

ASB Agenda Item 4B

PROPOSED INTERNATIONAL STANDARD ON AUDITING 600 (REVISED)

SPECIAL CONSIDERATIONS—AUDITS OF GROUP FINANCIAL STATEMENTS (INCLUDING THE WORK OF COMPONENT AUDITORS)

Introduction

Scope of this ISA

1. The International Standards on Auditing (ISAs) apply to an audit of group financial statements (a group audit). This ISA 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 ISA refer to, or expand on, the application of other relevant ISAs to a group audit, in particular ISA 220 (Revised),¹ ISA 230,² ISA 300,³ ISA 315 (Revised 2019),⁴ and ISA 330.⁵ (Ref: Para. A1–A2)
- 1A. Group financial statements include the financial information of more than one entity or business unit through a consolidation process, as described in paragraph 9(k). The term consolidation process as used in this ISA 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. A2A–A2C, A15B.)
- 1B. As explained in ISA 220 (Revised),⁶ this ISA, 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 ISA 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 location⁴. This ISA highlights the responsibility of the group engagement team to obtain sufficient appropriate audit evidence to provide a basis for forming an opinion on the group financial statements. This ISA also recognizes that component auditors can be, and often are, involved in all phases of the group audit, and in particular to assist the group engagement team in identifying, assessing and responding to the risks of material misstatement of the group financial statements. Accordingly, this ISA requires sufficient and appropriate involvement by the group engagement team in the work of component auditors and emphasizes the importance of two-way communication between the group engagement team and component auditors. In addition, this ISA explains the matters that the group engagement team 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. A7–A8, Appendix 1)

¹ ISA 220 (Revised), *Quality Management for an Audit of Financial Statements*

² ISA 230, *Audit Documentation*

³ ISA 300, *Planning an Audit of Financial Statements*

⁴ ISA 315 (Revised 2019), *Identifying and Assessing the Risks of Material Misstatement*

⁵ ISA 330, *The Auditor's Responses to Assessed Risks*

⁶ ISA 220 (Revised), paragraph A1

Groups and Components

3. 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 ISA, these different forms of organization are collectively referred to as “entities or business units.” (Ref: Para. A3A)
- 3A. 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 (see paragraph 17A(a)). 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 common information systems and internal control. (Ref: Para. A5–A6A)

Involvement of Component Auditors

- 3B. ISA 220 (Revised) 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.⁷ In a group audit, such resources may include component auditors. Therefore, this ISA requires the group auditor to determine the nature, timing and extent of involvement of component auditors (see paragraph 17A(b)). Component auditors may have greater experience 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. A7–A8, Appendix 1)
4. Audit risk is a function of the risks of material misstatement and detection risk.⁸ In a group audit, this includes the risk that the component auditor may not detect a misstatement in the financial information of the component that could cause a material misstatement of the group financial statements, and the risk that the group auditor may not detect this misstatement. Accordingly, this ISA requires sufficient and appropriate involvement by the group auditor in the work of component auditors and emphasizes the importance of two-way communication between the group auditor and component auditors. In addition, this ISA 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. A8A–A8B)

Professional Skepticism

5. In accordance with ISA 200,⁹ 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

⁷ ISA 220 (Revised), paragraph 25

⁸ ISA 200, *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with International Standards on Auditing*, paragraph A34

⁹ ISA 200, paragraphs 15–16 and A20–A24

engagement team, including emphasizing the importance of each engagement team member exercising professional skepticism throughout the group audit engagement. Such actions and communications may include specific steps to mitigate impediments that may impair the appropriate exercise of professional skepticism. (Ref: Para. A9–A10)

Scalability

- 5A. This ISA is intended for all group audits, regardless of size or complexity. However, the requirements of this ISA 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 ISA 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 A75A and A76 also may be helpful in applying this ISA in these circumstances. [Previously paragraph A2C]

Responsibilities of the Group Engagement Partner and Group Auditor

6. The group engagement partner remains ultimately responsible, and therefore accountable, for compliance with the requirements of this ISA. 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 ISA 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. A19)

Effective Date

7. This ISA is effective for audits of group financial statements for periods beginning on or after December 15, 20XX.

Objectives

8. The objectives of the auditor are to:
- (a) 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;
 - (b) Identify and assess the risks of material misstatement of the group financial statements, and to plan and perform further audit procedures to appropriately respond to those assessed risks;
 - (c) Be sufficiently and appropriately involved in the work of component auditors throughout the group audit engagement, including communicating clearly about the scope and timing of their work, and in evaluating the results of that work; and

- (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

9. For purposes of the ISAs, 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. A11)
 - (b) Component – An entity or business unit or a function or activity, (or some combination thereof), determined by the group auditor for purposes of planning and performing audit procedures in a group audit. (Ref: Para. A12)
 - (c) Component auditor – An auditor who, at the request of the group auditor, performs audit work related to a component for purposes of the group audit. A component auditor is a part of the engagement team for a group audit.¹⁰ (Ref: Para. A13–A14)
 - (d) Component management – Management responsible for a component. (Ref: Para. A15)
 - (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 who are 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.
 - (i) Group audit opinion – The audit opinion on the group financial statements.
 - (j) Group engagement partner – The engagement partner¹¹ who is responsible for the group audit. (Ref: Para. A15A)
 - (k) 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 ISA, a consolidation process includes:
 - (i) Consolidation, proportionate consolidation, or an equity method of accounting;
 - (ii) The presentation in combined financial statements of the financial information of entities

¹⁰ ISA 220 (Revised), paragraph 10(d)

¹¹ ISA 220 (Revised), paragraph 10(a)

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. (Ref: Para. A16–A16B)
 - (l) Group management – Management responsible for the preparation of the group financial statements.
 - (m) Group performance materiality – Performance materiality¹² in relation to the group financial statements as a whole, as determined by the group auditor.
10. Reference in this ISA to “the applicable financial reporting framework” means the financial reporting framework that applies to the group financial statements.

Requirements

Leadership Responsibilities for Managing and Achieving Quality on a Group Audit

12. In applying ISA 220 (Revised),¹³ the group engagement partner shall take overall responsibility for managing and achieving quality on the group audit engagement, including taking responsibility for creating an environment for the engagement that emphasizes the expected behavior of engagement team members. In doing so, the group engagement partner shall 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. (Ref: Para. A19–A20)

Acceptance and Continuance

13. 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. A21–A23)
14. 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. A25)

Terms of the Engagement

15. In applying ISA 210,¹⁴ 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. A26)
- (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

¹² ISA 320, *Materiality in Planning and Performing an Audit*, paragraphs 9 and 11

¹³ ISA 220 (Revised), paragraph 13

¹⁴ ISA 210, *Agreeing the Terms of Audit Engagements*, paragraphs 6(b) and 8(b)

matters;

- (b) Additional information that the engagement team may request from group management and 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 Outside the Control of Group Management

16. 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. A27–A32)

Restrictions on Access Imposed by Group Management

17. If the group engagement partner concludes that:
- (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 continuing engagement, withdraw from the engagement, where withdrawal is possible under applicable law or regulation; or
- (ii) Where law or regulation prohibit an auditor from declining an engagement or where 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. (Ref: Para. A31–A33)

Overall Group Audit Strategy and Group Audit Plan

- 17A. In applying ISA 300, the group auditor shall establish an overall group audit strategy and group audit plan that includes a determination of: (Ref: Para. A33A–A33E)
- (a) The components at which audit work will be performed; and (Ref: Para. A33F)
 - (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. A33G–A33I)

Considerations When Component Auditors Are Involved

18. As part of the determination in paragraph 12, 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. A34)

19. As part of the evaluation in paragraph 18, 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. A35A)

Relevant Ethical Requirements, Including Those Related to Independence

20. In applying ISA 220 (Revised),¹⁵ the group engagement partner shall take responsibility for: (Ref: Para. A36–A39A, A52J)
- (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 ethical requirements that are relevant to the group audit engagement, including with respect to independence.

Engagement Resources

21. In applying ISA 220 (Revised),¹⁶ the group engagement partner shall: (Ref: Para. A40A–A40B)
- (a) Determine that component auditors have the appropriate competence and capabilities, including sufficient time, to perform the assigned audit procedures at the component; and (Ref: Para. A41–A45)
 - (b) When information about the results of the monitoring and remediation process or external inspections with respect to the component auditor's firm has been provided by the 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 21(a)
22. The group auditor shall obtain sufficient appropriate audit evidence relating to the work to be performed at the component without involving that component auditor if:
- (a) A component auditor is not independent in accordance with ethical requirements that are relevant to the group audit; or (Ref: Para. A46A–A47)
 - (b) The group engagement partner has serious concerns about the matters in paragraphs 18–21. (Ref: Para. A48)

Engagement Performance

23. In applying ISA 220 (Revised),¹⁷ 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. In doing so, the group engagement partner takes into account: (Ref: Para. A48A–A52)
- (a) Areas of higher assessed risks of material misstatement of the group financial statements, or significant risks identified in accordance with ISA 315 (Revised 2019); and
 - (b) Areas in the audit of the group financial statements that involve significant judgment.

¹⁵ ISA 220 (Revised), paragraphs 16–17 and 21

¹⁶ ISA 220 (Revised), paragraphs 25

¹⁷ ISA 220 (Revised), paragraph 29

Communications with Component Auditors

23A. The group auditor shall communicate with component auditors about their respective responsibilities and the group auditor's expectations, including about the nature, timing and extent of communications. These communications shall take place at appropriate points in time throughout the group audit and reflect the component auditor's involvement in various phases of the group audit. (Ref: Para. A52A–A52J)

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

24. In applying ISA 315 (Revised 2019),¹⁸ the group auditor shall take responsibility for obtaining an understanding of the following: (Ref: Para. A53–A55A, A69–A70)

- (a) The group and its environment, including: (Ref: Para. A56–A58)
 - (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 activities and the extent to which they are similar; and
 - c. The extent to which the group's business model integrates the use of IT;
 - (ii) Regulatory factors impacting the entities and business units in a group; and
 - (iii) The measures used internally and externally to assess the entities or business units' financial performance;
- (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. A59–A63)
 - (ii) Whether, and if so, how, the group centralizes activities relevant to financial reporting; (Ref: Para. A64–A65A)
 - (iii) The consolidation process used by the group, including sub-consolidations, if any, and consolidation adjustments; and
 - (iv) How the 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. (Ref: Para. A66–A68)

Considerations When Component Auditors Are Involved

Communications with Component Auditors

26. The group auditor shall communicate to component auditors on a timely basis:

¹⁸ ISA 315 (Revised 2019), paragraph 19

- (a) In applying ISA 550,¹⁹ 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. (Ref: Para. A72)
- (b) In applying ISA 570 (Revised)²⁰ any 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.²⁷ In applying ISA 550,²¹ the group engagement team shall communicate with the component auditor related party relationships or transactions identified by group management, and any other related parties of which the group engagement team is aware, that are relevant to the work of the component auditor. (Ref: Para. A72)

26A. The group auditor shall request component auditors to communicate on a timely basis: (Ref: Para. A72A)

- (a) Matters related to the financial information of the component that may 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.
- (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. [Previously paragraph 41]

Identifying and Assessing the Risks of Material Misstatement

26B. In applying ISA 315 (Revised 2019),²² based on the understanding obtained in paragraph 24, the group auditor shall take responsibility for the identification and the assessment of the risks of material misstatement of the group financial statements. (Ref: Para. A72B–A72G) [Previously paragraph 31]

Considerations When Component Auditors Are Involved

26C. In applying ISA 315 (Revised 2019),²³ the group auditor shall include the work of component auditors in the evaluation whether the audit evidence obtained from the risk assessment procedures provides an appropriate basis for the identification and assessment of the risks of material misstatement of the group financial statements. (Ref: Para. A72H–A72I)

Materiality

29. In applying ISA 320²⁴ and ISA 450,²⁵ when classes of transactions, account balances or disclosures in the group financial statements are disaggregated across components, for purposes of planning and performing audit procedures, the group auditor shall determine:

¹⁹ ISA 550, *Related Parties*, paragraph 17

²⁰ ISA 570 (Revised), *Going Concern*

²¹ ISA 550, *Related Parties*, paragraph 17

²² ISA 315 (Revised 2019), paragraphs 28–34

²³ ISA 315 (Revised 2019), paragraph 35

²⁴ ISA 320, paragraph 11

²⁵ ISA 450, *Evaluation of Misstatements Identified during the Audit*, paragraph 5

- (a) Component performance materiality. To address aggregation risk, such amount shall be lower than group performance materiality. (Ref: Para. A73–A76)
- (b) The threshold above which misstatements identified in 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. A77)

Considerations When Component Auditors Are Involved

30. The group auditor shall communicate to the component auditor the amounts determined in accordance with paragraph 29. (Ref: Para: A77A–A77B)

Responding to the Assessed Risks of Material Misstatement

33. In applying ISA 330,²⁶ 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

Consolidation Process

34. 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:
- (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; (Ref: Para. A94)
 - (b) Evaluating whether any fraud risk factors or indicators of possible management bias exist; and
 - (c) Evaluating the appropriateness, completeness and accuracy of consolidation adjustments and reclassifications. (Ref: Para. A95)
35. 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.
36. If the group financial statements include the financial statements 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 those financial statements in accordance with the applicable financial reporting framework.

Considerations When Component Auditors Are Involved

37. When the group auditor involves component auditors in the design or performance of further audit procedures, the group auditor shall communicate with component auditors matters that are relevant to the design of responses to the assessed risks of material misstatement of the group financial statements.

²⁶ ISA 330, paragraphs 6–7

38. For areas of higher assessed risks of material misstatement of the group financial statements, or significant risks identified in accordance with ISA 315 (Revised 2019), 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.
39. In accordance with paragraph 23, the group auditor shall determine the nature and extent of direction and supervision of component auditors and the review of their work when component auditors perform further audit procedures on the consolidation process, including on sub-consolidations. (Ref: Para. A102)
40. The group auditor shall determine whether the financial information identified in the component auditor's communication (see paragraph 44(a)) is the financial information that is incorporated in the group financial statements.

Using Audit Evidence from an Audit Performed for Another Purpose

42. If an audit has been performed on the financial statements of an entity or business unit that is part of the group, and an auditor's report has been issued for statutory, regulatory or other reasons, and the group auditor plans to use such work as audit evidence for the group audit, the group auditor shall evaluate whether: (Ref: Para. A103–A104)
 - (a) The audit procedures performed are an appropriate response to the assessed risks of material misstatement of the group financial statements;
 - (b) Performance materiality used for that audit is appropriate for the purposes of the group audit; and
 - (c) Other relevant requirements in this ISA have been met with respect to the use of the work of a component auditor, including the requirements in paragraphs 20–22. (Ref: Para. A105)

Communication about Matters Relevant to the Group Auditor's Conclusion

44. 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. A111A)
 - (a) Identification of the financial information on which the component auditor has been requested to perform audit procedures;
 - (aa) Whether the component auditor has performed the work requested by the group auditor;
 - (ab) Whether the component auditor has complied with the ethical requirements that are relevant to the group audit, including those relating to independence;
 - (b) Information on instances of non-compliance with laws or regulations;
 - (c) 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 30; (Ref: Para. A111B)
 - (d) Indicators of possible management bias;
 - (e) Description of any deficiencies in the system of internal control identified in connection with the

audit procedures performed;

- (f) 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 financial information of the component; (Ref: Para. A112)
 - (fa) Other significant matters that the component auditor communicated or expects to communicate to component management or those charged with governance of the component;
 - (g) Any other matters that may be relevant to the group audit, or that the component auditor wishes 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
 - (h) The component auditor's overall findings or conclusions. (Ref: Para. A112A)
45. The group auditor shall:
- (a) Discuss significant matters arising from the communications with the component auditor, component management or group management, as appropriate; and
[Moved to paragraph 45A]
 - (b) Evaluate whether the communications with component auditors are adequate for the group auditor's purposes.
- 45A. The group auditor also shall determine whether, and the extent to which, it is necessary to review parts of the component auditor's audit documentation. In making this determination, the group auditor shall consider:
- (a) The nature, timing and extent of the work performed by the component auditor; and
 - (b) The competence and capabilities of the component auditor. (Ref: Para. A112C–A113)
[Previously paragraph 45(b)]
46. If the group auditor determines that the component auditors' communications are not adequate for the group auditor's purposes, the group auditor shall consider whether further information can be obtained from component auditors or other sources. If such information cannot be obtained through other sources, the group auditor shall consider the implications for the group audit, in accordance with paragraph 49.

Subsequent Events

47. In applying ISA 560,²⁷ 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 to or disclosure in the group financial statements. (Ref: Para. A114)

Considerations When Component Auditors Are Involved

²⁷ ISA 560, *Subsequent Events*, paragraph 7

48. The group auditor shall request the component auditors to notify the group auditor if they become aware of subsequent events that may require an adjustment to or disclosure in the group financial statements. (Ref: Para. A114)

Evaluating the Sufficiency and Appropriateness of Audit Evidence Obtained

49. In applying ISA 330,²⁸ the group auditor shall evaluate whether sufficient appropriate audit evidence has been obtained from the audit procedures performed, including with respect to the work performed by component auditors, on which to base the group audit opinion. (Ref: Para. A114A–A115B)

Evaluating the Effect on the Group Audit Opinion

50. 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 where there has been an inability to obtain sufficient appropriate audit evidence. (Ref: Para. A116)

Considerations When Component Auditors Are Involved

51. If the group auditor concludes that the work of the component auditor is insufficient, 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.

Auditor's Report

52. 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. A117–A118)

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

Communication with Group Management

- 53A. The group auditor shall communicate with group management an overview of the group audit plan. (Ref: Para. A119A, A123)
54. If fraud has been identified by the group auditor or brought to its attention by a component auditor (see paragraph 44(f)), or information indicates that a fraud may exist, the group auditor shall communicate this on a timely basis to the appropriate 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. A120)
55. A component auditor may be required by statute, regulation or for another reason, 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

²⁸ ISA 330, paragraph 26

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. A121)

Communication with Those Charged with Governance of the Group

56. The group auditor shall communicate the following matters with those charged with governance of the group, in addition to those required by ISA 260 (Revised)²⁹ and other ISAs: (Ref: Para. A122)
- (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. A123)
 - (b) Instances where 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 where the fraud resulted in a material misstatement of the group financial statements.

Communication of Identified Deficiencies in Internal Control

- 56A. In applying ISA 265,³⁰ 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 and 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 44(e). (Ref: Para. A123A) [Previously paragraph 53]

Documentation

57. In accordance with ISA 230, 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 ISA 230,³¹ the group auditor shall include in the audit documentation: (Ref: Para. A123B–A124x, A129–A130A)

²⁹ ISA 260 (Revised), *Communication with Those Charged with Governance*

³⁰ ISA 265, *Communicating Deficiencies in Internal Control to Those Charged with Governance and Management*

³¹ ISA 230, paragraphs 1–3, 8–11, A6–A7 and Appendix

- (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; A124y)
- (c) The basis for the determination of component performance materiality and the threshold for communicating misstatements in component financial information to the group auditor.
- (ca) 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. A124z)
- (cb) Key elements of the understanding of the group's system of internal control in accordance with paragraph 24(c);
- (d) 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 parts of the component auditor's audit documentation in accordance with paragraph 45A. (Ref: Para. A124D–A128)
- (e) 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 26A.
 - (ii) Matters relevant to the group auditor's conclusion with regard to the group audit, in accordance with paragraph 44, including how the group auditor has addressed significant matters discussed with component auditors, component management or group management.
- (f) The group auditor's evaluation of, and response to, findings or conclusions of the component auditors with respect to matters that could have a material effect on the group financial statements.

* * *

Application and Other Explanatory Material

Scope (Ref: Para. 1–1B)

- A1. This ISA also deals with the special considerations for the group engagement partner or group auditor, as applicable, in applying the requirements and guidance in ISA 220 (Revised), including with respect to the direction and supervision of component auditors and the review of their work.

- A2. ISQM 1³² addresses the engagements for which an engagement quality review is required to be performed. ISQM 2³³ 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.
- A2A. 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 subgroup). This ISA therefore applies to an audit of the group financial statements of such subgroups.
- A2AA. A single legal entity may be organized with more than one entity or business unit, for example, a company with operations in multiple locations, such as a bank with multiple branches. When those entities or business units have characteristics such as separate locations, separate management, or separate information systems (including a separate general ledger) and the financial information is required to be 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.
- A2B. 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 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 regulatory or management purposes does not create separate entities or business units (e.g., divisions) for purposes of this ISA.

Groups and Components (Ref: Para. 3–3A)

- A3A. 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.
- A5. 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 jurisdiction, 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.
- A6. 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

³² International Standard on Quality Management (ISQM) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*

³³ ISQM 2, *Engagement Quality Reviews*

centralized activities are relevant to the group's financial reporting process, the group auditor may determine that the shared service center is a component for purposes of the group audit.

- A6A. 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.³⁴

Involvement of Component Auditors (Ref: Para. 3B–4)

- A7. The involvement of component auditors may be necessary for various reasons. For example, when there are many components across multiple jurisdictions, the group auditor may need the assistance of component auditors to identify, assess and respond to the risks of material misstatement of the group financial statements.
- A8. The group auditor may involve component auditors to provide information, or to perform audit procedures, to fulfill the requirements of this ISA. Appendix 1 provides additional guidance about the matters that the group auditor may consider regarding the involvement of component auditors.
- A8A. As explained in ISA 200,³⁵ 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.
- A8B. Detection risk is a broader concept than aggregation risk as described in paragraphs 9(a) and A11. 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. 5)

- A9. ISA 220 (Revised)³⁶ provides examples of the impediments to the exercise of professional skepticism at the engagement level, unconscious auditor biases that may impede the exercise of professional skepticism when designing and performing audit procedures and evaluating audit evidence. ISA 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.
- A9A. A group audit engagement may present additional challenges to the exercise of professional skepticism by the engagement team. Such challenges may include, for example:
- When there are a large number of components across multiple jurisdictions, it may be important for the group auditor to remain alert for contradictory information from component auditors, component management and group management with respect to a matter of significance to

³⁴ See, for example, International Financial Reporting Standard (IFRS) 8, *Operating Segments*

³⁵ ISA 200, paragraph A45

³⁶ ISA 220 (Revised), paragraphs A35–A37

the group financial statements.

- 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.
- The complex structure of some groups may require an additional understanding of the business purpose and activities of certain entities or business units.
- The nature and extent of intragroup transactions (for example, 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 in accordance with ISA 240.³⁷
- When the group audit is subject to tight reporting deadlines imposed by group management, the ability of the engagement team to make appropriate judgments and appropriately question management's assertions may be affected. In these circumstances, the group auditor may need to communicate with those charged with governance of the group.

A9B. As explained in paragraph A52A, effective two-way communication between the group auditor and component auditors 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.

A9C. The exercise of professional skepticism also may be evident from the group auditor's direction and supervision of engagement team members, including component auditors, and the review of their work. In addition, challenges to the exercise of professional skepticism in a group audit, such as those described in paragraph A9A, may be considered by the group auditor in the evaluation of the sufficiency and appropriateness of audit evidence obtained in accordance with paragraph 49.

A10. Requirements and relevant application material in ISA 315 (Revised 2019),³⁸ ISA 540 (Revised)³⁹ and other ISAs also provide examples of areas in an audit where the auditor exercises professional skepticism, or examples of where appropriate documentation may help provide evidence about how the auditor exercised professional skepticism.

Definitions

Aggregation Risk (Ref: Para. 9(a))

A11. 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.

³⁷ ISA 240, *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements*

³⁸ ISA 315 (Revised 2019), paragraph A238

³⁹ ISA 540 (Revised), *Auditing Accounting Estimates and Related Disclosures*, paragraph A11

Component (Ref: Para. 9(b))

A12. As noted in paragraph 3A, the group auditor uses professional judgment in determining components at which audit procedures will be performed, including whether to combine certain entities or business units, or functions or activities, for purposes of planning and performing audit procedures. However, the group auditor's consideration 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. 9(c))

A13. References in this ISA to the engagement team include the group auditor and component auditors. The engagement team includes individuals from the group auditor's firm and may include individuals from a network firm, a firm that is not a network firm, or an external service provider.

A14. 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 for purposes of this ISA..

Component Management (Ref: Para. 9(d))

A15. Component management refers to management responsible for the financial information or other activity (for example, processing of transactions at a shared service center) at an entity or business unit that is part of the group. When the group auditor combines entities or business units into components (see paragraphs A5–A6), 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.

Group Engagement Partner (Ref: Para. 9(j))

A15A. 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 ISAs. This ISA 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. 1A, 9(k))

A16. 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.

A16A. The term 'consolidation process' as used in this ISA 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. Also see paragraph 1A.

A16B. 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 intragroup 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. 6, 12)

A19. It may not be possible or practical for the group engagement partner to solely deal with all requirements in ISA 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, ISA 220 (Revised)⁴⁰ permits the engagement partner to assign responsibilities for the design or performance of procedures, tasks or actions to appropriately skilled or suitably experienced members of the engagement team to assist the engagement partner. Accordingly, the group engagement partner may assign responsibilities to other members of the engagement team and these members may assign responsibilities further. In such circumstances, ISA 220 (Revised) requires that the engagement partner shall continue to take overall responsibility for managing and achieving quality on the engagement.⁴¹

A19A. The group engagement partner's responsibility for managing and achieving quality is supported by a firm culture that demonstrates a commitment to quality. In addressing the requirements in paragraph 12 of this ISA, the group engagement partner may communicate directly to other members of the engagement team and reinforce this communication through personal conduct and actions (e.g., leading by example). As explained in ISA 220 (Revised),⁴² a culture that demonstrates a commitment to quality is further shaped and reinforced by the engagement team members as they demonstrate expected behaviors when performing the engagement. The firm's policies or procedures may require the firm or the group engagement partner to take different actions from those applicable to personnel when communicating the expected behaviors to component auditors.

A20. Policies or procedures established by the firm, or that are common network requirements or network services,⁴³ 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.

⁴⁰ ISA 220 (Revised), paragraph 15

⁴¹ ISA 220 (Revised), paragraph 15

⁴² ISA 220 (Revised), paragraphs A24 and A28

⁴³ ISQM 1, paragraphs 48–52

Acceptance and Continuance

Determining Whether Sufficient and Appropriate Audit Evidence Can Reasonably Be Expected To Be Obtained (Ref: Para. 13–14)

A21. 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.
- Business 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, component information; 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 in accordance with paragraph 21.

A21A. There may be more complexities with obtaining sufficient appropriate audit evidence in a group audit with components in jurisdictions other than the group auditor's jurisdiction because of cultural and language differences and different laws or regulations (e.g., regulations restricting access to data).

A22. In the case of an initial engagement, the group auditor's understanding of the matters in paragraph A21 may be obtained from:

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

A23. For a continuing engagement, obtaining audit evidence may be affected by significant changes, for example:

- Changes in the group structure (e.g., acquisitions, disposals, reorganizations, or changes in how the group financial reporting system is organized).
- Changes in components' business activities that are significant to the group.
- Changes in 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.

- New concerns the group auditor has with regard to the integrity and competence of group or component management.
- Changes in the applicable financial reporting framework.

A25. 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); or
- The work to be performed on the financial information of components.
- An inability to obtain sufficient appropriate audit evidence would need to be evaluated, in accordance with ISA 705 (Revised), in forming an opinion on the group financial statements.⁴⁴ In exceptional circumstances, such restrictions may lead to withdrawal from the engagement, where withdrawal is possible under applicable laws or regulations.
- New concerns the group engagement team has with regard to the integrity and competence of group or component management.
- Changes in the applicable financial reporting framework.

Agreeing the Terms of Audit Engagements (Ref: Para. 15)

A26. ISA 210 requires the auditor to agree the terms of the audit engagement with management or those charged with governance, as appropriate.⁴⁵ The terms of engagement identify the applicable financial reporting framework.⁴⁶ Additional matters may be included in the terms of a group audit engagement, such as:

- 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.

⁴⁴ ISA 705 (Revised), *Modifications to the Opinion in the Independent Auditor's Report*

⁴⁵ ISA 210, paragraph 9

⁴⁶ ISA 210, paragraph 10

Restrictions on Access to Information or People (Ref: Para. 16–17)

- A27. Restrictions on access to information or people do not alleviate the requirement for the group auditor to obtain sufficient appropriate audit evidence.
- A28. 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..
- A29. In many cases, the group auditor may be able to overcome restrictions on access to information or people, for example:
- When laws or regulations restrict sending relevant audit documentation across borders, the group auditor may be able to access the relevant audit documentation by one or more of the following:
 - Visiting the location of the component;
 - Reviewing the relevant audit documentation remotely through the use of technology (e.g., videoconferencing, remote access to the audit file), where not prohibited by law or regulations;
 - 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 the procedures performed, the results obtained and the conclusions reached with the component auditor.
 - When the group has a non-controlling interest in an entity that is accounted for by the equity method, the group auditor may be able to overcome restrictions by determining 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 requesting management to exercise such rights. Paragraph A29A describes possible procedures to obtain sufficient appropriate audit evidence when the group has a non-controlling interest in an entity that is accounted for by the equity method;
 - When war, civil unrest or outbreaks of disease restrict access to relevant audit documentation of a component auditor, the group auditor may be able to access the relevant audit documentation by one or more of the following:
 - Meeting with the component auditor in a location different from where the component auditor is located;
 - Reviewing the relevant audit documentation remotely through the use of technology (e.g., video conferencing, remote access to the audit file), where not prohibited by laws or regulations;
 - 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 the procedures performed, the results obtained and the conclusions reached with the component auditor.
- When access to component management or those charged with governance of the component is restricted, the group auditor may be able to perform the work themselves by working with group management or those charged with governance of the group.
- Whether one, or a combination, of the above options can overcome restrictions on access to people or information to enable the group auditor to obtain sufficient appropriate audit evidence is a matter of professional judgment.

A29A. When the group has a non-controlling interest in an entity that is accounted for by the equity method and the group auditor's access is restricted, the group auditor's procedures to obtain sufficient appropriate audit evidence are a matter of professional judgment in view of the assessed risks of material misstatement.⁴⁷ Such procedures may include:

- Considering financial information that is available from group management, as group management also needs to obtain the entity's financial information in order to prepare the group financial statements.
- Considering publicly available information, such as audited financial statements, public disclosure documents, or quoted prices of equity instruments in the non-controlled entity.
- Considering other sources of information that may corroborate or otherwise contribute to audit evidence obtained. For example, if the group has representatives who are on the executive board or are members of those charged with governance of the non-controlled entity, discussion with them regarding the non-controlled entity and its operations and financial status may be a useful source of information.

A30. When the group auditor cannot overcome restrictions, the group auditor may communicate about the restrictions to the group auditor's firm. The group auditor's firm may discuss with the component auditor's firm about how to overcome the restrictions. The group auditor's firm may also be required by law or regulation to communicate with regulators, listing authorities, or others, about the restrictions or how to overcome the restrictions. The group auditor may also be required by law and regulation to communicate about the restrictions with group management 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.

A31. 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 may call into question group management's integrity.

Effect of Restrictions on the Auditor's Report on Group Financial Statements

A32. ISA 705 (Revised) contains requirements and guidance about how to address situations where the group auditor is unable to obtain sufficient appropriate audit evidence. Appendix 2 to this ISA contains an example of an auditor's report containing a qualified group audit opinion based on the group

⁴⁷ ISA 330, paragraph 7(b)

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

A33. 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 ISA still apply to the group audit, and the effect of the group auditor's inability to obtain sufficient appropriate audit evidence is addressed in ISA 705 (Revised).

Overall Group Audit Strategy and Group Audit Plan

The Continual and Iterative Nature of Planning and Performing a Group Audit (Ref: Para. 17A)

A33A. As explained in ISA 300,⁴⁸ 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 risk assessment or further audit procedures, the group auditor may need to modify the overall group audit strategy and group audit plan, and thereby the resulting planned nature, timing and extent of further audit procedures, based on the revised consideration of assessed risk. 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 to which component auditors are to be involved. ISA 300⁴⁹ requires the group auditor to update and change the overall audit strategy and audit plan as necessary during the course of the audit.

A33B. In a continuing group audit engagement the group auditor may have an initial understanding of the group and its environment, the applicable financial reporting framework and the entity's system of internal control obtained through the prior year's audit. This initial understanding may assist the group auditor in developing initial expectations about the classes of transactions, account balances and disclosures that may be significant.

A33C. In an initial group audit engagement, the group auditor may establish the overall group audit strategy and group audit plan based on information obtained from group management, those charged with governance of the group and, where applicable, communication with component management or the predecessor.

Establishing the Overall Group Audit Strategy and Group Audit Plan (Ref: Para. 17A)

A33D. The process of establishing the overall group audit strategy and group audit plan may assist the group auditor in developing expectations for matters such as:

- Whether to perform audit work centrally, at a component or a combination thereof; and

⁴⁸ ISA 300, paragraph A2

⁴⁹ ISA 300, paragraph 10

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

A33E. The 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.

Components at Which to Perform Audit Work (Ref: Para. 17A(a))

A33F. 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 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.
- 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 associated with the 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.
 - Abnormal fluctuations identified by analytical procedures performed at group level, as required by ISA 315 (Revised 2019).⁵⁰
- The nature and extent of commonality of controls and whether, and if so, how, the group centralizes activities relevant to financial reporting.

Resources (Ref: Para. 17A(b), 25)

A33G. Factors that influence the group auditor's determination about the resources needed to perform the group audit and the nature, timing and extent to which component auditors are to be involved is a matter of professional judgment and 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 members. For example, the involvement of experts may be needed on complex matters. In addition, 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.
- The initial expectations about the potential risks of material misstatement.

⁵⁰ ISA 315 (Revised 2019), paragraph 14(b)

- 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' business activities, including their complexity or specialization of operations.
- 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.

A33H. When the group auditor determines that component auditors will be involved in the group audit, the group auditor may involve the component auditors throughout the different phases of an audit, for example, component auditors may:

- Perform risk assessment procedures (see paragraph 25); and
- Respond to the assessed risks of material misstatement (see paragraph 37).
- 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.

A33I. ISA 300⁵¹ requires the group engagement partner and other key members of the engagement team to be involved in planning the 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. 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 audit. The group engagement partner's 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 involved in designing and performing risk assessment or further audit procedures.

Consideration When Component Auditors Are Involved (Ref: Para. 18–19)

A34. In evaluating whether the group auditor has the ability 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.

⁵¹ ISA 300, paragraph 5

A35A. Where the component auditor is unable to cooperate with the group engagement team, the group auditor may request the component auditor to provide the reasons why. When the component auditor is unable as a result of restrictions imposed by a law or regulation, the group auditor may be able to take appropriate action to address the matter, including adjusting the nature of the work requested to be performed and obtaining sufficient appropriate audit evidence relating to the work to be performed at the component without involving that component auditor (in accordance with paragraph 22).

Relevant Ethical Requirements, Including Those Related to Independence (Ref: Para. 20)

A36. When performing work at a component for a group audit engagement, the component auditor is subject to ethical requirements, including those relating to independence, that are relevant to the group audit. Such requirements may be different 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.

A37. In communicating relevant ethical requirements, the group auditor may consider whether additional information or training for component auditors is necessary with respect to the provisions of the ethical requirements that are relevant to the group audit engagement.

A38. ISA 220 (Revised) requires the engagement partner to remain alert throughout the audit engagement, through observation and making inquiries as necessary, for actual or suspected breaches of relevant ethical requirements by the engagement team.⁵² Becoming aware of actual or suspected breaches of relevant ethical requirements may be more challenging in a group audit, particularly where component auditors do not use common network requirements. In such circumstances, the group auditor may also instruct component auditors to communicate relevant information timely to the group engagement partner, such that the group engagement partner has sufficient time to respond and address the actual or suspected breach.

A39. As described in ISQM 1, there may be circumstances when the fee quoted for an engagement is not sufficient given the nature and circumstances of the engagement and where such insufficiency 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 more important consideration by the firm in respect to group audit engagements where, for example, there are multiple components at which audit procedures are performed. 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.

A39A. Relevant ethical requirements may also contain provisions regarding the identification and evaluation of threats and how they are to be dealt with. For example, the International Ethics Standards Board of Accountants' (IESBA) International Code of Ethics for Professional Accountants (including

⁵² ISA 220 (Revised), paragraph 19

International Independence Standards) (IESBA Code) explains that a self-interest threat to compliance with the fundamental principle of professional competence and due care may arise if the fee quoted for an audit engagement is so low that it might be difficult to perform the engagement in accordance with professional standards.⁵³

Engagement Resources (Ref: Para. 21)

A40A. 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 firm and may subsequently request the component auditor or the firm to make sufficient and appropriate resources available.

A40B. ISA 220 (Revised)⁵⁴ provides guidance regarding matters the engagement partner may take into account when determining the competence and capabilities of the engagement team. This determination is particularly important in a group audit because the engagement team may include component auditors (i.e., individuals from another firm). Paragraph A24 of ISA 220 (Revised) 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 an individual from another firm has the appropriate competence and capabilities to perform the audit engagement. For example, as part of the confirmation as required by paragraph 19, the group auditor may ask the component auditor to confirm that the component auditor has the appropriate competence and capabilities, including sufficient time to perform the assigned audit procedures at the component.

Competence and capabilities of the component auditors

A41. Determining whether the component auditor has the appropriate competence and capabilities 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. Determining whether the component auditor has the appropriate competence and capabilities is a matter of professional judgment and is influenced by the nature and circumstances of the group audit engagement.

A42. In determining whether component auditors have the appropriate competence and capabilities to perform the necessary procedures at the component for purposes of the group audit, 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 component auditor's understanding of the applicable financial reporting framework relevant to the group financial statements, and any instructions provided by group management.
- The degree to which the group auditor and component auditor are subject to common systems of quality management, for example, whether the group auditor and a component auditor:

⁵³ IESBA Code, paragraph 330.3 A2

⁵⁴ ISA 220 (Revised), paragraph A71

- Use common resources to perform the work (e.g., audit methodologies or information technology (IT) applications);
- Share common policies or procedures affecting engagement performance (e.g., direction and 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
- Information obtained through interactions with component management, those charged with governance, and other key personnel, such as internal auditors.

A43. 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.⁵⁵
 - Information from the network about the results of the monitoring activities undertaken by the network across the network firms.
 - Obtaining confirmations from the professional body or bodies to which the component auditor belongs, the authorities by which the component auditor is licensed, or other third parties.
- Discussing the matters in paragraph A51 with the component auditor.
- Requesting the component auditor to confirm the matters referred to in paragraph 20 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.
- In subsequent years, requesting that the component auditor confirm whether anything in relation to the matters listed in paragraph 21(a)–(b) has changed since the previous year.
- Obtaining published external inspection reports

⁵⁵ ISQM 1, paragraph 53

A44. The group engagement partner's firm and the component auditor's firm may be members of the same network and may be subject to common network requirements or use common networks services.⁵⁶ 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, 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, taking into account the nature and circumstances of the firm and the engagements it performs

Automated tools or techniques

A45. As described in ISA 220 (Revised),⁵⁷ 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 or techniques. When the group auditor requires component auditors to use specific automated tools and techniques when performing audit procedures, the group auditor may include in communications 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. 22)

A46A. ISA 220 (Revised)⁵⁸ 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 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. Such actions may include the component auditor evaluating the significance of the breach, determining whether actions may be taken to satisfactorily address the consequences of the breach, and communicating with the group auditor. No further actions or involvement of the group auditor may be needed with respect to the work of the component auditor if the group auditor agrees that the component auditor has satisfactorily addressed the breach.

A47. If a component auditor is not independent in accordance with ethical requirements that are relevant to the group audit, the group auditor cannot overcome this by being involved in the work of the component auditor or by supplementing the work of component auditor by performing additional risk assessment or further audit procedures on the financial information of the component.

⁵⁶ ISQM 1, paragraphs 58–59

⁵⁷ ISA 220 (Revised), paragraph A20

⁵⁸ ISA 220 (Revised), paragraphs 17

- A48. Serious concerns are those concerns that 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. 23)

- A48A. ISA 220 (Revised)⁵⁹ includes requirements and guidance regarding the engagement partner's responsibility for the nature, timing and extent of the direction and supervision of the members of the engagement team and the review of their work. For a group audit, the approach to direction, supervision and review 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 group audit-engagement specific responses. 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.
- A49. It may be not possible or practical for the group engagement partner to solely determine the nature, timing and extent of direction, supervision and review, particularly when the engagement team includes a large number of component auditors that may be located in multiple locations. In managing quality at the engagement level, the group engagement partner may assign such responsibilities to other members of the engagement team.
- A50. 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, for example, in relation to the form, content and timing of communications with component auditors, including the use of group auditor instructions to component auditors. ISA 220 (Revised) provides examples of actions that may need to be taken in such circumstances.⁶⁰
- A51. In addition, the nature, timing and extent of direction and supervision and review of the component auditor's work may be tailored by taking into account 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, a corresponding increase in the extent of direction and supervision of the component auditor and a more detailed review of the component

⁵⁹ ISA 220 (Revised), paragraphs 30, A81–A89 and A94–A97

⁶⁰ ISA 220 (Revised), paragraph A24

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 detailed instructions, introduce greater in-person supervision, increase the frequency of discussions with component auditors, or assign more experienced group auditors 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 where service delivery centers are used.
- Access to component auditors' audit documentation. For example, where component auditor working papers cannot be transferred out of the jurisdiction, greater in-person supervision of the component auditor and in-person or electronic review of the component auditor's audit documentation may be appropriate (see also paragraphs A27–A32).

A52. There are different ways in which the group engagement partner may direct and supervise component auditors and review their work, for example:

- Meetings or calls with component auditors to communicate about identified and assessed risks, issues, findings and conclusions.
- Reviews of the component auditor's documentation in person or remotely when permitted by law and regulation.
- Participating in the closing and other key meetings between the component auditors and component management.

Communications with Component Auditors (Ref: Para. 23A)

A52A. 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.

A52B. 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 and procedures of the group auditor.
- A mutual understanding of relevant issues and the expected actions arising from the communication process.
- The form of communications. For example, it may be better to discuss matters that need timely attention in a face-to-face meeting (in person or by videoconference) or by audioconference 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.

- The process for taking action and reporting back on matters communicated by the group auditor.

A52C. The nature, timing and extent of communications between the group auditor and component auditors depends 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.

Form of communications

A52D. 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.

A52E. The form of communications also may be affected by such factors as:

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

A52F. 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 onsite with the component auditor to discuss significant matters or to review relevant parts of the component auditor's audit documentation.

A52G. Paragraph 44 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 A112A, 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.

A52H. Regardless of the form of communication, the documentation requirements of this and other ISAs apply.

Timing of communications

A52I. The appropriate timing for 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 engagement, may be made as part of agreeing the terms of the engagement.

Non-compliance with laws or regulations (Ref: Para. 20, 23A)

A52J. 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.⁶¹ The obligation of the group engagement partner to communicate non-compliance or suspected non-compliance may extend to components that are not included in the scope of the group audit (e.g., components for which an audit is required by statute, regulation or for another reason, but for which no additional procedures are 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

A53. ISA 315 (Revised 2019) 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.⁶² Appendix 3 of this ISA provides further explanation of the components of the group's system of internal control, including controls over the group's financial reporting process and the consolidation process.

A55. The group auditor's 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 and 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 another reason on the financial statements of an entity or business unit that is part of the group.

A55A. 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. [Previously paragraph A71D]

The Group and Its Environment (Ref: Para. 24(a))

A56. 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,

⁶¹ See, for example, Section 360.17 and Section 360.18 of the IESBA Code

⁶² ISA 315 (Revised 2019), paragraphs A50–A89

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. Further, an understanding of change management controls, automated application controls and interface controls may be obtained to understand the integrity of a complex 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 over multiple jurisdictions and when there are changes in ownership through formation, acquisition or joint ventures. These factors may give rise to increased susceptibility to material misstatements.

A57. Obtaining an understanding of the degree to which the group's activities are similar may enable the group auditor to identify similar risks of material misstatement across components and design an appropriate response.

A58. 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 group auditor's understanding of such performance measures may help to identify:

- Areas where there is increased susceptibility to the risk of material misstatement (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. 24(c)(i))

- A59. 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, that 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.⁶³
- A60. The understanding of the components of the group's system of internal control therefore includes understanding the commonality of the controls within those components across the group. That understanding may help the group auditor to appropriately respond to the assess risks of material misstatement. When the group auditor plans to test the operating effectiveness of identified controls⁶⁴ that are common across the group, the group auditor evaluates the design and determines the implementation of those controls in accordance with ISA 315 (Revised 2019).
- A61. To determine the commonality of an identified control across the group, the group auditor may consider whether:
- The control is designed centrally and 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.
- A62. Judgment may often be needed to determine whether an identified 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 are 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, the group auditor may need to consider whether the control can still 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).
- A63. 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

⁶³ ISA 315 (Revised 2019), paragraph A5

⁶⁴ ISA 315 (Revised 2019), paragraph 26(a)

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 services center that processes transactions on behalf of other entities or business units within the group). Typically, the processing of transactions and related controls at a shared service center operates 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 for those transactions being processed by the shared service center, regardless of the source of the transaction, are the same). 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. 24(c)(ii))

A64. 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., where the initiation, authorization, recording, processing, or reporting of revenue transactions is performed at a shared service center).

A65. Obtaining an understanding of how centralized activities fit into the overall group structure, and the nature of the activities undertaken, may help the group auditor 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 a component, but the processing may occur at the shared service center).

A65A. The group auditor may involve component auditors in testing the operating effectiveness of common controls or controls at 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 at centralized activities supports the group auditor's determination of the nature, timing and extent of substantive procedures to be performed.

Communications About Significant Matters that Support the Preparation of the Group Financial Statements (Ref: Para. 24(c)(iv))

A66. Group entities or business units may use a financial reporting framework for statutory, regulatory or another reason 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, where 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

A67. In applying ISA 315 (Revised 2019),⁶⁵ the group auditor is required to understand how group

⁶⁵ ISA 315 (Revised 2019), paragraph 25(b)

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 group auditor's identification and assessment of the risks of material misstatement of the group financial statements. For example, in certain circumstances, 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.

A68. 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.

Engagement Team Discussion (Ref: Para. 24)

A69. The group engagement partner's determination of which members of the engagement team to include in the discussions and the topics to be discussed, is affected by factors such as initial expectations about the risks of material misstatement and the expected involvement of component auditors.

A70. The discussions provide 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.⁶⁶
- Identify policies followed by group or component management that may be biased or designed to manage earnings that could lead to fraudulent financial reporting.

⁶⁶ ISA 240, paragraph 16 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.

- 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.
- Consider whether uniform accounting policies are used to prepare the financial information of the components for the group financial statements and, where not, how differences in accounting policies are identified and adjusted (where required by the applicable financial reporting framework).
- Discuss fraud that has been identified, or information that indicates existence of a fraud.
- 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.
- Share information that may indicate non-compliance with national laws or regulations, for example, payments of bribes and improper transfer pricing practices.
- Identify risks of material misstatement relevant to components where the exercise of professional skepticism may be particularly important.
- Discuss any 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.

Considerations When Component Auditors Are Involved

Communications with Component Auditors (Ref: Para. 26–26A)

A72. 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.⁶⁷ 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 ISA 200,⁶⁸ is therefore particularly important when these circumstances exist.

A72A. The group auditor may communicate the matters in paragraph 26A to other component auditors, if these matters are relevant to the work of those component auditors. *Element of Unpredictability*

⁶⁷ ISA 550, paragraph 2

⁶⁸ ISA 200, paragraphs 17 and A53–A54

Identifying and Assessing the Risks of Material Misstatement

- A72B. The group auditor's process to identify and assess the risks of material misstatement of the group financial statements is cumulative and iterative and may be challenging, particularly where the component's business activities are complex or specialized, or when there are many components across multiple locations. In applying ISA 315 (Revised 2019),⁶⁹ the group 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. [Previously paragraph A78]
- A72C. The initial expectations about the potential risks of material misstatement take into account the group 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 have direct knowledge and experience with the entities or business units which may be helpful in understanding the business 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. [Previously paragraph A79]
- A72D. For the identified risks of material misstatement at the assertion level, a separate assessment of inherent risk and control risk is required by ISA 315 (Revised 2019).⁷⁰ The group auditor assesses the inherent risk by assessing the likelihood and magnitude of identified risks of material misstatement, taking into account the inherent risk factors. After identifying the risks of material misstatement, including those communicated by component auditors, the group auditor determines the relevant assertions and related significant classes of transactions, account balances and disclosures of the group financial statements. The group auditor's process (or the process of component auditors to whom risk assessment procedures are assigned) of assessing the identified risks of material misstatement at the assertion level also includes the determination of significant risks. [Previously paragraph A79A]
- A72E. 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. [Previously paragraph A79C]
- A72F. Appendix 4 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. [Previously paragraph A79D] Consolidation Adjustments and Reclassifications (Ref: Para. 34(b))

Fraud

⁶⁹ ISA 315 (Revised 2019), paragraph 22

⁶⁶ ISA 315 (Revised), paragraph 31 – 34 ⁷¹

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

A72G. The auditor is required to identify and assess the risks of material misstatement of the financial statements due to fraud, and to design and implement appropriate responses to the assessed risks.⁷¹ 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 risks that the group financial statements are materially misstated as a result of fraud.
- Group management's process for identifying and responding to the risks of fraud in the group, including any specific fraud risks identified by group management, or classes of transactions, account balances, or for which a risk of fraud is higher.
- Whether there are particular components for which the risks of material misstatement due to fraud is higher.
- 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 if considered appropriate, component management, the component auditors, and others) to the group auditor's inquiry whether they have knowledge of any actual, suspected, or alleged fraud affecting a component or the group. [Previously paragraph A80].

Considerations When Component Auditors Are Involved (Ref: Para. 26C)

A72H. 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 assessment of the risks of material misstatement of the group financial statements in accordance with paragraph 26B. [Previously paragraph A71]

A72I. 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, ISA 315 (Revised 2019)⁷² requires the group auditor to perform additional risk assessment procedures until audit evidence has been obtained to provide such a basis. [Previously paragraph A71B]

Component Performance Materiality (Ref: Para. 29(a))

A73. Paragraph 29(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

⁷¹ ISA 240, *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements*

⁷² ISA 315 (Revised 2019), paragraph 35

not be an arithmetical portion of the group performance materiality and, consequently, the aggregate of component performance materiality amounts may exceed group performance materiality.

A74. This ISA 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 financial statements, ISA 320 requires the auditor to determine the materiality level or levels to be applied to those particular classes of transactions, account balances or disclosures.⁷³ 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.⁷⁴

A75. 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 generally 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.

A75A. To address aggregation risk, paragraph 29(a) requires component performance materiality to be lower than group performance materiality. As explained in paragraph A75, as the extent of disaggregation across components increases, a lower component performance materiality amount generally 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 account balance or class of transactions for one component represents a substantial portion of the respective significant class of transactions or significant account balance in the group financial statements.

A76. 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

⁷³ ISA 320, paragraphs 10 and A11–A12

⁷⁴ ISA 320, paragraph A13

(i.e., not disaggregated across components). In such cases, group performance materiality often will be used for purposes of performing these procedures.

'Clearly Trivial' Threshold (Ref: Para: 29(b))

A77. 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 ISA 450,⁷⁵ 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.

Communicating Component Performance Materiality to Component Auditors (Ref. Para. 30)

A77A. 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 in-depth 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.

A77B. Because component performance materiality is based, at least in part, on expectations about the nature, frequency, and magnitude of misstatements in the component financial information, 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. 33)

Performing Further Audit Procedures

Performing Further Audit Procedures Centrally

A86. The group auditor may design and perform further audit procedures centrally if the audit evidence to be obtained from performing further audit procedures on one or more 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), the group auditor may perform further audit procedures to address the assessed risks of material misstatement of the related classes of transactions, account balances, and disclosures. 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.

A88. 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 homogenous because they share the same characteristics,

⁷⁵ ISA 450, paragraph A3

the related risks of material misstatement are the same, and controls are designed and operating in a consistent way.

A88A. 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

A88B. In other circumstances, procedures to respond to the risks of material misstatement at the group financial statement level 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;
- Multiple lines of business;
- Operations across multiple locations; or
- De-centralized systems of internal control.

Numerous Individual Components that Are not Individually Financially Significant

A89. The group auditor may have identified a significant class of transactions, account balance or disclosure in the group financial statements that comprises classes of transactions, account balances or disclosures at many entities and business units, none of which individually result in a risk of material misstatement at the group financial statement level. In some cases, it may be possible for the group auditor to obtain sufficient appropriate audit evidence by performing audit procedures centrally on these 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 use of automated tools and techniques may be helpful in these circumstances

A89A. In other cases, it may be necessary for the group auditor to perform audit procedures at selected individually financially insignificant components to address the risks of material misstatement of the group financial statements. The determination of the components at which audit procedures may need to be performed, and the nature, timing and extent of 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 A91).

A90. The group auditor may perform substantive analytical procedures in accordance with ISA 520⁷⁶ to address the risks of material misstatement at the assertion level for classes of transactions, account balances or disclosures in the group financial statements. Depending on the circumstances of the engagement, the financial information of the components may be aggregated by the group auditor 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

⁷⁶ ISA 520, *Analytical Procedures*

The Nature and Extent of Further Audit Procedures

A90A. In determining the nature and extent of further audit procedures to be performed at a component, the group auditor may:

- 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. [Previously paragraph A97]

A90B. The group auditor shall take responsibility for the nature, timing and extent of further audit procedures to be performed. However, as described in paragraph 3, component auditors can be, and often are, involved in all phases of the group audit, including in the performance of further audit procedures.

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

A90C. 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. [Previously paragraph A98] **Subsequent Events** (Ref: Para. 47–48)

Design and perform further audit procedures on one or more classes of transactions, account balances or disclosures

A90D. The group auditor may determine that designing and performing further audit procedures on one or more classes of transactions, account balances, or disclosures of the financial information of a component is an appropriate approach to address an assessed risk 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. [Previously paragraph A100]

Perform specific further audit procedures

A90E. The group auditor may determine that performing specific further audit procedures on the financial information of a component is an appropriate approach, including when audit evidence needs to be obtained with respect to specific assertions. For example, the group auditor may centrally test the class of transaction, account balance or disclosure and may require 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 litigations in the component's jurisdiction or the existence of an asset). [Previously paragraph A101]

Element of Unpredictability

A91. Including 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.⁷⁷

Operating Effectiveness of Controls that Are Common Across the Group

A92. If the group auditor intends to 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, the group auditor, in accordance with ISA 330,⁷⁸ is required to design and perform tests of controls to obtain sufficient appropriate audit evidence as to the operating effectiveness of those controls. This includes obtaining sufficient appropriate audit evidence that the controls are operating at the components as designed. The group auditor may request the component auditor to assist the group auditor in performing these procedures.

A93. 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.

A93A. 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 with component auditors. For example, when a component auditor is requested to design and perform further audit procedures on the entire financial information of the component, or design and perform further audit procedures on one or more classes of transactions, account balances or disclosures, the component auditor may need information about the control testing performed to determine the nature, timing and extent of the substantive procedures.

Consolidation Process

Consolidation Procedures (Ref: Para. 34(a))

A94. The further audit procedures on the consolidation, including sub-consolidations, may include:

- Determining that the journal entries necessary 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.

⁷⁷ ISA 240, paragraph 30(c)

⁷⁸ ISA 330, paragraph 8

Consolidation Adjustments and Reclassifications (Ref: Para. 34(b))

A95. 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;
- Determining whether significant adjustments have been correctly calculated, processed and authorized by group management and, where 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.

Consolidation Process (Ref: Para. 39)

A102. 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 and sub-consolidations (also see paragraphs A42 and A51) 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).

Using Audit Evidence from an Audit Performed for Another Purpose (Ref: Para. 42)

A103. An audit may be performed on the financial statements of an entity or business unit that is part of the group, and an auditor's report has been issued for statutory, regulatory or other reasons. For example, when an entity or business unit has been acquired close to year-end. If an audit has been performed and an auditor's report has been issued for statutory, regulatory or other reasons, the group auditor may use audit evidence from that audit if the group auditor is satisfied that the work is appropriate for the group auditor's purposes. If the audit procedures performed are not an appropriate response to the assessed risks of material misstatement of the group financial statements, the group auditor may decide not to use the audit evidence from that audit. Alternatively, the group auditor may plan to have additional audit procedures performed on the component, to address the assessed risks of material misstatement of the group financial statements.

A104. In addition to the factors in paragraph 42, factors that may affect the group auditor's decision whether to use the audit evidence from an audit that has already been performed due to statutory, regulatory or other reasons to provide audit evidence for the group audit may include the following:

- Differences in the financial reporting framework applied in preparing the financial statements of the entity or business unit and that applied in preparing the group financial statements.

- Differences in the auditing and other standards applied by the component auditor and those applied in the audit of the group financial statements.
- Differences in the financial reporting period-end between the financial statements of the entity or business unit and the financial statements of the group.

Communication about Matters Relevant to the Group Auditor's Conclusion

Communication about Matters Relevant to the Group Auditor's Conclusion with Regard to the Group Audit (Ref: Para. 44)

A111A. Although the matters required to be communicated in accordance with paragraph 44 relate to the group auditor's conclusion with regard to the group audit, certain matters may need to be communicated timely in the course of the component auditor's procedures. Such matters may include, for example:

- Information on instances of non-compliance with ethical requirements relevant to the group audit, including identified breaches of independence provisions;
- Information on 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. 44(c))

A111B. 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 44(e). 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.

Communications with Those Charged with Governance of the Component (Ref: Para. 44(f))

A112. In certain circumstances, the group auditor may combine certain entities or business units into components for purposes of planning and performing the group audit (see paragraphs A4–A6). In these circumstances, the group auditor may need to use professional judgment to determine, in accordance with ISA 260 (Revised),⁷⁹ the appropriate person(s) in the governance structure of those entities or business units with whom to communicate, in view of the nature of the matters to be communicated.

Component Auditor's Overall Findings or Conclusions (Ref: Para. 44(h))

A112A. The form and content of the deliverables from the component auditor are influenced by the nature

⁷⁹ ISA 260 (Revised), paragraph 11

and extent of the audit work the component auditor has been requested to perform. The component auditor's overall findings or conclusions may take the form of a conclusion or opinion on the audit work performed by the component auditor for purposes of the group audit.

Reviewing the Component Auditor's Audit Documentation (Ref: Para. 45A)

A112C. ISA 220 (Revised) 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.⁸⁰ Accordingly, when determining whether, and the extent to which, it is necessary to review parts of the component auditor's audit documentation, paragraph 45A requires the group auditor to consider the work performed by the component auditor and the competence and capabilities of the component auditor.

A113. Paragraph A51 provides factors that the group auditor may take into account in tailoring the nature, timing and extent of the direction and supervision of the component auditor, and the review of their work, to the facts and circumstances of the group audit. Other factors that may affect the nature, timing and extent of the review of the component auditor's audit documentation in the circumstances include:

- (a) 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;
- (b) The significant judgments made by, and the findings or conclusions of, the component auditor with respect to matters that are material to the group financial statements;
- (c) The matters communicated to the group auditor in accordance with this ISA; and
- (d) The fact that the component auditor's audit documentation has been subjected to the component auditor's firm's policies or procedures for review of audit documentation

Subsequent Events

A114. The group auditor may:

- (a) 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.
- (b) 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. 49)

⁸⁰ ISA 220 (Revised 2020), paragraph 30

A114A. 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 classes of transactions, account balances, or disclosures and related assertions.

A115. The evaluation required by paragraph 49 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 ISA 330⁸¹ for the auditor, irrespective of the assessed risks of material misstatement, to design and perform substantive procedures for each material account balance, class of transactions and disclosure also may be helpful for purposes of this evaluation in the context of the group financial statements.

A115A. In performing the evaluation required by paragraph 49, information that the group auditor may take into account with respect to 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 44, 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 26A;
- 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 the component auditor's audit documentation in accordance with paragraph 45A. [Previously paragraph A112B]

A115B. In some circumstances, an overall summary memorandum or report 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. 50)

⁸² ISA 705 (Revised), paragraphs 20 and 24

A116. 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., with respect to transactions subject to common accounting policies or common controls) that may affect other components.

Auditor's Report

Auditor's Report (Ref: Para: 52)

A117. 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.

A118. 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.⁸² In some circumstances, a reference to a component auditor may be necessary to adequately describe the reasons for the modified opinion, e.g., 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 (Ref: Para. 53A–55)

A119A. The group audit plan may be complex due to the number and nature of the entities and business units comprising the group. In addition, as explained in paragraph A5, 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 group auditor plan may be helpful with respect to coordinating the work performed at components, including when component auditors are involved, and in identifying component management (see paragraph A15).

A120. ISA 240 contains requirements and guidance on communication of fraud to management and, where management may be involved in the fraud, to those charged with governance.⁸³

A121. 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.

⁸² ISA 705 (Revised), paragraphs 20 and 24

⁸³ ISA 240, paragraphs 41–43

Communication with Those Charged with Governance of the Group (Ref: Para. 56)

A122. 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 56(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 56(b) may be communicated at the end of the audit, and the matters referred to in paragraph 56(c)–(d) may be communicated when they occur.

A123. ISA 260 (Revised)⁸⁴ requires the auditor to communicate with those charged with governance an overview of the planned scope and timing of the audit. With respect to a group audit, the group auditor's determination of the planned scope and approach is based on the understanding of the group and its environment in accordance with paragraph 24 of this ISA. This understanding helps the group auditor to determine components at which audit work will be performed, including whether certain of the group's entities or business units may be considered together as a component, and the nature, timing and extent to which component auditors are to be involved.

Communication of Identified Deficiencies in Internal Control

A123A. In accordance with ISA 265, 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.⁸⁵ The group auditor may request input from the component auditor as to whether an identified deficiency or combination of deficiencies at the component is a significant deficiency in internal control.

Documentation (Ref: Para. 57)

A123B. As explained in paragraph A6 of ISA 230, other ISAs contain specific documentation requirements that are intended to clarify the application of ISA 230 in the particular circumstances of those other ISAs. The Appendix to ISA 230 lists other ISAs that contain specific documentation requirements and guidance.

A123C. The audit documentation for the group audit supports the group auditor's evaluation in accordance with paragraph 49 as to whether sufficient appropriate audit evidence has been obtained on which to base the group audit opinion. [Previously paragraph A123A.]

A124. The audit documentation for the group audit comprises:

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

⁸⁴ ISA 260 (Revised), paragraph 15

⁸⁵ ISA 265, paragraph 8

A124x. 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 1.⁸⁶ 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: 57(b))

A124y. Documentation of the basis for the group auditor's determination of components may be evidenced in various ways, including fulfillment of the following requirements:

- Paragraph 17A, which requires the group auditor to determine the components at which audit work will be performed, based on the group auditor's understanding of the group's organizational structure and information system.
- Paragraph 26B, which requires the group auditor to take responsibility for the identification and assessment of the risks of material misstatement of the group financial statements.
- Paragraph 56(a), which requires the group auditor to communicate with those charged with governance of the group 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.

Basis for the Group Auditor's Determination of the Competence and Capabilities of Component Auditors (Ref: Para: 57(ca))

A124z. ISQM 1 provides guidance regarding the firm's policies or procedures that address the competence and capabilities of the engagement team.⁸⁷ Such policies or procedures also may describe or provide guidance about the documentation of the determination of the competence and capabilities of the engagement team, including component auditors.

A124A. [Moved to paragraph A127A]

A124B. [Moved to paragraph A127A]

A124C. [Moved to paragraph A127B]

Documentation of the Direction and Supervision of Component Auditors and the Review of Their Work (Ref: Para. 57(d))

A124D. As described in paragraph A48A, 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 responses specific to the group audit and addressing the group auditor's firm policies or procedures. 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.

A125. ISA 300 requires the auditor to describe, in the audit plan, the nature, timing and extent of the planned direction and supervision of engagement team members and the review of their work. When

⁸⁶ ISQM 1, paragraphs 31(f) and A83–A85

⁸⁷ ISQM 1, paragraph A96

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, is influenced by the factors described in paragraphs A33E and A33F.

A126. When component auditors are involved in the group audit, the group auditor's documentation of its involvement in the work of component auditors may include, for example:

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

A127. Paragraph 45A requires the group auditor to consider certain matters in determining whether, and the extent to which, it is necessary to review parts of the component auditor's audit documentation. Paragraph A113 includes other factors that may affect the nature, timing and extent of the review of audit documentation of component auditors.

A127A. Component auditor documentation generally need not be replicated in the group auditor's audit file. However, depending on the facts and circumstances, the group auditor may decide to replicate or retain copies of certain component auditor documentation in the group auditor's audit file (e.g., for ease of accessibility). For example, the group auditor may determine that copies of certain component auditor documentation may be helpful to facilitate the review by the group engagement partner or engagement quality reviewer for the group audit, or to supplement the description of a particular matter in the communication from the component auditor. 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. [Previously paragraphs A124A and A124B]

A127B. 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 facilitate the request of a regulatory authority to review documentation related to work performed by a component auditor. [Previously paragraph A124C]

A128. 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, and also may also be used for audit documentation, including indicating the names of the group auditor reviewer(s) and the date(s) and extent of the review.

Additional Considerations When Access to Component Auditor Documentation is Restricted

A129. 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 may restrict the component auditor from providing documentation outside of its jurisdiction.

A130. In these circumstances, the group auditor may be able to overcome the restrictions, such as when the group auditor is able to review the component auditor documentation by visiting the component auditor's location, or remotely when permitted by law or regulation (see paragraph A29). In these circumstances, the group auditor's documentation nonetheless needs to comply with the requirements of this ISA, including with respect 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 paragraph A113 may be helpful to the group auditor in determining the extent of the review of the component auditor documentation in these circumstances. The guidance in paragraphs A127A and A127B provides examples of circumstances in which certain component auditor documentation may be included in the group auditor's audit file.

A130A. If the group auditor is unable to obtain access to the component auditor 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 A32.