ED-2410 RESPONSE FORM

May 2026

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)	Indonesian Institute of Public Accountants (IAPI)
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Steven Tanggara, Chair of DSPAP I (DSPAP I is the IAPI's Professional Standards Board responsible for adopting IAASB's Standards Pronouncement).
Name(s) of contact(s) for this submission (or leave blank if the same as above)	Adhitya Ghaziawan Head of Technical and Professional Standards Division at IAPI
E-mail address(es) of contact(s)	adhitya.ghaziawan@iapi.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.	Asia Pacific
	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).	The **Indonesian Institute of Certified Public Accountants** (known as *Institut Akuntan Publik Indonesia* or **IAPI**) is the official professional organization that regulates and represents public accountants in Indonesia. This submission is made by the Dewan Standar Profesi Akuntan Publik (DSPAP) - IAPI. DSPAP is responsible for setting and adopting auditing, assurance and related standards for the public accounting profession in Indonesia.

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:

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 agree that ED-2410 is responsive to the public interest. We particularly support the clearer articulation of the interim review as a limited assurance engagement that is distinct from an audit. We encourage the IAASB to ensure that the enhanced work effort in the identified public interest areas remains proportionate, so that the revised standard does not inadvertently reduce the availability or affordability of interim reviews in markets where such engagements are not yet common 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 support the IAASB decision to introduce enhanced requirements on fraud and NOCLAR, going concern and group engagements, as these areas were not addressed in the existing standard and are important in the public interest. At the same time, we encourage the IAASB to guard against scope creep: the additional requirements should not blur the fundamental distinction between a limited assurance interim review and a reasonable assurance audit, nor create work effort or cost that is disproportionate to the limited assurance objective. We recommend that the IAASB provide transition guidance and illustrative examples to facilitate consistent and proportionate implementation by firms of all sizes.

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: **Agree, with comments below**

Detailed comments (if any):

We agree that ED-2410 appropriately addresses professional skepticism and professional judgment. We suggest the IAASB include additional application material illustrating how professional skepticism operates in an engagement based primarily on inquiry and analytical procedures, as distinct from the corroborative evidence obtained in an audit. This would help manage expectations and reduce any perception gap regarding the nature and depth of assurance provided by an interim review.

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: **Agree, with comments below**

Detailed comments (if any):

We agree that the Introduction provides a clear description of the nature and purpose of an interim review and how it differs from an audit. To reinforce this distinction, we suggest the final standard emphasise prominently that an interim review does not provide the same level of assurance as an audit and does not, by itself, discharge the auditor responsibilities under the annual audit.

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

Detailed comments (if any):

Click or tap here to enter text.

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: **Agree (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: **<u>Agree, with comments below</u>**

Detailed comments (if any):

We agree with the considerations for first-time interim review engagements. We encourage the IAASB to ensure the related guidance is sufficiently robust and practical, and to consider illustrative examples addressing the additional effort required to obtain the necessary understanding in a first-time engagement.

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: **<u>Agree, with comments below</u>**

Detailed comments (if any):

We agree with the requirement to determine materiality for the interim review engagement. We encourage the IAASB to provide clearer application material on determining materiality for interim periods, in particular how materiality for the interim financial information relates to materiality determined for the annual financial statements, and the treatment of items assessed on an annual rather than an interim basis. Greater clarity would help reduce diversity in practice.

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: **<u>Agree, with comments below</u>**

Detailed comments (if any):

We agree that ED-2410 is capable of being applied to group interim reviews. To promote consistency, we encourage the IAASB to align the group concepts, terminology and approach with ISA 600 (Revised), appropriately scaled for a limited assurance interim review, so that practitioners can readily leverage their understanding of the group audit when performing the interim review.

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: **Agree, with comments below**

Detailed comments (if any):

We agree that the specific requirements for group interim reviews are broadly appropriate. We recommend that the IAASB, in coordination with the IESBA, clarify whether the provisions of Section 405 of the IESBA Code (group audits) also extend to group interim review engagements, to avoid any gap or inconsistency in ethical requirements. We also encourage alignment of these requirements with the concepts in ISA 600 (Revised), scaled appropriately for limited assurance.

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 agree that the work effort on fraud and NOCLAR should be proportionate to a limited assurance interim review, recognising that the practitioner is also the auditor of the annual financial statements. We encourage the IAASB to make clear the boundary of the auditor responsibility in an interim review, and to ensure the requirements can operate alongside jurisdiction-specific reporting obligations. In Indonesia, for example, auditors may be subject to reporting obligations to regulators (including the Financial Services Authority, OJK) and under anti-money-laundering rules; clearer articulation of how the ED-2410 requirements interact with the auditor responsibilities under the IESBA Code (Section 360) and local law would support consistent application.

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 agree in principle with the going concern work effort requirements. We draw the IAASB attention to a potential tension: interim reporting frameworks (such as IAS 34, and the equivalent Indonesian standard on interim reporting, PSAK 3) do not generally require management to perform a full going concern assessment at each interim date, whereas ED-2410 expands the auditor related work effort. We recommend the IAASB address this interaction so that the auditor responsibilities are not disproportionate to management own responsibilities under the applicable financial reporting framework.

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: **Agree, with comments below**

Detailed comments (if any):

We support the introduction of a separate going concern section in the interim review report, as it enhances transparency and is consistent with the auditor report on the annual financial statements. We encourage the IAASB to provide clear illustrative reports covering the range of going concern scenarios.

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

Detailed comments (if any):

Click or tap here to enter text.

(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: **Agree, with comments below**

Detailed comments (if any):

We agree with the approach in paragraph 111. To promote consistency in application, we recommend the IAASB add a short, non-exhaustive list of factors to assist auditors in determining what is fundamental to users understanding of the interim financial information, given the significant judgment involved.

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 agree with the proposed new structure of the interim review report and support its alignment with the structure of the auditor report on the annual financial statements, which should assist users. We encourage the IAASB to include a complete set of clear, scalable illustrative reports.

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: **Agree, with comments below**

Detailed comments (if any):

We do not foresee significant practical consequences, but we encourage the IAASB to provide clear guidance and illustrative wording for both fair presentation and compliance frameworks. This is relevant in Indonesia, where interim financial information is typically prepared under a fair presentation framework (Indonesian Financial Accounting Standards, SAK); clear examples would support consistent application.

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: **Agree, with comments below**

Detailed comments (if any):

As the national standard-setting body for the public accounting profession in Indonesia, we wish to highlight the importance of market readiness and cost-benefit considerations. In Indonesia, interim and quarterly financial information of listed entities is often not subject to auditor review outside specific circumstances (for example, in connection with certain capital-market transactions).

We encourage the IAASB to remain mindful that the enhanced requirements should be scalable and proportionate, so that the standard can be adopted effectively across markets at different levels of maturity. We also encourage the IAASB to develop implementation support materials, including illustrative reports and worked examples, to facilitate consistent adoption.

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>Agree, with comments below</u>**

Detailed comments (if any):

As an adopter of international standards through our national standards (SPAP), we encourage the IAASB to allow sufficient lead time for a high-quality translation into Bahasa Indonesia and to ensure terminology is consistent with terms already used in the Indonesian Standards on Auditing and related pronouncements. Consistency of key terms, such as review, limited assurance, material uncertainty and going concern, across the standards would 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: **<u>Agree, with comments below</u>**

Detailed comments (if any):

Assuming final approval around June 2027, an implementation period of approximately 18 months points to an effective date for interim periods beginning on or after 15 December 2028, meaning first-time application in the 2029 reporting cycle for calendar year-end entities. We consider this timeline broadly reasonable.

We recommend the IAASB provide transition support materials on a timely basis. We also encourage the IAASB to coordinate timing with national due processes for adoption (in Indonesia, adoption into SPAP by IAPI), so that there is no gap between the international effective date and local adoption.

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: **<u>Yes, with comments below</u>**

Detailed comments (if any):

Yes. We believe it would be helpful to clarify the application of Section 405 of the Code to group review engagements, including group interim reviews, to remove any ambiguity as to whether the requirements applicable to group audits extend to group interim reviews. We suggest the clarification be made within the Code to ensure authoritative and consistent application, complemented by guidance in ISRE 2410.

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: **<u>No, with comments below</u>**

Detailed comments (if any):

We believe the application of the Code in this area would benefit from further clarification. In particular, it would be helpful to clarify how the auditor responsibilities under Section 360 of the Code operate in the specific context of a limited assurance interim review, and how they interact with reporting obligations under local laws and regulations (in Indonesia, for example, obligations towards regulators such as the OJK). We suggest such clarification be provided within 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.