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)	IFAC	
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Thokozani Nkosi Audit Technical, Ethics, and Methodology Manager	
Name(s) of contact(s) for this submission (or leave blank if the same as above)		
E-mail address(es) of contact(s)	ThokozaniNkosi@ifac.org	
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.	Global	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.	Other (if none of the groups above apply to you)	If "Other", please specify: International organization for the accountancy profession
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: **Neither agree/disagree, but see comments below**

Detailed comments (if any):

We support the IAASB's objective of modernizing ISRE 2410 and establishing a more consistent global baseline for the performance and reporting of interim review engagements.

An important public interest consideration is ensuring that the revised standard remains proportionate to the nature and purpose of a limited assurance engagement. A defining feature of ISRE 2410 is that the review is performed by the auditor of the entity's annual financial statements. The ED recognizes that the auditor may draw on knowledge and work from the annual audit, but much of this is addressed in the application material rather than in the requirements themselves.

We believe the requirements could more clearly reflect the fact that the auditor starts from an existing knowledge base and may already have relevant evidence from audit work undertaken before or alongside the interim review. This would help avoid unnecessary duplication and better reflect the way annual audit and interim review work may be integrated in practice.

As explained in our responses below, we also have concerns that some of the more robust proposals, particularly in relation to going concern, fraud and Non-Compliance with Laws and Regulations (NOCLAR), and aspects of reporting, may increase work effort or expectations in a way that risks narrowing the distinction between a review and an audit.

Addressing these matters would, in our view, strengthen the responsiveness of the revised standard to the public interest.

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 support strengthening ISRE 2410 in areas of heightened public interest. However, we are not convinced that the proposals, taken as a whole, are yet sufficiently proportionate to a limited assurance engagement.

A review under ISRE 2410 is performed by the auditor of the entity's annual financial statements, who already has an established understanding of the entity and may have relevant evidence available from work performed during the audit cycle. In our view, the revised standard should make greater allowance for that starting point when determining the work necessary to support the review conclusion. For example, the revised standard could clarify how and when the auditor may make use of existing audit knowledge when performing the interim review engagement. This is important both to avoid unnecessary duplication and to preserve the distinct purpose of an interim review engagement.

Our principal concern is the cumulative effect of the proposed changes. Enhanced requirements in areas such as going concern, fraud and NOCLAR may together increase the extent and prescription of the work to a point where the practical distinction between a review and an audit becomes less clear.

Going concern illustrates the issue particularly clearly. The ED introduces a more extensive baseline of work and, at the same time, requires explicit reporting on going concern even where no material uncertainty has been identified. This raises a question as to whether the work effort is being driven in part by the proposed reporting outcome, rather than solely by what is necessary to support a limited assurance conclusion. The IAASB itself acknowledges the potential for the proposed reporting to affect perceptions of the work performed and the assurance obtained.

We therefore encourage the IAASB to reconsider whether the requirements, taken as a whole, are proportionate to a limited assurance engagement, with particular emphasis on ensuring that additional procedures are necessary to achieve the limited assurance objective, that existing audit knowledge and evidence can be used appropriately, and that the revised standard continues to maintain a clear distinction between an interim review 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 support the proposed treatment of professional skepticism and professional judgment as foundational concepts throughout an interim review engagement, as long as their application remains proportionate to a limited assurance engagement and does not create an expectation of audit-level work.

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 agree that the Introduction clearly describes the nature and purpose of an interim review engagement and the distinction from an audit. Our concerns relate instead to whether this distinction is consistently maintained in some of the more detailed requirements, as discussed in our responses below.

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 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: **No, with comments below**

Detailed comments (if any):

We agree with the underlying principle that, for recurring engagements, the auditor should build on knowledge and understanding obtained through previous annual audits and interim reviews. However, we do not think this is sufficiently clear in the requirements themselves.

Paragraph 44 of the Explanatory Memorandum explains that, in developing paragraphs 43 - 44 of ED-2410, the IAASB took into account that the auditor already possesses knowledge of the entity, its environment and its system of internal control. The application material also makes this point. In particular, paragraphs A72 - A74 explain that the auditor's understanding is updated iteratively and that the auditor may consider prior audit and review documentation, significant risks, estimates, misstatements and the results of audit procedures already performed in respect of the current year.

However, this is much less apparent from paragraphs 43 - 44 themselves. Paragraph 43 requires the auditor to obtain an understanding sufficient to identify areas where material misstatements are likely to arise, while paragraph 44 requires the auditor to design and perform review procedures in response. Neither requirement expressly states that, for a recurring engagement, this work should build on the auditor's existing knowledge and relevant audit work. As drafted, the requirements do not make the relationship with the annual audit as clear as the application material does.

We think this becomes more important as the detailed requirements are applied. For example, the required inquiries under paragraph 45, the fraud and NOCLAR requirements in paragraphs 52 - 57, and the requirements concerning the use of an auditor's expert in paragraphs 66 - 67 may overlap with matters already considered, or being considered, in the course of the annual audit. The ED contains application material explaining how audit work may be relevant in some of these areas, including ISA 240 and ISA 620, but the requirements do not consistently make that relationship explicit.

A defining feature of ISRE 2410 is that the engagement is performed by the entity's annual auditor. Extant ISRE 2410 makes this relationship explicit at the outset in paragraph 3, that the auditor has already obtained an understanding of the entity through the annual audit, and that understanding is updated through the interim review and used to focus the procedures performed. We think the revised standard should preserve that principle more visibly in the requirements.

We therefore suggest that paragraphs 43 - 44 explicitly state that, for recurring engagements, the auditor builds on and updates knowledge and understanding obtained from previous annual audits and interim reviews and takes account of relevant audit work already performed or being performed when determining the nature and extent of review procedures.

This would make the intended approach clearer, reduce the risk of unnecessary duplication, and reinforce the distinction between ISRE 2410 and a review engagement performed by a practitioner who is not the entity's annual auditor.

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 additional considerations for first-time interim review engagements in paragraphs A77 - A79. However, we note that paragraph 43 applies the same requirement to obtain an understanding regardless of whether the auditor has previously audited the entity or is performing a first-time interim review engagement. The distinction between these different starting points is therefore addressed principally in the application material.

This reinforces our comments in response to Q6. For recurring engagements, we believe the requirements should more clearly recognize that the auditor ordinarily builds on an existing understanding obtained through previous audit and review work. This would make the distinction between recurring and first-time engagements clearer, while retaining the targeted application material in A77 - A79 for circumstances in which that existing knowledge is not available.

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 support the introduction of an explicit requirement to determine materiality for the interim review engagement. However, given that an ISRE 2410 engagement is performed by the entity's annual auditor, we think the application material should provide greater clarity on the relationship between materiality determined for the interim review and materiality determined for the annual audit.

We recognize that materiality for interim financial information may differ from annual-audit materiality, reflecting the different reporting period and the information needs of users. However, further guidance on when and why those differences arise would help avoid the interim review being approached as a separate exercise without sufficient regard to the wider audit context.

This would also support a clearer distinction between applying materiality in a limited assurance engagement and the way materiality is applied in an audit.

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: **No, with comments below**

Detailed comments (if any):

We suggest clarifying that the involvement of component auditors in an interim review should remain proportionate to a limited assurance engagement and should not be interpreted as replicating the direction, supervision and review model applicable to a group audit.

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: **Disagree, with comments below**

Detailed comments (if any):

We support strengthening the auditor's response where fraud or suspected fraud, or identified or suspected NOCLAR, comes to the auditor's attention during an interim review. We also support the inquiries required by paragraphs 52 - 53 and the clearer communication requirements.

However, we do not believe paragraphs 54 – 57 sufficiently distinguish the work required in an interim review from that undertaken in an audit. In particular, the proposed requirements do not clearly define the nature, extent and boundaries of the auditor's work after becoming aware of fraud or suspected fraud, or identifying or suspecting NOCLAR, but before concluding that the interim financial information may be materially misstated. In our view, ED 2410 establishes three distinct stages in the auditor's consideration of fraud and NOCLAR:

1. Making inquiries and remaining alert for fraud and NOCLAR — paragraphs 52–53

At the initial stage, the auditor is required to make specified inquiries and remain alert for indications of fraud or NOCLAR when performing the review. We consider ED 2410 to be reasonably clear regarding the nature and extent of the work effort required at this stage.

2. Becoming aware of fraud or suspected fraud, or identifying NOCLAR or suspected NOCLAR — paragraphs 54–57

At this stage, the auditor has become aware of a matter that is not clearly inconsequential but may not yet have identified anything that causes the auditor to believe the interim financial information may be materially misstated. Further work may therefore be necessary to understand the matter and assess its potential relevance to the interim financial information. However, ED-2410 does not clearly define the nature and extent of the additional procedures which should be conducted, including what the auditor needs to establish before determining whether paragraph 70 is triggered.

3. Becoming aware that the interim financial information may be materially misstated — paragraph 70

At this stage, the auditor becomes aware of a matter(s), which may include the identified fraud or NOCLAR, that causes the auditor to believe that the interim financial information may be materially misstated. We consider ED 2410 to be reasonably clear regarding the nature and extent of the work effort required at this stage.

The principal area requiring clarification is therefore the boundary between the second and third stages. Paragraphs 54 and 56 require the auditor to obtain an understanding of the matter and further information when fraud or suspected fraud, or NOCLAR or suspected NOCLAR, is identified. It is unclear how far these procedures are expected to extend before the separate requirement in paragraph 70 to perform additional procedures applies. Although paragraph A99 explains aspects of this relationship in the context of fraud, the distinction between the initial response under paragraphs 54–57 and the additional work required under paragraph 70 should be made more explicit.

This is particularly important because the engagement is performed by the entity's annual auditor. Relevant knowledge about fraud risks, identified matters and NOCLAR may already exist from previous or current audit work. Consistent with our response to Q6, we believe the requirements should state more explicitly that this existing knowledge and relevant audit work are taken into account when determining the nature and extent of the procedures required under paragraphs 54 - 56. This would reduce the risk that the interim review is treated as requiring a separate fraud or NOCLAR assessment alongside work already undertaken in the audit context. This would reduce the risk of unnecessary duplication and of creating audit-type expectations within a limited assurance engagement.

We also think the interaction with relevant ethical requirements needs greater clarity, particularly for NOCLAR. The EM notes that different provisions of Section 360 of the IESBA Code apply to an interim review and to an audit, even though in practice the matter would ordinarily be communicated within the firm to the audit engagement partner and the firm's ultimate response should not diverge. This complexity reinforces the need for ED-2410 to distinguish clearly between the work required specifically for the interim review and responsibilities arising under the IESBA Code and the annual audit.

We therefore suggest that the IAASB clarify:

- that the procedures in paragraphs 54 - 56 are directed at understanding the matter and determining its relevance to the interim financial information, rather than establishing a separate audit-style fraud or NOCLAR process.
- how existing audit knowledge and relevant audit work should be taken into account in determining the extent of those procedures.
- the point at which paragraph 70 is triggered and additional procedures are required, together with the interaction between ED-2410 and relevant ethical requirements for NOCLAR.

This would, in our view, retain the stronger public interest response to fraud and NOCLAR while keeping the work proportionate to a limited assurance engagement.

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 support strengthening the consideration of going concern in an interim review engagement. However, we do not believe that all of the proposed work effort requirements in paragraphs 58 - 65 are proportionate to a limited assurance engagement in all circumstances.

Our main concern relates to paragraphs 58 - 60. Under extant ISRE 2410, paragraph 27 requires the auditor to inquire whether management has changed its going concern assessment, with further work required when events or conditions are identified that may cast significant doubt on the entity's ability to continue as a going concern. By contrast, ED-2410 requires the auditor in every engagement to determine whether management has performed an assessment and, if not, to request one covering at least twelve months from the date of approval of the interim financial information. Where the assessment covers a shorter period, the auditor is required to request that it be extended.

We recognize that paragraph 61(a) of the Explanatory Memorandum states that the assessment is not intended to be performed or documented to the same level of detail as for annual reporting. However, this distinction is not apparent from the requirements themselves. In circumstances where there are no events or conditions indicating going concern concerns, paragraphs 59–60 could therefore create an expectation of a separate management assessment and additional auditor work that goes beyond what is necessary for a limited assurance engagement.

We are more supportive of the subsequent requirements. In particular, paragraph 62 appropriately focuses inquiries on changes since the previous annual audit or interim review, existing going concern matters, and new events or conditions. Where such matters are identified, it is appropriate for the auditor to undertake further work under paragraph 63 and evaluate the implications under paragraphs 64–65.

We therefore suggest reconsidering paragraphs 59 - 60 so that the extent of management's assessment, and the auditor's related work, reflects the circumstances of the engagement. Where no going concern indicators have been identified and the auditor's existing knowledge and relevant audit work provide no reason for concern, the standard should not create an expectation of an audit-level going concern assessment solely because an interim review is being performed. Where events or conditions are identified, or the auditor's knowledge from the audit indicates heightened going concern risk, the more extensive requirements would appropriately apply.

This would preserve greater attention to going concern while maintaining the distinction between the work necessary for a limited assurance review and that required for an audit.

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 the interim review report where a going concern matter has been identified. However, we do not support requiring a separate going concern section in every interim review report, including in circumstances where no material uncertainty or other going concern matter requiring specific attention has been identified.

Paragraph 108 would require the auditor to make explicit statements about management's use of the going concern basis of accounting and the existence of a material uncertainty in such cases. Although these statements are expressed in limited assurance terms, presenting them in a separate section risks giving going concern greater prominence than is warranted by the work performed and may lead users to infer that the auditor has provided a distinct level of assurance on going concern.

We note that the EM itself acknowledges the risk that the proposed statements may suggest a greater work effort than is necessary for an interim review and may increase the expectations gap. In our view, this concern is particularly relevant given the different purpose and level of assurance of an interim review compared with an audit.

As noted in our response to Q12, there is also a risk that requiring explicit reporting in all circumstances could influence the level of work performed to support those statements, rather than the work effort being determined by what is necessary to support the limited assurance conclusion.

We therefore suggest a more differentiated reporting approach. Where no material uncertainty or other going concern matter requiring specific attention has been identified, a separate going concern section should not be required. Where a material uncertainty exists, or another going concern matter is fundamental to users' understanding of the interim financial information, specific reporting should be required or permitted, with wording that clearly reflects the limited assurance nature of the engagement.

This would preserve transparency where it is most useful while reducing the risk that routine going concern reporting blurs the distinction between an interim review and an audit.

We encourage the IAASB to undertake targeted outreach with users of interim financial information and other relevant stakeholders to assess whether the proposed changes to the auditor's interim review report are clearly understood, particularly in relation to the nature and level of assurance provided. Such outreach could also explore whether the proposed reporting language and illustrative reports may affect users' perceptions of the assurance obtained and, consequently, their investment and capital allocation decisions.

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 comments below**

Detailed comments (if any):

We consider the use of negative-form wording to be appropriate for a limited assurance engagement. However, as noted in our response to Question 13, the key issue is whether such wording should be required in every interim review report.

In particular, the similarity between the proposed required statements and the corresponding wording in the auditor's report may blur the distinction between an interim review engagement and an annual audit engagement. This could make it more difficult for users to understand the different nature and level of assurance provided by each engagement.

Accordingly, we encourage the IAASB to consider whether the proposed statements are necessary in all circumstances and whether greater differentiation in the reporting language would better communicate the limited assurance nature of an interim review.

(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):

We consider the "fundamental to users' understanding" threshold to be appropriate.

However, we do not believe that paragraph 108 of ED 2410 should require a separate Going Concern section in the interim review report in all circumstances, including where no material uncertainty or other going concern matter warranting specific attention has been identified. Such a requirement could result in unnecessary reporting and may reduce the prominence of going concern matters when they are genuinely significant.

If paragraph 108 is revised so that a separate Going Concern section is not required routinely, we believe that going concern matters that are fundamental to users' understanding could instead be highlighted, where appropriate, through the Emphasis of Matter mechanism in paragraph 117.

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 proposed new structure of the auditor's interim review report, including presenting the auditor's conclusion first, followed by the Basis for Conclusion section. We also support the clearer explanation of the limited assurance nature of the engagement and how the procedures performed, and level of assurance obtained, differ from an audit.

While consistency with the structure of the auditor's report may assist users in navigating the report, it is important that this does not obscure the fundamental distinction between an interim review and an audit. The nature and level of assurance provided by the interim review should therefore remain prominent and unambiguous.

Subject to our comments in Q13 regarding the proposed separate Going Concern section, we support the proposed reporting structure.

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 response**

Detailed comments (if any):

Click or tap here to enter text.

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):

Click or tap here to enter text.

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):

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

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 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):

Click or tap here to enter text.

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: **Neither yes/no, but see comments below**

Detailed comments (if any):

While we recognize that there are differing views, Section 360 of the Code is already detailed and prescriptive. In our view, the priority should be to simplify the existing provisions and make them more principles-based, rather than introduce further detailed requirements to address specific engagement standards such as ISRE 2410. Adding further requirements to the Code for this purpose would risk increasing complexity and, in our view, would be disproportionate.

More broadly, with respect to NOCLAR, including its application to review and other non-audit engagements, we believe that any lack of alignment between the Code and the IAASB's engagement standards should be considered holistically by IESBA and the IAASB as part of the post-implementation review of the NOCLAR provisions. This would provide an appropriate opportunity to assess the overall requirements in the Code against assurance standards and determine whether changes are necessary, rather than addressing this issue on a piecemeal basis.

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.
