completeness and accuracy of the adjustments and reclassifications may include:

- Evaluating whether significant adjustments appropriately reflect the events and transactions underlying them;
- Determining whether those entities or business units whose financial information has been included in the group financial statements were appropriately included;

¹⁰⁶SA 240, paragraph 30(c) (Paragraph 29 (c) of existing SA 240)

¹⁰⁷SA 330, paragraph 8

¹⁰⁸SA 330, paragraph 17

- Determining whether significant adjustments have been correctly calculated, processed and authorized by group management and, when applicable, by component management;
- Determining whether significant adjustments are properly supported and sufficiently documented; and
- Evaluating the reconciliation and elimination of intra-group transactions, unrealized profits, and intra-group account balances.

Considerations When Component Auditors Are Involved (Ref: Para. 42–43)

A142. When the group auditor involves component auditors in the design or performance of further audit procedures, the component auditor may determine that the use of the work of an auditor's expert is appropriate and communicate this to the group auditor. In such circumstances, when determining whether the component auditor's design and performance of further audit procedures is appropriate, the group auditor may, for example, discuss with the component auditor:

- The nature, scope and objectives of the auditor's expert's work.
- The component auditor's evaluation of the adequacy of the work of the auditor's expert for the group auditor's purposes.

A143. The appropriate level of the group auditor's involvement may depend on the circumstances and the structure of the group and other factors, such as the group auditor's previous experience with the component auditors that perform procedures on the consolidation process, including sub-consolidations, and the circumstances of the group audit engagement (e.g., if the financial information of an entity or business unit has not been prepared in accordance with the same accounting policies applied to the group financial statements).

Evaluating the Component Auditor's Communication and the Adequacy of Their Work

Communication about Matters Relevant to the Group Auditor's Conclusion with Regard to the Group Audit (Ref: Para. 45)

A144. Although the matters required to be communicated in accordance with paragraph 45 are relevant to the group auditor's conclusion with regard to the group audit, certain matters may be communicated during the course of the component auditor's procedures. In addition to the matters in paragraphs 32 and 50, such matters may include, for example:

- Information about breaches of relevant ethical requirements, including identified breaches of independence provisions;
- Information about instances of non-compliance with laws or regulations;
- Newly arising significant risks of material misstatement, including risks of fraud;
- Identified or suspected fraud or illegal acts involving component management or employees that could have a material effect on the group financial statements; or
- Significant and unusual transactions.

Communication of Misstatements of Component Financial Information (Ref: Para. 45(e))

A145. Knowledge about corrected and uncorrected misstatements across components may alert the group auditor to potential pervasive internal control deficiencies, when considered along with the communication of deficiencies in accordance with paragraph 45(g). In addition, a higher than expected number of identified misstatements (uncorrected or corrected) may indicate a higher risk of undetected misstatements, which may lead the group auditor to conclude that additional audit procedures need to be performed at certain components.

Component Auditor's Overall Findings or Conclusions (Ref: Para. 45(k))

A146. The form and content of the deliverables from the component auditor are influenced by the nature and extent of the audit work the component auditor has been requested to perform. The group auditor's firm policies or procedures may address the form or specific wording of an overall conclusion from the component auditor on the audit work performed for purposes of the group audit. In some cases, local law or regulation may specify the form of conclusion (e.g., an opinion) to be provided by the component auditor.

Evaluating Whether Communications with the Component Auditor Are Adequate for the Group Auditor's Purposes (Ref: Para. 46(b))

A147. If the group auditor determines that the component auditor's communications are not adequate for the group auditor's purposes, the group auditor may consider whether, for example:

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- Further information can be obtained from the component auditor (e.g., through further discussions or meetings);
- It is necessary to review additional component auditor audit documentation in accordance with paragraph 47; • Additional audit procedures may need to be performed in accordance with paragraph 48; or
- There are any concerns about the component auditor’s competence or capabilities.

Reviewing Additional Component Auditor Audit Documentation (Ref: Para. 47)

A148. Paragraph A75 provides guidance for the group auditor in tailoring the nature, timing and extent of the direction and supervision of the component auditor, and the review of their work, based on the facts and circumstances of the group audit and other matters (e.g., the assessed risks of material misstatement of the group financial statements). The group auditor’s consideration in accordance with paragraph 47(c) also may be affected by the following matters relevant to the group auditor’s ongoing involvement in the work of the component auditor:

- Communications from the component auditor, including those in accordance with paragraph 45 of this SA; and
- The review of component auditor audit documentation by the group auditor during the course of the group audit (e.g., to fulfill the requirements of paragraphs 34, 42 and 43) or by the group engagement partner in accordance with paragraph 31 of SA 220 (Revised).

A149. Other factors that may affect the group auditor’s determination about whether, and the extent to which, it is necessary to review additional component auditor audit documentation in the circumstances include:

- The degree to which the component auditor was involved in risk assessment procedures and in the identification and assessment of the risks of material misstatement of the group financial statements;
- The significant judgments made by, and the findings or conclusions of, the component auditor about matters that are material to the group financial statements;
- The competence and capabilities of more experienced engagement team members from the component auditor responsible for reviewing the work of less experienced individuals; and
- Whether the component auditor and group auditor are subject to common policies or procedures for review of audit documentation.

Subsequent Events (Ref: Para. 49–50)

A150. The group auditor may:

- Request a component auditor to perform subsequent events procedures to assist the group auditor to identify events that occur between the dates of the financial information of the components and the date of the auditor’s report on the group financial statements.
- Perform procedures to cover the period between the date of communication of subsequent events by the component auditor and the date of the auditor’s report on the group financial statements.

Evaluating the Sufficiency and Appropriateness of Audit Evidence Obtained

Sufficiency and Appropriateness of Audit Evidence (Ref: Para. 51)

A151. The audit of group financial statements is a cumulative and iterative process. As the group auditor performs planned audit procedures, the audit evidence obtained may cause the group auditor to modify the nature, timing or extent of other planned audit procedures as information may come to the group auditor’s attention that differs significantly from the information on which the risk assessment was based. For example:

- The misstatements identified at a component may need to be considered in relation to other components; or
- The group auditor may become aware of access restrictions to information or people at a component because of changes in the environment (e.g., war, civil unrest or outbreaks of disease).

In such circumstances, the group auditor may need to reevaluate the planned audit procedures, based on the revised consideration of assessed risks for all or some of the significant classes of transactions, account balances, or disclosures and related assertions.

A152. The evaluation required by paragraph 51 assists the group auditor in determining whether the overall group audit strategy and group audit plan developed to respond to the assessed risks of material misstatement of the group financial statements

continues to be appropriate. The requirement in SA 330¹⁰⁹ for the auditor, irrespective of the assessed risks of material misstatement, to design and perform substantive procedures for each material class of transactions, account balance, and disclosure also may be helpful for purposes of this evaluation in the context of the group financial statements.

A153. The group auditor may consider the engagement team’s exercise of professional skepticism when evaluating the sufficiency and appropriateness of audit evidence obtained. For example, the group auditor may consider whether matters such as those described in paragraph A17 have inappropriately led the engagement team to:

- Obtain audit evidence that is easier to access without giving appropriate consideration to its relevance and reliability;
- Obtain less persuasive evidence than is necessary in the circumstances; or
- Design and perform audit procedures in a manner that is biased towards obtaining evidence that is corroborative or excluding evidence that is contradictory.

A154. SA 220 (Revised)¹¹⁰ requires the engagement partner to determine, on or before the date of the auditor’s report, through review of audit documentation and discussion with the engagement team, that sufficient appropriate audit evidence has been obtained to support the conclusions reached and for the auditor’s report to be issued. Information that may be relevant to the group auditor’s evaluation of the audit evidence obtained from the work performed by component auditors depends on the facts and circumstances of the group audit, and may include:

- The communications from the component auditors required by paragraph 45, including the overall findings or conclusions of the component auditors on the work performed for purposes of the group audit;
- Other communications from the component auditors throughout the group audit, including those required by paragraph 32; and
- The group auditor’s direction and supervision of the component auditors, and review of their work, including, as applicable, the group auditor’s review of additional component auditor audit documentation in accordance with paragraph 47.

A155. In some circumstances, an overall summary memorandum describing the work performed and the results thereof may provide a basis on its own for the group auditor to conclude that the work performed and audit evidence obtained by the component auditor is sufficient for purposes of the group audit. This may be the case, for example, when the component auditor has been requested to perform specific further audit procedures as identified and communicated by the group auditor.

Evaluating the Effect on the Group Audit Opinion (Ref: Para. 52)

A156. The group engagement partner’s evaluation may include a consideration of whether corrected and uncorrected misstatements communicated by component auditors indicate a systemic issue (e.g., regarding transactions subject to common accounting policies or common controls) that may affect other components.

Auditor’s Report (Ref: Para. 53)

A157. Although component auditors may perform work on the financial information of the components for the group audit and as such are responsible for their overall findings or conclusions, the group engagement partner or the group engagement partner’s firm is responsible for the group audit opinion.

A158. When the group audit opinion is modified because the group auditor was unable to obtain sufficient appropriate audit evidence in relation to the financial information of one or more components, the Basis for Qualified Opinion or Basis for Disclaimer of Opinion section in the auditor’s report on the group financial statements describes the reasons for that inability.¹¹¹ In some circumstances, a reference to a component auditor may be necessary to adequately describe the reasons for the modified opinion, for example, when the component auditor is unable to perform or complete the work requested on the component financial information due to circumstances beyond the control of component management.

Communication with Group Management and Those Charged with Governance of the Group

Communication with Group Management (Ref: Para. 54–56)

¹⁰⁹SA 330, paragraph 18

¹¹⁰SA 220 (Revised), paragraph 32

¹¹¹SA 705 (Revised), paragraphs 20 and 24

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(Applicable to PIEs under Rule 3 of NFRA Rules 2018 except PSUs, PSBs and PSIs and their branches)

A159. The group audit may be complex due to the number and nature of the entities and business units comprising the group. In addition, as explained in paragraph A7, the group auditor may determine that certain entities or business units may be considered together as a component for purposes of planning and performing the group audit. Therefore, discussing with group management an overview of the planned scope and timing may help in coordinating the work performed at components, including when component auditors are involved, and in identifying component management (see paragraph A24).

A160. SA 240¹¹² contains requirements and guidance on the communication of fraud to management and, when management may be involved in the fraud, to those charged with governance.

A161. Group management may need to keep certain material sensitive information confidential. Examples of matters that may be significant to the financial statements of the component of which component management may be unaware include the following:

- Potential litigation.
- Plans for abandonment of material operating assets.
- Subsequent events.
- Significant legal agreements.

A162. Group management may inform the group auditor about non-compliance or suspected non-compliance with laws or regulations in entities or business units within the group. Paragraph A87 provides guidance for the group engagement partner in these circumstances.

Communication with Those Charged with Governance of the Group (Ref: Para. 57)

A163. The matters the group auditor communicates to those charged with governance of the group may include those brought to the attention of the group auditor by component auditors that the group auditor judges to be significant to the responsibilities of those charged with governance of the group. Communication with those charged with governance of the group may take place at various times during the group audit. For example, the matter referred to in paragraph 57(a) may be communicated after the group auditor has determined the work to be performed on the financial information of the components. On the other hand, the matter referred to in paragraph 57(b) may be communicated at the end of the audit, and the matters referred to in paragraph 57(c)–(d) may be communicated when they occur.

A164. SA 260 (Revised)¹¹³ requires the auditor to communicate with those charged with governance an overview of the planned scope and timing of the audit. For a group audit, this communication helps those charged with governance understand the group auditor's determination of the components at which audit work will be performed, including whether certain of the group's entities or business units will be considered together as a component, and the planned involvement of component auditors. This communication also helps to enable a mutual understanding of and discussion about the group and its environment (see paragraph 30) and areas, if any, in which those charged with governance may request the group auditor to undertake additional procedures.

Communication of Identified Deficiencies in Internal Control (Ref: Para. 58)

A165. The group auditor is responsible for determining, on the basis of the audit work performed, whether one or more identified deficiencies, individually or in combination, constitute significant deficiencies.¹¹⁴ The group auditor may request input from the component auditor about whether an identified deficiency or combination of deficiencies at the component is a significant deficiency in internal control.

Documentation (Ref: Para. 59)

A166. Other SAs contain specific documentation requirements that are intended to clarify the application of SA 230 in the particular circumstances of those other SAs. The Appendix to SA 230 lists other SAs that contain specific documentation requirements and guidance.

¹¹²SA 240, paragraphs 41–43

¹¹³SA 260 (Revised), paragraph 15

¹¹⁴SA 265, paragraph 8

A167. The audit documentation for the group audit supports the group auditor's evaluation in accordance with paragraph 51 as to whether sufficient appropriate audit evidence has been obtained on which to base the group audit opinion. Also see paragraph A154.

A168. The audit documentation for the group audit comprises:

- The documentation in the group auditor's file; and
- The separate documentation in the respective component auditor files relating to the work performed by the component auditors for purposes of the group audit (i.e., component auditor audit documentation).

A169. The final assembly and retention of the audit documentation for a group audit is subject to the policies or procedures of the group auditor's firm in accordance with ISQM 1.¹¹⁵ The group auditor may provide specific instructions to component auditors regarding the assembly and retention of the documentation of work performed by them for purposes of the group audit.

Basis for the Group Auditor's Determination of Components (Ref: Para: 59(b))

A170. The basis for the group auditor's determination of components may be documented in various ways, including, for example, documentation related to the fulfillment of the requirements in paragraphs 22, 33 and 57(a) of this SA.

Basis for the Group Auditor's Determination of the Competence and Capabilities of Component Auditors (Ref: Para: 59(d))

A171. ISQM 1¹¹⁶ provides guidance on matters that the firm's policies or procedures may address regarding the competence and capabilities of the engagement team members. Such policies or procedures may describe or provide guidance about how to document the determination of the competence and capabilities of the engagement team, including component auditors. For example, the confirmation obtained from the component auditor in accordance with paragraph 24 may include information about the component auditor's relevant industry experience. The group auditor also may ask for confirmation that the component auditor has sufficient time to perform the assigned audit procedures.

Documentation of the Direction and Supervision of Component Auditors and the Review of Their Work (Ref: Para. 59(f))

A172. As described in paragraph A75, the approach to direction, supervision and review in a group audit will be tailored by the group auditor based on the facts and circumstances of the engagement, and will generally include a combination of addressing the group auditor's firm policies or procedures and responses specific to the group audit. Such policies or procedures may also describe or provide guidance about the documentation of the group auditor's direction and supervision of the engagement team and the review of their work.

A173. SA 300¹¹⁷ requires the auditor to develop an audit plan that includes a description of the nature, timing and extent of the planned direction and supervision of engagement team members and the review of their work. When component auditors are involved, the extent of such descriptions will often vary by component, recognizing that the planned nature, timing and extent of direction and supervision of component auditors, and review of their work, may be influenced by the matters described in paragraph A51.

A174. The group auditor's documentation of the direction and supervision of component auditors and the review of their work may include, for example:

- Required communications with component auditors, including instructions issued and other confirmations required by this SA.
- The rationale for the selection of visits to component auditor sites, attendees at meetings and the nature of the matters discussed.
- Matters discussed in meetings with component auditors or component management.
- The rationale for the group auditor's determination of component auditor audit documentation selected for review.

¹¹⁵SQM 1, paragraphs 31(f) and A83–A85

¹¹⁶SQM 1, paragraph A96

¹¹⁷SA 300, paragraph 9

(INCLUDING THE WORK OF COMPONENT AUDITORS)
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- Changes in the planned nature and extent of involvement in the work of component auditors, and the reasons why (e.g., assigning more experienced engagement team members in areas of the audit that are more complex or subjective than initially anticipated).

A175. Paragraph 47 requires the group auditor to determine whether, and the extent to which it is necessary to review additional component auditor audit documentation. Paragraphs A148–A149 provide guidance for the group auditor in making this determination.

A176. Component auditor audit documentation ordinarily need not be replicated in the group auditor’s audit file. However, the group auditor may decide to summarize, replicate or retain copies of certain component auditor documentation in the group auditor’s audit file to supplement the description of a particular matter in communications from the component auditor, including the matters required to be communicated by this SA. Examples of such component auditor documentation may include:

- A listing or summary of the significant judgments made by the component auditor, and the conclusions reached thereon, that are relevant to the group audit;
- Matters that may need to be communicated to those charged with governance of the group; or
- Matters that may be determined to be key audit matters to be communicated in the auditor’s report on the group financial statements.

A177. When required by law or regulation, certain component auditor documentation may need to be included in the group auditor’s audit file, for example, to respond to the request of a regulatory authority to review documentation related to work performed by a component auditor.

A178. Policies or procedures established by the firm in accordance with the firm’s system of quality management, or resources provided by the firm or a network, may assist the group auditor in documenting the direction and supervision of component auditors and the review of their work. For example, an electronic audit tool may be used to facilitate communications between the group auditor and component auditors. The electronic audit tool also may be used for audit documentation, including providing information about the reviewer(s) and the date(s) and extent of their review.

Additional Considerations When Access to Component Auditor Audit Documentation is Restricted (Ref: Para. 59)

A179. Audit documentation for a group audit may present some additional complexities or challenges in certain circumstances. This may be the case, for example, when law or regulation restrict the component auditor from providing documentation outside of its jurisdiction, or when war, civil unrest or outbreaks of disease restrict access to relevant component auditor audit documentation.

A180. The group auditor may be able to overcome such restrictions by, for example:

- Visiting the location of the component auditor, or meeting with the component auditor in a location different from where the component auditor is located, to review the component auditor’s audit documentation;
- Reviewing the relevant audit documentation remotely through the use of technology, when not prohibited by law or regulation;
- Requesting the component auditor to prepare and provide a memorandum that addresses the relevant information and holding discussions with the component auditor, if necessary, to discuss the contents of the memorandum; or
- Discussing with the component auditor the procedures performed, the evidence obtained and the conclusions reached by the component auditor.

It is a matter of professional judgment whether one or more of the actions described above may be sufficient to overcome the restrictions depending on the facts and circumstances of the group audit.

A181. When access to component auditor audit documentation is restricted, the group auditor’s documentation nonetheless needs to comply with the requirements of the SAs, including those relating to the documentation of the nature, timing and extent of the group auditor’s direction and supervision of component auditors and the review of their work. The guidance in paragraphs A148–A149 may be helpful in determining the extent of the group auditor’s review of the component auditor audit documentation in these circumstances. Paragraphs A176 and A177 provide examples of circumstances in which certain component auditor audit documentation may be included in the group auditor’s audit file.

A182. If the group auditor is unable to overcome restrictions on access to the component auditor audit documentation, the group auditor may need to consider whether a scope limitation exists that may require a modification to the opinion on the group financial statements. See paragraph A45.

Illustration of Independent Auditor’s Report When the Group Auditor Is Not Able to Obtain Sufficient Appropriate Audit Evidence on Which to Base the Group Audit Opinion

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- **Audit of a complete set of consolidated financial statements of an entity other than a listed entity using a fair presentation framework. The audit is a group audit of an entity with subsidiaries (i.e., SA 600 (Revised) applies).**
- **The consolidated financial statements are prepared by management of the entity in accordance with Ind ASs (a general purpose framework).**
- **The terms of the audit engagement reflect the description of management’s responsibility for the consolidated financial statements in SA 210.**
- **The group auditor is unable to obtain sufficient appropriate audit evidence relating to a component accounted for by the equity method (recognized at ₹15 million in the statement of financial position, which reflects total assets of ₹60 million) because the group auditor did not have access to the accounting records, management, or auditor of the component.**
- **The group auditor has read the audited financial statements of the component as at December 31, 20X1, including the auditor’s report thereon, and considered related financial information kept by group management in relation to the component.**
- **In the group engagement partner’s judgment, the effect on the group financial statements of this inability to obtain sufficient appropriate audit evidence is material but not pervasive.¹¹⁸**
- **The Code of Ethics comprises all of the relevant ethical requirements that apply to the audit.**
- **Based on the audit evidence obtained, the auditor has concluded that a material uncertainty does not exist related to events or conditions that may cast significant doubt on the entity’s ability to continue as a going concern in accordance with SA 570 (Revised).**
- **The auditor is not required, and has otherwise not decided, to communicate key audit matters in accordance with SA 701.¹¹⁹**
- **The auditor has obtained all of the other information prior to the date of the auditor’s report and the qualified opinion on the consolidated financial statements also affects the other information.**
- **Those responsible for oversight of the consolidated financial statements differ from those responsible for the preparation of the consolidated financial statements.**
- **In addition to the audit of the consolidated financial statements, the auditor has other reporting responsibilities required under local law.**

¹¹⁸ If, in the group engagement partner’s judgment, the effect on the group financial statements of the inability to obtain sufficient appropriate audit evidence is material and pervasive, the group engagement partner would disclaim an opinion in accordance with SA 705 (Revised).

¹¹⁹SA 701, *Communicating Key Audit Matters in the Independent Auditor’s Report*

INDEPENDENT AUDITOR’S REPORT

To the Shareholders of ABC Company [or Other Appropriate Addressee]

Report on the Audit of the Consolidated Financial Statements¹²⁰

Qualified Opinion

We have audited the consolidated financial statements of ABC Company and its subsidiaries (the Group), which comprise the consolidated statement of financial position as at December 31, 20X1, and the consolidated statement of comprehensive income, consolidated statement of changes in equity and consolidated statement of cash flows for the year then ended, and notes to the consolidated financial statements, including material accounting policy information.

In our opinion, except for the possible effects of the matter described in the Basis for Qualified Opinion section of our report, the accompanying consolidated financial statements present fairly, in all material respects (or give a true and fair view of), the consolidated financial position of the Group as at December 31, 20X1, and (of) its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with Indian Accounting Standards (Ind ASs).

Basis for Qualified Opinion

ABC Company’s investment in XYZ Company, a foreign associate acquired during the year and accounted for by the equity method, is carried at ₹15 million on the consolidated statement of financial position as at December 31, 20X1, and ABC’s share of XYZ’s net income of \$1 million is included in the consolidated statement of comprehensive income for the year then ended. We were unable to obtain sufficient appropriate audit evidence about the carrying amount of ABC’s investment in XYZ as at December 31, 20X1 and ABC’s share of XYZ’s net income for the year because we were denied access to the financial information, management, and the auditors of XYZ. Consequently, we were unable to determine whether any adjustments to these amounts were necessary.

We conducted our audit in accordance with Standards on Auditing (SAs). Our responsibilities under those standards are further described in the *Auditor’s Responsibilities for the Audit of the Consolidated Financial Statements* section of our report. We are independent of the Group in accordance with the *Code of Ethics for Professional Accountants (including Independence Standards)* (Code of Ethics (Revised 2019)), and we have fulfilled our other ethical responsibilities in accordance with the Code of Ethics (Revised 2019). We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our qualified audit opinion.

Other Information [or another title if appropriate such as “Information Other than the Financial Statements and Auditor’s Report Thereon”]

[Reporting in accordance with the reporting requirements in SA 720 (Revised)¹²¹ – see Illustration 6 in Appendix 2 of SA 720 (Revised). The last paragraph of the Other Information section in Illustration 6 would be customized to describe the specific matter giving rise to the qualified opinion that also affects the other information.]

Responsibilities of Management and Those Charged with Governance for the Consolidated Financial Statements¹²²

[Reporting in accordance with SA 700 (Revised)¹²³ – see Illustration 2 in SA 700 (Revised).]

Auditor’s Responsibilities for the Audit of the Consolidated Financial Statements

[Reporting in accordance with SA 700 (Revised) – see Illustration 2 in SA 700 (Revised). The last two paragraphs which are applicable for audits of listed entities only would not be included.]

¹²⁰ The sub-title, “Report on the Audit of the Consolidated Financial Statements” is unnecessary in circumstances when the second sub-title, “Report on Other Legal and Regulatory Requirements” is not applicable.

¹²¹ SA 720 (Revised), *The Auditor’s Responsibilities Relating to Other Information*

¹²² Throughout these illustrative auditor’s reports, the terms management and those charged with governance may need to be replaced by another term that is appropriate in the context of the legal framework in the particular jurisdiction.

¹²³ SA 700 (Revised), *Forming an Opinion and Reporting on Financial Statements*

Report on Other Legal and Regulatory Requirements

[Reporting in accordance with SA 700 (Revised) – see Illustration 2 in SA 700 (Revised).]

[Signature in the name of the audit firm, the personal name of the auditor, or both, as appropriate for the particular jurisdiction]

[Auditor Address]

[Date]

Appendix 2

(Ref: Para. A88)

Understanding the Group's System of Internal Control

1. This appendix provides examples of matters related to internal control that may be helpful in obtaining an understanding of the system of internal control in the context of a group environment, and expands on how SA 315 (Revised)¹²⁴ is to be applied in relation to an audit of group financial statements. The examples may not be relevant to every group audit engagement and the list of examples is not necessarily complete.

Control Environment

2. The group auditor's understanding of the control environment may include matters such as the following:
 - The structure of the governance and management functions across the group, and group management's oversight responsibilities, including arrangements for assigning authority and responsibility to management of entities or business units in the group.
 - How oversight over the group's system of internal control by those charged with governance is structured and organized.
 - How ethical and behavioral standards are communicated and reinforced in practice across the group, (e.g., group-wide programs, such as codes of conduct and fraud prevention programs).
 - The consistency of policies and procedures across the group, including a group financial reporting procedures manual.

The Group's Risk Assessment Process

3. The group auditor's understanding of the group's risk assessment process may include matters such as group management's risk assessment process, that is, the process for identifying, analyzing and managing business risks, including the risk of fraud, that may result in material misstatement of the group financial statements. It may also include an understanding of how sophisticated the group's risk assessment process is and the involvement of entities and business units in this process.

The Group's Process to Monitor the System of Internal Control

4. The group auditor's understanding of the group's process to monitor the system of internal control may include matters such as monitoring of controls, including how the controls are monitored across the group and, when relevant, activities of the internal audit function across the group, including its nature, responsibilities and activities in respect of monitoring of controls at entities or business units in the group. SA 610 (Revised 2013)¹²⁵ requires the auditor to evaluate the extent to which the internal audit function's organizational status and relevant policies and procedures support the objectivity of internal auditors, the level of competence of the internal audit function, and whether the internal audit function applies a systematic and disciplined approach, including quality control.

The Information System and Communication

5. The group auditor's understanding of the group's information system and communication may include matters such as the following:
 - The extent of centralization in the group's IT environment and the commonality of IT applications, IT processes and IT infrastructure.
 - Group management's monitoring of operations and the financial results of entities or business units in the group, including regular reporting routines, which enables group management to monitor performance against budgets, and to take appropriate action.
 - Monitoring, controlling, reconciling, and eliminating intra-group transactions and unrealized profits, and intra-group account balances at group level.
 - A process for monitoring the timeliness and evaluating the accuracy and completeness of financial information received from entities or business units in the group.

¹²⁴SA 315 (Revised), Appendix 3

¹²⁵SA 610 (Revised 2013), *Using the Work of Internal Auditors*, paragraph 15

Consolidation Process

6. The group auditor's understanding of the consolidation process may include matters such as the following:
- Matters Relating to the Applicable Financial Reporting Framework
 - The extent to which management of entities or business units in the group have an understanding of the applicable financial reporting framework.
 - The process for identifying and accounting for entities or business units in the group in accordance with the applicable financial reporting framework.
 - The process for identifying reportable segments for segment reporting in accordance with the applicable financial reporting framework.
 - The process for identifying related party relationships and related party transactions for reporting in accordance with the applicable financial reporting framework.
 - The accounting policies applied to the group financial statements, changes from those of the previous financial year, and changes resulting from new or revised standards under the applicable financial reporting framework.
 - The procedures for dealing with entities or business units in the group with financial year-ends different from the group's year-end.

Matters Relating to the Consolidation Process

- Group management's process for obtaining an understanding of the accounting policies used by entities or business units in the group, and, when applicable, ensuring that uniform accounting policies are used to prepare the financial information of the entities or business units in the group for the group financial statements, and that differences in accounting policies are identified, and adjusted when required in terms of the applicable financial reporting framework. Uniform accounting policies are the specific principles, bases, conventions, rules, and practices adopted by the group, based on the applicable financial reporting framework, that the entities or business units in the group use to report similar transactions consistently. These policies are ordinarily described in the financial reporting procedures manual and reporting package issued by group management.
- Group management's process for ensuring complete, accurate and timely financial reporting by the entities or business units in the group for the consolidation.
- The process for translating the financial information of foreign entities or business units in the group into the currency of the group financial statements.
- How the group's IT environment is organized for the consolidation and the policies that define the flows of information in the consolidation process, including the IT applications involved.
- Group management's process for obtaining information on subsequent events.

Matters Relating to Consolidation Adjustments and Reclassifications:

- The process for recording consolidation adjustments, including the preparation, authorization and processing of related journal entries, and the experience of personnel responsible for the consolidation.
- The consolidation adjustments required by the applicable financial reporting framework.
- The business rationale for the events and transactions that gave rise to the consolidation adjustments.
- Frequency, nature and size of transactions between entities or business units in the group.
- The procedures for monitoring, controlling, reconciling and eliminating intra-group transactions and unrealized profits, and intra-group account balances.
- Steps taken to arrive at the fair value of acquired assets and liabilities, procedures for amortizing goodwill (when applicable), and impairment testing of goodwill, in accordance with the applicable financial reporting framework.

(INCLUDING THE WORK OF COMPONENT AUDITORS)
(Applicable to PIEs under Rule 3 of NFRA Rules 2018 except PSUs, PSBs and PSIs and their branches)

- Arrangements with a majority owner or minority interests regarding losses incurred by an entity or business unit in the group (e.g., an obligation of the minority interest to make good such losses).

Control Activities

7. The group auditor's understanding of the control activities component may include matters such as the following:
 - The commonality of information processing controls and general IT controls for all or part of the group.
 - The extent of the commonality of the design of controls for all or part of the group that address risks of material misstatement of the group financial statements at the assertion level.
 - The extent to which commonly designed controls have been implemented consistently for all or part of the group.

Examples of Events or Conditions that May Give Rise to Risks of Material Misstatement of the Group Financial Statements

The following are examples of events (including transactions) and conditions that may indicate the existence of risks of material misstatement of the group financial statements, whether due to fraud or error, including with respect to the consolidation process. The examples provided by inherent risk factor cover a broad range of events and conditions; however, not all events and conditions are relevant to every group audit engagement and the list of examples is not exhaustive. The events and conditions have been categorized by the inherent risk factor that may have the greatest effect in the circumstances. Importantly, due to the interrelationships among inherent risk factors, the example events and conditions also are likely to be subject to, or affected by, other inherent risk factors to varying degree. Also see SA 315 (Revised), Appendix 2.

Inherent Risk Factor	Examples of Events or Conditions that May Give Rise to the Existence of Risks of Material Misstatement of the Group Financial Statements at the Assertion Level:
Complexity	<ul style="list-style-type: none"> • The existence of complex transactions that are accounted for in more than one entity or business unit in the group. • The application of accounting policies by entities or business units in the group that differ from those applied to the group financial statements. • Accounting measurements or disclosures that involve complex processes used by entities or business units in the group, such as accounting for complex financial instruments. • Operations that are subject to a high degree of complex regulation in multiple jurisdictions, or entities or business units in the group that operate in multiple industries that are subject to different types of regulation.
Subjectivity	<ul style="list-style-type: none"> • Judgments regarding which entities or business units in the group require incorporation of their financial information in the group financial statements in accordance with the applicable financial reporting framework, for example, whether any special-purpose entities or non-trading entities exist and require incorporation. • Judgments regarding the correct application of the requirements of the applicable financial reporting framework by entities or business units in the group.
Change	<ul style="list-style-type: none"> • Frequent acquisitions, disposals or reorganizations.
Uncertainty	<ul style="list-style-type: none"> • Entities or business units in the group operating in foreign jurisdictions that may be exposed to factors such as unexpected government intervention in areas such as trade and fiscal policy, and restrictions on currency and dividend movements; and fluctuations in exchange rates.
Susceptibility to Misstatement Due to Management Bias or Other Fraud Risk Factors Insofar as They Affect Inherent Risk	<ul style="list-style-type: none"> • Unusual related party relationships and transactions. • Entities or business units in the group with different financial year-ends, which may be utilized to manipulate the timing of transactions. • Prior occurrences of unauthorized or incomplete consolidation adjustments. • Aggressive tax planning within the group, or large cash transactions with entities in tax havens. • Prior occurrences of intra-group account balances that did not balance or reconcile on consolidation. • Large or unusual cash transfers within the group, particularly to newly incorporated entities or business units operating in locations with a significant or heightened fraud risk

Indicators that the control environment, the group’s risk assessment process or the group’s process to monitor the group’s system of internal control are not appropriate to the group’s circumstances, considering the nature and complexity of the group, and do not provide an appropriate foundation for the other components of the group’s system of internal control, include:

(INCLUDING THE WORK OF COMPONENT AUDITORS)

(Applicable to PIEs under Rule 3 of NFRA Rules 2018 except PSUs, PSBs and PSIs and their branches)

- Poor corporate governance structures, including decision making processes that are not transparent.
- Non-existent or ineffective controls over the group's financial reporting process, including inadequate group management information on monitoring of operations and financial results of entities or business units in the group.

CONFORMING AND CONSEQUENTIAL AMENDMENTS ARISING FROM PROPOSED SA 600 (REVISED)

Note: The following are conforming amendments to other Standards as a result of the approval of SA 600 (Revised). These amendments will become effective at the same time as SA 600 (Revised) and are shown with marked changes from the latest approved versions of the Standards that are amended. The footnote numbers within these amendments do not align with the existing Standards that are amended.

SQM 1 – QUALITY MANAGEMENT FOR FIRMS THAT PERFORM AUDITS OR REVIEWS OF FINANCIAL STATEMENTS, OR OTHER ASSURANCE OR RELATED SERVICES ENGAGEMENTS

...

Application and Other Explanatory Material

...

Resources (Ref: Para. 32)

...

Human Resources

...

Engagement Team Members Assigned to Each Engagement (Ref: Para. 32(d))

...

A96. SA 220 (Revised)¹²⁶ addresses the responsibility of the engagement partner to determine that members of the engagement team, and any auditor's external experts and internal auditors who provide direct assistance who are not part of the engagement team, collectively have the appropriate competence and capabilities, including sufficient time, to perform the engagement. SA 600 (Revised)¹²⁷ expands on how SA 220 (Revised) is to be applied in relation to an audit of group financial statements. The responses designed and implemented by the firm to address the competence and capabilities of engagement team members assigned to the engagement may include policies or procedures that address:

- Information that may be obtained by the engagement partner and factors to consider in determining that the engagement team members assigned to the engagement, including those assigned by the firm's network, another network firm or service provider, have the competence and capabilities to perform the engagement.
- How concerns about the competence and capabilities of engagement team members, in particular those assigned by the firm's network, another network firm or service provider, may be resolved.

...

Information and Communication (Ref: Para. 33)

...

Communication Within the Firm (Ref: Para. 33(b), 33(c))

A112. The firm may recognize and reinforce the responsibility of personnel and engagement teams to exchange information with the firm and with one another by establishing communication channels to facilitate communication across the firm.

¹²⁶SA 220 (Revised), paragraph 26-

¹²⁷ SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*, paragraph 26+9 846

teams.

- The firm communicates changes to the system of quality management to personnel and engagement teams, to the extent that the changes are relevant to their responsibilities and enables personnel and engagement teams to take prompt and appropriate action in accordance with their responsibilities.
- The firm communicates information that is obtained during the firm's acceptance and continuance process that is relevant to engagement teams in planning and performing engagements.
- Engagement teams communicate to the firm information about:
 - The client that is obtained during the performance of an engagement that may have caused the firm to decline the client relationship or specific engagement had that information been known prior to accepting or continuing the client relationship or specific engagement.
 - The operation of the firm's responses (e.g., concerns about the firm's processes for assigning personnel to engagements), which in some cases, may indicate a deficiency in the firm's system of quality management.
- Engagement teams communicate information to the engagement quality reviewer or individuals providing consultation.
- The Group engagement teams auditor communicates matters to component auditors in accordance with the firm's policies or procedures, including matters related to quality management at the engagement level.
- ~~The~~ individual(s) assigned operational responsibility for compliance with independence requirements communicates to relevant personnel and engagement teams changes in the independence requirements and the firm's policies or procedures to address such changes.

Examples of communication among the firm, personnel and engagement teams

- The firm communicates the responsibility for implementing the firm's responses to personnel and engagement

...

SQM 2 – ENGAGEMENT QUALITY REVIEWS

...

Application and Other Explanatory Material

...

Performance of the Engagement Quality Review (Ref: Para. 24–27)

...

Procedures Performed by the Engagement Quality Reviewer (Ref: Para. 25–27)

...

Group Audit Considerations

A32. The performance of an engagement quality review for an audit of group financial statements may involve additional considerations for the individual appointed as the engagement quality reviewer for the group audit, depending on the size and complexity of the group. Paragraph 21(a) requires the firm's policies or procedures to require the engagement quality reviewer to take overall responsibility for the performance of the engagement quality review. In doing so, for larger and more complex group audits, the group engagement quality reviewer may need to discuss significant matters and significant judgments with key members of the engagement team other than the group engagement team auditor (e.g., ~~those responsible for performing audit procedures on the financial information of a component auditor~~). In these circumstances, the engagement quality reviewer may be assisted by individuals in accordance with paragraph 20. The guidance in paragraph A22 may be helpful when the engagement quality reviewer for the group audit is using assistants.

...

SA 220 (REVISED) – QUALITY MANAGEMENT FOR AN AUDIT OF FINANCIAL STATEMENTS

...

Application and Other Explanatory Material

Scope of this SA (Ref: Para. 1)

A1. This SA applies to all audits of financial statements, including audits of group financial statements. SA 600 (Revised)¹²⁸ deals with special considerations that apply to an audit of group financial statements and when component auditors are involved. SA 600 (Revised), adapted as necessary in the circumstances, may also be useful in an audit of financial statements when the engagement team includes individuals from another firm. For example, SA 600 (Revised) may be useful when involving such an individual to attend a physical inventory count, inspect property, plant and equipment, or perform audit procedures at a shared service center at a remote location.

...

Definitions

Engagement Team (Ref: Para. 12(d))

...

A21A. When joint auditors conduct an audit, the joint engagement partners and their engagement teams collectively constitute the “engagement partner” and “engagement team” for the purposes of the SAs. This SA does not, however, deal with the relationship between joint auditors or the work that one joint auditor performs in relation to the work of the other joint auditor.

...

The Application of Firm Policies or Procedures by Members of the Engagement Team (Ref: Para. 9, 12(d),17)

...

A24. In particular, the firm’s policies or procedures may require the firm or the engagement partner to take different actions from those applicable to personnel when obtaining an understanding of whether an individual from another firm:

- Has the appropriate competence and capabilities to perform the audit engagement. For example, the individual would not be subject to the firm’s recruitment and training processes and therefore the firm’s policies or procedures may state that this determination can be made through other actions such as obtaining information from the other firm or a licensing or registration body. Paragraphs ~~2619~~ and ~~A59–A6438~~ of SA 600 (Revised) contain guidance on obtaining an understanding of the competence and capabilities of component auditors.
- Understands the ethical requirements that are relevant to the group audit engagement. For example, the individual would not be subject to the firm’s training in respect of the firm’s policies or procedures for relevant ethical requirements. The firm’s policies or procedures may state that this understanding is obtained through other actions such as providing information, manuals, or guides containing the provisions of the relevant ethical requirements applicable to the audit engagement to the individual.
- Will confirm independence. For example, individuals who are not personnel may not be able to complete independence declarations directly on the firm’s independence systems. The firm’s policies or procedures may state that such

¹²⁸SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*

individuals can provide evidence of their independence in relation to the audit engagement in other ways, such as written confirmation.

A25. When firm policies or procedures require specific activities to be undertaken in certain circumstances (e.g., consultation on a particular matter), it may be necessary for the firm's related policies or procedures to be communicated to individuals who are not personnel. Such individuals are then able to alert the engagement partner if the circumstance arises, and this enables the engagement partner to comply with the firm's policies or procedures. For example, in a group audit engagement, if a component auditor is performing audit procedures on the financial information of a component and identifies a difficult or contentious matter that is relevant to the group financial statements and subject to consultation¹²⁹ under the group auditor's policies or procedures, the component auditor is able to alert the group ~~engagement team~~ auditor about the matter.

...

Relevant Ethical Requirements, Including Those Related to Independence (Ref: Para. 16–21)

Relevant Ethical Requirements (Ref: Para. 1, 16–21)

A38. SA 200¹³⁰~~131~~¹³² requires that the auditor comply with relevant ethical requirements, including those pertaining to independence, relating to financial statement audit engagements. Relevant ethical requirements may vary depending on the nature and circumstances of the engagement. For example, certain requirements related to independence may be applicable only when performing audits of listed entities. SA 600 (Revised) includes additional requirements and guidance to those in this SA regarding communications about relevant ethical requirements with component auditors.

...

Acceptance and Continuance of Client Relationships and Audit Engagements (Ref: Para. 22–24)

...

A53. Information obtained during the acceptance and continuance process may assist the engagement partner in complying with the requirements of this SA and making informed decisions about appropriate courses of action. Such information may include:

- Information about the size, complexity and nature of the entity, including whether it is a group audit, the industry in which it operates and the applicable financial reporting framework;
- The entity's timetable for reporting, such as at interim and final stages;
- In relation to group audits, the nature of the control relationships between the parent and its entities and business units; and
- Whether there have been changes in the entity or in the industry in which the entity operates since the previous audit engagement that may affect the nature of resources required, as well as the manner in which the work of the engagement team will be directed, supervised and reviewed.

A54. Information obtained during acceptance and continuance may also be relevant in complying with the requirements of other SAs, as well as this SA, for example with respect to:

- Establishing an understanding of the terms of the audit engagement, as required by SA 210;6
- Identifying and assessing risks of material misstatement, whether due to error or fraud, in accordance with SA 315 (Revised) and SA 240;7
- Understanding the group, ~~its components~~ and ~~their~~ environments, in the case of an audit of group financial statements in accordance with SA 600 (Revised), and directing, supervising and reviewing the work of component auditors;
- Determining whether, and how, to involve an auditor's expert in accordance with SA 620; and
- The entity's governance structure in accordance with SA 260 (Revised)¹³³ and SA 265.¹³⁴

¹²⁹ See paragraph 35.

¹³⁰ SA 200, paragraphs 14 and A16–A19 (Paragraph 14 and A14 –A17 in existing SA 200)

¹³¹ SA 210, *Agreeing the Terms of Audit Engagements*, paragraph 9

¹³² SA 240, *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements*

¹³³ SA 260 (Revised), *Communication with Those Charged with Governance*

¹³⁴ SA 265, *Communicating Deficiencies in Internal Control to Those Charged with Governance and Management*

...

Engagement Resources (Ref: Para. 25–28)

...

A60. Resources for an audit engagement are primarily assigned or made available by the firm, although there may be circumstances when the engagement team directly obtains resources for the audit engagement. For example, this may be the case when a component auditor is required by statute, regulation or for another reason to express an audit opinion on the financial statements of a component, and the component auditor is also appointed by component management to perform audit procedures on behalf of the group ~~engagement team~~auditor. In such circumstances, the firm's policies or procedures

may require the engagement partner to take different actions, such as requesting information from the component auditor, to determine whether sufficient and appropriate resources are assigned or made available.

...

Insufficient or Inappropriate Resources (Ref: Para. 27)

...

~~A76. In an audit of group financial statements, when there are insufficient or inappropriate resources in relation to work being performed at a component by a component auditor, the engagement partner may discuss the matter with the component auditor, management or the firm to make sufficient and appropriate resources available.~~

...

Engagement Performance

...

Direction, Supervision and Review (Ref: Para. 30)

...

The Engagement Partner's Review (Ref: Para. 30–34)

...

A92. The engagement partner exercises professional judgment in identifying the areas of significant judgment made by the engagement team. The firm's policies or procedures may specify certain matters that are commonly expected to be significant judgments. Significant judgments in relation to the audit engagement may include matters related to the overall audit strategy and audit plan for undertaking the engagement, the execution of the engagement and the overall conclusions reached by the engagement team, for example:

- Matters related to planning the engagement, such as matters related to determining materiality.
- The composition of the engagement team, including:
 - Personnel using expertise in a specialized area of accounting or auditing;
 - The use of personnel from service delivery centers.
- The decision to involve an auditor's expert, including the decision to involve an external expert.
- The engagement team's consideration of information obtained in the acceptance and continuance process and proposed responses to that information. • The engagement team's risk assessment process, including situations where consideration of inherent risk factors and the assessment of inherent risk requires significant judgment by the engagement team. The engagement team's consideration of related party relationships and transactions and disclosures.
- Results of the procedures performed by the engagement team on significant areas of the engagement, for example, conclusions in respect of certain accounting estimates, accounting policies or going concern considerations.
- The engagement team's evaluation of the work performed by experts and conclusions drawn therefrom.
- In group audit situations:

CONFORMING AND CONSEQUENTIAL AMENDMENTS ARISING FROM
PROPOSED SA 600 (REVISED)

- The proposed overall group audit strategy and group audit plan; ○ Decisions about the involvement of component auditors, including how to direct and supervise them and review their work, ~~including, for example, when there are areas of higher assessed risk of material misstatement of the financial information of a component~~; and
- The evaluation of work performed by component auditors and the conclusions drawn therefrom.
- How matters affecting the overall audit strategy and audit plan have been addressed.
- The significance and disposition of corrected and uncorrected misstatements identified during the engagement.
- The proposed audit opinion and matters to be communicated in the auditor’s report, for example, key audit matters, or a “Material Uncertainty Related to Going Concern” paragraph.

...

SA 230 – AUDIT DOCUMENTATION

...

Appendix

(Ref: Para. 1)

Specific Audit Documentation Requirements in Other SAs

This appendix identifies paragraphs in other SAs that contain specific documentation requirements. The list is not a substitute for considering the requirements and related application and other explanatory material in SAs.

- SA 210, *Agreeing the Terms of Audit Engagements* – paragraphs 10–12
- SA 220 (Revised), *Quality Management for an Audit of Financial Statements* – paragraph 41
- SA 240, *The Auditor’s Responsibilities Relating to Fraud in an Audit of Financial Statements* – paragraphs 45–48 (Para 44 – 47 in existing SA)
- SA 250 (Revised), *Consideration of Laws and Regulations in an Audit of Financial Statements* – paragraph 30 (Para 29 in existing SA))
- SA 260 (Revised), *Communication with Those Charged with Governance* – paragraph 23
- SA 300, *Planning an Audit of Financial Statements* – paragraph 12 (Para 11 in existing SA)
- SA 315 (Revised), *Identifying and Assessing the Risks of Material Misstatement* – paragraph 38
- SA 320, *Materiality in Planning and Performing an Audit* – paragraph 14
- SA 330, *The Auditor’s Responses to Assessed Risks* – paragraphs 28–30
- SA 450, *Evaluation of Misstatements Identified during the Audit* – paragraph 15
- SA 540 (Revised), *Auditing Accounting Estimates and Related Disclosures* – paragraph 39
- SA 550, *Related Parties* – paragraph 28
- SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)* – paragraph 59~~570~~
- SA 610 (Revised), *Using the Work of Internal Auditors* – paragraph 36–37
- SA 720 (Revised), *The Auditor’s Responsibilities Relating to Other Information* – paragraph 25

...

SA 240 – THE AUDITOR’S RESPONSIBILITIES RELATING TO FRAUD IN AN AUDIT OF FINANCIAL STATEMENTS

...

Application and Other Explanatory Material

...

Responsibility for the Prevention and Detection of Fraud

Responsibilities of the Auditor (Ref: Para. 9)

A6. Law, regulation or relevant ethical requirements may require the auditor to perform additional procedures and take further actions. For example, the Ethics Standards Board for Accountants' *Code of Ethics for Professional Accountants (including Independence Standards)* (Code of Ethics) requires the auditor to take steps to respond to identified or suspected noncompliance with laws and regulations and determine whether further action is needed. Such steps may include the communication of identified or suspected non-compliance with laws and regulations ~~to other~~ between auditors within the engagement team a group, including a group engagement partner, component auditors, or

other auditors performing work at components entities or business units of a group for purposes other than the audit of the group financial statements.¹³⁵

...

SA 250 (REVISED) – CONSIDERATION OF LAWS AND REGULATIONS IN AN AUDIT OF FINANCIAL STATEMENTS

...

Application and Other Explanatory Material

Responsibility for Compliance with Laws and Regulations (Ref: Para. 3–9)

...

Responsibility of the Auditor

...

Additional Responsibilities Established by Law, Regulation or Relevant Ethical Requirements (Ref: Para. 9)

A8. Law, regulation or relevant ethical requirements may require the auditor to perform additional procedures and take further actions. For example, the Ethics Standards Board for Accountants' *Code of Ethics for Professional Accountants (including Independence Standards)* (Code of Ethics) requires the auditor to take steps to respond to identified or suspected noncompliance with laws and regulations and determine whether further action is needed. Such steps may include the communication of identified or suspected non-compliance with laws and regulations ~~to other~~ between auditors within the engagement team a group, including a group engagement partner, component auditors, or other auditors performing work at components entities or business units of a group for purposes other than the audit of the group financial statements.¹³⁶

...

SA 260 (REVISED) – COMMUNICATION WITH THOSE CHARGED WITH GOVERNANCE

...

Application and Other Explanatory Material *Those*

Charged with Governance (Ref: Para. 11)

....

A4. SA 600 (Revised) includes specific matters to be communicated by the group auditors with those charged with governance of the group.¹³⁷ The matters communicated may include those brought to the attention of the group auditor by component auditors that the group auditor judges to be significant to the responsibilities of those charged with governance of the group. Component auditors also may communicate matters to those charged with governance of the component.¹³ In those circumstances, the appropriate person(s) with whom the component auditor communicates depends on the engagement

¹³⁵See, for example, paragraphs R360.16–360.18 A1 of the Code of Ethics (Revised 2019).

¹³⁶See, for example, paragraphs R360.16–360.18 A1 of the Code of Ethics (Revised 2019).

¹³⁷ SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*, paragraph 5749¹³
SA 600 (Revised), paragraph 45(i)

circumstances and the matter to be communicated. In some cases, a number of ~~components~~ entities or business units may be conducting the same businesses within the same system of internal control and using the same accounting practices. Where those charged with governance of those ~~components~~ entities or business units are the same (e.g., common board of directors), duplication may be avoided by dealing with these ~~components~~ entities or business units concurrently for the purpose of communication.

Appendix 1

(Ref: Para. 3)

Specific Requirements in SQM 1 and Other SAs that Refer to Communications with Those Charged With Governance

This appendix identifies paragraphs in ISQM 1¹³⁸ and other SAs that require communication of specific matters with those charged with governance. The list is not a substitute for considering the requirements and related application and other explanatory material in SAs.

- SQM 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements or Other Assurance or Related Services Engagements* – paragraph 34(e)
- SA 240, *The Auditor’s Responsibilities Relating to Fraud in an Audit of Financial Statements* – paragraphs 22, 39(c)(i) and 41–43
- SA 250 (Revised), *Consideration of Laws and Regulations in an Audit of Financial Statements* – paragraphs 15, 20 and 23–25
- SA 265, *Communicating Deficiencies in Internal Control to Those Charged with Governance and Management* – paragraph 9
- SA 450, *Evaluation of Misstatements Identified during the Audit* – paragraphs 12-13
- SA 505, *External Confirmations* – paragraph 9
- SA 510, *Initial Audit Engagements—Opening Balances* – paragraph 7
- SA 540 (Revised), *Auditing Accounting Estimates and Related Disclosures* – paragraph 38
- SA 550, *Related Parties* – paragraph 27
- SA 560, *Subsequent Events* – paragraphs 7(b)-(c), 10(a), 13(b), 14(a) and 17
- SA 570 (Revised), *Going Concern* – paragraph 25
- SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)* – paragraph ~~57~~⁴⁹
- SA 610 (Revised), *Using the Work of Internal Auditors* – paragraphs 20 and 31
- SA 700 (Revised), *Forming an Opinion and Reporting on Financial Statements* – paragraph 46
- SA 701, *Communicating Key Audit Matters in the Independent Auditor’s Report* – paragraph 17
- SA 705 (Revised), *Modifications to the Opinion in the Independent Auditor’s Report* – paragraphs 12, 14, 23 and 30
- SA 706 (Revised), *Emphasis of Matter Paragraphs and Other Matter Paragraphs in the Independent Auditor’s Report* – paragraph 12
- SA 710, *Comparative Information—Corresponding Figures and Comparative Financial Statements* – paragraph 18
- SA 720 (Revised), *The Auditor’s Responsibilities Relating to Other Information* – paragraphs 17–19

SA 300 – PLANNING AN AUDIT OF FINANCIAL STATEMENTS

Requirements

¹³⁸SQM 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*
CONFORMING AND CONSEQUENTIAL AMENDMENTS

Planning Activities

...

10A. The engagement partner shall review the overall audit strategy and audit plan.

...

Application and Other Explanatory Material

...

Planning Activities

The Overall Audit Strategy (Ref: Para. 7–8)

- A8. The process of establishing the overall audit strategy, subject to the completion of the auditor’s risk assessment procedures, may include such matters as:
- The nature of resources (human, technological or intellectual) to be deployed for specific audit areas. For example, the deployment of experienced team members for high risk areas, or the assignment of experts to address complex matters;
 - The amount of resources to be allocated to specific audit areas. For example, the number of team members assigned to attend the physical inventory count at multiple locations, the nature and extent of direction and supervision of component auditors and the review of other auditors’~~their~~ work in the case of group audits, or the audit budget in hours to allocate to high risk areas;
 - When these resources are to be deployed, such as whether at an interim audit stage or at key cutoff dates; and
 - How such resources are directed, supervised or used. For example, when team briefing and debriefing meetings are expected to be held, how engagement partner and manager reviews are expected to take place (for example, on-site or off-site).

...

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 managing quality at the engagement level. Many of these matters will influence the auditor’s overall audit strategy and 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 SAs, not all matters are relevant to every audit engagement and the list is not necessarily complete. *Characteristics of the Engagement*

...

- The expected audit ~~coverage~~ scope, including the ~~number and locations of components to be included at which audit work is expected to be performed for purposes of a group audit, and the extent to which component auditors will be involved.~~
- The nature of the control relationships between a parent and its ~~components~~ entities or business units 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 ~~requirement need~~ for an audit of financial statements for statutory, regulatory or other reasons, ~~audit of standalone financial statements~~ in addition to an audit work performed for consolidation purposes of a group audit.

...

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

...

- Communication with component ~~auditors of components~~ regarding the expected types and timing of ~~reports to be issued and other~~ communications in connection with the audit work performed for purposes of the group 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 audit work performed.

...

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

- The determination of materiality in accordance with SA 320¹³⁹ and, where applicable:
 - The determination of component performance materiality ~~for components~~ and communication thereof to component auditors in accordance with SA 600 (Revised).¹⁴⁰
 - The initial expectations about the preliminary identification of significant components and material classes of transactions, account balances and disclosures that may be significant.

...

SA 315 (REVISED) – IDENTIFYING AND ASSESSING THE RISKS OF MATERIAL MISSTATEMENT

...

Application and Other Explanatory Material

...

Risk Assessment Procedures and Related Activities (Ref: Para. 13–18)

A11. The risks of material misstatement to be identified and assessed include both those due to fraud and those due to error, and both are covered by this SA. However, the significance of fraud is such that further requirements and guidance are included in SA 240 in relation to risk assessment procedures and related activities to obtain information that is used to identify and assess the risks of material misstatement due to fraud.¹⁴¹¹⁴²¹⁴³ In addition, the following SAs provide further requirements and guidance on identifying and assessing risks of material misstatement regarding specific matters or circumstances:

- SA 540 (Revised)¹⁸ in regard to accounting estimates;
- SA 550 in regard to related party relationships and transactions;
- SA 570 (Revised)¹⁹ in regard to going concern; and
- SA 600 (Revised)¹⁴⁴ in regard to group financial statements

...

Engagement Team Discussion (Ref: Para. 17–18)

...

¹³⁹SA 320, *Materiality in Planning and Performing an Audit*

¹⁴⁰ SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*, paragraphs ~~21–23 and 40(c)~~35–36

¹⁴¹SA 240, paragraphs 12–27

¹⁴²SA 540 (Revised), *Auditing Accounting Estimates and Related Disclosures*

¹⁴³SA 570 (Revised), *Going Concern*

¹⁴⁴SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*

Scalability

...

A45. When an engagement is carried out by a large engagement team, such as for an audit of group financial statements, it is not always necessary or practical for the discussion to include all members in a single discussion (for example, in a multilocation audit), nor is it necessary for all the members of the engagement team to be informed of all the decisions reached in the discussion. The engagement partner may discuss matters with key members of the engagement team including, if considered appropriate, those with specific skills or knowledge, and those responsible for the work to be performed at audits of components, while delegating discussion with others, taking into account the extent of communication considered necessary throughout the engagement team. A communications plan, agreed by the engagement partner, may be useful.

...

Identifying and Assessing the Risks of Material Misstatement (Ref: Para. 28–37)

...

Assessing Risks of Material Misstatement at the Assertion Level

...

Significant Risks (Ref: Para. 32)

Why significant risks are determined and the implications for the audit

A218. The determination of significant risks allows for the auditor to focus more attention on those risks that are on the upper end of the spectrum of inherent risk, through the performance of certain required responses, including:

- ...
- SA 600 (Revised) requires the group auditor to evaluate the appropriateness of the design and performance of further audit procedures for areas of higher assessed risks of material misstatement of the group financial statements, or significant risks, on which a component auditor is determining the further audit procedures to be performed ~~more involvement by the group engagement partner if the significant risk relates to a component in a group audit and for the group engagement team to direct the work required at the component by the component auditor.~~¹⁴⁵

...

SA 320 – MATERIALITY IN PLANNING AND PERFORMING AN AUDIT

...

Definitions

9. For purposes of the SAs, the following terms have the meanings attributed below:

- P-performance materiality – means – ~~The amount or amounts set by the auditor at less than materiality for the financial statements as a whole to reduce aggregation risk to an appropriately low level – the probability that the aggregate of uncorrected and undetected misstatements exceeds materiality for the financial statements as a whole.~~ If applicable, performance materiality also refers to the amount or amounts set by the auditor at less than the materiality level or levels for particular classes of transactions, account balances or disclosures.
- Aggregation risk – The probability that the aggregate of uncorrected and undetected misstatements exceeds materiality for the financial statement as a whole.

...

Application and Other Explanatory Material

...

¹⁴⁵SA 600, paragraphs 30 and 34-42

Determining Materiality and Performance Materiality When Planning the Audit

...

Performance Materiality (Ref: Para. 11)

A13. Planning the audit solely to detect individually material misstatements overlooks the fact that the aggregate of individually immaterial misstatements may cause the financial statements to be materially misstated, and leaves no margin for possible undetected misstatements. Performance materiality (which, as defined, is one or more amounts) is set at less than materiality for the financial statements as a whole to reduce aggregation risk~~to an appropriately low level to an appropriately low level the probability that the aggregate of uncorrected and undetected misstatements in the financial statements exceeds materiality for the financial statements as a whole~~. Similarly, performance materiality relating to a materiality level determined for a particular class of transactions, account balance or disclosure is set to reduce to an appropriately low level the probability that the aggregate of uncorrected and undetected misstatements in that particular class of transactions, account balance or disclosure exceeds the materiality level for that particular class of transactions, account balance or disclosure. The determination of performance materiality is not a simple mechanical calculation and involves the exercise of professional judgment. It is affected by the auditor's understanding of the entity, updated during the performance of the risk assessment procedures; and the nature and extent of misstatements identified in previous audits and thereby the auditor's expectations in relation to misstatements in the current period.

...

SA 402 – AUDIT CONSIDERATIONS RELATING TO AN ENTITY USING A SERVICE ORGANIZATION

...

Application and Other Explanatory Material

Obtaining an Understanding of the Services Provided by a Service Organization, Including Internal Control

...

Further Procedures When a Sufficient Understanding Cannot Be Obtained from the User Entity (Ref: Para. 12)

...

A19. Another auditor may be used to perform procedures that will provide the necessary information about the relevant controls at the service organization related to services provided to the user entity. If a type 1 or type 2 report has been issued, the user auditor may use the service auditor to perform these procedures as the service auditor has an existing relationship with the service organization. The user auditor using the work of another auditor may find the guidance in SA 220600 (Revised)¹⁴⁶ useful as it relates to determining the competence and capabilities of the other understanding another auditor (including that auditor's independence and professional competence), the direction and supervision involvement in the work of the other another auditor, in planning the nature, timing and extent of such the work assigned to the other auditor, and in evaluating the sufficiency and appropriateness of the audit evidence obtained.

...

SA 501 – AUDIT EVIDENCE—SPECIFIC CONSIDERATIONS FOR SELECTED ITEMS

...

Application and Other Explanatory Material

Inventory

Attendance at Physical Inventory Counting (Ref: Para. 4(a))

¹⁴⁶ SA 220 (Revised), *Quality Management for an Audit of Financial Statements* 600 *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*, paragraph 2, states: "An auditor may find this SA, adapted as necessary in the circumstances, useful when that auditor involves other auditors in the audit of financial statements that are not group financial statements" See also paragraph 19 of SA 600.

...

A3. Matters relevant in planning attendance at physical inventory counting (or in designing and performing audit procedures pursuant to paragraphs 4–8 of this SA) include, for example:

- The risks of material misstatement related to inventory.
- The nature of the internal control related to inventory.
- Whether adequate procedures are expected to be established and proper instructions issued for physical inventory counting.
- The timing of physical inventory counting.
- Whether the entity maintains a perpetual inventory system.
- The locations at which inventory is held, including the materiality of the inventory and the risks of material misstatement at different locations, in deciding at which locations attendance is appropriate. ~~SA 600¹⁴⁷ deals with the involvement of other auditors and accordingly may be relevant if such involvement is with regard to attendance of physical inventory counting at a remote location.~~
- Whether the assistance of an auditor's expert is needed. SA 620¹⁴⁸ deals with the use of an auditor's expert to assist the auditor to obtain sufficient appropriate audit evidence.

...

SA 510 – INITIAL AUDIT ENGAGEMENTS—OPENING BALANCES

...

Appendix

...

Illustration 1:

For purposes of this illustrative auditor's report, the following circumstances are assumed:

- **Audit of a complete set of financial statements of an entity other than a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 (Revised)¹⁴⁹ does not apply).**
- ...

...

Illustration 2:

For purposes of this illustrative auditor's report, the following circumstances are assumed:

- **Audit of a complete set of financial statements of an entity other than a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 (Revised) does not apply).**
- ...

¹⁴⁷SA 600, *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*

¹⁴⁸SA 620, *Using the Work of an Auditor's Expert*

¹⁴⁹SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*

...

SA 550 – RELATED PARTIES

...

Application and Other Explanatory Material

...

Risk Assessment Procedures and Related Activities

...

Understanding the Entity's Related Party Relationships and Transactions

...

The Identity of the Entity's Related Parties (Ref: Para. 13(a))

...

A13. In the context of a group audit, SA 600 (Revised) requires the group engagement team auditor to request component auditors to communicate on a timely basis related party relationships not previously identified by group management or the group auditor provide each component auditor with a list of related parties prepared by group management and any other related parties of which the group engagement team is aware.¹⁵⁰ Where the entity is a component within a group, this Such information provides a useful basis for the auditor group auditor's inquiries of management regarding the identity of the entity's related parties.

...

Responses to the Risks of Material Misstatement Associated with Related Party Relationships and Transactions (Ref: Para. 20)

...

Identified Significant Related Party Transactions outside the Entity's Normal Course of Business

Evaluating the Business Rationale of Significant Related Party Transactions (Ref: Para. 23)

A38. In evaluating the business rationale of a significant related party transaction outside the entity's normal course of business, the auditor may consider the following:

- Whether the transaction:
 - Is overly complex (for example, it may involve multiple related parties within a consolidated group).
 - Has unusual terms of trade, such as unusual prices, interest rates, guarantees and repayment terms.
 - Lacks an apparent logical business reason for its occurrence.
 - Involves previously unidentified related parties.
 - Is processed in an unusual manner.
- Whether management has discussed the nature of, and accounting for, such a transaction with those charged with governance.
- Whether management is placing more emphasis on a particular accounting treatment rather than giving due regard to the underlying economics of the transaction. If management's explanations are materially inconsistent with the terms of the related party

¹⁵⁰ SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*, paragraph 32(b)(4)(e) ²⁷ SA 500, *Audit Evidence*, paragraph 11

transaction, the auditor is required, in accordance with SA 500,²⁷ to consider the reliability of management's explanations and representations on other significant matters.

...

SA 570 (REVISED) – GOING CONCERN

...

...

Illustration 1 – Unmodified Opinion When a Material Uncertainty Exists and Disclosure in the Financial Statements Is Adequate

For purposes of this illustrative auditor's report, the following circumstances are assumed:

Audit of a complete set of financial statements of a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 (Revised)¹⁵¹ does not apply).

...

...

Illustration 2 – Qualified Opinion When a Material Uncertainty Exists and the Financial Statements Are Materially Misstated Due to Inadequate Disclosure

For purposes of this illustrative auditor's report, the following circumstances are assumed:

Audit of a complete set of financial statements of a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 (Revised) does not apply).

...

...

Illustration 3 – Adverse Opinion When a Material Uncertainty Exists and Is Not Disclosed in the Financial Statements For purposes of this illustrative auditor's report, the following circumstances are assumed:

Audit of a complete set of financial statements of an entity other than a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 (Revised) does not apply).

...

¹⁵¹SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*

...

SA 610 (REVISED) – USING THE WORK OF INTERNAL AUDITORS

...

Application and Other Explanatory Material

...

Determining Whether, in Which Areas, and to What Extent the Work of the Internal Audit Function Can Be Used

...

Determining the Nature and Extent of Work of the Internal Audit Function that Can Be Used

Factors Affecting the Determination of the Nature and Extent of the Work of the Internal Audit Function that Can Be Used (Ref: Para. 17– 19)

...

A16. Examples of work of the internal audit function that can be used by the external auditor include the following:

- Testing of the operating effectiveness of controls.
- Substantive procedures involving limited judgment.
- Observations of inventory counts.
- Tracing transactions through the information system relevant to financial reporting.
- Testing of compliance with regulatory requirements.
- ~~In some circumstances, audits or reviews of the financial information of subsidiaries that are not significant components to the group (where this does not conflict with the requirements of SA 600).~~¹⁵²

...

Determining Whether, in Which Areas and to What Extent Internal Auditors Can Be Used to Provide Direct Assistance Determining Whether Internal Auditors Can Be Used to Provide Direct Assistance for Purposes of the Audit (Ref: Para. 5, 26–28)

A31. In jurisdictions where the external auditor is prohibited by law or regulation from using internal auditors to provide direct assistance, it is relevant ~~for~~ in the circumstances of a the group audit, auditors for the group auditor to consider whether the prohibition also extends to component auditors and, if so, to address this in the communication to the component auditors.¹⁵³

...

SA 700 (REVISED) – FORMING AN OPINION AND REPORTING ON FINANCIAL STATEMENTS

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Requirements

...

Auditor's Report

...

¹⁵²SA 600, *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*

¹⁵³SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*, paragraph 25(a)~~40(b)~~

CONFORMING AND CONSEQUENTIAL AMENDMENTS ARISING FROM
PROPOSED SA 600 (REVISED)

Auditor's Report for Audits Conducted in Accordance with Standards on Auditing

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Auditor's Responsibilities for the Audit of the Financial Statements

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39. The Auditor's Responsibilities for the Audit of the Financial Statements section of the auditor's report shall further: (Ref: Para. A50)

...

(c) When SA 600 (Revised)¹⁵⁴ applies, further describe the auditor's responsibilities in a group audit engagement by stating that:

¹⁵⁴SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*

CONFORMING AND CONSEQUENTIAL AMENDMENTS ARISING FROM
PROPOSED SA 600 (REVISED)

- (i) The auditor's responsibilities are to plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business ~~activities~~ units within the group ~~to~~ as a basis for ~~express~~ forming an opinion on the group financial statements;
- (ii) The auditor is responsible for the direction, supervision and review performance of the audit work performed for purposes of the group audit; and
- (iii) The auditor remains solely responsible for the auditor's opinion.¹⁵⁵

...

Application and Other Explanatory Material

...

Auditor's Report (Ref: Para. 20)

...

Auditor's Report for Audits Conducted in Accordance with Standards on Auditing

...

Basis for Opinion (Ref: Para. 28)

...

Considerations specific to group audits

A38. In group audits ~~for which when~~ there are multiple sources of relevant ethical requirements, including those pertaining to independence, the reference in the auditor's report to the jurisdiction ordinarily relates to the relevant ethical requirements that are applicable to the group ~~engagement team~~ auditor. This is because, in a group audit, component auditors are also subject to ethical requirements that are relevant to the group audit.¹⁵⁶¹⁵⁷

A39. The SAs do not establish specific independence or ethical requirements for auditors, including component auditors, and thus do not extend, or otherwise override, the independence requirements of the IESBA Code or other ethical requirements to which the group ~~engagement team~~ auditor is subject, nor do the SAs require that the component auditor in all cases to be subject to the same specific independence requirements that are applicable to the group ~~engagement team~~ auditor. As a result, relevant ethical requirements, including those pertaining to independence, in a group audit situation may be complex. SA 600 (Revised)³⁴ provides guidance for auditors in performing work on the financial information of a component for a group audit, including those situations where the component auditor does not meet the independence requirements that are relevant to the group audit.

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Appendix

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Illustration 1 – Auditor's Report on Financial Statements of a Listed Entity Prepared in Accordance with a Fair Presentation Framework

For purposes of this illustrative auditor's report, the following circumstances are assumed:

¹⁵⁵SA 600 (Revised), paragraph 53

¹⁵⁶SA 600 (Revised), paragraph ~~A56–A57, A66–A68~~A37

¹⁵⁷ (Revised), paragraphs ~~25, 27~~19–20

- **Audit of a complete set of financial statements of a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 (Revised) does not apply).**

• ...

...

Illustration 2 – Auditor’s Report on Consolidated Financial Statements of a Listed Entity Prepared in Accordance with a Fair Presentation Framework

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- **Audit of a complete set of consolidated financial statements of a listed entity using a fair presentation framework. The audit is a group audit of an entity with subsidiaries (i.e., SA 600 (Revised) applies).**
- ...

INDEPENDENT AUDITOR’S REPORT

To the Shareholders of ABC Company [or Other Appropriate Addressee] **Report**
on the Audit of the Consolidated Financial Statements¹⁵⁸

...

Auditor’s Responsibilities for the Audit of the Consolidated Financial Statements

...

As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

...

- Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to regarding the financial information of the entities or business units within the group as a basis for express forming an opinion on the consolidated group financial statements. We are responsible for the direction, supervision and review performance of the audit work performed for purposes of the group audit. We remain solely responsible for our audit opinion.

...

¹⁵⁸ The sub-title “Report on the Audit of the Consolidated Financial Statements” is unnecessary in circumstances when the second sub-title “Report on Other Legal and Regulatory Requirements” is not applicable.

Illustration 3 – Auditor’s Report on Financial Statements of an Entity Other than a Listed Entity Prepared in Accordance with a Fair Presentation Framework

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- Audit of a complete set of financial statements of an entity other than a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 (Revised) does not apply).
- ...

...

Illustration 4 – Auditor’s Report on Financial Statements of an Entity Other than a Listed Entity Prepared in Accordance with a General Purpose Compliance Framework

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- Audit of a complete set of financial statements of an entity other than a listed entity required by law or regulation. The audit is not a group audit (i.e., SA 600 (Revised) does not apply).
- ...

...

SA 701 – COMMUNICATING KEY AUDIT MATTERS IN THE INDEPENDENT AUDITOR’S REPORT

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Application and Other Explanatory Material

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Determining Key Audit Matters (Ref: Para. 9–10)

...

Matters that Required Significant Auditor Attention (Ref: Para. 9)

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A15. Various SAs require specific communications with those charged with governance and others that may relate to areas of significant auditor attention. For example:

- SA 260 (Revised) requires the auditor to communicate significant difficulties, if any, encountered during the audit with those charged with governance.¹⁵⁹ The SAs acknowledge potential difficulties in relation to, for example: ○ Related party transactions,¹⁶⁰ in particular limitations on the auditor’s ability to obtain audit evidence that all other aspects of a related party transaction (other than price) are equivalent to those of a similar arm’s length transaction. ○ Limitations on the group audit, for example, where ~~the group engagement team’s~~ access to information or people may have been restricted.¹⁶¹
- SA 220 (Revised) establishes requirements for the engagement partner in relation to undertaking appropriate consultation on difficult or contentious matters, matters on which the firm’s policies or procedures require

¹⁵⁹SA 260 (Revised), paragraphs 16(b) and A21-same

¹⁶⁰SA 550, *Related Parties*, paragraph A42-same

¹⁶¹SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*, paragraph 5749(c)

consultation,¹⁶²¹⁶³ and other matters that in the engagement partner’s professional judgment, require consultation. For example, the auditor may have consulted with others within the firm or outside the firm on a significant technical matter, which may be an indicator that it is a key audit matter. The engagement partner is also required to discuss, among other things, significant matters and significant judgments arising during the audit engagement with the engagement quality reviewer.⁴⁰

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SA 705 (REVISED) – MODIFICATIONS TO THE OPINION IN THE INDEPENDENT AUDITOR’S REPORT

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Application and Other Explanatory Material

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Circumstances When a Modification to the Auditor’s Opinion Is Required

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Nature of an Inability to Obtain Sufficient Appropriate Audit Evidence (Ref: Para. 6(b))

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A10. Examples of circumstances beyond the control of the entity include when:

- The entity’s accounting records have been destroyed.
- The accounting records of a ~~significant~~ component for which further audit procedures are determined to be necessary for the purposes of the group audit have been seized indefinitely by governmental authorities.

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Appendix

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Illustration 1 – Qualified Opinion due to a Material Misstatement of the Financial Statements For

purposes of this illustrative auditor’s report, the following circumstances are assumed:

- **Audit of a complete set of financial statements of a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 (Revised)¹⁶⁴ does not apply).**
- ...

...

¹⁶²SA 220 (Revised), *Quality Management for an Audit of Financial Statements*, paragraph 35-same

¹⁶³ (Revised), paragraph 36-same

¹⁶⁴SA 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*

Illustration 2 – Adverse Opinion due to a Material Misstatement of the Consolidated Financial Statements For

purposes of this illustrative auditor’s report, the following circumstances are assumed:

- Audit of a complete set of consolidated financial statements of a listed entity using a fair presentation framework. The audit is a group audit of an entity with subsidiaries (i.e., SA 600 (Revised) applies).
- ...

Illustration 3 – Qualified Opinion due to the Auditor’s Inability to Obtain Sufficient Audit Evidence Regarding a Foreign Associate

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- Audit of a complete set of consolidated financial statements of a listed entity using a fair presentation framework. The audit is a group audit of an entity with subsidiaries (i.e., SA 600 (Revised) applies).
- ...

Illustration 4 – Disclaimer of Opinion due to the Auditor’s Inability to Obtain Sufficient Appropriate Audit Evidence about a Single Element of the Consolidated Financial Statements

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- Audit of a complete set of consolidated financial statements of an entity other than a listed entity using a fair presentation framework. The audit is a group audit of an entity with subsidiaries (i.e., SA 600 (Revised) applies).
- ...

Illustration 5 – Disclaimer of Opinion due to the Auditor’s Inability to Obtain Sufficient Appropriate Audit Evidence about Multiple Elements of the Financial Statements

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- Audit of a complete set of financial statements of an entity other than a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 (Revised) does not apply).
- ...

**SA 706 (REVISED) – EMPHASIS OF MATTER PARAGRAPHS AND OTHER MATTER
PARAGRAPHS IN THE INDEPENDENT AUDITOR’S REPORT**

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Appendix 3

...

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- **Audit of a complete set of financial statements of a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 (Revised)⁴² does not apply).**
- ...

...

Appendix 4

...

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- **Audit of a complete set of financial statements of an entity other than a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 (Revised) does not apply).**

⁴² 600 (Revised), *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)*

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**SA 710 – COMPARATIVE INFORMATION CORRESPONDING FIGURES AND
COMPARATIVE FINANCIAL STATEMENTS**

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Appendix

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Illustration 1 – Corresponding Figures

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- **Audit of a complete set of financial statements of an entity other than a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 Revised)⁴³ does not apply).**
- ...

...

Illustration 2 – Corresponding Figures

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- **Audit of a complete set of financial statements of an entity other than a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 Revised) does not apply).**
- ...

...

Illustration 3 – Corresponding Figures

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- **Audit of a complete set of financial statements of an entity other than a listed entity using a fair presentation framework. The audit is not a group audit (i.e., SA 600 Revised) does not apply).**
- ...

...

Illustration 4 – Comparative Financial Statements

For purposes of this illustrative auditor’s report, the following circumstances are assumed:

- **Audit of a complete set of financial statements of an entity other than a listed entity using a fair presentation**