

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)	ASEAN Federation of Accountants (AFA)
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Janoearto Alamsyah
Name(s) of contact(s) for this submission (or leave blank if the same as above)	
E-mail address(es) of contact(s)	Janoearto@iaiglobal.or.id
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.	<u>Asia Pacific</u>
	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.	<u>Professional accountancy or professional organization (PAO)</u>
	Umbrella Organisation for the PAOs in ASEAN
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:

Click or tap here to enter text.

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 support the modernization of ISRE 2410 and the establishment of a clearer global baseline for interim review engagements. In particular, we welcome the clearer articulation of interim reviews as limited assurance engagements that are distinct from audits.

We also believe the final standard would benefit from additional explanation of the level of assurance that an interim review engagement is intended to provide. Greater clarity regarding concepts used throughout the Exposure Draft (ED), including terms such as "likely", "may" and "not likely", would support more consistent professional judgment and application across jurisdictions. Such clarification would further support the objective of establishing a more consistent global baseline for interim review engagements.

While the ED is considered responsive to the public interest, the enhanced work effort required in certain public interest areas should remain proportionate, so that the revised standard does not adversely affect the availability or affordability of interim review engagements, particularly in jurisdictions where such interim reviews are not yet common in practice.

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: Agree, with comments below

Detailed comments (if any):

We generally agree that the ED achieves an appropriate balance between the work effort necessary to support a limited assurance conclusion and the proposed enhancements addressing public interest matters, including fraud, NOCLAR, and going concern.

We support the continued emphasis on proportionality and believe the final standard should avoid creating expectations of audit-level work. The work effort required should remain commensurate with a review engagement and should not create an expectation that practitioners perform procedures more appropriately associated with an audit. Maintaining a clear distinction between review and audit engagements is essential to avoiding unnecessary expectation gaps.

Additional practical guidance, illustrative examples, and implementation support would further promote consistent application.

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 with the distinction and treatment of the two concepts as presented in the ED. We would suggest including definitions in the standard or cross-referencing the IAASB Glossary. The additional application material should illustrate how professional skepticism operates in an engagement based primarily on inquiry and analytical procedures, distinct from corroborative audit evidence, to manage expectations about the level and depth of assurance.

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):

We support the proposed fundamental principles and the description provided in the Introduction section of the Exposure Draft.

However, we recommend that the IAASB further clarify the proposed requirements to promote consistent application in practice. Clearer wording emphasising that an interim review is a limited assurance engagement and is distinct from an audit would help reduce the risk of misunderstanding among practitioners and users of the interim review report.

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: Yes, with comments below

Detailed comments (if any):

We generally agree that the concept is clear, while further clarification would be helpful on the circumstances in which additional review procedures are expected, particularly in relation to fraud and going concern. Application material and practical examples illustrating how identified concerns can be addressed through further review procedures, without automatically requiring substantive audit testing. This would help to clarify the boundary between review and audit work and to promote consistent application in practice.

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 comments below**

Detailed comments (if any):

We support the proposed approach and recommend emphasising that, in an ongoing engagement, the practitioner is ordinarily updating and refreshing existing knowledge of the entity and its environment rather than obtaining an entirely new understanding.

We also encourage the IAASB to provide application material addressing unresolved matters from prior audits, including issues relating to going concern, fraud, and NOCLAR.

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: **Agree, with comments below**

Detailed comments (if any):

We agree with the proposed considerations for first-time interim review engagements. However, we believe additional guidance is needed regarding the extent of understanding and work required when the practitioner has not previously performed an engagement for the entity.

In particular, clarification would be helpful when predecessor information is unavailable and how procedures should be planned without expanding the review into audit-level procedures.

Given that interim reviews are not yet widespread or mandatory in some jurisdictions, many engagements may be first-time engagements. Accordingly, practical guidance and illustrative examples would assist practitioners in applying the requirements consistently and proportionately.

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):

There is broad agreement with the ED on determining materiality for interim financial information as a whole and with the principle-based approach, while recognising that detailed methodology may appropriately remain within individual firms' methodologies. However, further practical guidance from an interim-review

perspective would be helpful, particularly on the application of materiality to interim periods, its relationship with annual financial statement materiality, and the treatment of items assessed on an annual rather than interim basis. Clearer application material in these areas would help reduce diversity in practice while retaining an appropriately principles-based approach.

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):

We support the inclusion of targeted group engagement requirements and the flexibility accorded to the group auditor.

However, we recommend removing the phrase "often will," in paragraph A63 as it may imply an expectation regarding component auditor involvement that may not be appropriate in all circumstances.

We also encourage the IAASB to provide additional guidance on the involvement of component auditors, including communication requirements, timing considerations, and the group auditor's evaluation of their work, to support consistent application of the standard.

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 comments below**

Detailed comments (if any):

We support the proposed requirements. We also encourage the IAASB to expand the application material to include practical guidance on assessing the competence and capabilities of component auditors, including those from non-network firms, as well as on evaluating and documenting component auditor work in a manner that is proportionate to the nature of a limited assurance engagement.

In addition, we suggest that the standard provide greater clarity on the application of the IESBA Code's ethical and independence requirements in the context of group interim reviews, particularly as they relate to both the group engagement team and component auditors.

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 comments below**

Detailed comments (if any):

We broadly support a proportionate approach to fraud and NOCLAR within the context of a limited assurance interim review engagement, recognising that the practitioner may also perform the annual financial statement audit.

Additional clarification would be helpful regarding the expected work effort and the distinction between review procedures and additional procedures in response to identified concerns, including whether certain responses may also apply to suspected fraud.

We also encourage the IAASB to consider consolidating paragraphs 55(a) and 55(b) and expanding the application material relating to NOCLAR to acknowledge relevant ethical obligations.

In addition, clearer guidance is needed on the boundary of the practitioner's responsibilities and their interaction with jurisdiction-specific requirements. For example, Indonesian regulatory reporting obligations by Indonesia's Financial Services Authority/OJK), anti-money-laundering requirements, IESBA Code Section 360, and applicable local law.

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: **Agree, with comments below**

Detailed comments (if any):

We support enhanced going concern requirements in principle, provided that they remain proportionate to the nature and scope of a limited assurance engagement.

We request clarification regarding expectations relating to management's assessment, management's mitigation plans, available evidence, unresolved matters from prior audits, and the extent of procedures expected of the practitioner.

We also question whether a mandatory twelve-month assessment period is appropriate in all circumstances. This is particularly relevant because interim reporting frameworks such as IAS 34 generally do not require management to perform a comprehensive going concern assessment at each interim reporting date.

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):

We support greater transparency in reporting on going concern matters and acknowledge the benefits of a separate section in the interim review report where appropriate.

However, we are concerned that requiring an explicit going concern statement in every interim review report could widen the expectation gap and imply that audit-level procedures have been performed.

Illustrative reports covering a range of circumstances would also assist consistent application.

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 support requiring an explicit going concern statement in every interim review report.

As stated in the response to the preceding question, such a requirement may imply a greater level of work effort than is intended in a limited assurance engagement and could blur the distinction between an audit and a review.

We support reporting when specifically required by regulation or when significant going concern matters exist. If the proposal is retained, additional guidance should be provided regarding the procedures necessary to support the reporting requirement.

- (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: **Disagree, with comments below**

Detailed comments (if any):

We generally consider the proposed scenarios to be comprehensive. However, we do not support a mandatory requirement to make reference in the interim review report to the prior annual report solely because a material uncertainty existed at year end.

We believe the reporting should focus primarily on the circumstances and disclosures relevant to the current interim period. Consideration should also be given to simplifying and consolidating paragraphs 109 and 110..

- (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: Agree, with comments below

Detailed comments (if any):

We generally agree with the approach in paragraph 111.

However, additional clarification would be helpful regarding the requirement to state that the review conclusion is not modified, particularly in light of the approach adopted in ISA 570 (Revised 2024).

We also encourage the IAASB to include a short, non-exhaustive list of factors that practitioners may consider when determining whether a matter is fundamental to users' understanding of the interim financial information.

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 comments below

Detailed comments (if any):

We support the new structure and conclusion-first presentation. We also support to exclude a Key Audit Matters-style section and propose several drafting/consistency refinements.

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):

We propose that the IAASB develop additional application material and illustrative examples, in consultation with the IASB, explaining the factors relevant to classification and the expected form of conclusion for common IAS 34 scenarios. In particular, the illustrative guidance could provide clarity on how auditors determine whether a framework is a fair presentation or compliance framework, including consideration of the wording and characteristics of the framework, requirements for additional disclosures, and whether departure from a requirement may be necessary to achieve fair presentation.

We also suggest that paragraph A151 include IAS 34 as an example of an applicable financial reporting framework, and references to IFRS Accounting Standards should clearly encompass IAS 34 where applicable.

Additional application material and illustrative examples would be helpful, including clarification regarding framework classification and the treatment of IAS 34-based interim financial information.

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: Yes, as further explained below

Detailed comments (if any):

The following are additional matters for consideration by the IAASB in relation to ED-2410:

- The requirements and application material for analytical procedures should distinguish review analytical procedures from substantive analytical procedures and explain when the outcomes of analytical procedures may trigger further inquiry or additional procedures.

In particular:

- Paragraph 13(a): While we acknowledge that the definition of analytical procedures in ED-2410 aligns with the definition in ISRE 2400 (Revised), we suggest that the IAASB consider the revisions made in proposed ISA 520 (Revised), Analytical Procedures, regarding the distinction between analytical procedures and substantive analytical procedures. We recommend adding application material to clarify that analytical procedures performed in an interim review engagement are review procedures and are not required to meet the requirements applicable to substantive analytical procedures in an audit.
- Paragraph A87 should clarify the meaning of the last sentence in the paragraph, which states that the auditor's use of technological tools to perform analytical procedures does not change the auditor's intended purpose in performing those procedures.

- Paragraph A98 should explain that the reliability of information used in analytical procedures may be evaluated in a manner similar to information used for risk assessment procedures, rather than implying that controls would ordinarily be considered in a review engagement. Reference to controls in this context may inadvertently imply a level of work effort more commonly associated with an audit.
- We recommend aligning the requirements in paragraph 76(e)(ii)-(iii) with the terminology used in the fraud requirements, as paragraph 52 refers only to "fraud or suspected fraud" while paragraph 76 refers to "allegations of fraud". The IAASB should use consistent terminology throughout the standard, either by incorporating "allegations" where intended or by aligning paragraph 76 with ISA 240 (Revised) terminology, to improve clarity and avoid differing interpretations of the auditor's responsibilities.
- Paragraph A62 should not imply that communications required by paragraph 57 are optional. The examples may inadvertently suggest that communication of fraud, suspected fraud, NOCLAR or suspected NOCLAR to those charged with governance is discretionary. We therefore propose better positioning these examples to align with the requirements of paragraph 57.

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: **Yes, see comments on translation below**

Detailed comments (if any):

No specific translation issues were identified, but there is an emphasis on ensuring accuracy and consistency in the Bahasa Indonesia translation, particularly for key terms such as "limited assurance," "sufficient appropriate evidence," "material uncertainty," and "going concern basis of accounting." Sufficient lead time should be provided to ensure a high-quality translation that remains consistent with terminology already established in the Indonesian Standards on Auditing and related pronouncements. Consistent use of terms relating to review engagements, limited assurance, material uncertainty, and going concern is important to preserve the distinction between audit and review engagements and support clear and consistent application.

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 comments below**

Detailed comments (if any):

We support approximately an 18-month transition period, and we note the need for translation, adoption, methodology/tool updates and training. We suggest an effective date based on periods beginning on or after 15 December, depending on the approval timing.

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: Yes, with comments below

Detailed comments (if any):

We seek clarification that Section 405 applies to group reviews, including group interim reviews, and clarification of its interaction with ISA 600 and the annual audit.

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 consider the application broadly clear, but seek further guidance distinguishing the review provisions from audit provisions and explaining the interaction with the annual audit and group/component teams. We also seek clarification on how auditor's responsibilities under Section 360 operate in a limited assurance interim review and interact with local legal and regulatory reporting obligations, including obligations toward regulators (such as Financial Services Authority/OJK in Indonesia). We suggest that these matters be clarified in the Code, supported by application material in ISRE 2410.

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.

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