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)	Instituto Mexicano de la Contaduría Pública, A.C. (IMCP)
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	JSS of Auditing and Assurance Standards and Ethics from the IMCP
Name(s) of contact(s) for this submission (or leave blank if the same as above)	Fernando Ruiz
E-mail address(es) of contact(s)	ferruizm@outlook.com
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.	North America
	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.	Jurisdictional or other standard setter
	If "Other", please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	

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:

N/A

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):

In the Appendix to the EM, a table is included summarizing key proposals in ED-2410, providing an explanation of the proposed changes and linking them to the corresponding sections or paragraphs of the ED, which contributes to achieving the public interest objective of the Project, and we agree that there is transparency in the proposed changes.

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):

We believe that, in the public interest, the incorporation of broader and more rigorous requirements into the proposed standard in areas such as going concern, fraud, and non-compliance with laws and regulations is understandable. However, specifically regarding going concern, the proposed procedures are similar to those of a financial statements audit under ISAs. Therefore, the requirements should be proportionate to those of a limited assurance conclusion required in an interim financial review engagement; that is, the level of effort required for a financial statement audit should not be demanded, given that the work involved in an interim financial review should be significantly less.

We believe the auditor's assessment should focus on specific situations and indications that could raise doubts about the entity's continuity, considering, as a starting point, the closing date of the latest financial statement audited by the auditor and then taking into account the cut-off date of the interim review plus any giving consideration included in the applicable financial reporting framework.

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 no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

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: **No, with comments below**

Detailed comments (if any):

The introduction section of ED-2410 includes a general overview of an interim financial review engagement, considering its scope, nature, objectives, and limitations, as well as the fundamental quality management requirements that should be considered in its execution, in addition to its differences from a financial statement audit engagement. However, we note that between what is established in the introduction section and the body of ED-2410, there are some relevant contradictions, as the proposed standard sets out requirements similar to those of a financial statements audit under ISAs that it should not include, such as the following: i) going concern assessment; ii) Design and evaluation of internal control associated with annual and interim financial information in interim review engagements.

A fundamental aspect relates to the scope, given that we believe it should be emphasized that this standard should only be used by the entity's financial statement auditor. Therefore, when there is a change in the audit firm, ISRE 2400 should be applied during such initial year instead of ISRE 2410. Consequently, we suggest that content in ISRE 2410 related to the first-year interim review be eliminated from any requirement and application material.

In this manner, the auditor's knowledge of the entity and its environment is reasonable, and a reasonable understanding of the design and implementation of controls could be achieved—particularly those associated with areas of interim financial information where material misstatements could exist as well as guiding their approach in designing and performing review procedures.

> 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):

See comments previously provided in relation to going concern and internal controls related to the annual financial statements.

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):

Click or tap here to enter text.

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):
Paragraph A77 states that, when performing an interim review engagement for the first time, the practitioner is required to obtain an understanding of the entity and its environment, including the applicable financial reporting framework and the entity's internal control relevant to the preparation of both annual and interim financial information. Based on this understanding, the practitioner determines the nature and extent of the procedures necessary, exercising professional judgment.

Also, paragraph A76 of this ISRE does not require a detailed understanding of each component of internal control, nor does it require the performance of procedures to obtain evidence regarding the design and implementation of controls. Although paragraph A74 describes possible procedures that may be relevant when conducting an interim review engagement for the first time, we believe there may be a risk that sufficient documentation will not be obtained to support the practitioner's understanding of the entity's internal control relevant to the preparation of interim financial information.

This concern is particularly relevant when no previously documented audit evidence is available because the interim review engagement is being performed by the practitioner for the first time.

Please also consider the proposed of the applicability of the standard as mentioned in previous responses.

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: **Agree, with comments below**

Detailed comments (if any):

We suggest providing additional guidance on the calculation of materiality for interim financial information, particularly when a benchmark related to the income statement is used for the annual financial statements and serves as the starting point for determining materiality for interim financial information, as this may result in inconsistencies in the determination of materiality.

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 no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

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):

Click or tap here to enter text.

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

Detailed comments (if any):

Click or tap here to enter text.

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):

We believe greater emphasis should be placed on the fact that this standard should only be applied by auditors who have previously audited the entity's financial statements. Moreover, the going concern assessment should merely complement the audit work already performed in the most recent full year audit. Also consider the suggestion to focus mainly on any significant changes from the last audit of financial statements.

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):
The proposed new section regarding the "going concern" concept implies a specific increase in the auditor's responsibility and the extent of procedures in order to be able to conclude about the going concern assumptions as this area is closely linked to an audit of financial statements. We strongly believe that only by performing a full-year audit, auditors have all relevant information subject to audit procedures that allow a proper assessment of going-concern expectations and assumptions. In contrast, an interim limited review may lack such extent of information, which can hinder the ability to reach an appropriate conclusion, particularly given that the standard's general objective is to provide limited assurance based primarily on inquiries and analytical procedures. We also consider that this section of going concern is in similar in nature to the concept of "key audit matters" addressed in ISA 701, and as mentioned in the explanatory memo: therefore, it should be treated in the same manner in recognition of the circumstances of interim review engagements and avoid inadvertently creating a perception that a greater level of assurance has been obtained and communicated in the conclusion report.

	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):

Please refer to our previous responses to exclude the concept of going concern as a "required section" in the conclusion report. According to the applicable financial reporting frameworks, it may be management's responsibility to disclose material uncertainties related to events or conditions that may cast significant doubt upon the entity's ability to continue as a going concern as well as the fact that an entity has not prepared financial statements on a going concern basis.

(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):

Click or tap here to enter text.

> (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):

Please refer to our previous comments.

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: **Disagree, with comments below**

Detailed comments (if any):

In general, we agree with the proposed structure and content for most of the sections except the one "required to going concern" as previously mentioned.

> 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: **No (with no further comments)**

Detailed comments (if any):

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: **<u>Yes, as further explained below</u>**

Detailed comments (if any):

We considered that if the auditor of the prior year is the one performing the interim review, circumstances around overdue/unpaid fees from the previous audit, or any other assurance and/or non-assurance work could represent a potential issue that the IESBA could review to analyze if more considerations should be included in section 905 of the international code of ethics in relation to the fundamental principle of independence. Also, IAASB may decide to incorporate application material to address these circumstances.

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: **<u>No</u>**

Detailed comments (if any):

Click or tap here to enter text.

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: **<u>Agree (with no further comments)</u>**

Detailed comments (if any):

Click or tap here to enter text.

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 to 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: **Yes, with comments below**

Detailed comments (if any):

We consider that it is appropriate to clarify that section 405 also applies to interim review engagement and not only to audits of financial statements. We note that such section includes many references to ISA 600, which deals with group audits and not with group engagement reviews. The suggestion is based on having more clarity within the code to avoid any misunderstanding, doubts or inconsistencies in application. Such clarifications will promote more transparency regarding the expectations form both, audits and review engagements. Nevertheless, we recognize that in practice, review engagements most likely follow the rules of section 405: however, a limited scope project may contribute to robust the current code.

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 comments below**

Detailed comments (if any):
We believe that no changes are strictly necessary in the section 360 related to NOCLAR because the content under the heading "Professional Services Other than Audits of Financial Statements" will

encompass the interim review engagements. Typically, auditors will follow the rules (requirements and application material) from the code as if it were an annual audit regardless of the type of engagement. The profession tends to understand that they need to comply with the code regardless of the type of non-audit engagement and there is little chance of lack of understanding when executing the work. Interim reviews do not change the client-auditor relationship and therefore auditor's responsibilities. Nevertheless, we also suggest considering any comments received from the NOCLAR PIR as other views replied as part of the responses may indicate that a limited scope project may be needed in order to clarify within the code that interim review engagements are covered in paragraphs R360.29 to 360.40 A1. We do not suggest clarifying outside the code.