

Exposure Draft

Proposed Changes to EP 100 Code of Professional Conduct and Ethics

Comments are requested by 31 May 2023.

Once issued, the proposed changes are effective as of 15 December 2023.



REQUEST FOR COMMENTS

This Exposure Draft (ED) of ISCA was approved for publication in May 2023. This Exposure Draft may be modified in light of comments received before being issued in its final form.

ISCA welcomes comments on all matters addressed in this ED. Specifically, we would like to hear your views on the following:

Group Audit Clients that are Public Interest Entities (PIEs)

Where the group audit client is a PIE, this ED proposes independence provisions applicable to a PIE that would apply to a component audit firm (CAF) outside the group auditor firm's (GAF) network for purposes of the group audit, including:

Non-assurance Services

1. The requirements and application material relevant to the permissibility of a non-assurance service to an audit client (see paragraphs R405.16 to R405.17); and

Key Audit Partners

2. The requirements and application material relevant to key audit partners and partner rotation (see paragraphs R405.18 and 405.18 A1).

Do you have any feedback or concern with applying the above PIE independence provisions for non-PIE component audit clients of CAFs outside the GAF's network?

Please let us know your reasons.

Comments should be submitted so as to be received by 31 May 2023, preferably by e-mail. All comments will be considered a matter of public record. Email responses should be sent to professionalstandards@isca.org.sg.

PROPOSED CHANGES TO EP 100
CODE OF PROFESSIONAL CONDUCT AND ETHICS
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EXPLANATORY MEMORANDUM

Introduction

1. All members of the Institute of Singapore Chartered Accountants (ISCA) must adhere to the EP 100 *Code of Professional Conduct and Ethics* (the Code or EP 100). EP 100 is modelled after the *International Code of Ethics for Professional Accountants (including International Independence Standards)* issued by the International Ethics Standards Board for Accountants (IESBA) of the International Federation of Accountants (IFAC).
2. EP 100 also encompasses the SG provisions included in the *Code of Professional Conduct and Ethics for Public Accountants and Accounting Entities* issued by the Accounting and Corporate Regulatory Authority (ACRA). SG provisions are local adaptations to serve the public interest in Singapore and to conform to Singapore's regulatory environment and statutory requirements.
3. This memorandum provides background to ISCA's Exposure Draft (ED), and an explanation of the proposed changes to EP 100.

Background

4. EP 100, revised on 7 September 2022 and effective 15 December 2022, is based on the *Handbook of the International Code of Ethics for Professional Accountants, 2022 Edition* of the IESBA, published by the IFAC in September 2022.
5. In February 2023, IFAC published the final pronouncement, *Revisions to the Code Relating to the Definition of Engagement Team and Group Audits* (ET-GA final pronouncement). If adopted, the Code would contain revised Section 400¹, new Section 405, conforming amendments to Sections 300, 310, 320, 360, 510, 540, 800, 900, 940 and 990 and Subsection 605 and the below new and revised terms in the Glossary.

New defined terms	Revised terms
Component	Assurance Team
Component audit client	Audit Client ²
Component auditor firm	Audit Team
Group	Engagement team
Group audit	Key audit partner
Group audit client ²	Review team
Group auditor firm	
Group audit team	
Group engagement partner	
Group financial statements	

(Please refer to pages 28 – 31 for mark-up from extant version of EP 100.)

¹ As part of the final pronouncement, *Revisions to the Definitions of Listed Entity and Public Interest Entity in the Code (PIE final pronouncement)*, the IESBA approved changes to the subsection on "Public Interest Entities" under Section 400 that will come into effect in **December 2024**. The numbering of these approved paragraphs, and the references thereto, will be updated subsequently in accordance with the proposed changes to revised Section 400.

² As part of the PIE final pronouncement, the IESBA approved changes to the definitions of audit client and publicly traded entity (PTE). Conforming amendments to the definitions of audit client and group audit client will come into effect in **December 2024** with the changes to the audit client and PTE definitions arising from the PIE Final Pronouncement.

Consultation

6. The proposals in the ET-GA final pronouncement address independence considerations in an audit of group financial statements. The revisions also address the independence implications of the change in the definition of an “engagement team” (ET) in the Code to align with changes to the definition of the same term in the International Standards on Auditing (ISAs) and International Standards on Quality Management (ISQMs).
7. This consultation seeks feedback on the proposed changes to EP 100 in this ED to adopt the ET-GA final pronouncement. The key amendments made to the ET-GA final pronouncement for the purpose of local adaptation as EP 100 are that references to international standards are changed to Singapore standards (i.e., from “ISA” to “SSA” and “ISQM” to “SSQM”).
8. The key elements of the proposed changes to EP 100 are highlighted in the section that follows below.

Key Elements of the Proposed Changes to EP 100

9. Key revisions to EP 100 to adopt the ET-GA final pronouncement are as follows:
 - Align the definition of ET in EP 100 with the definition of the same term in SSQM 1, with explanatory guidance to clarify the nature of the various teams with reference to Part 4A and Part 4B of EP 100.
 - Consistent with SSQM 2³, amend the definitions of “assurance team”, “audit team” and “review team” to recognise that engagement quality reviewers may be sourced from within or outside the firm or its network.
 - Provide guidance to facilitate the determination of individuals who are included in the ET and audit team/group audit team.
 - Enhance independence considerations for individuals and firms in an audit of group financial statements with a new Section 405 (Group Audits) and new defined terms⁴ in the Glossary. Amongst other matters, the new Section 405:
 - Requires appropriate communication between a group auditor firm (GAF) and a component auditor firm (CAF) on relevant ethical requirements, including those related to independence, consistent with SSA 600 (Revised)⁵.
 - More explicitly sets out the process to address a breach of an independence provision at a CAF within or outside the GAF’s network.
 - Specifies the approach to independence for individuals at a CAF outside the GAF’s network.
 - Clearly set out the independence provisions applicable to a public interest entity (PIE) that would apply to a CAF outside the GAF’s network when the group audit client is a PIE, and the component audit client is not a PIE.

³ See paragraph A4 of SSQM 2.

⁴ The definitions of “component”, “group”, “group audit” and “group engagement partner” are aligned with the definitions of the same term in SSA 600 (Revised). Other new defined terms are aligned as closely as possible with those in SSA 600 (Revised).

⁵ See paragraphs 25(a) and 45(c) of SSA 600 (Revised).

Effective Date

10. The proposed changes to Sections 300, 310, 320 and 360 of EP 100 in this ED will be effective as of 15 December 2023.
11. The proposed changes to Sections 400, 405, 510, 540 and 800 and Subsection 605 of EP 100 in this ED relating to independence for audit and review engagements will be effective for audits and reviews of financial statements for periods beginning on or after 15 December 2023.
12. The proposed changes to Sections 900, 940 and 990 of EP 100 in this ED relating to independence for assurance engagements with respect to underlying subject matter covering periods will be effective for periods beginning on or after 15 December 2023; otherwise, it will be effective as of 15 December 2023.
13. For non-assurance services engagements a component auditor firm outside the group auditor firm's network has entered into with a component audit client before 15 December 2023 and for which work has already commenced, the component auditor firm may continue such engagements under the extant provisions of the Code until completed in accordance with the original engagement terms.
14. Early adoption is permitted.

Useful Resource

15. The Staff of IESBA has issued Basis for Conclusions which relate to but does not form part of the ET-GA final pronouncement. This Basis for Conclusions explain how the IESBA has addressed the significant matters raised on exposure.
16. The Basis for Conclusions relating to the ET-GA final pronouncement issued in February 2023 may be downloaded from the IESBA website using this [link](#).

PROPOSED CHANGES TO EP 100

MARK-UP FROM EXTANT VERSION

SECTION 300

APPLYING THE CONCEPTUAL FRAMEWORK – PROFESSIONAL ACCOUNTANTS IN PUBLIC PRACTICE

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Requirements and Application Material

General

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Addressing Threats

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Examples of Safeguards

300.8 A2 Safeguards vary depending on the facts and circumstances. Examples of actions that in certain circumstances might be safeguards to address threats include:

- Assigning additional time and qualified personnel to required tasks when an engagement has been accepted might address a self-interest threat.
- Having an appropriate reviewer who was not a member of the team review the work performed or advise as necessary might address a self-review threat.
- Using different partners and **engagement**-teams with separate reporting lines for the provision of non-assurance services to an assurance client might address self-review, advocacy or familiarity threats.
- Involving another firm to perform or re-perform part of the engagement might address self-interest, self-review, advocacy, familiarity or intimidation threats.
- Disclosing to clients any referral fees or commission arrangements received for recommending services or products might address a self-interest threat.
- Separating teams when dealing with matters of a confidential nature might address a self-interest threat.

...

[Other paragraphs of extant Section 300 remain unchanged.]

SECTION 310

CONFLICTS OF INTEREST

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Conflict Identification

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Threats Created by Conflicts of Interest

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310.8 A3 Examples of actions that might be safeguards to address threats created by a conflict of interest include:

- Having separate **engagement** teams who are provided with clear policies and procedures on maintaining confidentiality.
- Having an appropriate reviewer, who is not involved in providing the service or otherwise affected by the conflict, review the work performed to assess whether the key judgements and conclusions are appropriate.

...

Confidentiality

...

When Disclosure to Obtain Consent would Breach Confidentiality

R310.12 When making specific disclosure for the purpose of obtaining explicit consent would result in a breach of confidentiality, and such consent cannot therefore be obtained, the firm shall only accept or continue an engagement if:

- (a) The firm does not act in an advocacy role for one client in an adversarial position against another client in the same matter;
- (b) Specific measures are in place to prevent disclosure of confidential information between the **engagement** teams serving the two clients; and
- (c) The firm is satisfied that a reasonable and informed third party would be likely to conclude that it is appropriate for the firm to accept or continue the engagement because a restriction on the firm's ability to provide the professional service would produce a disproportionate adverse outcome for the clients or other relevant third parties.

...

Documentation

R310.13 In the circumstances set out in paragraph R310.12, the professional accountant shall document:

- (a) The nature of the circumstances, including the role that the accountant is to undertake;
- (b) The specific measures in place to prevent disclosure of information between the **engagement** teams serving the two clients; and
- (c) Why it is appropriate to accept or continue the engagement.

[Other paragraphs of extant Section 310 remain unchanged.]

SECTION 320
PROFESSIONAL APPOINTMENTS

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Requirements and Application Material

Client and Engagement Acceptance

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General

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320.3 A3 A self-interest threat to compliance with the principle of professional competence and due care is created if the ~~engagement~~ team does not possess, or cannot acquire, the competencies to perform the professional services.

...

[Other paragraphs of extant Section 320 remain unchanged.]

SECTION 360

RESPONDING TO NON-COMPLIANCE WITH LAWS AND REGULATIONS

...

Communication with Respect to Groups

R360.16 Where a professional accountant becomes aware of non-compliance or suspected non-compliance ~~in relation to a component of a group~~ in either of the following two situations in the context of a group, the accountant shall communicate the matter to the group engagement partner unless prohibited from doing so by law or regulation:

- (a) The accountant ~~is, for purposes of an audit of the group financial statements, requested by the group engagement team to perform~~ audit work on financial information related to ~~the~~ component for purposes of the group audit; or
- (b) The accountant is engaged to perform an audit of the ~~component's~~ financial statements of a legal entity or business unit that is part of a group for purposes other than the group audit, for example, a statutory audit.

The communication to the group engagement partner shall be in addition to responding to the matter in accordance with the provisions of this section.

360.16 A1 The purpose of the communication is to enable the group engagement partner to be informed about the matter and to determine, in the context of the group audit, whether and, if so, how to address it in accordance with the provisions in this section. The communication requirement in paragraph R360.16 applies regardless of whether the group engagement partner's firm or network is the same as or different from the professional accountant's firm or network.

R360.17 Where the group engagement partner becomes aware of non-compliance or suspected non-compliance in the course of an group audit ~~of group financial statements~~, the group engagement partner shall consider whether the matter might be relevant to ~~one or more components~~:

- (a) One or more components ~~Whose financial information is~~ subject to audit work for purposes of the group audit ~~of the group financial statements~~; or
- (b) One or more legal entities or business units that are part of the group and ~~Whose~~ financial statements are subject to audit for purposes other than the group audit, for example, a statutory audit.

This consideration shall be in addition to responding to the matter in the context of the group audit in accordance with the provisions of this section.

R360.18 If the non-compliance or suspected non-compliance might be relevant to one or more of the components specified in paragraph R360.17(a) and legal entities or business units specified in paragraph R360.17(b), the group engagement partner shall take steps to have the matter communicated to those performing audit work at the components, legal entities or business units, unless prohibited from doing so by law or regulation. If necessary, the group engagement partner shall arrange for appropriate inquiries to be made (either of management or from publicly available information) as to whether the relevant ~~component(s)~~ legal entities or business units specified in paragraph R360.17(b) is-are subject to audit and, if so, to ascertain to the extent practicable the identity of the auditors.

360.18 A1 The purpose of the communication is to enable those responsible for audit work at the components, legal entities or business units to be informed about the matter and to determine whether and, if so, how to address it in accordance with the provisions in this section. The communication requirement applies regardless of

whether the group engagement partner's firm or network is the same as or different from the firms or networks of those performing audit work at the components, legal entities or business units.

...

[Other paragraphs of extant Section 360 remain unchanged.]

SECTION 400

APPLYING THE CONCEPTUAL FRAMEWORK TO INDEPENDENCE FOR AUDIT AND REVIEW ENGAGEMENTS

Introduction

General

...

400.6 When performing audit engagements, the Code requires firms to comply with the fundamental principles and be independent. This Part sets out specific requirements and application material on how to apply the conceptual framework to maintain independence when performing such engagements. The conceptual framework set out in Section 120 applies to independence as it does to the fundamental principles set out in Section 110. Section 405 sets out specific requirements and application material applicable in a group audit.

...

Engagement Team and Audit Team

400.8 This Part applies to all audit team members, including engagement team members.

400.9 An engagement team for an audit engagement includes all partners and staff in the firm who perform audit work on the engagement, and any other individuals who perform audit procedures who are from:

(a) A network firm; or

(b) A firm that is not a network firm, or another service provider.

For example, an individual from a component auditor firm who performs audit procedures on the financial information of a component for purposes of a group audit is a member of the engagement team for the group audit.

400.10 In SSQM 1, a service provider includes an individual or organization external to the firm that provides a resource that is used in the performance of engagements. Service providers exclude the firm, a network firm or other structures or organizations in the network.

400.11 An audit engagement might involve experts within, or engaged by, the firm, a network firm, or a component auditor firm outside a group auditor firm's network, who assist in the engagement. Depending on the role of the individuals, they might be engagement team or audit team members. For example:

- Individuals with expertise in a specialized area of accounting or auditing who perform audit procedures are engagement team members. These include, for example, individuals with expertise in accounting for income taxes or in analyzing complex information produced by automated tools and techniques for the purpose of identifying unusual or unexpected relationships.

- Individuals within, or engaged by, the firm who have direct influence over the outcome of the audit engagement through consultation regarding technical or industry-specific issues, transactions or events for the engagement are audit team members but not engagement team members.

However, individuals who are external experts are neither engagement team nor audit team members.

400.12 If the audit engagement is subject to an engagement quality review, the engagement quality reviewer and any other individuals performing the engagement quality review are audit team members but not engagement team

members.

Public Interest Entities

400.138 Some of the requirements and application material set out in this Part reflect the extent of public interest in certain entities which are defined to be public interest entities. Firms are encouraged to determine whether to treat additional entities, or certain categories of entities, as public interest entities because they have a large number and wide range of stakeholders. Factors to be considered include:

- The nature of the business, such as the holding of assets in a fiduciary capacity for a large number of stakeholders. Examples might include financial institutions, such as banks and insurance companies, and pension funds.
- Size.
- Number of employees.

400.914 (...)

...

Period During which Independence is Required

All Audit Clients

R400.30 Independence, as required by this Part, shall be maintained during both:

- (a) The engagement period; and
- (b) The period covered by the financial statements.

400.30 A1 The engagement period starts when the audit engagement team begins to perform the audit. The engagement period ends when the audit report is issued. When the engagement is of a recurring nature, it ends at the later of the notification by either party that the professional relationship has ended or the issuance of the final audit report.

R400.31 If an entity becomes an audit client during or after the period covered by the financial statements on which the firm will express an opinion, the firm shall determine whether any threats to independence are created by:

- (a) Financial or business relationships with the audit client during or after the period covered by the financial statements but before accepting the audit engagement; or
- (b) Previous Sservices provided to the audit client by the firm or a network firm in prior financial statement periods.

400.31 A1 Threats to independence are created if a non-assurance service was provided to an audit client during, or after the period covered by the financial statements, but before the audit engagement team begins to perform the audit, and the service would not be permitted during the engagement period.

...

[Other paragraphs of extant Section 400 remain unchanged.]

SECTION 405

GROUP AUDITS

Introduction

405.1 Section 400 requires a firm to be independent when performing an audit engagement, and to apply the conceptual framework set out in Section 120 to identify, evaluate and address threats to independence. This section sets out specific requirements and application material relevant to applying the conceptual framework when performing a group audit engagement.

Requirements and Application Material

General

405.2 A1 SSAs apply to an audit of group financial statements. SSA 600 (Revised) deals with special considerations that apply to an audit of group financial statements, including when component auditors are involved. SSA 600 (Revised) requires the group engagement partner to take responsibility for confirming whether the component auditors understand and will comply with the relevant ethical requirements, including those related to independence, that apply to the group audit. The independence requirements referred to in SSA 600 (Revised), or other relevant auditing standards applicable to group audits that are equivalent to SSA 600 (Revised), are those specified in this section.

405.2 A2 A component auditor firm that participates in a group audit engagement might separately issue an audit opinion on the financial statements of the component audit client. Depending on the circumstances, the component auditor firm might need to comply with different independence requirements when performing audit work for a group audit and separately issuing an audit opinion on the financial statements of the component audit client for statutory, regulatory or other reasons.

Communication Between a Group Auditor Firm and a Component Auditor Firm

R405.3 SSA 600 (Revised) requires the group engagement partner to take responsibility to make a component auditor aware of the relevant ethical requirements that are applicable given the nature and the circumstances of the group audit engagement. When making the component auditor firm aware of the relevant ethical requirements, the group auditor firm shall communicate at appropriate times the necessary information to enable the component auditor firm to meet its responsibilities under this section.

405.3 A1 Examples of matters the group auditor firm might communicate include:

- Whether the group audit client is a public interest entity and the relevant ethical requirements applicable to the group audit engagement.
- The related entities and other components within the group audit client that are relevant to the independence considerations applicable to the component auditor firm and the group audit team members within, or engaged by, that firm.
- The period during which the component auditor firm is required to be independent.
- Whether an audit partner who performs work at the component for purposes of the group audit is a key audit partner for the group audit.

R405.4 SSA 600 (Revised) also requires the group engagement partner to request the component auditor to communicate whether the component auditor has complied with the relevant ethical requirements, including those related to independence,

that apply to the group audit engagement. For the purposes of this section, such a request shall include the communication of:

- (a) Any independence matters that require significant judgment; and
- (b) In relation to those matters, the component auditor firm's conclusion whether the threats to its independence are at an acceptable level, and the rationale for that conclusion.

405.4 A1 If a matter comes to the attention of the group engagement partner that indicates that a threat to independence exists, SSA 220 (Revised) requires the group engagement partner to evaluate the threat and take appropriate action.

Independence Considerations Applicable to Individuals

Members of the Group Audit Team Within, or Engaged by, a Group Auditor Firm and Its Network Firms

R405.5 Members of the group audit team within, or engaged by, the group auditor firm and its network firms shall be independent of the group audit client in accordance with the requirements of this Part that are applicable to the audit team.

Other Members of the Group Audit Team

R405.6 Members of the group audit team within, or engaged by, a component auditor firm outside the group auditor firm's network shall be independent of:

- (a) The component audit client;
- (b) The entity on whose group financial statements the group auditor firm expresses an opinion; and
- (c) Any entity over which the entity in subparagraph (b) has direct or indirect control, provided that such entity has direct or indirect control over the component audit client,

in accordance with the requirements of this Part that are applicable to the audit team.

R405.7 In relation to related entities or components within the group audit client other than those covered in paragraph R405.6, a member of the group audit team within, or engaged by, a component auditor firm outside the group auditor firm's network shall notify the component auditor firm about any relationship or circumstance the individual knows, or has reason to believe, might create a threat to the individual's independence in the context of the group audit.

405.7 A1 Examples of relationships or circumstances involving the individual or any of the individual's immediate family members, as applicable, that are relevant to the individual's consideration when complying with paragraph R405.7 include:

- A direct or material indirect financial interest in an entity that has control over the group audit client if the group audit client is material to that entity (see Section 510).
- A loan or guarantee involving: (see Section 511)
 - An entity that is not a bank or similar institution unless the loan or guarantee is immaterial; or
 - A bank or similar institution unless the loan or guarantee is made under normal lending procedures, terms and conditions.
- A business relationship that is significant or involves a material financial interest (see Section 520).
- An immediate family member who is: (see Section 521)

- A director or officer of an entity; or
- An employee in a position to exert significant influence over the preparation of an entity's accounting records or financial statements.
- The individual serving as, or having recently served as: (see Section 522 and Section 523)
 - A director or officer of an entity; or
 - An employee in a position to exert significant influence over the preparation of an entity's accounting records or financial statements.

R405.8 Upon receiving the notification as set out in paragraph R405.7, the component auditor firm shall evaluate and address any threats to independence created by the individual's relationship or circumstance.

Independence Considerations Applicable to a Group Auditor Firm

R405.9 A group auditor firm shall be independent of the group audit client in accordance with the requirements of this Part that are applicable to a firm.

Independence Considerations Applicable to Network Firms of a Group Auditor Firm

R405.10 A network firm of the group auditor firm shall be independent of the group audit client in accordance with the requirements of this Part that are applicable to a network firm.

Independence Considerations Applicable to Component Auditor Firms outside a Group Auditor Firm's Network

All Group Audit Clients

R405.11 A component auditor firm outside the group auditor firm's network shall:

- (a)** Be independent of the component audit client in accordance with the requirements set out in this Part that are applicable to a firm with respect to all audit clients;
- (b)** Apply the relevant requirements in paragraphs R510.4(a), R510.7 and R510.9 with respect to financial interests in the entity on whose group financial statements the group auditor firm expresses an opinion; and
- (c)** Apply the relevant requirements in Section 511 with respect to loans and guarantees involving the entity on whose group financial statements the group auditor firm expresses an opinion.

R405.12 When a component auditor firm outside the group auditor firm's network knows, or has reason to believe, that a relationship or circumstance involving the group audit client, beyond those addressed in paragraph R405.11(b) and (c), is relevant to the evaluation of the component auditor firm's independence from the component audit client, the component auditor firm shall include that relationship or circumstance when identifying, evaluating and addressing threats to independence.

R405.13 When a component auditor firm outside the group auditor firm's network knows, or has reason to believe, that a relationship or circumstance of a firm within the component auditor firm's network with the component audit client or the group audit client creates a threat to the component auditor firm's independence, the component auditor firm shall evaluate and address any such threat.

Period During which Independence is Required

405.14 A1 The references to the financial statements and the audit report in paragraphs R400.30 and 400.30 A1 mean the group financial statements and the audit report on the group financial statements, respectively, when applied in this section.

Group Audit Clients that are Not Public Interest Entities

R405.15 When the group audit client is not a public interest entity, a component auditor firm outside the group auditor firm's network shall be independent of the component audit client in accordance with the requirements set out in this Part that are applicable to audit clients that are not public interest entities for the purposes of the group audit.

405.15 A1 Where a component auditor firm outside the group auditor firm's network also performs an audit engagement for a component audit client that is a public interest entity for reasons other than the group audit, for example, a statutory audit, the independence requirements that are relevant to audit clients that are public interest entities apply to that engagement.

Group Audit Clients that are Public Interest Entities

Non-Assurance Services

R405.16 Subject to paragraph R405.17, when the group audit client is a public interest entity, a component auditor firm outside the group auditor firm's network shall comply with the provisions in Section 600 that are applicable to public interest entities with respect to the provision of non-assurance services to the component audit client.

405.16 A1 Where the group audit client is a public interest entity, a component auditor firm outside the group auditor firm's network is prohibited from, for example:

- Providing accounting and bookkeeping services to a component audit client that is not a public interest entity (see Subsection 601).
- Designing the information technology system, or an aspect of it, for a component audit client that is not a public interest entity where such information technology system generates information for the component audit client's accounting records or financial statements (see Subsection 606).
- Acting in an advocacy role for a component audit client that is not a public interest entity in resolving a dispute or litigation before a tribunal or court (see Subsection 608).

405.16 A2 The financial information on which a component auditor firm outside the group auditor firm's network performs audit procedures is relevant to the evaluation of the self-review threat that might be created by the component auditor firm's provision of a non-assurance service, and therefore the application of Section 600. For example, if the component auditor firm's audit procedures are limited to a specific item such as inventory, the results of any non-assurance service that form part of or affect the accounting records or the financial information related to the accounting for, or the internal controls over, inventory are relevant to the evaluation of the self-review threat.

R405.17 As an exception to paragraph R405.16, a component auditor firm outside the group auditor firm's network may provide a non-assurance service that is not prohibited under Section 600 to a component audit client without communicating information about the proposed non-assurance service to those charged with governance of the group audit client or obtaining their concurrence regarding the provision of that service as addressed by paragraphs R600.21 to R600.24.

Key Audit Partners

R405.18 The group engagement partner shall determine whether an audit partner who performs audit work at a component for purposes of the group audit is a key audit partner for the group audit. If so, the group engagement partner shall:

- (a) Communicate that determination to that individual; and

(b) Indicate:

- (i) In the case of all group audit clients, that the individual is subject to paragraph R411.4, and**
- (ii) In the case of group audit clients that are public interest entities, that the individual is also subject to paragraphs R524.6, R540.5(c) and R540.20.**

405.18 A1 A key audit partner makes key decisions or judgments on significant matters with respect to the audit of the group financial statements on which the group auditor firm expresses an opinion in the group audit.

Changes in Components

All Group Audit Clients

R405.19 When an entity that is not a related entity becomes a component within the group audit client, the group auditor firm shall apply paragraphs R400.71 to R400.76

Changes in Component Auditor Firms

All Group Audit Clients

405.20 A1 There might be circumstances in which the group auditor firm requests another firm to perform audit work as a component auditor firm during or after the period covered by the group financial statements, for example due to a client merger or acquisition. A threat to the component auditor firm's independence might be created by:

- (a) Financial or business relationships of the component auditor firm with the component audit client during or after the period covered by the group financial statements but before the component auditor firm agrees to perform the audit work; or**
- (b) Previous services provided to the component audit client by the component auditor firm.**

405.20 A2 Paragraphs 400.31 A1 to A3 set out application material that is applicable for a component auditor firm's assessment of threats to independence if a non-assurance service was provided by the component auditor firm to the component audit client during or after the period covered by the group financial statements, but before the component auditor firm begins to perform the audit work for the purposes of the group audit, and the service would not be permitted during the engagement period.

405.20 A3 Paragraph 400.31 A4 sets out application material that is applicable for a component auditor firm's assessment of threats to independence if a non-assurance service was provided by the component auditor firm to the component audit client prior to the period covered by the group financial statements.

Group Audit Clients that are Public Interest Entities

405.21 A1 Paragraphs R400.32 and 400.32 A1 are applicable when a component auditor firm agrees to perform audit work for group audit purposes in relation to a group audit client that is a public interest entity if the component auditor firm has previously provided a non-assurance service to the component audit client.

405.21 A2 Paragraphs R600.25 and 600.25 A1 are applicable in relation to a non-assurance service provided, either currently or previously, by a component auditor firm to a component audit client when the group audit client subsequently becomes a public interest entity.

Breach of an Independence Provision at a Component Auditor Firm

405.22 A1 A breach of a provision of this section might occur despite a component auditor

firm having a system of quality management designed to address independence requirements. Paragraphs R405.23 to R405.29 are relevant to a group auditor firm's determination as to whether it would be able to use a component auditor firm's work if a breach has occurred at the component auditor firm.

405.22 A2 In the case of a breach at a component auditor firm within the group auditor firm's network, paragraphs R400.80 to R400.89 also apply to the group auditor firm in relation to the group audit, as applicable.

When a Component Auditor Firm Identifies a Breach

R405.23 If a component auditor firm concludes that a breach of this section has occurred, the component auditor firm shall:

- (a) End, suspend or eliminate the interest or relationship that created the breach and address the consequences of the breach;
- (b) Evaluate the significance of the breach and its impact on the component auditor firm's objectivity and ability to perform audit work for the purposes of the group audit;
- (c) Depending on the significance of the breach, determine whether it is possible to take action that satisfactorily addresses the consequences of the breach and whether such action can be taken and is appropriate in the circumstances; and
- (d) Promptly communicate in writing the breach to the group engagement partner, including the component auditor firm's assessment of the significance of the breach and any actions proposed or taken to address the consequences of the breach.

405.23 A1 Paragraphs 400.80 A2 and A3 set out application material relevant to the component auditor firm's evaluation of the significance and impact of the breach on the component auditor firm's objectivity and ability to issue an opinion or conclusion on the audit work performed at the component for purposes of the group audit, and its consideration of any actions that might be taken to address the consequences of the breach satisfactorily.

R405.24 Upon receipt of the component auditor firm's communication of the breach, the group engagement partner shall:

- (a) Review the component auditor firm's assessment of the significance of the breach and its impact on the component auditor firm's objectivity, and any action that can be or has been taken to address the consequences of the breach;
- (b) Evaluate the group auditor firm's ability to use the work of the component auditor firm for the purposes of the group audit; and
- (c) Determine the need for any further action.

R405.25 In applying paragraph R405.24, the group engagement partner shall exercise professional judgment and take into account whether a reasonable and informed third party would be likely to conclude that the component auditor firm's objectivity is compromised, and therefore, the group auditor firm is unable to use the work of the component auditor firm for the purposes of the group audit.

405.25 A1 If the group engagement partner determines that the consequences of the breach have been satisfactorily addressed by the component auditor firm and does not compromise the component auditor firm's objectivity, the group auditor firm may continue to use the work of the component auditor firm for the group audit. In certain circumstances, the group engagement partner might determine that additional actions are needed to satisfactorily address the breach in order to use the component auditor firm's work. Examples of such action include the group

auditor firm performing specific procedures on the areas impacted by the breach or requesting the component auditor firm to perform appropriate remedial work on the affected areas.

405.25 A2 SSA 600 (Revised) sets out that if there has been a breach by a component auditor and the breach has not been satisfactorily addressed, the group auditor cannot use the work of that component auditor. In those circumstances, the group engagement partner might find other means to obtain the necessary audit evidence on the component audit client's financial information. Examples of such means include the group auditor firm performing the necessary audit work on the component audit client's financial information or requesting another component auditor firm to perform such audit work.

Discussion with Those Charged with Governance of the Group Audit Client

405.26 A1 With respect to breaches by a component auditor firm within the group auditor firm's network, paragraph R400.84 applies.

R405.27 With respect to breaches by a component auditor firm outside the group auditor firm's network, the group auditor firm shall discuss with those charged with governance of the group audit client:

(a) The component auditor firm's assessment of the significance and impact of the breach on the component auditor firm's objectivity, including the nature and duration of the breach, and the action that can be or has been taken; and

(b) Whether:

(i) The action will satisfactorily address, or has addressed, the consequences of the breach; or

(ii) The group auditor firm will use other means to obtain the necessary audit evidence on the component audit client's financial information.

Such discussion shall take place as soon as possible unless an alternative timing is specified by those charged with governance for reporting less significant breaches.

R405.28 The group auditor firm shall communicate in writing to those charged with governance of the group audit client all matters discussed in accordance with paragraph R405.27 and obtain the concurrence of those charged with governance that the action can be or has been taken to satisfactorily address the consequences of the breach.

R405.29 If those charged with governance do not concur that the action that can be or has been taken would satisfactorily address the consequences of the breach at the component auditor firm, the group auditor firm shall not use the work performed by the component auditor firm for the purposes of the group audit.

SECTION 510

FINANCIAL INTERESTS

...

Requirements and Application Material

...

Financial Interests Held by the Firm, a Network Firm, Audit Team Members and Others

...

510.4 A1 The office in which the engagement partner practices in connection with an audit engagement is not necessarily the office to which that partner is assigned. When the engagement partner is located in a different office from that of the other ~~audit~~ engagement team members, professional judgement is needed to determine the office in which the partner practices in connection with the engagement.

...

[Other paragraphs of extant Section 510 remain unchanged.]

SECTION 540

LONG ASSOCIATION OF PERSONNEL (INCLUDING PARTNER ROTATION) WITH AN AUDIT CLIENT

...

Requirements and Application Material

All Audit Clients

...

R540.4 If a firm decides that the level of the threats created can only be addressed by rotating the individual off the audit team, the firm shall determine an appropriate period during which the individual shall not:

- (a) Be a member of the engagement team for the audit engagement;
- (b) Perform an engagement quality review, or a review consistent with the objective of an engagement quality review, for the engagement~~Provide quality control for the audit engagement~~; or
- (c) Exert direct influence on the outcome of the audit engagement.

The period shall be of sufficient duration to allow the familiarity and self-interest threats to be addressed. In the case of a public interest entity, paragraphs R540.5 to R540.20 also apply.

...

Restrictions on Activities During the Cooling-off Period

R540.20 For the duration of the relevant cooling-off period, the individual shall not:

- (a) Be an engagement team member or perform an engagement quality review, or a review consistent with the objective of an engagement quality review~~provide quality control~~ for the audit engagement;
- (b) Consult with the engagement team or the client regarding technical or industry-specific issues, transactions or events affecting the audit engagement (other than discussions with the engagement team limited to work undertaken or conclusions reached in the last year of the individual's time-on period where this remains relevant to the audit);
- (c) Be responsible for leading or coordinating the professional services provided by the firm or a network firm to the audit client, or overseeing the relationship of the firm or a network firm with the audit client; or
- (d) Undertake any other role or activity not referred to above with respect to the audit client, including the provision of non-assurance services that would result in the individual:
 - (i) Having significant or frequent interaction with senior management or those charged with governance; or
 - (ii) Exerting direct influence on the outcome of the audit engagement.

...

[Other paragraphs of extant Section 540 remain unchanged.]

SECTION 600

PROVISION OF NON-ASSURANCE SERVICES TO AN AUDIT CLIENT

...

SUBSECTION 605 – INTERNAL AUDIT SERVICES

...

Requirements and Application Material

...

605.4 A2 When a firm uses the work of an internal audit function in an audit engagement, SSAs require the performance of procedures to evaluate the adequacy of that work. Similarly, when a firm or a network firm accepts an engagement to provide internal audit services to an audit client, the results of those services might be used in conducting the external audit. This might create a self-review threat because it is possible that the audit engagement team will use the results of the internal audit service for purposes of the audit engagement without:

- (a) Appropriately evaluating those results; or
- (b) Exercising the same level of professional scepticism as would be exercised when the internal audit work is performed by individuals who are not members of the firm.

605.4 A3 Factors that are relevant in identifying a self-review threat created by providing internal audit services to an audit client, and evaluating the level of such a threat include:

- The materiality of the related financial statement amounts.
- The risk of misstatement of the assertions related to those financial statement amounts.
- The degree of reliance that the audit engagement team will place on the work of the internal audit service.

When a self-review threat for an audit client that is a public interest entity has been identified, paragraph R605.6 applies.

...

[Other paragraphs of extant Subsection 605 remain unchanged.]

SECTION 800

REPORTS ON SPECIAL PURPOSE FINANCIAL STATEMENTS THAT INCLUDE A RESTRICTION ON USE AND DISTRIBUTION (AUDIT AND REVIEW ENGAGEMENTS)

...

Requirements and Application Material

General

...

Financial Interests, Loans and Guarantees, Close Business Relationships, and Family and Personal Relationships

R800.10 When the firm performs an eligible audit engagement:

- (a) The relevant provisions set out in Sections 510, 511, 520, 521, 522, 524 and 525 need apply only to the members of the engagement team, their immediate family members and, where applicable, close family members;
- (b) The firm shall identify, evaluate and address any threats to independence created by interests and relationships, as set out in Sections 510, 511, 520, 521, 522, 524 and 525, between the audit client and the following audit team members:
 - (i) Those who provide consultation regarding technical or industry-specific issues, transactions or events; and
 - (ii) Those who perform an engagement quality review, or a review consistent with the objective of an engagement quality review, for the engagement~~Those who provide quality control for the engagement, including those who perform the engagement quality control review;~~ and
- (c) The firm shall evaluate and address any threats that the engagement team has reason to believe are created by interests and relationships between the audit client and others within the firm who can directly influence the outcome of the audit engagement.

...

[Other paragraphs of extant Section 800 remain unchanged.]

SECTION 900

APPLYING THE CONCEPTUAL FRAMEWORK TO INDEPENDENCE FOR ASSURANCE ENGAGEMENTS OTHER THAN AUDIT AND REVIEW ENGAGEMENTS

...

Requirements and Application Material

...

Period During which Independence is Required

R900.30 Independence, as required by this Part, shall be maintained during both:

- (a) The engagement period; and
- (b) The period covered by the subject matter information.

900.30 A1 The engagement period starts when the ~~assurance engagement~~ team begins to perform assurance services with respect to the particular engagement. The engagement period ends when the assurance report is issued. When the engagement is of a recurring nature, it ends at the later of the notification by either party that the professional relationship has ended or the issuance of the final assurance report.

...

R900.32 Threats to independence are created if a non-assurance service was provided to the assurance client during, or after the period covered by the subject matter information, but before the ~~assurance engagement~~ team begins to perform assurance services, and the service would not be permitted during the engagement period. In such circumstances, the firm shall evaluate and address any threat to independence created by the service. If the threats are not at an acceptable level, the firm shall only accept the assurance engagement if the threats are reduced to an acceptable level.

...

[Other paragraphs of extant Section 900 remain unchanged.]

SECTION 940

LONG ASSOCIATION OF PERSONNEL WITH AN ASSURANCE CLIENT

...

Requirements and Application Material

General

...

R940.4 If a firm decides that the level of the threats created can only be addressed by rotating the individual off the assurance team, the firm shall determine an appropriate period during which the individual shall not:

- (a) Be a member of the engagement team for the assurance engagement;
- (b) Perform an engagement quality review, or a review consistent with the objective of an engagement quality review, for the engagement~~Provide quality control for the assurance engagement~~; or
- (c) Exert direct influence on the outcome of the assurance engagement.

The period shall be of sufficient duration to allow the familiarity and self-interest threats to be addressed.

...

[Other paragraphs of extant Section 940 remain unchanged.]

SECTION 990

REPORTS THAT INCLUDE A RESTRICTION ON USE AND DISTRIBUTION (ASSURANCE ENGAGEMENTS OTHER THAN AUDIT AND REVIEW ENGAGEMENTS)

...

Financial Interests, Loans and Guarantees, Close Business, Family and Personal Relationships

R990.7 When the firm performs an eligible assurance engagement:

- (a) The relevant provisions set out in Sections 910, 911, 920, 921, 922 and 924 need apply only to the members of the engagement team, and their immediate and close family members;
- (b) The firm shall identify, evaluate and address any threats to independence created by interests and relationships, as set out in Sections 910, 911, 920, 921, 922 and 924, between the assurance client and the following assurance team members:
 - (i) Those who provide consultation regarding technical or industry-specific issues, transactions or events; and
 - (ii) Those who perform an engagement quality review, or a review consistent with the objective of an engagement quality review, for the engagement~~Those who provide quality control for the engagement, including those who perform the engagement quality control review;~~ and
- (c) The firm shall evaluate and address any threats that the engagement team has reason to believe are created by interests and relationships between the assurance client and others within the firm who can directly influence the outcome of the assurance engagement, as set out in Sections 910, 911, 920, 921, 922 and 924.

...

[Other paragraphs of extant Section 990 remain unchanged.]

GLOSSARY, INCLUDING LISTS OF ABBREVIATIONS

In the *Code of Professional Conduct and Ethics*, the singular shall be construed as including the plural as well as the reverse, and the terms below have the following meanings assigned to them.

In this Glossary, explanations of defined terms are shown in regular font; italics are used for explanations of described terms which have a specific meaning in certain parts of the Code or for additional explanations of defined terms. References are also provided to terms described in the Code.

Assurance team	<p>(a) All members of the engagement team for the assurance engagement;</p> <p>(b) All others within <u>, or engaged by, at the</u> firm who can directly influence the outcome of the assurance engagement, including:</p> <p>(i) Those who recommend the compensation of, or who provide direct supervisory, management or other oversight of the assurance engagement partner in connection with the performance of the assurance engagement;</p> <p>(ii) Those who provide consultation regarding technical or industry-specific issues, transactions or events for the assurance engagement; and</p> <p>(iii) Those who provide <u>perform an engagement quality review, or a review consistent with the objective of an engagement quality review, control</u> for the assurance engagement; including those who perform the engagement quality control review for the assurance engagement.</p>
Audit client	<p>An entity in respect of which a firm conducts an audit engagement. When the client is a listed entity, audit client will always include its related entities. When the audit client is not a listed entity, audit client includes those related entities over which the client has direct or indirect control. <i>(See also paragraph R400.20.)</i></p> <p><i>In Part 4A, the term “audit client” applies equally to “review client.”</i></p> <p><i><u>In the case of a group audit, see the definition of group audit client.</u></i></p>
Audit team	<p>(a) All members of the engagement team for the audit engagement;</p> <p>(b) All others within <u>, or engaged by, the</u> firm who can directly influence the outcome of the audit engagement, including:</p> <p>(i) Those who recommend the compensation of, or who provide direct supervisory, management or other oversight of the engagement partner in connection with the performance of the audit engagement, including those at all successively senior levels above the engagement partner through to the individual who is the firm’s Senior or Managing Partner (Chief Executive or equivalent);</p> <p>(ii) Those who provide consultation regarding technical or industry-specific issues, transactions or events for the engagement; and</p>

	<p>(iii) Those who provide <u>perform an engagement quality review, or a review consistent with the objective of an control for the engagement, including those who perform the engagement quality control review,</u> for the engagement; and</p> <p>(c) All these <u>Any other individuals</u> within a network firm who can directly influence the outcome of the audit engagement.</p> <p><i>In Part 4A, the term “audit team” applies equally to “review team.” In the case of a group audit, see the definition of group audit team.</i></p>
<u>Component</u>	<u>An entity, business unit, function or business activity, or some combination thereof, determined by the group auditor for purposes of planning and performing audit procedures in a group audit.</u>
<u>Component audit client</u>	<p><u>A component in respect of which a group auditor firm or component auditor firm performs audit work for purposes of a group audit. When a component is:</u></p> <p>(a) <u>A legal entity, the component audit client is the entity and any related entities over which the entity has direct or indirect control; or</u></p> <p>(b) <u>A business unit, function or business activity (or some combination thereof), the component audit client is the legal entity or entities to which the business unit belongs or in which the function or business activity is being performed.</u></p>
<u>Component auditor firm</u>	<u>A firm performing audit work related to a component for purposes of a group audit.</u>
Engagement team	<p>All partners and staff performing the engagement, and any <u>other individuals engaged by the firm or a network firm who perform assurance procedures on the engagement, excluding external experts and internal auditors who provide direct assistance on the engagement.</u> This excludes external experts engaged by the firm or by a network firm.</p> <p>The term “engagement team” also excludes individuals within the client’s internal audit function who provide direct assistance on an audit engagement when the external auditor complies with the requirements of SSA 610 (Revised 2013), <u>Using the Work of Internal Auditors⁶.</u> <i>In Part 4A, the term “engagement team” refers to individuals performing audit or review procedures on the audit or review engagement, respectively. This term is further described in paragraph 400.9.</i></p> <p><u>SSA 220 (Revised) provides further guidance on the definition of engagement team in the context of an audit of financial statements.</u></p> <p><u>SSA 620 defines an auditor’s expert as an individual or organization possessing expertise in a field other than accounting or auditing, whose work in that field is used by the auditor to assist the auditor in obtaining sufficient appropriate audit evidence. SSA 620 deals with the auditor’s</u></p>

⁶ SSA 610 (Revised 2013) establishes limits on the use of direct assistance. It also acknowledges that the external auditor may be prohibited by law or regulation from obtaining direct assistance from internal auditors. Therefore, the use of direct assistance is restricted to situations where it is permitted.

	<p><u>responsibilities relating to the work of such experts.</u></p> <p><u>SSA 610 (Revised 2013) deals with the auditor’s responsibilities if using the work of internal auditors, including using internal auditors to provide direct assistance on the audit engagement.</u></p> <p><u>In Part 4B, the term “engagement team” refers to individuals performing assurance procedures on the assurance engagement.</u></p>
<u>Group</u>	<u>A reporting entity for which group financial statements are prepared.</u>
<u>Group audit</u>	<u>The audit of group financial statements.</u>
<u>Group audit client</u>	<p><u>The entity on whose group financial statements the group auditor firm conducts an audit engagement. When the entity is a listed entity, group audit client will always include its related entities and any other components at which audit work is performed. When the entity is not a listed entity, group audit client includes related entities over which such entity has direct or indirect control and any other components at which audit work is performed.</u></p> <p><u>See also paragraph R400.20.</u></p>
<u>Group auditor firm</u>	<u>The firm that expresses the opinion on the group financial statements.</u>
<u>Group audit team</u>	<p><u>(a) All members of the engagement team for the group audit, including individuals within, or engaged by, component auditor firms who perform audit procedures related to components for purposes of the group audit;</u></p> <p><u>(b) All others within, or engaged by, the group auditor firm who can directly influence the outcome of the group audit, including:</u></p> <p><u>(i) Those who recommend the compensation of, or who provide direct supervisory, management or other oversight of the group engagement partner in connection with the performance of the group audit, including those at all successively senior levels above the group engagement partner through to the individual who is the firm’s Senior or Managing Partner (Chief Executive or equivalent);</u></p> <p><u>(ii) Those who provide consultation regarding technical or industry-specific issues, transactions or events for the group audit; and</u></p> <p><u>(iii) Those who perform an engagement quality review, or a review consistent with the objective of an engagement quality review, for the group audit;</u></p> <p><u>(c) Any other individuals within a network firm of the group auditor firm’s network who can directly influence the outcome of the group audit; and</u></p> <p><u>(d) Any other individuals within a component auditor firm outside the group auditor firm’s network who can directly influence the outcome of the group audit.</u></p>

<u>Group engagement partner</u>	<u>The engagement partner who is responsible for the group audit.</u>
<u>Group financial statements</u>	<u>Financial statements that include the financial information of more than one entity or business unit through a consolidation process.</u>
Key audit partner	The engagement partner, the individual responsible for the engagement quality review, and other audit partners, if any, on the engagement team who make key decisions or judgements on significant matters with respect to the audit of the financial statements on which the firm will express an opinion. Depending upon the circumstances and the role of the individuals on the audit, “other audit partners” might include, for example, <u>audit engagement partners responsible for certain components in a group audit such as</u> significant subsidiaries or divisions.
Review team	<p>(a) All members of the engagement team for the review engagement; and</p> <p>(b) All others within <u>, or engaged by, the</u> firm who can directly influence the outcome of the review engagement, including:</p> <p>(i) Those who recommend the compensation of, or who provide direct supervisory, management or other oversight of the engagement partner in connection with the performance of the review engagement, including those at all successively senior levels above the engagement partner through to the individual who is the firm’s Senior or Managing Partner (Chief Executive or equivalent);</p> <p>(ii) Those who provide consultation regarding technical or industry specific issues, transactions or events for the engagement; and</p> <p>(iii) Those who <u>perform an engagement quality review, or a review consistent with the objective of an engagement quality review</u>provide quality control for the engagement; including those who perform the engagement quality control review for the engagement; and</p> <p>(c) All those<u>Any other individuals</u> within a network firm who can directly influence the outcome of the review engagement.</p>

...

[Other defined/described terms and abbreviations used in the extant “Glossary, including Lists of Abbreviations” remain unchanged.]

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