EXPOSURE DRAFT OF PROPOSED ISRE 2410 (REVISED), *REVIEW OF INTERIM FINANCIAL INFORMATION PERFORMED BY THE INDEPENDENT AUDITOR OF THE ENTITY'S ANNUAL FINANCIAL STATEMENTS*

Response Form

Guide for Respondents

Comments are requested by **September 3, 2026**. *Note that requests for extensions of time cannot be accommodated due to the timeline for finalization of this proposed revised standard.*

This form is for providing comments on the Exposure Draft of proposed International Standard on Review Engagements™ (ISRE) 2410*, Review of Interim Financial Information Performed by the Independent Auditor of the Entity's Annual Financial Statements* (ED-2410), in response to the questions set out in the Explanatory Memorandum (EM) to ED-2410. It also allows for respondent details, demographics and other comments to be provided. Use of this form will facilitate the IAASB's analysis of the responses.

You may respond to all questions or only those questions for which you have specific comments.

To assist our consideration and analysis of your comments, please:

- For each question, start by indicating your overall response using the drop-down menu under each question. Include any detailed comments below that, as indicated.
- When providing comments, respond directly to the questions and:
    - Provide the rationale for your answers. If you disagree with the proposals in ED-2410, please provide specific reasons for your disagreement and include specific suggestions for changes (including specific wording) that may be needed to the requirements, application material or appendices. If you agree with the proposals, it will be helpful for the IAASB to be made aware of this view as support for the IAASB's proposals cannot always be inferred when not stated.
    - Be specific about the sections, headings or paragraphs in ED-2410 to which your responses relate.
    - Refrain from inserting tables or text boxes in your responses.

It is not necessary to include a cover letter containing a summary of your key issues. The response form provides the opportunity to include any other views you wish to place on the public record, should you choose to do so. All responses will be considered a matter of public record and will ultimately be posted on the IAASB website.

Use the "**Submit Comment**" button on the web page for proposed ISRE 2410 (Revised) to upload the completed form.

Responses to IAASB's Request for Comments in the EM for ED-2410, Review of Interim Financial Information Performed by the Independent Auditor of the Entity's Annual Financial Statements

PART A: Respondent Details and Demographic information

Your organization's name (or your name if you are making a submission in your personal capacity)	Wirtschaftsprüferkammer, Germany
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Dr. Michael Hüning
Name(s) of contact(s) for this submission (or leave blank if the same as above)	Jan Langosch
E-mail address(es) of contact(s)	jan.langosch@wpk.de
Geographical profile that best represents your situation (i.e., the geographical perspective from which are you providing feedback on ED-2410). Select the most appropriate option.	Europe If "Other", please clarify
The stakeholder group to which you belong (i.e., the perspective from which are you providing feedback on ED-2410). Select the most appropriate option.	Professional accountancy or professional organization (PAO) If "Other", please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	Chamber of Public Accountants (Wirtschafts-prüferkammer, WPK) is a corporation under public law, whose members are German public accountants, German sworn auditors, German public audit firms and German firms of sworn auditors in Germany. As the representative of the entire profession of auditors in Germany. WPK represents their professional interests towards the public and articulates these interests towards lawmakers, competent courts and other authorities.

Should you choose to do so, you may provide overall views or additional background to your submission. **Please note that this is optional**. The IAASB's preference is that you incorporate all your views in your comments to the questions (also, Question 16 in Part B allows for raising any other matters in relation to ED-2410).

Information, if any, not already included in responding to the questions in Part B:

First, we would like to thank the IAASB for its excellent work on revising the standard.

It is apparent at first glance that the draft sets forth significantly more extensive requirements and thus a higher level of detail than the existing standard. On the one hand, this greater regulatory density could contribute to a more uniform approach to the review of interim financial statements globally; on the other hand, it could be seen to represent a further departure from a principles-based approach in professional pronouncements.

Particularly due to the significantly increased requirements—especially with regard to fraud, subsequent events and going concern—the interim review is becoming more akin to an audit, even though it remains a review providing limited assurance. This could create or widen an expectation gap.

At the same time, the expanded requirements entail a considerable additional documentation burden without providing significant added value to the users.

Ultimately, the independent auditor's interim review report will also become longer and more complex. There is a risk that this will lead to an overburdening of the report and make it more difficult to understand.

PART B: Responses to Questions in the EM for ED-2410

For each question, please start with your overall response by selecting one of the items in the drop-down list under the question. Provide your detailed comments, if any, below as indicated.

Overall Impact

1. Do you agree that ED-2410 is **responsive to the public interest**, considering the qualitative standard-setting characteristics and the standard-setting actions in the project proposal?

   (*See Section I-A and the Appendix in the EM)*

Overall response: **Agree, with comments below**

Detailed comments (if any):

We generally support the revision of ISRE 2410 and consider it to be responsive to the public interest. The existing standard was developed more than 20 years ago and may no longer fully reflect today's reporting environments, regulatory expectations and review practices. Given the importance of interim financial reporting, it seems appropriate to modernize the standard.

However, it is to be noted that in the proposed revised ISRE 2410 the density of regulation, in particular the number and granularity of requirements, has increased significantly. In doing so, the standard moves a step away from a principles-based approach toward a more rules-based one. This impression is further reinforced by the additional 186 paragraphs in the "Application and Other Explanatory Material."

This may partially be due to the fact that many provisions of the extant standard are relatively vague. Consequently, reviewers often relied on their experience from other review engagements, i.e. in accordance with ISRE 2400, in the practical implementation of ISRE 2410, whereas the revision of ISRE 2410 seems to aim at converting it into a sufficient, standalone standard for interim reviews.

On the other hand, the significant increase in requirements is particularly evident in the areas of going concern, fraud, and non-compliance with laws and regulations. Here, a move towards a full-scope audit is apparent, extending beyond the scope of an interim financial statement review. There is a risk that this will create or exacerbate an expectation gap.

Therefore, special care should be taken to preserve the fundamental characteristics of a review.

2. Do you agree that ED-2410 strikes **an appropriate balance** between the work effort required to express a limited assurance conclusion on the interim review engagement, and more robust requirements in the public interest in certain areas (e.g., going concern, fraud and non-compliance with laws and regulations)? You are invited to include as part of your response insights on **the implications or effects** of implementing the proposed standard.

Overall response: **Disagree, with comments below**

Detailed comments (if any):

The requirements relating to going concern, fraud and non-compliance with laws and regulations as well as subsequent events are largely derived from the audit standards and are closely linked to the objectives of an audit engagement. Introducing increasingly audit-like requirements may blur the distinction between a review and an audit. A clear differentiation between limited assurance and reasonable assurance engagements is important for users, preparers and regulators alike.

In our view, the focus of ISRE 2410 should remain on the nature and objectives of a review engagement as a limited assurance engagement. The revised standard should avoid creating an expectation gap by introducing requirements that may be perceived as audit-like by users of the interim financial information. The distinction between a review and an audit should remain clear and understandable.

The strength of a review engagement lies in its ability to provide timely limited assurance through focused inquiries and analytical procedures. The revised standard should preserve these characteristics. In many circumstances, matters relating to fraud and going concern have already been addressed as part of the annual audit. Additional requirements in the interim review should therefore be carefully assessed against the incremental benefit they provide, taking into account the additional complexity, implementation effort and potential impact on users' understanding of the nature of a review engagement.

We encourage the IAASB to maintain a clear distinction between a review engagement and an audit.

Professional Skepticism and Professional Judgment

3.	Does ED-2410 appropriately address the foundational concepts of professional skepticism and professional judgment, and the importance of applying these concepts throughout the interim review engagement? If not, what more might be needed in this regard? *(See Section I-B, paragraph 22(a) in the EM)*

Overall response: **Yes, with comments below**

Detailed comments (if any):

We agree that both fundamental concepts are of paramount importance to all assurance engagements (audits and reviews). Professional skepticism, in particular, must be the basic mindset of an auditor, so to say an indispensable prerequisite for practicing the profession. If this mindset is not sufficiently developed, well-intentioned reminders of the principle in individual standards will be of little use.

Fundamental Principles of an Interim Review Engagement

4.	Does the Introduction section of ED-2410 provide a clear description of the nature and purpose of an interim review engagement, and how it differs from an audit of financial statements, to provide foundational context for the work effort needed to achieve the objective of the engagement? *(See Section I-B in the EM)*

Overall response: **Yes, with comments below**

Detailed comments (if any):

The description seems principally clear and sufficient. However, the increasing alignment of audit requirements, particularly regarding going concern and subsequent events, carries the risk that the distinction between these different types of assurance engagements will become blurred (reference is made to the comments on Question 1).

5.	Is ED-2410 sufficiently clear that while the auditor performs primarily inquiries and analytical procedures, *all procedures* performed for the purpose of achieving the overall objective of the interim review engagement are "review procedures"? If not, what suggestions do you have to make this clearer? *(See Section I-F, paras. 44-47 in the EM)*

Overall response: **No, with comments below**

Detailed comments (if any):

The revised wording "A review involves performing procedures, primarily consisting of inquiries and analytical procedures, and evaluating the evidence obtained." seems somewhat vague. Without further guidance, this may create considerable pressure on the auditor regarding the exercise of professional judgment and the need for justification concerning the scope and depth of the review procedures. Furthermore, it could be perceived by users that the extent of the "review procedures" are required to go far beyond inquiries and analytical procedures thus creating an expectation gap as to the scope of a review.

Approaching an Interim Review Engagement in Accordance with ED-2410

6.	Is it sufficiently clear that, for recurring engagements, the auditor leverages the knowledge and understanding obtained from previous annual audits and interim review engagements for the entity? If not, what suggestions do you have to make this clearer? *(See Section I-B and Section I-F, paragraphs 44-52 in the EM)*

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

n/a

7.	Do you agree with the considerations that apply when the review of interim financial information is the first engagement performed for the audit client? If not, what suggestions do you have for additional considerations related to first-time interim review engagements? *(See Section I-F, paras. 48-52 in the EM)*

Overall response: **Disagree, with comments below**

Detailed comments (if any):

In Section 1-F, para. 48 of the Explanatory Memorandum, it is expressly stated that the underlying principles of ISRE 2410 apply irrespective of whether the auditor has previously audited the financial statements or is newly appointed and the interim review is the auditor's first assurance engagement for the entity and that therefore any specific consideration should be introduced through explanation in the targeted application material only. Para. A77 requires the auditor to obtain the understanding required by paragraph 43 and states that the procedures described in paragraph A74 are also relevant in these circumstances.

It is questionable how to deal with the situation if the incoming auditor is not able to obtain information from the predecessor auditor, e.g. by reviewing the working papers. The revised standard says that the auditor "may have no alternative but to perform the procedures needed to obtain the understanding of the entity and its environment and the entity's system of internal control required for the purposes of the audit of the financial statement".

This would mean that the review of the interim financial statements can be completed only after performing a significant portion of the procedures that are usually performed in an audit of the annual financial statements.

As a result, the requirements of ISRE 2410 would exceed those for a "normal" review of financial information in ISRE 2400. The question remains whether ISRE 2410 is indeed fully applicable to interim review engagements by the auditor of the financial statements in such circumstances, i.e. if the auditor of the interim review engagement has not yet audited the financial statements before.

Materiality

8.	Do you agree with the requirement for the auditor to determine materiality for the interim review engagement, and the related application material that describes the relevant principles that apply? If not, what would you suggest? *(See Section I-F, paragraphs 41-43 in the EM)*

Overall response: **Neither agree/disagree, but see comments below**

Detailed comments (if any):

While it is fully understandable that the auditor needs to determine materiality, in particular, in respect of evaluating the results of the review procedures and the identified misstatements, it does not seem entirely clear what is meant by applying this materiality in designing review procedures that primarily consist of inquiries and analytical reviews.

Group Interim Review Engagements

9.	Overall, do you agree that ED-2410 is capable of being applied for the review of interim financial information of groups? If not, please explain your reasons, and provide suggestions for additional requirements or application material that might be needed. *(See Section I-F, paragraphs 37-40 in the EM)*

Overall response: **Agree, with comments below**

Detailed comments (if any):

The requirements related to group interim review engagements included in the proposed ISRE 2410 (Revised) mainly refer to the cooperation with component auditors, if their involvement is necessary. As far as the necessity of involving component auditors is concerned, the standard only lists a number of factors in the application guidance the auditor may consider. We consider this to be sufficient for the group auditor to apply ISRE 2410 to group interim review engagements.

10.	Are the requirements in ED-2410 that address specific considerations related to group interim review engagements appropriate? If not, please explain your reasons, and provide suggestions for additional requirements or application material that might be needed. *(See Section I-F, paragraphs 37-40 in the EM)*

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

n/a

Fraud and Non-Compliance with Laws and Regulations (NOCLAR)

11. Do you agree that the work effort requirements related to fraud and NOCLAR are appropriate and proportionate to the circumstances of an interim review engagement, recognizing that the engagement is performed by the auditor of the entity's annual financial statements and has responsibilities related to fraud and NOCLAR in the context of that engagement? If not, please explain your reasons, and provide suggestions for the auditor's approach to fraud and NOCLAR in an interim review engagement.

    (See Section I-F, paras. 54-56 in the EM)

Overall response: **Neither agree/disagree, but see comments below**

Detailed comments (if any):

While we believe the requirements regarding NOCLAR are appropriate, those requirements concerning fraud seem rather excessive. The mere fact that "fraud" is mentioned more than 50 times in the revised standard is an indication of the exceptional importance attached to this issue. However, the actual specific review procedures for identifying fraud (and NOCLAR) consist solely of inquiring with management or other appropriate persons whether they have knowledge of any (suspected) fraud or NOCLAR. The remaining requirements merely relate to how to handle such cases and are already known from the respective requirements for audit engagements.

Going Concern

Questions 12 and 13 below address both the auditor's work effort related to going concern in an interim review engagement and transparency about going concern in the interim review report.

12. Do you agree that the work effort requirements related to going concern are appropriate and proportionate to the circumstances of an interim review engagement, recognizing that the engagement is performed by the auditor of the entity's annual financial statements and has responsibilities related to going concern in the context of that engagement? If not, please explain your reasons and provide suggestions for how ED-2410 should address the auditor's responsibilities related to going concern in an interim review engagement.

    (See Section I-F, paras. 57-61 in the EM)

Overall response: **Disagree, with comments below**

Detailed comments (if any):

The revision in this area is a clear move towards an audit with the new requirements going beyond the scope of a review of interim financial statements.

On the other hand, the review procedures described in paragraphs 62 and 63 mainly consist of inquiries and making considerations in respect of management plans. This results in a risk of creating or widening an expectation gap.

The revised standard requires the auditor to "consider performing other procedures as necessary in the circumstances regarding management's plans". The respective guidance given in paragraphs A111 and A112 is very vague only stating that this is a matter of professional judgment.

Furthermore, in some jurisdictions, management is not required to perform an assessment of the entity's ability to continue as a going concern in respect of all periods of interim financial information or not for "a period of at least of 12 months from date of approval of the interim financial statements". If management is unwilling to make such assessment, the revised standard requires the auditor to consider the implications for the interim review engagement but gives no further guidance.

13. Do you agree with the proposals to introduce a new separate section relating to going concern in the auditor's interim review report? If not, please explain your reasons and provide suggestions for how ED-2410 should address transparency about going concern in the interim review report.

(See Section I-H, paragraphs 74-79 in the EM)

Overall response: **Disagree, with comments below**

Detailed comments (if any):

See our comments to question 12 above and 13 (a) below

In particular:

(a) Do you agree with the proposed required statements, appropriately worded for a limited assurance engagement, relating to the going concern basis of accounting and whether a material uncertainty exists? If not, please explain your reasons and provide suggestions for how such statements should be worded in the interim review report.

Overall response: **Disagree, with comments below**

Detailed comments (if any):

We do not consider it useful that the auditor is required to include such statement in the review report, in particular in the case that nothing has come to the auditor's attention (a) that causes the auditor to believe that management's use of the going concern basis of accounting is inappropriate and (b) to indicate that a material uncertainty exists relating to events that cast significant doubt on the entity's ability as a going concern.

In particular, the explicit statement, according to requirement 108, that, based on the evidence obtained, nothing has come to the auditor's attention that causes the auditor to believe that a material uncertainty exists might create an expectation gap for the users of the financial statements with regard to the scope and meaning of such statement. This may be particularly the case if events or conditions have been identified that may cast significant doubt on the entity's ability to continue as a going concern but the auditor concludes that they do not result in a material uncertainty.

Although the auditor is required to include a phrase in the review report that this statements regarding going concern are not a guarantee as to the entity's ability to continue as a going concern, the intended users might nevertheless misunderstand this, as the scope of the review procedures performed during an interim review—and thus the meaning of the resulting statements—may not be clear to them.

(b) Do you agree that the circumstances addressed in the requirements in paragraphs 108-111 of ED-2410 capture the most frequently encountered scenarios in practice? If not, please explain your reasons and provide suggestions for any other scenarios that should be addressed in ED-2410.

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

n/a

(c) Do you agree with the requirement in paragraph 111 of ED-2410 to include a reference in the interim review report to disclosure(s) of a going concern matter, other than a material uncertainty (for example, a "close call") only when the matter is, in the auditor's professional judgment, of such importance that it is fundamental to users' understanding of the interim financial information, and to do so in a manner akin to an emphasis of matter paragraph? If not, please explain your reasons and provide suggestions for how such matters should be addressed in ED-2410.

Overall response: **Disagree, with comments below**

Detailed comments (if any):

It remains unclear why other going concern matters need to be highlighted as an emphasis of matter in the independent auditors review report. It seems to be sufficient to clearly and explicitly describe such matters in the interim financial statements, if required by law or the applicable financial reporting standards. It cannot be the auditor's role to single out every conceivable issue for emphasis. This would potentially make the auditor liable because of failing to highlight a specific matter while having highlighted others.

The Auditor's Interim Review Report

General

14. Do you agree with the proposed new structure of the auditor's interim review report? In particular, consider whether the new structure may be clearer for intended users of the report since it is consistent with the structure of the auditor's report on the financial statements. If not, please explain your reasons, including any suggestions for how the interim review report can be made clearer for intended users.

    (See Section I-H, paragraphs 65-68 in the EM)

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

n/a

The Auditor's Interim Review Conclusion

15. Do you foresee any practical consequences from the approach in ED-2410 that the auditor's interim review conclusion would differ, depending on whether the applicable financial reporting framework is a fair presentation framework or a compliance framework, as defined in paragraph 13(b) of ED-2410? Please be as specific as possible in describing any potential issues and suggestions for how the IAASB may address them.

    (See Section I-H, paragraphs 69-73 in the EM)

Overall response: **Yes, with comments below**

Detailed comments (if any):

The illustrative interim review reports in ED-2410 address both fair presentation and compliance frameworks.

The distinction between these frameworks may have practical implications for the auditor's interim review conclusion, particularly where the applicable framework permits condensed interim financial information and certain information or disclosures to be omitted, because material information may therefore not be included. In such cases, it appears questionable whether the resulting interim financial information can still be considered to achieve fair presentation, as material information may be missing.

We therefore suggest that the IAASB consider further engagement with the IASB and relevant jurisdictional standard setters to promote a common understanding and consistent application across financial reporting frameworks and jurisdictions.

Other Matters

16.	Are there any other matters you would like to raise in relation to ED-2410? If so, please clearly indicate the specific paragraph numbers of any requirements, application material, or Appendix, to which your comments relate. If you provide views on other matters, please use subheadings in your response to clearly identify and distinguish different matters.

Overall response: **No other matters to raise**

Detailed comments (if any):

n/a

Translations

17.	Recognizing that many respondents may intend to translate the final standard for adoption in their own environments, have you identified any potential translation challenges or issues? If so, please describe the issue identified and clearly indicate the specific paragraph numbers of any requirements, application material, or specific illustrations or appendices to which your comments relate.

Overall response: **No**

Detailed comments (if any):

n/a

Effective Date

18.	The IAASB believes that an appropriate implementation period would be approximately 18 months after the expected date of approval of the proposed revised standard. Do you agree that this will provide a sufficient period to support effective implementation of the proposed standard? If not, what do you propose and why? *(See Section I-I, paragraphs 85-86 in the EM)*

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

n/a

Questions to Inform the International Ethics Standards Board for Accountants (IESBA)

The IESBA is seeking views from respondents related to the application of the IESBA Code. Respondents for whom these questions are relevant are encouraged answer these questions to inform the IESBA's consideration of the need for any future actions.

(See the Introduction, paragraphs 12-14, and Section I-C in the EM)

Group Interim Review Engagements

E.1. Recognizing that ED-2410 requires the auditor to comply with relevant ethical requirements, including those related to independence, when performing an interim review engagement:

(a) Given the context set out in Section I-C, paragraph 28, in the EM and taking into account that Part 4A of the Code applies to both audit and review engagements unless otherwise stated, do you believe there is a need to clarify the application of Section 405 with respect to group review engagements, including group interim reviews? If so, please explain why. Also explain what clarifications would be useful and whether they should be made inside or outside the Code.

Overall response: **No (with no further comments)**

Detailed comments (if any):

n/a

Non-compliance or Suspected Non-compliance with Laws and Regulations

E.1. Recognizing that ED-2410 requires the auditor to comply with relevant ethical requirements, including those related to independence, when performing an interim review engagement:

(b) Do you believe the application of the Code as described in Section I-C, paragraph 29, in the EM is clear when information concerning non-compliance or suspected non-compliance with laws and regulations comes to the auditor's attention when performing an interim review engagement? If not, please explain why. Also explain what clarifications would be useful and whether they should be made inside or outside the Code.

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

n/a

This document was prepared by the Staff of the International Auditing and Assurance Standards Board (IAASB).

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

The IAASB develops auditing and assurance standards and guidance under a shared standard-setting process involving the Public Interest Oversight Board, which oversees the activities of the IAASB, and the IAASB Stakeholder Advisory Council, which provides public interest input into the development of the standards and guidance.