

STATEMENT OF AUDITING STANDARDS
110
THE AUDITORS' RESPONSIBILITY TO CONSIDER
FRAUD AND ERROR IN AN AUDIT OF FINANCIAL STATEMENTS

*(Effective for audits of financial statements for periods beginning before 15 December 2004)**

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* HKSA 240 "The auditor's responsibility to consider fraud in an audit of financial statements" is effective for audits of financial statements for periods beginning on or after 15 December 2004.

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110
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*Statements of Auditing Standards (SASs) are to be read in the light of SAS 010 "The scope and authority of auditing pronouncements". In particular, they contain basic principles and essential procedures (auditing standards), indicated by paragraphs in **bold italic type**, with which auditors are required to comply in the conduct of any audit including those of companies applying section 141D of the Companies Ordinance. SASs also include explanatory and other material which is designed to assist auditors in interpreting and applying auditing standards.*

Introduction

1. The purpose of this Statement of Auditing Standards (SAS) is to establish standards and provide guidance on the auditors' responsibility to consider fraud and error in an audit of financial statements. While this SAS focuses on the auditors' responsibilities with respect to fraud and error, the primary responsibility for the prevention and detection of fraud and error rests with both those charged with governance and the management of an entity.
2. ***When planning and performing audit procedures and evaluating and reporting the results thereof, the auditors should consider the risk of material misstatements in the financial statements resulting from fraud or error. (SAS 110.1)***

Fraud and error and their characteristics

3. Misstatements in the financial statements can arise from fraud or error. The term "error" refers to an unintentional misstatement in financial statements, including the omission of an amount or a disclosure, such as:
 - a. a mistake in gathering or processing data from which financial statements are prepared;
 - b. an incorrect accounting estimate arising from oversight or misinterpretation of facts; and
 - c. a mistake in the application of accounting principles relating to measurement, recognition, classification, presentation, or disclosure.
4. The term "fraud" refers to an intentional act by one or more individuals among management, those charged with governance, employees, or third parties, involving the use of deception to obtain an unjust or illegal advantage. Although fraud is a broad legal concept, the auditors are concerned with fraudulent acts that cause a material misstatement in the financial statements. Misstatement of the financial statements may not be the objective of some frauds. Auditors do not make legal determinations of whether fraud has actually occurred. Fraud involving one or more members of management or those charged with governance is referred to as "management fraud"; fraud involving only employees of the entity is referred to as "employee fraud". In either case, there may be collusion with third parties outside the entity.
5. Two types of intentional misstatements are relevant to the auditors' consideration of fraud - misstatements resulting from fraudulent financial reporting and misstatements resulting from misappropriation of assets.
6. Fraudulent financial reporting involves intentional misstatements or omissions of amounts or disclosures in financial statements to deceive financial statement users. Fraudulent financial reporting may involve:
 - a. deception such as manipulation, falsification, or alteration of accounting records or supporting documents from which the financial statements are prepared;

- b. misrepresentation in, or intentional omission from, the financial statements of events, transactions or other significant information; and
 - c. intentional misapplication of accounting principles relating to measurement, recognition, classification, presentation, or disclosure.
7. Misappropriation of assets involves the theft of an entity's assets. Misappropriation of assets can be accomplished in a variety of ways (including embezzling receipts, stealing physical or intangible assets, or causing an entity to pay for goods and services not received); it is often accompanied by false or misleading records or documents in order to conceal the fact that the assets are missing.
 8. Fraud involves motivation to commit fraud and a perceived opportunity to do so. Individuals might be motivated to misappropriate assets, for example, because the individuals are living beyond their means. Fraudulent financial reporting may be committed because management is under pressure, from sources outside or inside the entity, to achieve an expected (and perhaps unrealistic) earnings target - particularly since the consequences to management of failing to meet financial goals can be significant. A perceived opportunity for fraudulent financial reporting or misappropriation of assets may exist when an individual believes internal control could be circumvented, for example, because the individual is in a position of trust or has knowledge of specific weaknesses in the internal control system.
 9. The distinguishing factor between fraud and error is whether the underlying action that results in the misstatement in the financial statements is intentional or unintentional. Unlike error, fraud is intentional and usually involves deliberate concealment of the facts. While the auditors may be able to identify potential opportunities for fraud to be perpetrated, it is difficult, if not impossible, for the auditors to determine intent, particularly in matters involving management judgement, such as accounting estimates and the appropriate application of accounting principles.

Responsibilities of those charged with governance and of management

10. The primary responsibility for the prevention and detection of fraud and error rests with both those charged with governance and the management of an entity. The respective responsibilities of those charged with governance and management may vary by entity. Management, with the oversight of those charged with governance, needs to set the proper tone, create and maintain a culture of honesty and high ethics, and establish appropriate controls to prevent and detect fraud and error within the entity.
11. It is the responsibility of those charged with governance of an entity to ensure, through oversight of management, the integrity of an entity's accounting and financial reporting systems and that appropriate controls are in place, including those for monitoring risk, financial control and compliance with the law.
12. It is the responsibility of the management of an entity to establish a control environment and maintain policies and procedures to assist in achieving the objective of ensuring, as far as possible, the orderly and efficient conduct of the entity's business. This responsibility includes implementing and ensuring the continued operation of accounting and internal control systems which are designed to prevent and detect fraud and error. Such systems reduce but do not eliminate the risk of misstatements, whether caused by fraud or error. Accordingly, management assumes responsibility for any remaining risk.

Responsibilities of the auditors

13. The objective of an audit of financial statements is to enable the auditors to express an opinion whether the financial statements are prepared, in all material respects, in accordance with Generally Accepted Accounting Principles in Hong Kong. An audit conducted in accordance with SASs is designed to provide reasonable assurance that the financial statements taken as a whole are free from material misstatement, whether caused by fraud or error. The fact that an audit is carried out may act as a deterrent, but the auditors are not and cannot be held responsible for the prevention of fraud and error.

Inherent limitations of an audit

14. Auditors cannot obtain absolute assurance that material misstatements in the financial statements will be detected. Owing to the inherent limitations of an audit, there is an unavoidable risk that some material misstatements of the financial statements will not be detected, even though the audit is properly planned and performed in accordance with SASs. An audit does not guarantee all material misstatements will be detected because of such factors as the use of judgement, the use of testing, the inherent limitations of internal control and the fact that much of the evidence available to the auditors is persuasive rather than conclusive in nature. For these reasons, the auditors are able to obtain only reasonable assurance that material misstatements in the financial statements will be detected.
15. The risk of not detecting a material misstatement resulting from fraud is higher than the risk of not detecting a material misstatement resulting from error because fraud may involve sophisticated and carefully organized schemes designed to conceal it, such as forgery, deliberate failure to record transactions, or intentional misrepresentations being made to the auditors. Such attempts at concealment may be even more difficult to detect when accompanied by collusion. Collusion may cause the auditors to believe that evidence is persuasive when it is, in fact, false. The auditors' ability to detect a fraud depends on factors such as the skillfulness of the perpetrator, the frequency and extent of manipulation, the degree of collusion involved, the relative size of individual amounts manipulated, and the seniority of those involved. Audit procedures that are effective for detecting an error may be ineffective for detecting fraud.
16. Furthermore, the risk of the auditors not detecting a material misstatement resulting from management fraud is greater than for employee fraud, because those charged with governance and management are often in a position that assumes their integrity and enables them to override the formally established control procedures. Certain levels of management may be in a position to override control procedures designed to prevent similar frauds by other employees, for example, by directing subordinates to record transactions incorrectly or to conceal them. Given its position of authority within an entity, management has the ability to either direct employees to do something or solicit their help to assist management in carrying out a fraud, with or without the employees' knowledge.
17. The auditors' opinion on the financial statements is based on the concept of obtaining reasonable assurance; hence, in an audit, the auditors do not guarantee that material misstatements, whether from fraud or error, will be detected. Therefore, the subsequent discovery of a material misstatement of the financial statements resulting from fraud or error does not, in and of itself, indicate:
 - a. a failure to obtain reasonable assurance;
 - b. inadequate planning, performance or judgement;
 - c. the absence of professional competence and due care; or
 - d. a failure to comply with SASs.

This is particularly the case for certain kinds of intentional misstatements, since auditing procedures may be ineffective for detecting an intentional misstatement that is concealed through collusion between or among one or more individuals among management, those charged with governance, employees, or third parties, or involves falsified documentation. Whether the auditors have performed an audit in accordance with SASs is determined by the adequacy of the audit procedures performed in the circumstances and the suitability of the auditors' report based on the result of these procedures.

Professional skepticism

18. The auditors plan and perform an audit with an attitude of professional skepticism in accordance with SAS 100 "Objective and general principles governing an audit of financial statements". Such an attitude is necessary for the auditors to identify and properly evaluate, for example:
 - a. matters that increase the risk of a material misstatement in the financial statements resulting from fraud or error (for example, management's characteristics and influence over the control environment, industry conditions, and operating characteristics and financial stability);

- b. circumstances that make the auditors suspect that the financial statements are materially misstated;
 - c. evidence obtained (including the auditors' knowledge from previous audits) that brings into question the reliability of management representations.
19. However, unless the audit reveals evidence to the contrary, the auditors are entitled to accept records and documents as genuine. Accordingly, an audit performed in accordance with SASs rarely contemplates authentication of documentation, nor are auditors trained as, or expected to be, experts in such authentication.

Planning discussions

20. *In planning the audit, the auditors should discuss with other members of the audit team the susceptibility of the entity to material misstatements in the financial statements resulting from fraud or error. (SAS 110.2)*
21. Such discussions would involve considering, for example, in the context of the particular entity, where errors may be more likely to occur or how fraud might be perpetrated. Based on these discussions, members of the audit team may gain a better understanding of the potential for material misstatements in the financial statements resulting from fraud or error in the specific areas of the audit assigned to them, and how the results of the audit procedures that they perform may affect other aspects of the audit. Decisions may also be made on which members of the audit team will conduct certain enquiries or audit procedures, and how the results of those enquiries and procedures will be shared.

Enquiries of management

22. *When planning the audit, the auditors should make enquiries of management:*
- a. *to obtain an understanding of:*
 - i. *management's assessment of the risk that the financial statements may be materially misstated as a result of fraud; and*
 - ii. *the accounting and internal control systems management has put in place to address such risk;*
 - b. *to obtain knowledge of management's understanding regarding the accounting and internal control systems in place to prevent and detect error;*
 - c. *to determine whether management is aware of any known fraud that has affected the entity or suspected fraud that the entity is investigating; and*
 - d. *to determine whether management has discovered any material errors. (SAS 110.3)*
23. The auditors supplement their own knowledge of the entity's business by making enquiries of management regarding management's own assessment of the risk of fraud and the systems in place to prevent and detect it. In addition, the auditors make enquiries of management regarding the accounting and internal control systems in place to prevent and detect error. Since management is responsible for the entity's accounting and internal control systems and for the preparation of the financial statements, it is appropriate for the auditors to enquire of management how it is discharging these responsibilities. Matters that may be discussed as part of these enquiries include:
- a. whether there are particular subsidiary locations, business segments, types of transactions, account balances or financial statement categories where the possibility of error may be high, or where fraud risk factors may exist, and how they are being addressed by management;
 - b. the work of the entity's internal audit function and whether internal audit has identified fraud or any serious weaknesses in the system of internal control; and
 - c. how management communicates to employees its view on responsible business practices and ethical behaviour, such as through ethics policies or codes of conduct.

24. The nature, extent and frequency of management's assessment of such systems and risk vary from entity to entity. In some entities, management may make detailed assessments on an annual basis or as part of continuous monitoring. In other entities, management's assessment may be less formal and less frequent. The nature, extent and frequency of management's assessment are relevant to the auditors' understanding of the entity's control environment. For example, the fact that management has not made an assessment of the risk of fraud may be indicative of the lack of importance that management places on internal control.
25. It is also important that the auditors obtain an understanding of the design of the accounting and internal control systems within the entity. In designing such systems, management makes informed judgements on the nature and extent of the control procedures it chooses to implement and the nature and extent of the risks it chooses to assume. As a result of making these enquiries of management, the auditors may learn, for example, that management has consciously chosen to accept the risk associated with a lack of segregation of duties. Information from these enquiries may also be useful in identifying fraud risk factors that may affect the auditors' assessment of the risk that the financial statements may contain material misstatements caused by fraud.
26. It is also important for the auditors to enquire about management's knowledge of frauds that have affected the entity, suspected frauds that are being investigated, and material errors that have been discovered. Such enquiries might indicate possible weaknesses in control procedures if, for example, a number of errors have been found in certain areas. Alternatively, such enquiries might indicate that control procedures are operating effectively because anomalies are being identified and investigated promptly.
27. Although the auditors' enquiries of management may provide useful information concerning the risk of material misstatements in the financial statements resulting from employee fraud, such enquiries are unlikely to provide useful information regarding the risk of material misstatements in the financial statements resulting from management fraud. Accordingly, the auditors' follow-up of fraud risk factors, as discussed in paragraphs 40 and 41, is of particular relevance in relation to management fraud.

Discussions with those charged with governance

28. Those charged with governance of an entity have oversight responsibility for systems for monitoring risk, financial control and compliance with the law, and play an active role in oversight of how management has discharged its responsibilities. In such circumstances, auditors are encouraged to seek the views of those charged with governance on the adequacy of accounting and internal control systems in place to prevent and detect fraud and error, the risk of fraud and error, and the competence and integrity of management. Such enquiries may provide insights regarding the susceptibility of the entity to management fraud, for example. The auditors may have an opportunity to seek the views of those charged with governance during, for example, a meeting with those charged with governance to discuss the general approach and overall scope of the audit. This discussion may also provide those charged with governance with the opportunity to bring matters of concern to the auditors' attention.
29. Since the responsibilities of those charged with governance and management may vary by entity, it is important that the auditors understand the nature of these responsibilities within an entity to ensure that the enquiries and communications described above are directed to the appropriate individuals. SAS 610 "Communications of audit matters of governance interest with directors or management" paragraphs 9 and 10 provide guidance on with whom the auditors communicate.
30. In addition, following the enquiries of management described in paragraphs 22-27, the auditors consider whether there are any matters of governance interest to be discussed with those charged with governance of the entity. For a discussion of these matters, see SAS 610 paragraphs 5-8. Such matters may include for example:
 - a. concerns about the nature, extent and frequency of management's assessments of the accounting and internal control systems in place to prevent and detect fraud and error, and of the risk that the financial statements may be misstated;
 - b. a failure by management to address appropriately material weaknesses in internal control identified during the prior period's audit;

- c. the auditors' evaluation of the entity's internal control environment, including questions regarding management competence and integrity; and
- d. the effect of any matters, such as those above, on the general approach and overall scope of the audit, including additional procedures the auditors may need to perform.

Audit risk

- 31. SAS 300 "Audit risk assessments and accounting and internal control systems" paragraph 3 states that "audit risk" is the risk that the auditors give an inappropriate audit opinion when the financial statements are materially misstated. Such misstatements can result from either fraud or error. SAS 300 identifies the three components of audit risk and provides guidance on how to assess these risks: inherent risk, control risk and detection risk.

Inherent risk and control risk

- 32. *When assessing inherent risk and control risk in accordance with SAS 300 "Audit risk assessments and accounting and internal control systems", the auditors should consider how the financial statements might be materially misstated as a result of fraud or error. In considering the risk of material misstatement resulting from fraud, the auditors should consider whether fraud risk factors are present that indicate the possibility of either fraudulent financial reporting or misappropriation of assets. (SAS 110.4)*
- 33. SAS 300 describes the auditors' assessments of inherent risk and control risk, and how those assessments affect the nature, timing and extent of the audit procedures. In making those assessments, the auditors consider how the financial statements might be materially misstated as a result of fraud or error.
- 34. The fact that fraud is usually concealed can make it very difficult to detect. Nevertheless, using the auditors' knowledge of the business, the auditors may identify events or conditions that provide an opportunity, a motive or a means to commit fraud, or indicate that fraud may already have occurred. Such events or conditions are referred to as "fraud risk factors". For example, a document may be missing, a general ledger may be out of balance, or an analytical procedure may not make sense. However, these conditions may be the result of circumstances other than fraud. Therefore, fraud risk factors do not necessarily indicate the existence of fraud, however, they often have been present in circumstances where frauds have occurred. The presence of fraud risk factors may affect the auditors' assessment of inherent risk or control risk. Examples of fraud risk factors are set out in Appendix 1 to this SAS.
- 35. Fraud risk factors cannot easily be ranked in order of importance or combined into effective predictive models. The significance of fraud risk factors varies widely. Some of these factors will be present in entities where the specific conditions do not present a risk of material misstatement. Accordingly, the auditors exercise professional judgement when considering fraud risk factors individually or in combination and whether there are specific controls that mitigate the risk.
- 36. Although the fraud risk factors described in Appendix 1 cover a broad range of situations typically faced by auditors, they are only examples. Moreover, not all of these examples are relevant in all circumstances, and some may be of greater or lesser significance in entities of different size, with different ownership characteristics, in different industries, or because of other differing characteristics or circumstances. Accordingly, the auditors use professional judgement when assessing the significance and relevance of fraud risk factors and determining the appropriate audit response.
- 37. The size, complexity, and ownership characteristics of the entity have a significant influence on the consideration of relevant fraud risk factors. For example, in the case of a large entity, the auditors ordinarily consider factors that generally constrain improper conduct by management, such as the effectiveness of those charged with governance, and the internal audit function. The auditors also consider what steps have been taken to enforce a formal code of conduct, and the effectiveness of the budgeting system. In the case of a small entity, some or all of these considerations may be inapplicable or less important. For example, a smaller entity might not have a written code of conduct but, instead, may have developed a culture that emphasizes the importance of integrity and ethical behaviour through oral communication and by management example. Domination of management by a single individual in a small entity does not generally, in and of itself, indicate a failure by management to

display and communicate an appropriate attitude regarding internal control and the financial reporting process. Furthermore, fraud risk factors considered at a business segment operating level may provide different insights than the consideration thereof at an entity-wide level.

38. The presence of fraud risk factors may indicate that the auditors will be unable to assess control risk at less than high for certain financial statement assertions. On the other hand, the auditors may be able to identify internal controls designed to mitigate those fraud risk factors that the auditors can test to support a control risk assessment below high.

Detection risk

39. ***Based on the auditors' assessment of inherent and control risks (including the results of any tests of controls), the auditors should design substantive procedures to reduce to an acceptably low level the risk that misstatements resulting from fraud and error that are material to the financial statements taken as a whole will not be detected. In designing the substantive procedures, the auditors should address the fraud risk factors that the auditors have identified as being present. (SAS 110.5)***
40. SAS 300 explains that the auditors' control risk assessment, together with the inherent risk assessment, influences the nature, timing and extent of substantive procedures to be performed to reduce detection risk to an acceptably low level. In designing substantive procedures, the auditors address fraud risk factors that the auditors have identified as being present. The auditors' response to those factors is influenced by their nature and significance. In some cases, even though fraud risk factors have been identified as being present, the auditors' judgement may be that the audit procedures, including both tests of control, and substantive procedures, already planned, are sufficient to respond to the fraud risk factors.
41. In other circumstances, the auditors may conclude that there is a need to modify the nature, timing and extent of substantive procedures to address fraud risk factors present. In these circumstances, the auditors consider whether the assessment of the risk of material misstatement calls for an overall response, a response that is specific to a particular account balance, class of transactions or assertion, or both types of response. The auditors consider whether changing the nature of audit procedures, rather than the extent of them, may be more effective in responding to identified fraud risk factors. Examples of response procedures are set out in Appendix 2 to this SAS, including examples of responses to the auditors' assessment of the risk of material misstatement resulting from both fraudulent financial reporting and misappropriation of assets.

Procedures when circumstances indicate a possible misstatement

42. ***When the auditors encounter circumstances that may indicate that there is a material misstatement in the financial statements resulting from fraud or error, the auditors should perform procedures to determine whether the financial statements are materially misstated. (SAS 110.6)***
43. During the course of the audit, the auditors may encounter circumstances that indicate that the financial statements may contain a material misstatement resulting from fraud or error. Examples of such circumstances that, individually or in combination, may make the auditors suspect that such a misstatement exists are set out in Appendix 3 to this SAS.
44. When the auditors encounter such circumstances, the nature, timing and extent of the procedures to be performed depends on the auditors' judgement as to the type of fraud or error indicated, the likelihood of its occurrence, and the likelihood that a particular type of fraud or error could have a material effect on the financial statements. Ordinarily, the auditors are able to perform sufficient procedures to confirm or dispel a suspicion that the financial statements are materially misstated resulting from fraud or error. If not, the auditors consider the effect on the auditors' report, as discussed in paragraph 48 below.
45. The auditors cannot assume that an instance of fraud or error is an isolated occurrence and therefore, before the conclusion of the audit, the auditors consider whether the assessment of the components of audit risk made during the planning of the audit may need to be revised and whether the nature, timing and extent of the auditors' other procedures may need to be reconsidered (see SAS 300, paragraphs 47 and 57). For example, the auditors consider:
- a. the nature, timing and extent of substantive procedures;

- b. the assessment of the effectiveness of internal controls if control risk was assessed below high; and
- c. the assignment of audit team members that may be appropriate in the circumstances.

Considering whether an identified misstatement may be indicative of fraud

46. *When the auditors identify a misstatement, the auditors should consider whether such a misstatement may be indicative of fraud and if there is such an indication, the auditors should consider the implications of the misstatement in relation to other aspects of the audit, particularly the reliability of management representations. (SAS 110.7)*
47. If the auditors have determined that a misstatement is, or may be, the result of fraud, the auditors evaluate the implications, especially those dealing with the organizational position of the person or persons involved. For example, fraud involving misappropriations of cash from a small petty cash fund is ordinarily of little significance to the auditors in assessing the risk of material misstatement due to fraud. This is because both the manner of operating the fund and its size tend to establish a limit on the amount of potential loss, and the custodianship of such funds is ordinarily entrusted to an employee with a low level of authority. Conversely, when the matter involves management with a higher level of authority, even though the amount itself is not material to the financial statements, it may be indicative of a more pervasive problem. In such circumstances, the auditors reconsider the reliability of evidence previously obtained since there may be doubts about the completeness and truthfulness of representations made and about the genuineness of accounting records and documentation. The auditors also consider the possibility of collusion involving employees, management or third parties when reconsidering the reliability of evidence. If management, particularly at the highest level, is involved in fraud, the auditors may not be able to obtain the evidence necessary to complete the audit and report on the financial statements.

Evaluation and disposition of misstatements, and the effect on the auditors' report

48. *When the auditors confirm that, or are unable to conclude whether, the financial statements are materially misstated as a result of fraud or error, the auditors should consider the implications for the audit. (SAS 110.8)*
49. SAS 220 "Audit materiality" paragraphs 15-19, and SAS 600 "Auditors' report on financial statements" paragraphs 37-46, provide guidance on the evaluation and disposition of misstatements and the effect on the auditors' report.

Documentation

50. *The auditors should document fraud risk factors identified as being present during the auditors' assessment process (see paragraph 32) and document the auditors' response to any such factors (see paragraph 39). If during the performance of the audit, fraud risk factors are identified that cause the auditors to believe that additional audit procedures are necessary, the auditors should document the presence of such risk factors and the auditors' response to them. (SAS 110.9)*
51. SAS 230 "Documentation" requires the auditors to document matters which are important in providing evidence to support the audit opinion, and states that the working papers include the auditors' reasoning on all significant matters which require the auditors' judgement, together with the auditors' conclusion thereon. Because of the importance of fraud risk factors in the assessment of the inherent or control risk of material misstatement, the auditors document fraud risk factors identified and the response considered appropriate by the auditors.

Management representations

52. *The auditors should obtain written representations from management that:*
- a. *it acknowledges its responsibility for the implementation and operations of accounting and internal control systems that are designed to prevent and detect fraud and error;*
 - b. *it believes the effects of those uncorrected financial statement misstatements aggregated by the auditors during the audit are immaterial, both individually and in the aggregate, to the financial statements taken as a whole. A summary of such items should be included in or attached to the written representation;*

- c. *it has disclosed to the auditors all significant facts relating to any frauds or suspected frauds known to management that may have affected the entity; and*
 - d. *it has disclosed to the auditors the results of its assessment of the risk that the financial statements may be materially misstated as a result of fraud. (SAS 110.10)*
53. SAS 440 "Representations by management" provides guidance on obtaining appropriate representations from management in the audit. In addition to acknowledging its responsibility for the financial statements, it is important that management acknowledges its responsibility for the accounting and internal control systems designed to prevent and detect fraud and error.
 54. Because management is responsible for adjusting the financial statements to correct material misstatements, it is important that the auditors obtain written representation from management that any uncorrected misstatements resulting from either fraud or error are, in management's opinion, immaterial, both individually and in the aggregate. Such representations are not a substitute for obtaining sufficient appropriate audit evidence. In some circumstances, management may not believe that certain of the uncorrected financial statement misstatements aggregated by the auditors during the audit are misstatements. For that reason, management may want to add to their written representation words such as, "We do not agree that items...and...constitute misstatements because [description of reasons]."
 55. The auditors may designate an amount below which misstatements need not be accumulated because the auditors expect that the accumulation of such amounts clearly would not have a material effect on the financial statements. In so doing, the auditors consider the fact that the determination of materiality involves qualitative as well as quantitative considerations and that misstatements of a relatively small amount could nevertheless have a material effect on the financial statements. The summary of uncorrected misstatements included in or attached to the written representation need not include such misstatements.
 56. Because of the nature of fraud and the difficulties encountered by auditors in detecting material misstatements in the financial statements resulting from fraud, it is important that the auditors obtain a written representation from management confirming that it has disclosed to the auditors all facts relating to any frauds or suspected frauds that it is aware of that may have affected the entity, and that management has disclosed to the auditors the results of management's assessment of the risk that the financial statements may be materially misstated as a result of fraud.

Communication

57. *When the auditors identify a misstatement resulting from fraud, or a suspected fraud, or error, the auditors should consider the auditors' responsibility to communicate that information to management, those charged with governance and, in some circumstances, to regulatory and enforcement authorities. (SAS 110.11)*
58. Communication of a misstatement resulting from fraud, or a suspected fraud, or error to the appropriate level of management on a timely basis is important because it enables management to take action as necessary. The determination of which level of management is the appropriate one is a matter of professional judgement and is affected by such factors as the nature, magnitude and frequency of the misstatement or suspected fraud. Ordinarily, the appropriate level of management is at least one level above the persons who appear to be involved with the misstatement or suspected fraud.
59. Unless a matter is prohibited from disclosure by the auditors in certain circumstances due to the statutory or regulatory requirements, the determination of which matters are to be communicated by the auditors to those charged with governance is a matter of professional judgement and is also affected by any understanding between the parties as to which matters are to be communicated. Ordinarily, such matters include:
 - a. questions regarding management competence and integrity;
 - b. fraud involving management;
 - c. other fraud that results in a material misstatement of the financial statements;

- d. material misstatements resulting from error;
- e. misstatements that indicate material weaknesses in internal control, including the design or operation of the entity's financial reporting process; and
- f. misstatements that may cause future financial statements to be materially misstated.

Communication of misstatements resulting from error to management and to those charged with governance

- 60. *If the auditors have identified a material misstatement resulting from error, the auditors should communicate the misstatement to the appropriate level of management on a timely basis, and consider the need to report it to those charged with governance in accordance with SAS 610. (SAS 110.12)*
- 61. *The auditors should inform those charged with governance of those uncorrected misstatements aggregated by the auditors during the audit that were determined by management to be immaterial, both individually and in the aggregate, to the financial statements taken as a whole. (SAS 110.13)*
- 62. As noted in paragraph 55, the uncorrected misstatements communicated to those charged with governance need not include the misstatements below a designated amount.

Communication of misstatements resulting from fraud to management and to those charged with governance

- 63. *If the auditors have:*
 - a. *identified a fraud, whether or not it results in a material misstatement in the financial statements; or*
 - b. *obtained evidence that indicates that fraud may exist (even if the potential effect on the financial statements would not be material),*

the auditors should, except when prohibited by law from informing any party other than the proper authority or when the fraud casts doubt on the integrity of those charged with governance, communicate these matters to the appropriate level of management on a timely basis, and consider the need to report such matters to those charged with governance in accordance with SAS 610. (SAS 110.14)
- 64. When the auditors have obtained evidence that fraud exists or may exist, it is important that the matter be brought to the attention of an appropriate level of management. This is so even if the matter might be considered inconsequential (for example, a minor defalcation by an employee at a low level in the entity's organization). The determination of which level of management is the appropriate one is also affected in these circumstances by the likelihood of collusion or the involvement of a member of management.
- 65. If the auditors have determined that the misstatement is, or may be, the result of fraud, and either have determined that the effect could be material to the financial statements or have been unable to evaluate whether the effect is material, the auditors:
 - a. discuss the matter and the approach to further investigation with an appropriate level of management that is at least one level above those involved, and with management at the highest level; and
 - b. if appropriate, suggest that management consult with legal counsel.

Communication of material weaknesses in internal control

- 66. *The auditors should communicate to management any material weaknesses in internal control related to the prevention or detection of fraud and error, which have come to the auditors' attention as a result of the performance of the audit. The auditors should also be satisfied that those charged with governance have been informed of any material weaknesses in internal control related to the prevention and detection of fraud that either have been brought to the auditors' attention by management or have been identified by the auditors during the audit. (SAS 110.15)*

67. When the auditors have identified any material weaknesses in internal control related to the prevention or detection of fraud or error, the auditors communicate these material weaknesses in internal control to management. Because of the serious implications of material weaknesses in internal control related to the prevention and detection of fraud, it is also important that such deficiencies be brought to the attention of those charged with governance.
68. If the integrity or honesty of management or those charged with governance are doubted, the auditors ordinarily consider seeking legal advice to assist in the determination of the appropriate course of action.

Communications to regulatory and enforcement authorities

69. The auditors' professional duty to maintain the confidentiality of client information ordinarily precludes reporting fraud and error to a party outside the client entity. However, in certain circumstances, the duty of confidentiality may be overridden by statute, the law or courts of law.
70. Paragraphs 71 to 81 below establish standards and provide guidance to auditors on the circumstances in which to report to third parties who have a proper interest in receiving such information. In addition, auditors of entities in the regulated industries, who are required to report certain information direct to the relevant regulators, have separate responsibilities. Guidance on the auditors' responsibility to report direct to regulators in the regulated industries is provided in Practice Note 620.1 "Communications between auditors and securities and futures regulators", Practice Note 620.2 "Communications between auditors and the Insurance Authority", Practice Note 860.1 "The audit of retirement schemes" and Auditing Guideline 3.401 "Authorized institutions in Hong Kong".
71. *Where the auditors become aware of a suspected or actual instance of fraud which could have a material effect on the financial statements, they should:*
 - a. *consider whether the matter may be one that ought to be reported to a proper authority in the public interest; and where this is the case*
 - b. *except when they are prohibited by law from informing any party other than the proper authority or when the matter casts doubt on the integrity of those charged with governance, discuss the matter with those charged with governance, including any audit committee. (SAS 110.16)*
72. Where having discussed an identified suspected or actual instance of fraud which could have a material effect on the financial statements with those charged with governance and considered any views expressed on behalf of the entity and in the light of any legal advice obtained, the auditors conclude that the matter ought to be reported to a proper authority in the public interest, they would, except in the circumstances covered in paragraph 74(b) below, notify those charged with governance in writing of their view. If the entity does not voluntarily report the matter to a proper authority itself or is unable to provide evidence that the matter has been reported, the auditors would consider reporting it themselves.
73. Confidentiality is an implied term of the auditors' contract. The duty of confidentiality, however, is not absolute. In certain exceptional circumstances auditors are not bound by the duty of confidentiality and may report a suspected or actual instance of fraud which could have a material effect on the financial statements to a proper authority in the public interest. Auditors need to weigh the public interest in maintaining confidential client relationships against the public interest in disclosure to a proper authority. Determination of where the balance of public interest lies requires careful consideration. Auditors whose suspicions have been aroused need to use their professional judgement to determine whether their misgivings justify them in carrying the matter further or are too insubstantial to deserve reporting.
74. In respect of an identified suspected or actual instance of fraud which could have a material effect on the financial statements, the auditors would make a report direct to a proper authority in the public interest without delay and without informing those charged with governance in advance in situations where:
 - a. the auditors conclude that the matter ought to be reported to a proper authority in the public interest; and
 - b. the auditors are prohibited by law from informing any party other than the proper authority or the matter casts doubt on the integrity of those charged with governance.

75. Examples of circumstances which may cause the auditors no longer to have confidence in the integrity of those charged with governance include situations:
- a. where they suspect or have evidence of the involvement or intended involvement of those charged with governance in possible fraud which could have a material effect on the financial statements; or
 - b. where they suspect or have evidence that those charged with governance are aware of such fraud and, contrary to regulatory requirements or the public interest, have not reported it to a proper authority within a reasonable period.
76. Auditors are protected from the risk of liability for breach of confidence or defamation provided that:
- a. in the case of breach of confidence:
 - i. disclosure is made in the public interest;
 - ii. such disclosure is made to a proper body or person; and
 - iii. there is no malice motivating the disclosure; and
 - b. in the case of defamation:
 - i. disclosure is made in their capacity as auditors of the entity concerned; and
 - ii. there is no malice motivating the disclosure.

In addition, auditors are protected from such risks where they are expressly permitted or required by legislation to disclose information.

77. "Public interest" is a concept that is not capable of general definition. Each situation must be considered individually. Matters to be taken into account when considering whether disclosure is justified in the public interest may include:
- a. the extent to which the suspected or actual fraud is likely to affect members of the public;
 - b. whether those charged with governance have rectified the matter or are taking, or are likely to take, effective corrective action;
 - c. the extent to which non-disclosure is likely to enable the suspected or actual fraud to recur with impunity;
 - d. the gravity of the matter; and
 - e. the weight of evidence and the degree of the auditors' suspicion that there has been an instance of fraud.
78. When reporting to proper authorities in the public interest it is important that auditors only report to one which has a proper interest to receive the information. Which body or person is the proper authority in a particular instance depends on the nature of the suspected or actual fraud. Proper authorities could include the Independent Commission Against Corruption, the Police, the Customs and Excise Department, The Hong Kong Exchanges and Clearing Limited, the Securities and Futures Commission, the Hong Kong Monetary Authority, the Insurance Authority or the Mandatory Provident Fund Schemes Authority. In cases of doubt as to the appropriate authority auditors are advised to seek legal advice.
79. Auditors receive the same protection even if they only have a reasonable suspicion that fraud has occurred. Auditors who can demonstrate that they have acted reasonably and in good faith in informing an authority of an instance of fraud which they think has been committed would not be held by the court to be in breach of duty to the client even if, an investigation or prosecution having occurred, it were found that there has been no offence.
80. Auditors may need to take legal advice before making a decision on whether the matter should be reported to a proper authority in the public interest.

81. Auditors need to remember that their decision as to whether to report, and if so to whom, may be called into question at a future date, for example on the basis of:
- what they knew at the time;
 - what they ought to have known in the course of their audit;
 - what they ought to have concluded; and
 - what they ought to have done.

Auditors may also wish to consider the possible consequences if financial loss is occasioned as a result of fraud which they suspect (or ought to suspect) has occurred but decide not to report.

82. In addition to the duty of auditors of entities in the regulated industries to report direct to regulators in certain circumstances (see paragraph 70 above), auditors and others have a statutory duty to take the initiative to disclose to an authorized officer (as defined in the Drug Trafficking (Recovery of Proceeds) Ordinance and the Organized and Serious Crimes Ordinance) knowledge or suspicion that property represents proceeds, etc. of drug trafficking and indictable offence under section 25A of the Drug Trafficking (Recovery of Proceeds) Ordinance and the Organized and Serious Crimes Ordinance respectively. A failure to disclose in these circumstances is itself an offence. Furthermore, it should be noted that if a person, knowing or suspecting that a disclosure has been made about property representing proceeds, etc of drug trafficking or an indictable offence under section 25A of the Drug Trafficking (Recovery of Proceeds) Ordinance and the Organized and Serious Crimes Ordinance respectively, discloses to any other person any matter which is likely to prejudice any investigation which might be conducted in consequence of the first-mentioned disclosure, that person commits an offence under the respective Ordinance.

Auditors unable to complete the engagement

83. *If the auditors conclude that it is not possible to continue performing the audit as a result of a misstatement resulting from fraud or suspected fraud, the auditors should:*
- consider the professional and legal responsibilities applicable in the circumstances, including whether there is a requirement for the auditors to report to the person or persons who made the audit appointment or, in some cases, to regulatory authorities;*
 - consider the possibility of withdrawing from the engagement; and*
 - if the auditors withdraw:*
 - discuss with the appropriate level of management and those charged with governance the auditors' withdrawal from the engagement and the reasons for the withdrawal; and*
 - consider whether there is a professional or legal requirement to report to the person or persons who made the audit appointment or, in some cases, to regulatory authorities, the auditors' withdrawal from the engagement and the reasons for the withdrawal. (SAS 110.17)*
84. The auditors may encounter exceptional circumstances that bring into question the auditors' ability to continue performing the audit, for example, in circumstances where:
- the entity does not take the remedial action regarding fraud that the auditors consider necessary in the circumstances, even when the fraud is not material to the financial statements;
 - the auditors' consideration of the risk of material misstatement resulting from fraud and the results of audit tests indicate a significant risk of material and pervasive fraud; or
 - the auditors have significant concern about the competence or integrity of management or those charged with governance.

85. Because of the variety of the circumstances that may arise, it is not possible to describe definitively when withdrawal from an engagement is appropriate. Factors that affect the auditors' conclusion include the implications of the involvement of a member of management or of those charged with governance (which may affect the reliability of management representations) and the effects on the auditors of continuing association with the entity.

Communication with the proposed successor auditors

86. As stated in the Professional Ethics Statements issued by the Hong Kong Institute of Certified Public Accountants, on receipt of an enquiry from the proposed successor auditors, the existing auditors would advise whether there are any professional reasons why the proposed successor auditors should not accept the appointment. If the client denies the existing auditors permission to discuss its affairs with the proposed successor auditors or limits what the existing auditors may say, that fact would be disclosed to the proposed successor auditors.
87. The existing auditors may be contacted by the proposed successor auditors enquiring whether there are any professional reasons why the proposed successor auditors should not accept the appointment. The responsibilities of existing and proposed successor auditors are set out in Professional Ethics Statement 1.207 "Changes in a professional appointment".
88. The extent to which the existing auditors can discuss the affairs of a client with the proposed successor auditors will depend on whether the existing auditors have obtained the client's permission to do so. Subject to any constraints arising from these responsibilities, the existing auditors advise the proposed successor auditors whether there are any professional reasons not to accept the appointment, providing details of the information and discussing freely with the proposed successor auditors all matters relevant to the appointment. If fraud or suspected fraud was a factor in the existing auditors' withdrawal from the engagement, it is important that the existing auditors take care to state only the facts (not their conclusions) relating to these matters.

Compliance with International Standards on Auditing

89. Compliance with the auditing standards contained in this SAS ensures compliance in all material respects with the basic principles and essential procedures in International Standard on Auditing 240 "The Auditor's Responsibility to Consider Fraud and Error in An Audit of Financial Statements".

Effective date

90. This SAS is effective for audits of financial statements for periods beginning before 15 December 2004.

Appendix 1

Examples of risk factors relating to misstatements resulting from fraud

The fraud risk factors identified in this Appendix are examples of such factors typically faced by auditors in a broad range of situations. However, the fraud risk factors listed below are only examples; not all of these factors are likely to be present in all audits, nor is the list necessarily complete. Furthermore, the auditors exercise professional judgement when considering fraud risk factors individually or in combination and whether there are specific controls that mitigate the risk. Fraud risk factors are discussed in paragraphs 34-38 of this SAS.

Fraud risk factors relating to misstatements resulting from fraudulent financial reporting

Fraud risk factors that relate to misstatements resulting from fraudulent financial reporting may be grouped in the following three categories:

1. Management's characteristics and influence over the control environment.
2. Industry conditions.
3. Operating characteristics and financial stability.

For each of these three categories, examples of fraud risk factors relating to misstatements arising from fraudulent financial reporting are set out below.

1. Fraud risk factors relating to management's characteristics and influence over the control environment

These fraud risk factors pertain to management's abilities, pressures, style, and attitude relating to internal control and the financial reporting process.

- There is motivation for management to engage in fraudulent financial reporting. Specific indicators may include the following:
 - A significant portion of management's compensation is represented by bonuses, stock options or other incentives, the value of which is contingent upon the entity achieving unduly aggressive targets for operating results, financial position or cash flow.
 - There is excessive interest by management in maintaining or increasing the entity's stock price or earnings trend through the use of unusually aggressive accounting practices.
 - Management commits to analysts, creditors and other third parties to achieving what appear to be unduly aggressive or clearly unrealistic forecasts.
 - Management has an interest in pursuing inappropriate means to minimize reported earnings for tax-motivated reasons.
- There is a failure by management to display and communicate an appropriate attitude regarding internal control and the financial reporting process. Specific indicators may include the following:
 - Management does not effectively communicate and support the entity's values or ethics, or management communicates inappropriate values or ethics.
 - Management is dominated by a single person or a small group without compensating controls such as effective oversight by those charged with governance.
 - Management does not monitor significant controls adequately.
 - Management fails to correct known material weaknesses in internal control on a timely basis.
 - Management sets unduly aggressive financial targets and expectations for operating personnel.
 - Management displays a significant disregard for regulatory authorities.

- Management continues to employ ineffective accounting, information technology or internal auditing staff.
- Non-financial management participates excessively in, or is preoccupied with, the selection of accounting principles or the determination of significant estimates.
- There is a high turnover of management, counsel or board members.
- There is a strained relationship between management and the current or predecessor auditors. Specific indicators may include the following:
 - Frequent disputes with the current or predecessor auditors on accounting, auditing or reporting matters.
 - Unreasonable demands on the auditors, including unreasonable time constraints regarding the completion of the audit or the issuance of the auditors' report.
 - Formal or informal restrictions on the auditors that inappropriately limit the auditors' access to people or information, or limit the auditors' ability to communicate effectively with those charged with governance.
 - Domineering management behaviour in dealing with the auditors, especially involving attempts to influence the scope of the auditors' work.
- There is a history of securities law violations, or claims against the entity or its management alleging fraud or violations of securities laws.
- The corporate governance structure is weak or ineffective, which may be evidenced by, for example:
 - A lack of members who are independent of management.
 - Little attention being paid to financial reporting matters and to the accounting and internal control systems by those charged with governance.

2. *Fraud risk factors relating to industry conditions*

These fraud risk factors involve the economic and regulatory environment in which the entity operates.

- New accounting, statutory or regulatory requirements that could impair the financial stability or profitability of the entity.
- A high degree of competition or market saturation, accompanied by declining margins.
- A declining industry with increasing business failures and significant declines in customer demand.
- Rapid changes in the industry, such as high vulnerability to rapidly changing technology or rapid product obsolescence.

3. *Fraud risk factors relating to operating characteristics and financial stability*

These fraud risk factors pertain to the nature and complexity of the entity and its transactions, the entity's financial condition, and its profitability.

- Inability to generate cash flows from operations while reporting earnings and earnings growth.
- Significant pressure to obtain additional capital necessary to stay competitive, considering the financial position of the entity (including a need for funds to finance major research and development or capital expenditures).
- Assets, liabilities, revenues or expenses based on significant estimates that involve unusually subjective judgements or uncertainties, or that are subject to potential significant change in the near term in a manner that may have a financially disruptive effect on the entity (for example, the ultimate collectibility of receivables, the timing of revenue recognition, the realizability of financial instruments based on highly-subjective valuation of collateral or difficult-to-assess repayment sources, or a significant deferral of costs).
- Significant related party transactions which are not in the ordinary course of business.
- Significant related party transactions which are not audited or are audited by another firm.

- Significant, unusual or highly complex transactions (especially those close to year-end) that pose difficult questions concerning substance over form.
- Significant bank accounts or subsidiary or branch operations in tax-haven jurisdictions for which there appears to be no clear business justification.
- An overly complex organizational structure involving numerous or unusual legal entities, managerial lines of authority or contractual arrangements without apparent business purpose.
- Difficulty in determining the organization or person (or persons) controlling the entity.
- Unusually rapid growth or profitability, especially compared with that of other companies in the same industry.
- Especially high vulnerability to changes in interest rates.
- Unusually high dependence on debt, a marginal ability to meet debt repayment requirements, or debt covenants that are difficult to maintain.
- Unrealistically aggressive sales or profitability incentive programmes.
- A threat of imminent bankruptcy, foreclosure or hostile takeover.
- Adverse consequences on significant pending transactions (such as a business combination or contract award) if poor financial results are reported.
- A poor or deteriorating financial position when management has personally guaranteed significant debts of the entity.

Fraud risk factors relating to misstatements resulting from misappropriation of assets

Fraud risk factors that relate to misstatements resulting from misappropriation of assets may be grouped in the following two categories:

1. Susceptibility of assets to misappropriation.
2. Controls.

For each of these two categories, examples of fraud risk factors relating to misstatements resulting from misappropriation of assets are set out below. The extent of the auditors' consideration of the fraud risk factors in category 2 is influenced by the degree to which fraud risk factors in category 1 are present.

1. Fraud risk factors relating to susceptibility of assets to misappropriation

These fraud risk factors pertain to the nature of an entity's assets and the degree to which they are subject to theft.

- Large amounts of cash on hand or processed.
- Inventory characteristics, such as small size combined with high value and high demand.
- Easily convertible assets, such as bearer bonds, diamonds or computer chips.
- Fixed asset characteristics, such as small size combined with marketability and lack of ownership identification.

2. Fraud risk factors relating to controls

These fraud risk factors involve the lack of controls designed to prevent or detect misappropriation of assets.

- Lack of appropriate management oversight (for example, inadequate supervision or inadequate monitoring of remote locations).
- Lack of procedures to screen job applicants for positions where employees have access to assets susceptible to misappropriation.
- Inadequate record keeping for assets susceptible to misappropriation.
- Lack of an appropriate segregation of duties or independent checks.
- Lack of an appropriate system of authorization and approval of transactions (for example, in purchasing).

- Poor physical safeguards over cash, investments, inventory or fixed assets.
- Lack of timely and appropriate documentation for transactions (for example, credits for merchandise returns).
- Lack of mandatory vacations for employees performing key control functions.

Appendix 2

Examples of modifications of procedures in response to the assessment of fraud risk factors in accordance with paragraphs 39-41 of this SAS

The following are examples of possible responses to the auditors' assessment of the risk of material misstatement resulting from both fraudulent financial reporting and misappropriation of assets. The auditors exercise judgement to select the most appropriate procedures in the circumstances. The procedures identified may not be the most appropriate nor necessary in each circumstance. The auditors' response to fraud risk factors is discussed in paragraphs 40 and 41 of this SAS.

Overall considerations

Judgements about the risk of material misstatements resulting from fraud may affect the audit in the following ways:

- Professional skepticism. The application of professional skepticism may include: (i) increased sensitivity in the selection of the nature and extent of documentation to be examined in support of material transactions, and (ii) increased recognition of the need to corroborate management explanations or representations concerning material matters.
- Assignment of members of the audit team. The knowledge, skill and ability of members of the audit team assigned significant audit responsibilities need to be commensurate with the auditors' assessment of the level of risk for the engagement. In addition, the extent of supervision needs to recognize the risk of material misstatement resulting from fraud and the qualifications of members of the audit team performing the work.
- Accounting principles and policies. The auditors may decide to consider further management's selection and application of significant accounting policies, particularly those related to revenue recognition, asset valuation or capitalizing versus expensing.
- Controls. The auditors' ability to assess control risk below high may be reduced. However, this does not eliminate the need for the auditors to obtain an understanding of the components of the entity's internal control sufficient to plan the audit. In fact, such an understanding may be of particular importance in further understanding and considering any controls (or lack thereof) the entity has in place to address the fraud risk factors identified. However, this consideration also needs to include an added sensitivity to management's ability to override such controls.

The nature, timing and extent of procedures may need to be modified in the following ways:

- The nature of audit procedures performed may need to be changed to obtain evidence that is more reliable or to obtain additional corroborative information. For example, more audit evidence may be needed from independent sources outside the entity.
- The timing of substantive procedures may need to be altered to be closer to, or at, year-end. For example, if there are unusual incentives for management to engage in fraudulent financial reporting, the auditors might conclude that substantive procedures would need to be performed near or at year-end because it would not be possible to control the incremental audit risk associated with that fraud risk factor.
- The extent of the procedures applied will need to reflect the assessment of the risk of material misstatement resulting from fraud. For example, increased sample sizes or more extensive analytical procedures may be appropriate.

The auditors consider whether changing the nature of the audit procedures, rather than the extent of them, may be more effective in responding to identified fraud risk factors.

Considerations at the account balance, class of transactions and assertion level

Specific responses to the auditors' assessment of the risk of material misstatement resulting from fraud will vary depending upon the types or combinations of fraud risk factors or conditions identified, and the account balances, classes of transactions and assertions they may affect. If these factors or conditions indicate a particular risk applicable to specific account balances or types of transactions, audit procedures addressing these specific areas will need to be considered that will, in the auditors' judgement, limit audit risk to an appropriate level in light of the fraud risk factors or conditions identified.

The following are specific examples of responses:

- Visit locations or perform certain tests on a surprise or unannounced basis. For example, observe inventory at locations where auditors' attendance has not been previously announced or count cash at a particular date on a surprise basis.
- Request that inventories be counted at a date closer to the year-end.
- Alter the audit approach in the current year. For example, contact major customers and suppliers orally in addition to sending written confirmation, send confirmation requests to a specific party within an organization, or seek more and different information.
- Perform a detailed review of the entity's quarter-end or year-end adjusting entries and investigate any that appear unusual as to nature or amount.
- For significant and unusual transactions, particularly those occurring at or near year-end, investigate the possibility of related parties and the sources of financial resources supporting the transactions.
- Perform substantive analytical procedures at a detailed level. For example, compare sales and cost of sales by location and line of business to expectations developed by the auditors.
- Conduct interviews of personnel involved in areas for which there is a concern about the risk of material misstatement resulting from fraud, to obtain their insights about the risk and whether, or how, controls address the risk.
- When other independent auditors are auditing the financial statements of one or more subsidiaries, divisions or branches, consider discussing with them the extent of work necessary to be performed to ensure that the risk of material misstatement resulting from fraud resulting from transactions and activities among these components is adequately addressed.
- If the work of an expert becomes particularly significant with respect to a financial statement item for which the risk of misstatement due to fraud is high, perform additional procedures relating to some or all of the expert's assumptions, methods or findings to determine that the findings are not unreasonable, or engage another expert for that purpose.
- Perform audit procedures to analyze selected opening balance sheet accounts of previously audited financial statements to assess how certain issues involving accounting estimates and judgements, for example, an allowance for sales returns, were resolved with the benefit of hindsight.
- Perform procedures on account or other reconciliations prepared by the entity, including consideration of reconciliations performed at interim periods.
- Perform computer-assisted techniques, such as data mining to test for anomalies in a population.
- Test the integrity of computer-produced records and transactions.
- Seeking additional audit evidence from sources outside of the entity being audited.

Specific responses - misstatements resulting from fraudulent financial reporting

Examples of responses to the auditors' assessment of the risk of material misstatements resulting from fraudulent financial reporting are as follows:

- Revenue recognition. If there is a risk of material misstatement resulting from fraud that may involve or result in improper revenue recognition, it may be appropriate to confirm with customers certain relevant contract terms and the absence of side agreements, inasmuch as the appropriate accounting is often influenced by such terms or agreements.
- Inventory quantities. If there is a risk of material misstatement resulting from fraud relating to inventory quantities, reviewing the entity's inventory records may help to identify locations, areas or items for specific attention during or after the physical inventory count. Such a review may lead, for example, to a decision to observe inventory counts at certain locations on an unannounced basis, or to ask management to ensure that counts at all locations subject to count are performed on the same date.
- Non-standard journal entries. If there is a risk of material misstatement resulting from fraudulent financial reporting, performing tests of non-standard journal entries to confirm that they are adequately supported and reflect underlying events and transactions may help in identifying fictitious entries of aggressive recognition practices. While there is no generally accepted definition of non-standard journal entries, in general, they are financial statement changes or entries made in the books and records (including computer records) of an entity that usually are initiated by management-level personnel and are not routine nor associated with the normal processing of transactions.

Specific responses - misstatements resulting from misappropriation of assets

Differing circumstances would necessarily dictate different responses. Ordinarily, the audit response to a risk of material misstatement resulting from fraud relating to misappropriation of assets will be directed toward certain account balances and classes of transactions.

Although some of the audit responses noted in the two categories above may apply in such circumstances, the scope of the work is to be linked to the specific information about the misappropriation risk that has been identified. For example, where a particular asset is highly susceptible to misappropriation that is potentially material to the financial statements, it may be useful for the auditors to obtain an understanding of the control procedures related to the prevention and detection of such misappropriation and to test the operating effectiveness of such controls.

Appendix 3

Examples of circumstances that indicate the possibility of fraud or error

The auditors may encounter circumstances that, individually or in combination, indicate the possibility that the financial statements may contain a material misstatement resulting from fraud or error. The circumstances listed below are only examples; not all of these circumstances are likely to be present in all audits, nor is the list necessarily complete. Circumstances that indicate a possible misstatement are discussed in paragraphs 43 and 44 of this SAS.

- Unrealistic time deadlines for audit completion imposed by management.
- Reluctance by management to engage in frank communication with appropriate third parties, such as regulators and bankers.
- Limitation in audit scope imposed by management.
- Identification of important matters not previously disclosed by management.
- Significant difficult-to-audit figures in the financial statements.
- Aggressive application of accounting principles.
- Conflicting or unsatisfactory evidence provided by management or employees.
- Unusual documentary evidence such as handwritten alterations to documentation, or handwritten documentation which is ordinarily electronically printed.
- Information provided unwillingly or after unreasonable delay.
- Seriously incomplete or inadequate accounting records.
- Unsupported transactions.
- Unusual transactions, by virtue of their nature, volume or complexity, particularly if such transactions occurred close to the year-end.
- Transactions not recorded in accordance with management's general or specific authorization.
- Significant unreconciled differences between control accounts and subsidiary records or between physical count and the related account balance which were not appropriately investigated and corrected on a timely basis.
- Inadequate control over computer processing (for example, too many processing errors; delays in processing results and reports).
- Significant differences from expectations disclosed by analytical procedures.
- Fewer confirmation responses than expected or significant differences revealed by confirmation responses.
- Evidence of an unduly lavish lifestyle by officers or employees.
- Unreconciled suspense accounts.
- Long outstanding account receivable balances.