



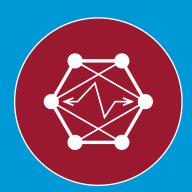


# THE STATE OF PLAY: SUSTAINABILITY DISCLOSURE & ASSURANCE

2019-2021 TRENDS & ANALYSIS













## FOREWORD

This marks our third annual benchmarking study of global practice in sustainability disclosure and its assurance. The momentum behind enhancing corporate reporting with environmental, social, and governance (ESG) or sustainability information continues—demonstrated by our findings that 95% of large companies report on ESG and 64% of companies now obtain assurance/verification over some of the information they provided in 2021 (increasing from 91% and 51%, respectively, in 2019).

The need for a harmonized, global system for reporting decisionuseful information is clearer than ever before given 86% of the companies reviewed employed multiple standards and frameworks to prepare and present sustainability information. We continue to believe this practice neither supports consistent, comparable, and reliable information, nor provides a foundation for globally consistent, high-quality sustainability assurance.

New in this report, we examine the extent to which companies provide forward-looking information on climate: emissions reduction targets and plans for achieving them. While nearly two-thirds of companies disclosed targets, they lag the rate at which companies report their historic greenhouse gas emissions (97%).

Other key highlights in this report demonstrate important global trends, as well as continuing jurisdictional differences.

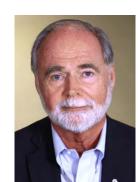
- Stand-alone sustainability reports remain a popular format for disclosure (especially in Canada, U.S., and jurisdictions in Asia). But there are jurisdiction-specific trends toward reporting in annual reports and integrated reports, which provide more connectivity between ESG and financial information and support integrated decision making within companies.
- While most reporting focuses on multi-stakeholder and societal matters, using or referencing the TCFD Framework and SASB Standards has grown dramatically since 2019, albeit unevenly around the world.
- The rate of assurance has increased significantly from 2019 to 2021, but most engagements remain narrowly focused on greenhouse gas metrics. Little more than half (53%) of engagements encompassed a range of ESG disclosures.
- The International Auditing and Assurance Standards Board's (IAASB) International Standard on Assurance Engagements 3000 (Revised) remained the most widely used assurance standard.

Assurance enhances trust and confidence in ESG information and the systems and controls used to collect and report data. It also supports informed capital allocation decisions. We believe professional accountants are best positioned to conduct engagements that connect sustainability assurance Kan holden

with financial statement audits—all based on rigorous and widely accepted professional, quality management, and ethical standards. In fact, 70% of the time, companies that obtained sustainability assurance from a professional accountant engaged their statutory auditor to also review their ESG disclosures.

 However, in seven jurisdictions, non-accountancy service providers performed a majority of assurance engagements, albeit narrower in scope—focused on greenhouse gas or other environmental metrics.

As the ISSB, IAASB, IESBA collectively work to ensure their standards support high-quality sustainability disclosure and assurance, the accountancy profession must demonstrate to stakeholders why our profession is best placed to deliver assurance. We hope that this study continues to serve as a foundation for evidenced-based conversations amongst policy makers, regulators, preparers, and all users of sustainability information.



**Kevin Dancey** Chief Executive Officer, IFAC



Susan S. Coffey CPA, CGMA, Chief Executive Officer – Public Accounting AICPA & CIMA







## MAPPING GLOBAL REPORTING AND ASSURANCE PRACTICES

For the third consecutive year, our analysis indicates that while the frequency of reporting ESG information is very high and the incidence of assurance is on an upward trend, there continues to be a meaningful difference between reporting and assurance rates.

This study updates understanding, based on 2021 reporting, of market practice for the reporting and assurance of environmental, social, and governance (ESG or sustainability) information, globally. 1,350 companies across twenty-one jurisdictions were reviewed for 2021 (see Methodology Section).

### **KEY FINDINGS: 2019 | 2020 | 2021**













reported some ESG information







of assurance was limited





obtained some level of assurance







assurance engagements conducted by firms







of firms applied ISAE 3000 (Revised)\*







of other service providers applied ISAE 3000 (Revised)

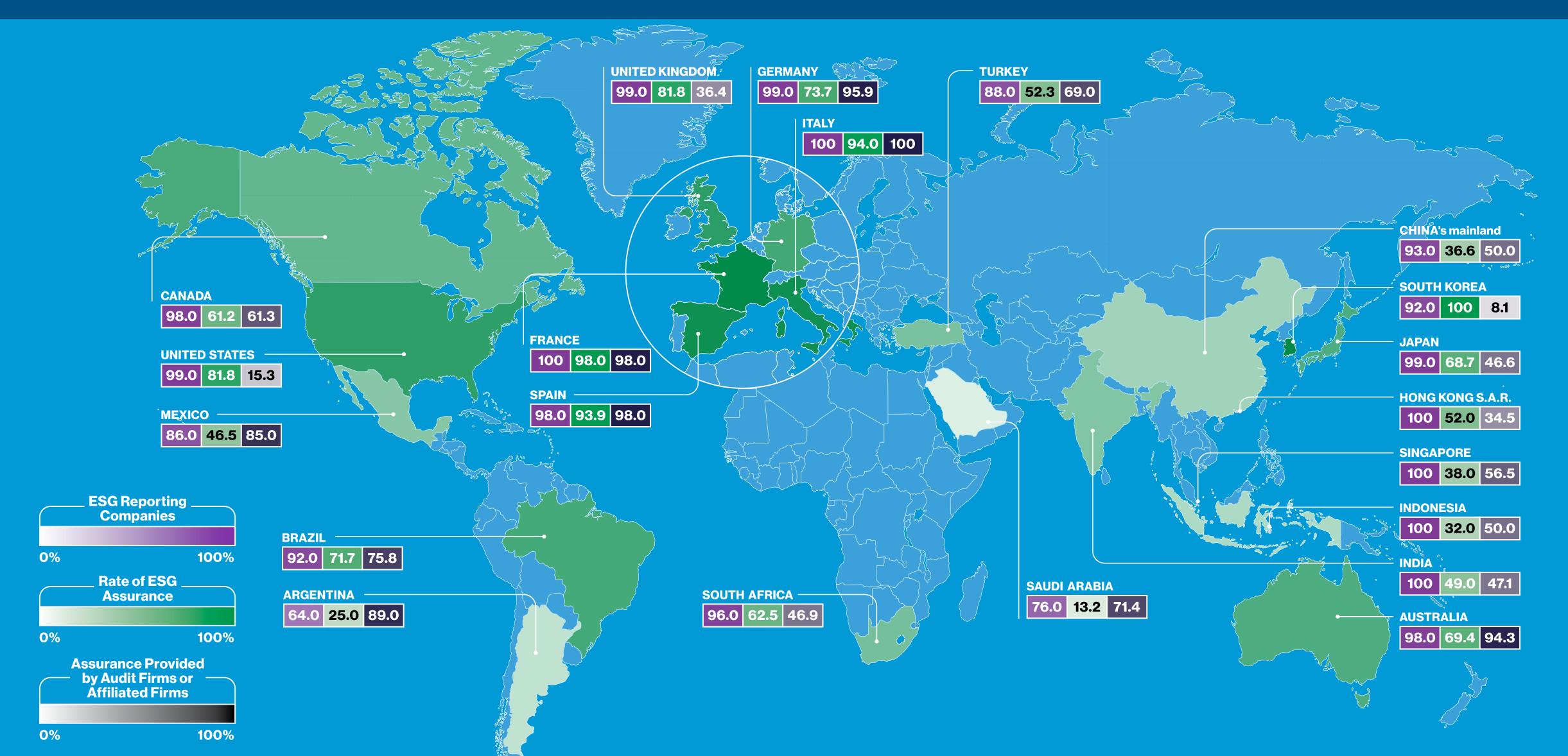
Link to 2020 State of Play report





<sup>\*</sup> Including national assurance standards—such as the AICPA's attestation standards—that are at least as robust as ISAE 3000 (Revised), the percentage of Firms that applied ISAE 3000 (Revised), or corresponding national standards, was 96% in 2019, 96% in 2020, and 99% in 2021.

## MAPPING GLOBAL REPORTING AND ASSURANCE PRACTICES - 2021



## SCOPE OF REPORTING AND ASSURANCE



Most companies reported some information on greenhouse gas (GHG), other environmental, social, and governance sustainability matters. The percentage of companies who provided information in all four of these ESG categories examined in this study increased to 96%.

#### **Assurance:**

Companies who obtained assurance still focused primarily on GHG data, but the scope of information being assured increased. **53% of companies** obtained assurance on information in all four of the ESG categories examined in this study.



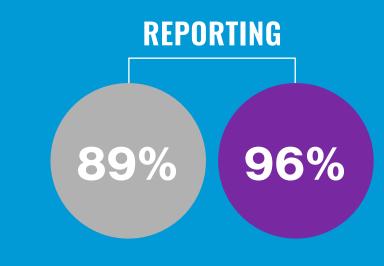


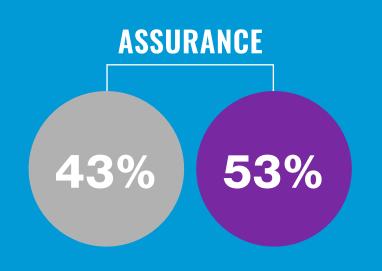
















<sup>\*</sup> Governance does not include remuneration (or other) information that is statutorily required to be reported and assured in some jurisdictions

## REPORTING

















## SUMMARY CHANGES: REPORTING



**METHOD OF REPORTING.** The use of stand-alone sustainability reports has declined globally over the 2019-2021 reporting periods, with Canada, China's mainland, Hong Kong S.A.R., South Korea and the U.S. being notable exceptions. Elsewhere ESG reporting in integrated reports (Brazil, France, Japan, India, Turkey, Singapore) and annual reports (Germany, Spain, Saudi Arabia, Indonesia, and Singapore) has increased. (See page 8 for more information.)

#### STANDARDS & FRAMEWORKS.

The use of / reference to the Sustainability Accounting Standards Board (SASB) Standards and the Task Force on Climate-related Financial Disclosure (TCFD) Framework increased significantly.

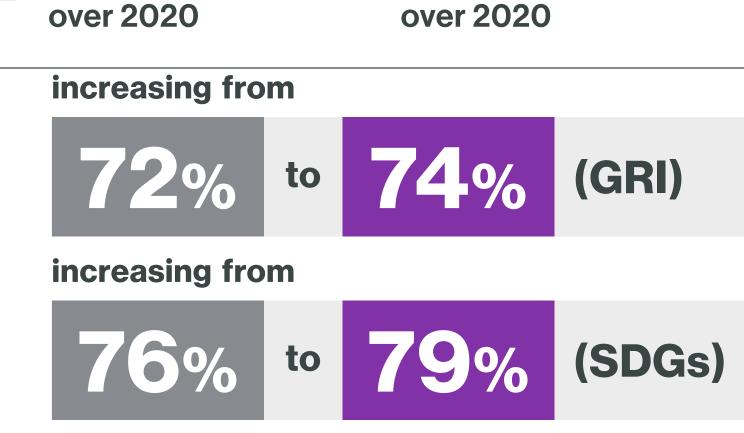
**1,283** of **1,350** companies reported ESG information in 2021 (compared to **1,283** of **1,400** in 2020).

SASB increase of TCFD increase of 30%

Over 2020

Over 2020

The use of / reference to Global Reporting Initiative (GRI) Standards and the UN Sustainable Development Goals (SDGs) remained high (comparing 2020 to 2021) among the companies that reported on ESG.







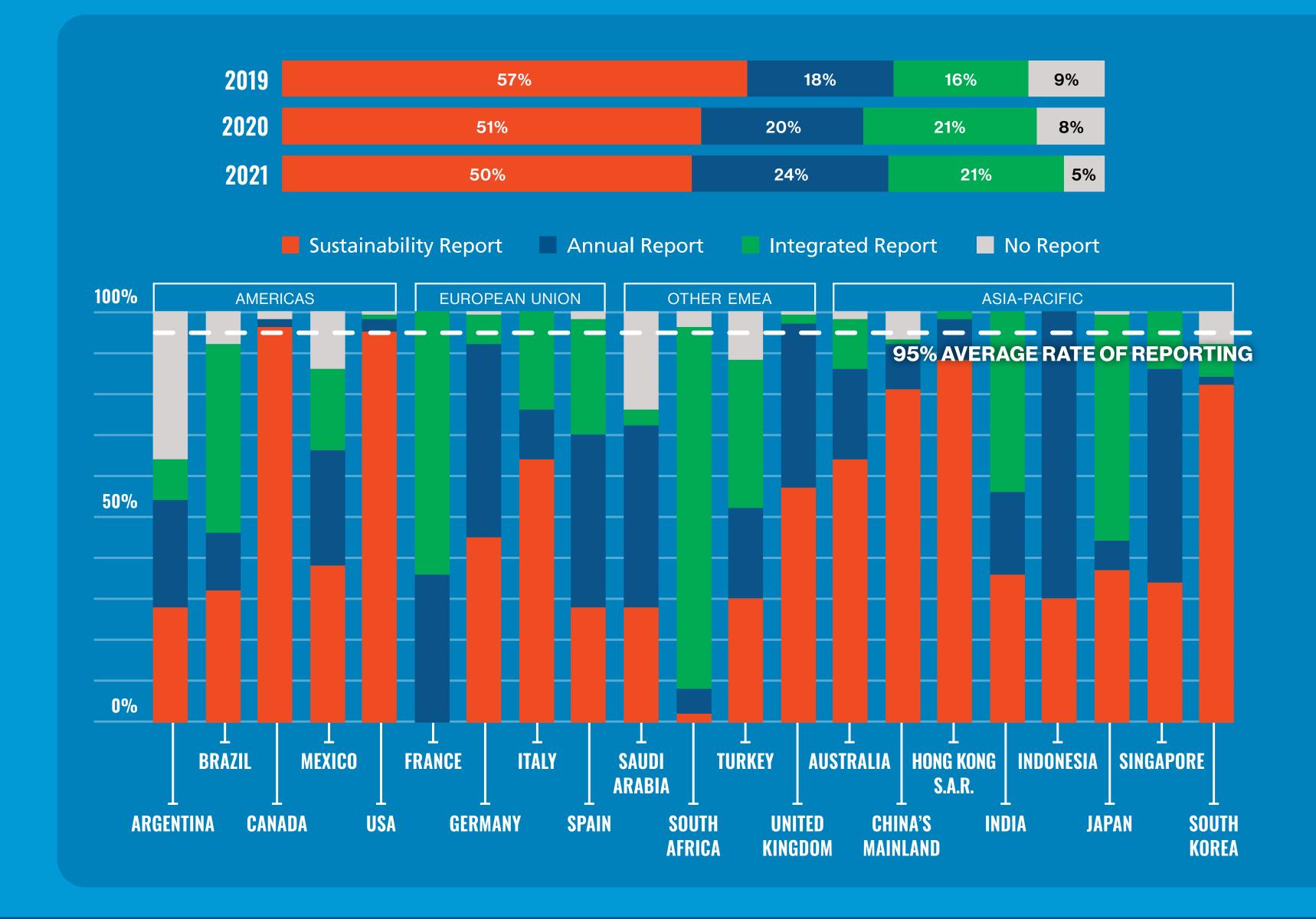
## CHANGES IN WHERE COMPANIES REPORTED ON ESG

Over the three year period, fewer companies relied on stand-alone sustainability reports while use of integrated and annual reports for ESG disclosures increased.

Use of Integrated Reports surged in France from 2020 to 2021 (up 44%). 30 of the 50 companies reviewed included ESG information in a report consistent with the Integrated Reporting Framework.

Globally, the number of reporting companies has steadily increased.

In Saudi Arabia, reporting on ESG increased 24% in 2021, primarily in annual reports.





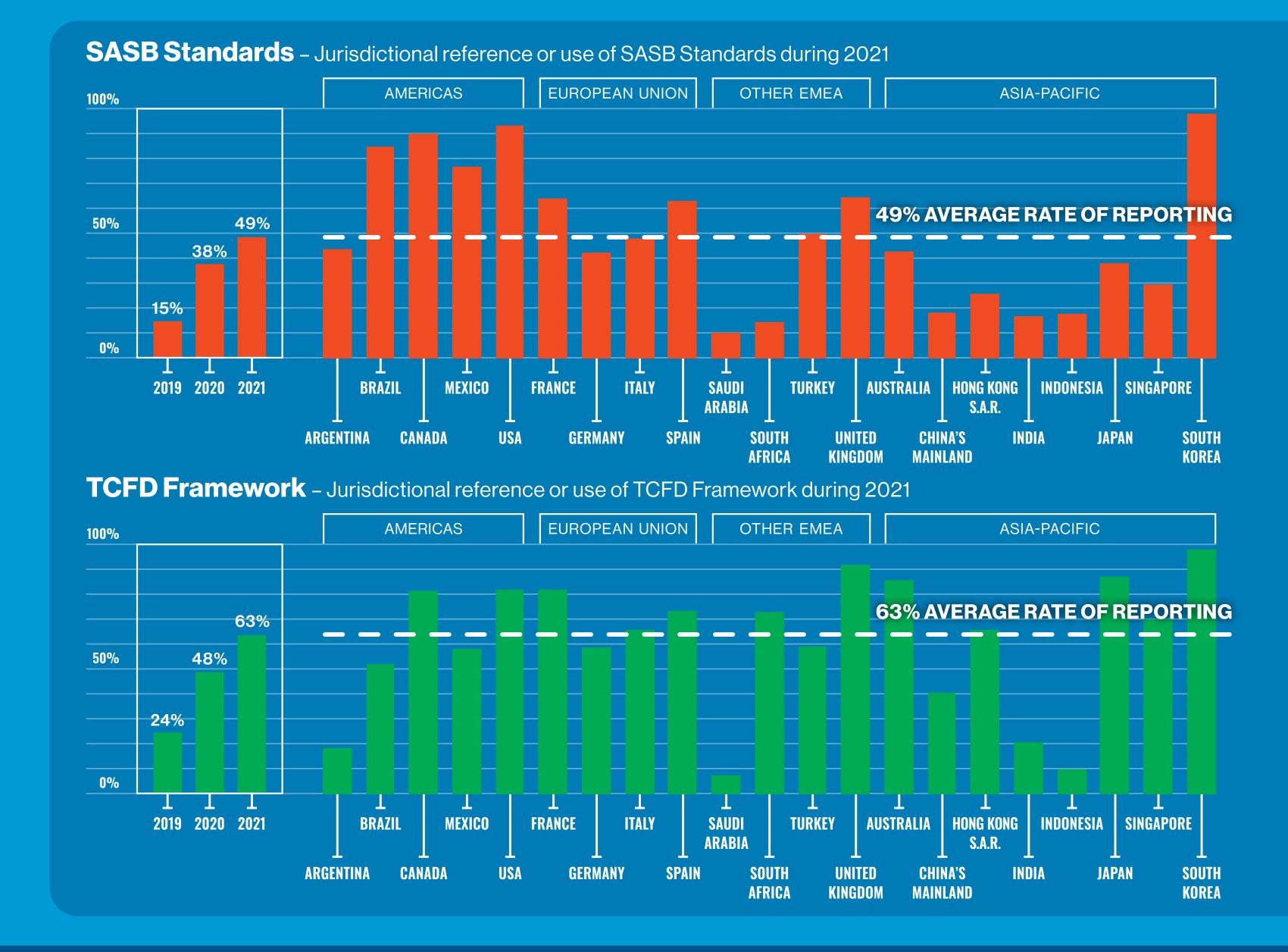


## STANDARDS AND FRAMEWORKS

Usage of SASB Standards and the TCFD Framework has increased significantly between 2019 and 2021—albeit not to the same extent across all jurisdictions.

Companies in the Americas and Europe have steadily adopted while companies in the Middle East, and parts of Asia have lagged.

The percentage of ESG reporting framework/standard is calculated as the number of reports that disclose the use of a specific framework/standard vs. the total number of reports that include ESG information (1283).



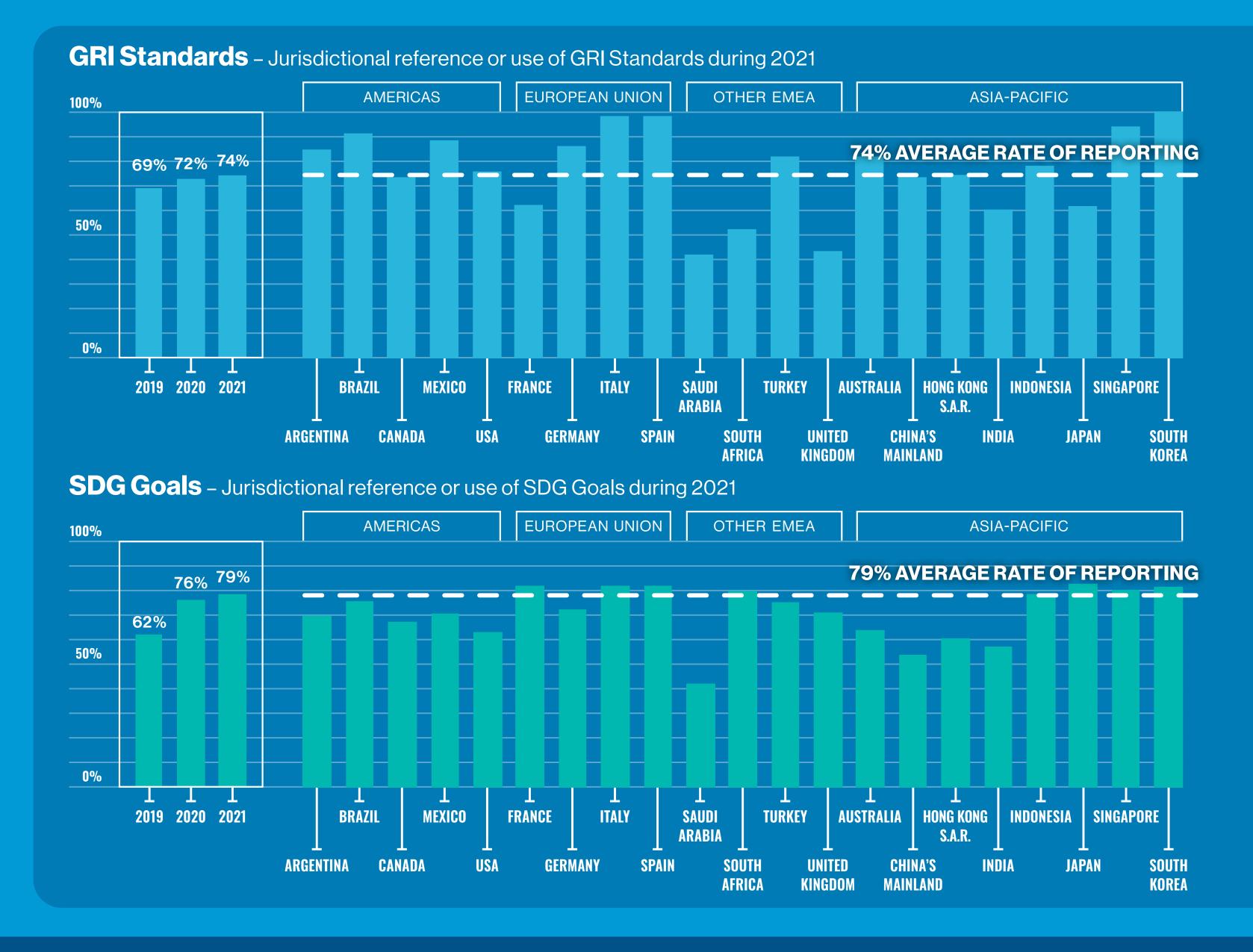




## STANDARDS AND **FRAMEWORKS**

86% of companies now use / reference more than one reporting standard or framework.





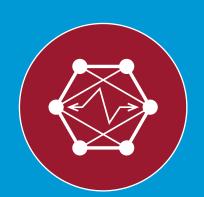




## FORWARD-LOOKING DISCLOSURE

















# SETTING AND GETTING TO CLIMATE REDUCTION GOALS

Carbon neutral or net zero?

The terms "carbon neutral" and "net zero" are often used interchangeably - leading to inconsistencies in what stakeholders understand about what is or is not included in an entity's emissions reduction target. This report highlights targets intended to achieve zero emissions (i.e., identified by the green sections of the graph).

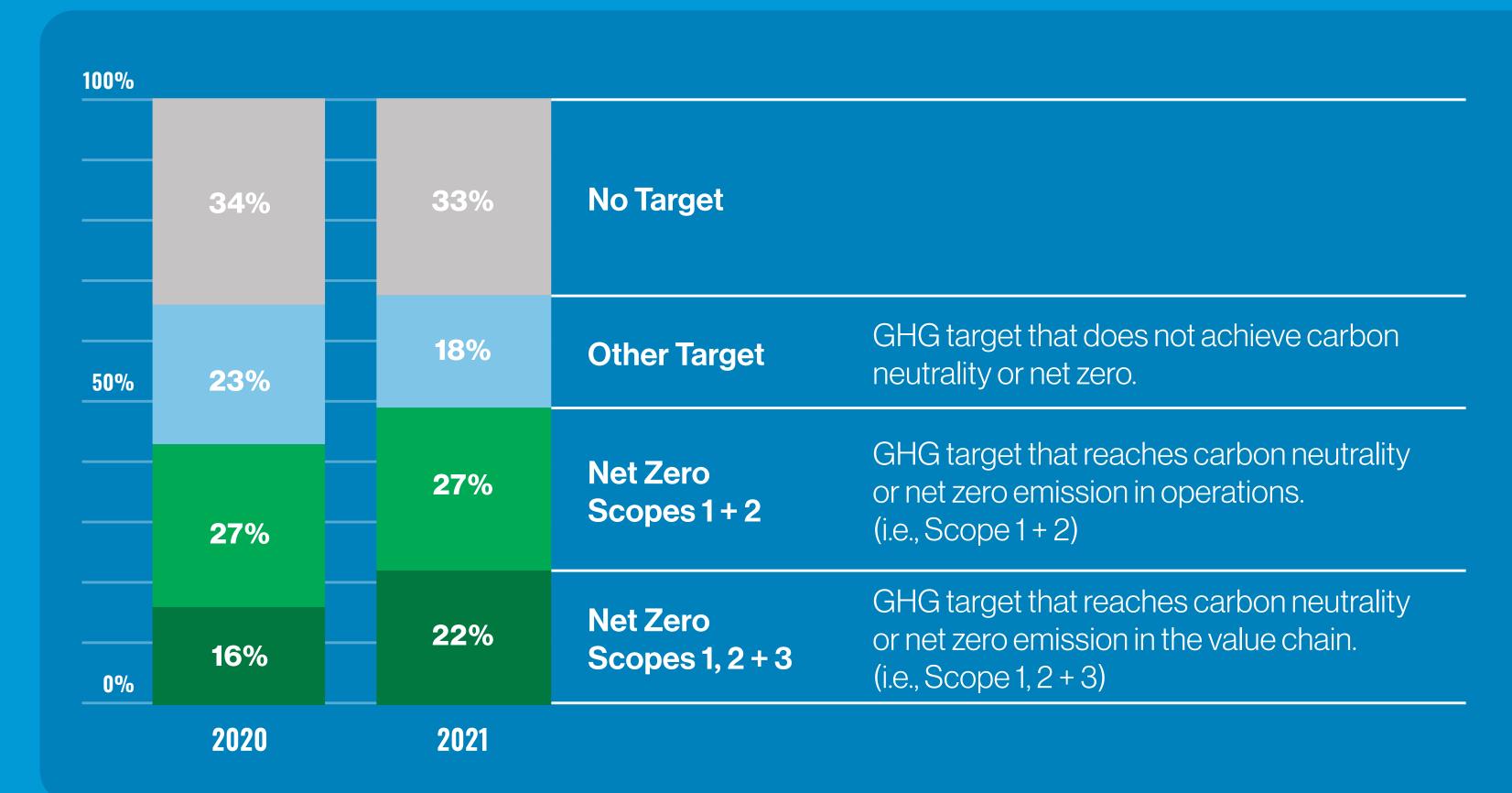
Scope 3 disclosures vary. Companies may include all 15 categories from the GHG Protocol standards, only material categories, or only select categories of Scope 3 emissions. A detailed analysis of Scope 3 emissions was not included in this analysis.



Click to view Net Zero report

2021 is based on 1,350 companies from 21 jurisdictions. 2020 is based on 600 companies from 15 jurisdictions.

#### 67% of companies reviewed in 2021 disclosed emissions reduction targets







### SETTING NET ZERO **REDUCTION TARGETS**

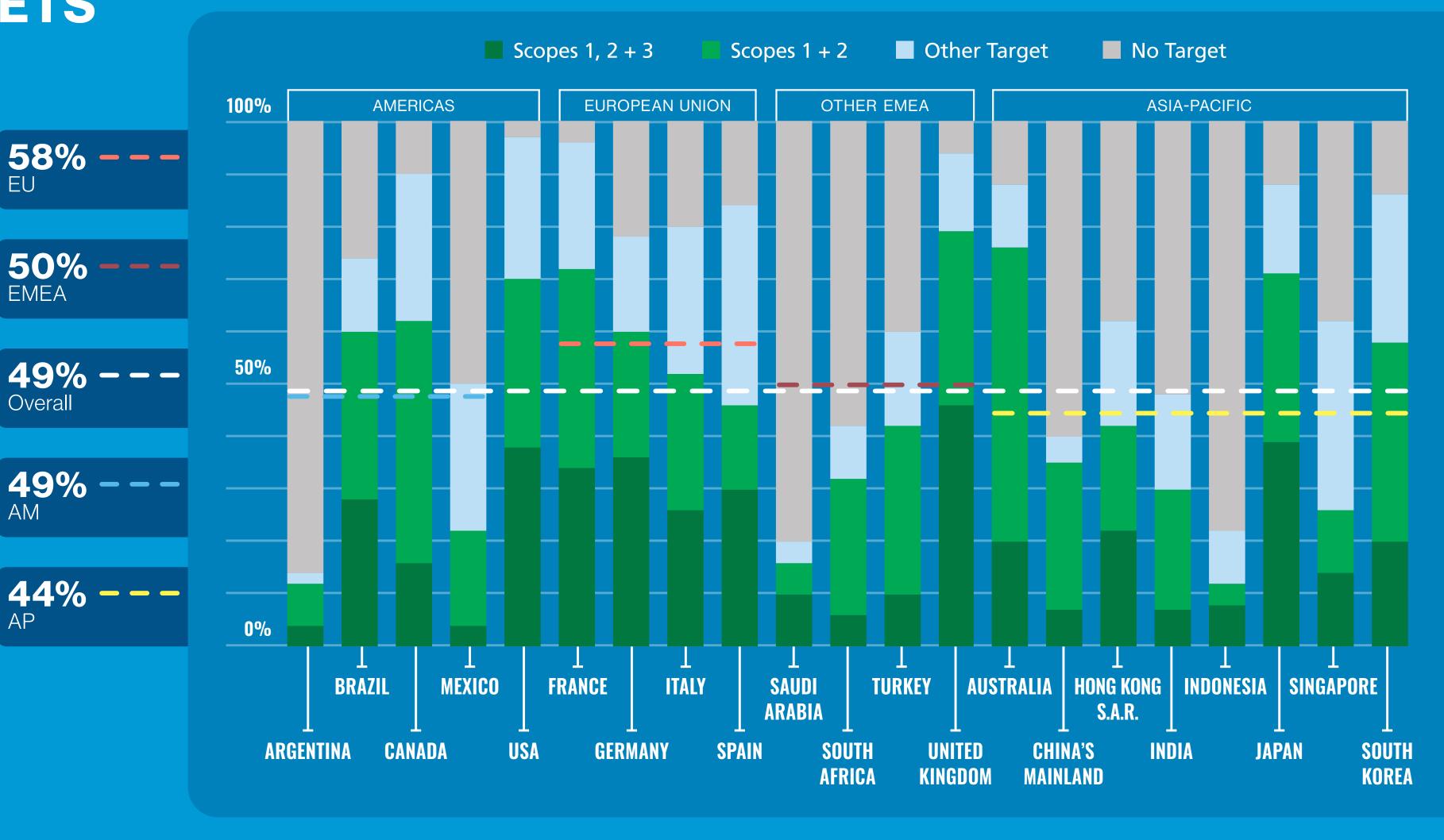
There is little regional variance in setting emissions reduction goals other than a slightly higher rate, 58%, of net zero targets - either Scopes 1 + 2 or Scopes 1, 2 + 3 - in the European Union.

However, companies in G7 jurisdictions were more likely to disclose net zero targets.

• 68% disclosed a net zero target compared to 40% from non-G7 jurisdictions.

Political and societal mandates, and other market incentives, may play a role in the level of voluntary disclosure observed by the largest companies in the G7 jurisdictions.

#### 49% of companies reviewed in 2021 set a net zero emissions reduction target







50% -

49% -

**EMEA** 

Overall

49%

AM

### **CREATING EMISSIONS REDUCTION PLANS**

87% of companies reviewed in 2021 with an emissions target also provide information about how they plan to reach the target.

However, companies may state their goal is "net zero by 2050" or "operationally neutral by 2050" without specific detail about how the stated plan will achieve the goal.







# ASSURANCE









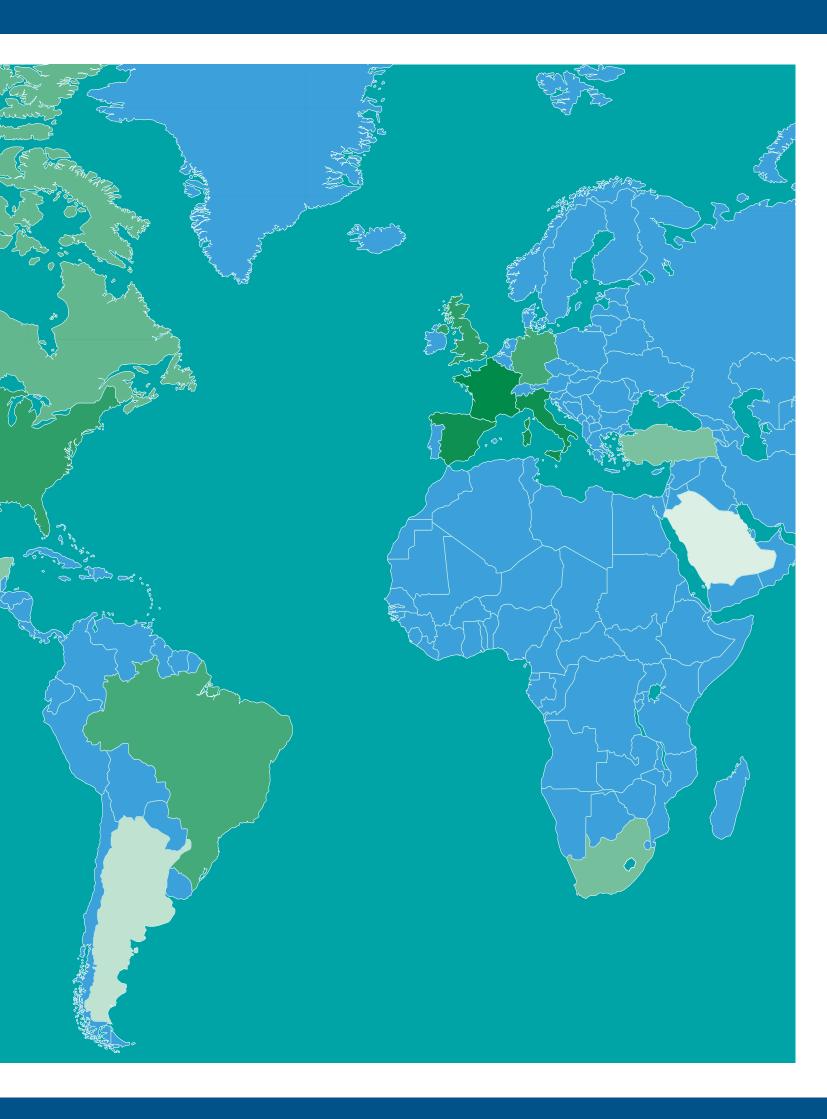






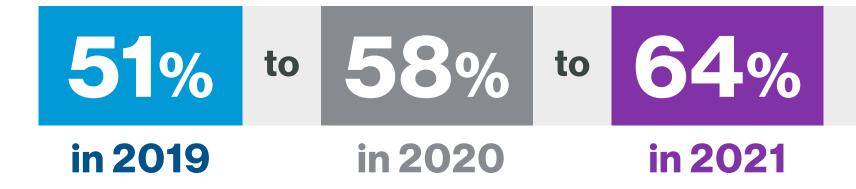


## SUMMARY CHANGES: ASSURANCE



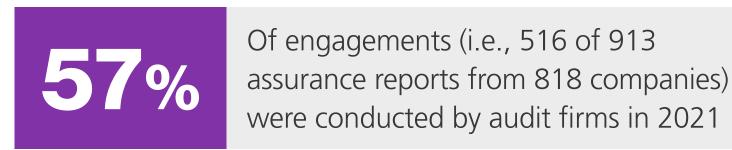
#### **ASSURED ESG INFORMATION.**

The percentage of companies that obtained assurance on some of their ESG reporting increased from:



The six jurisdictions with the largest 3-year increases are Hong Kong S.A.R., Italy, Japan, Singapore, Turkey, and the United Kingdom, while Hong Kong S.A.R., Japan, and the U.K. posted the largest single-year increases in 2021.

#### WHO PROVIDES ASSURANCE.

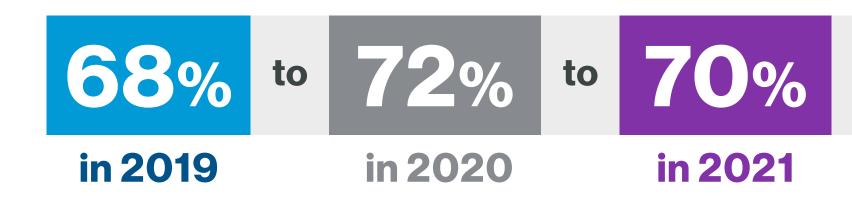






#### **ASSURANCE STANDARDS.**

The International Auditing and Assurance Standards Board's (IAASB) International Standard on Assurance Engagements (ISAE) 3000 (Revised) remained the most widely used standard for ESG assurance engagements:



**95% of firms\*** (or their affiliates) used ISAE 3000 (Revised), while non-IAASB standards were most commonly used by the other services providers (i.e., only 38% used ISAE 3000) during 2021.





<sup>\* 99%</sup> of Firms applied ISAE 3000 (Revised), or corresponding national standards, in 2021.

## RATE OF **ASSURANCE BY JURISDICTION**

64% OF THE COMPANIES THAT DISCLOSED ESG DATA OBTAINED ASSURANCE IN 2021.

The percentage of assurance is based on the number of companies that obtained assurance over reported ESG information (818) vs. the total number of companies that reported ESG information (1,283). If a company obtained more than one assurance report (i.e., there were multiple metrics or information individually verified), that company is only counted once. Reviews, verification statements, and other similar items were not counted as assurance reports.







# TYPE OF FIRM PROVIDING ASSURANCE BY JURISDICTION

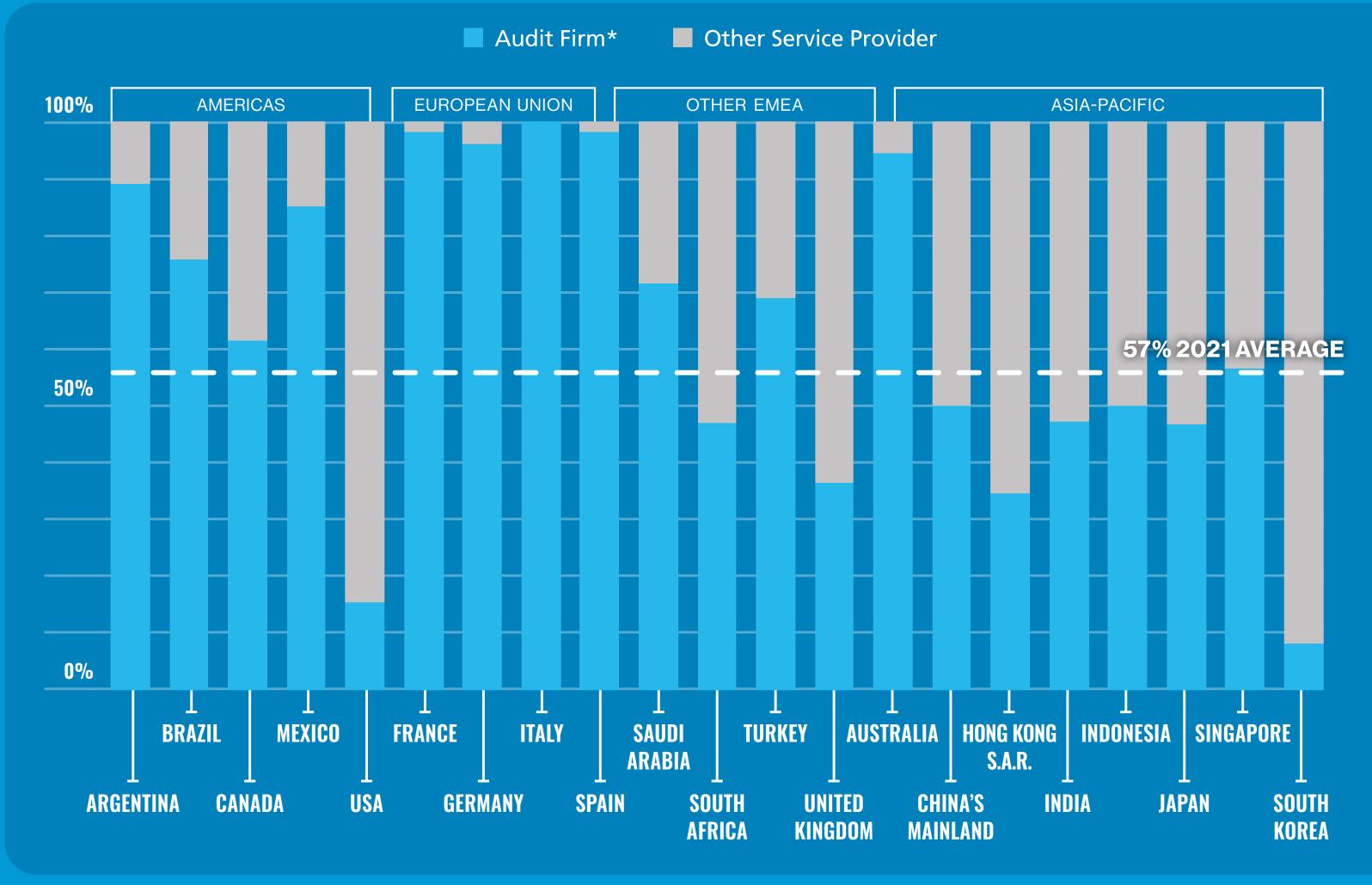
Largest Audit Firm Market Share (2019-2021):

Increase	ncrease Decrease		
Indonesia	17%	South Africa	20%
Hong Kong, S.A.R.	11%	<b>United Kingdom</b>	17%
Mexico	11%	India	16%
		Japan	16%

The number of assurance engagements performed by firms continues to grow (516 in 2021 from 505 in 2020), but firm market share continues to decline (57% from 61%). In 2021, other service providers (OSPs) had a majority market share in seven jurisdictions (Hong Kong S.A.R., India, Japan, South Africa, South Korea, the U.K., and the U.S.).

Assurance provider is calculated as the number of assurance reports signed by firm type vs. the total number of assurance reports.

#### On average, 57% of assurance in 2021 was performed by audit firms



<sup>\*</sup>An Affiliated Firm is an independent entity that is associated with a specific audit firm (typically the local audit firm member of a global network). Audit firms and their affiliates have been combined in the data above.





### LOCATION AND LEVEL **OF ASSURANCE**

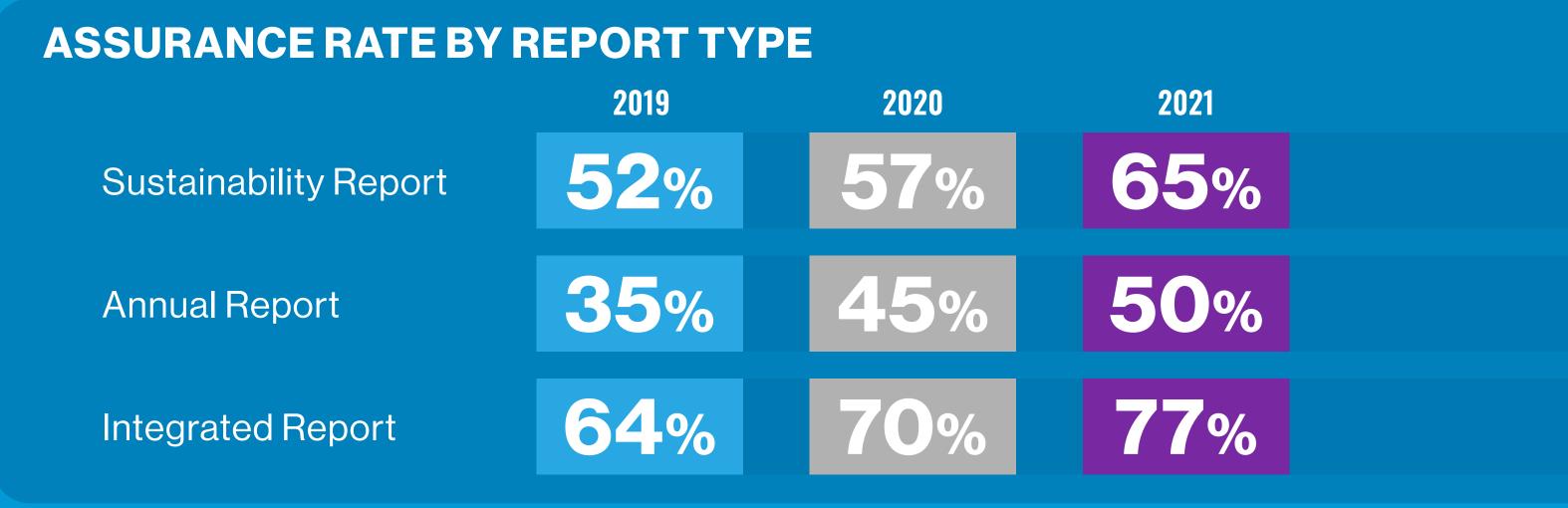
97% of audit firm-related engagements resulted in limited assurance reports. In contrast, 58% of engagements conducted by other service providers resulted in limited assurance.

 Higher rates of assurance from other service providers (OSPs) in Asia-Pacific resulted in more moderate and reasonable assurance.

Assurance rates are increasing across all report types.

 Many jurisdictions that have high rates of integrated reporting also have high rates of assurance—e.g. the assurance rate is 98% in France and 72% in Brazil in 2021.









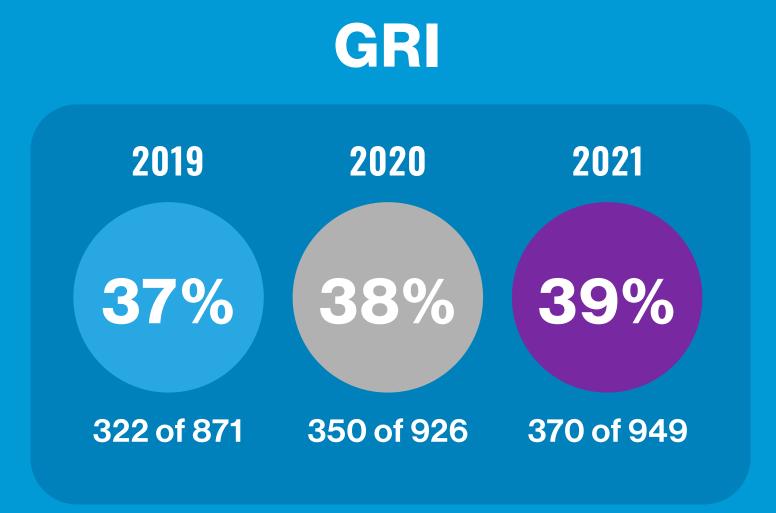
## ASSURED ESG INFORMATION BY REPORTING FRAMEWORK OR STANDARD

Information disclosed in accordance with GRI Standards is assured more often than any other reporting framework or standard.

While the SDGs are the most commonly cited reporting framework (79% in 2021), this information is not the subject of sustainability assurance engagements.

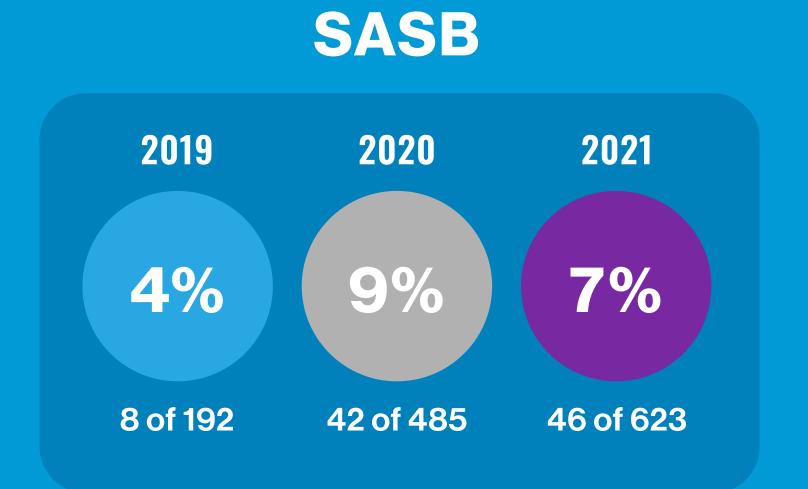
Information disclosed in accordance with the Greenhouse Gas (GHG) Protocol and jurisdictional standards in Europe are commonly the subject of assurance:

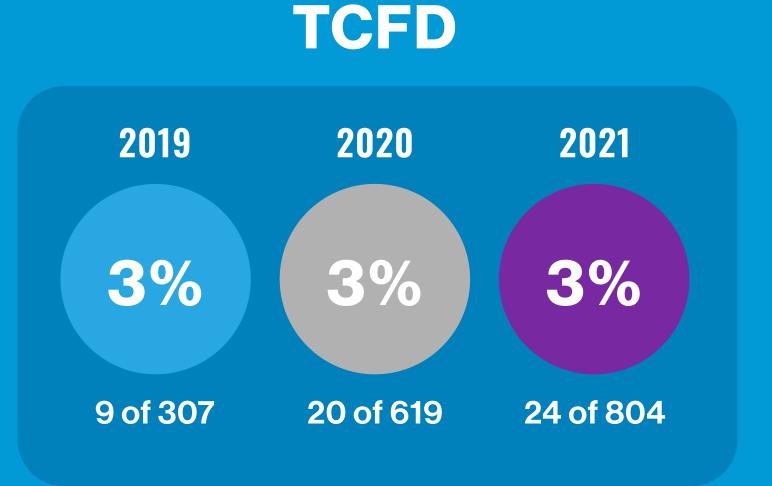
- GHG Protocol **145 assurance reports**
- EU standards 116 assurance reports





SDG





Percentages are calculated as the number of times an ESG framework/standard was referenced in an assurance report divided by the total number of times the framework/standard was referenced for ESG reporting.

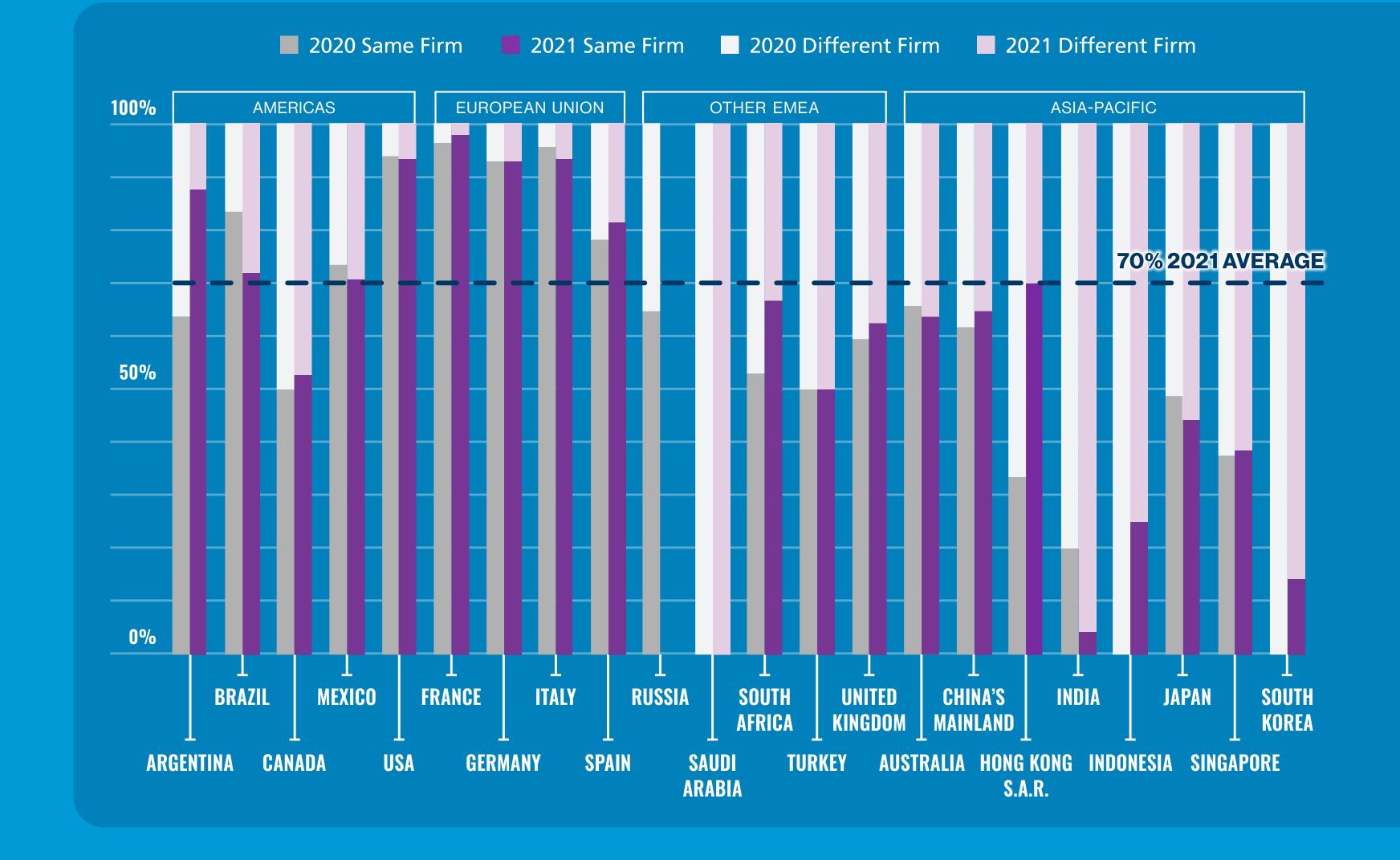




## **STATUTORY AUDITORS VS. ESG ASSURANCE PROVIDERS**

## 70% of 516

ESG assurance reports reviewed in 2021 provided by audit firms were from the same firm as the statutory audit provider for the same reporting entity - a slight decline from 71% of 505 in 2020.



Statutory audit firm data was only collected for 2020 and 2021.





# DAYS BETWEEN STATUTORY AUDIT AND ESG ASSURANCE

The global gap between when statutory audit reports are issued and sustainability assurance reports are issued decreased to **51** days in 2021 from **54** days in 2020.

Asia-Pacific saw the most improvement – decreasing to **61** days in 2021 from **73** days in 2020.

The assurance lag worsened in the Americas – increasing to **92** days in 2021 from **89** days in 2020.

- - - Average 2021

**— — — Average 2020** 

Some jurisdictions may have different deadline requirements for statutory reporting versus voluntary disclosures, which can impact the time between the date of the statutory audit report and ESG assurance report(s). Statutory audit information was only collected for 2020 and 2021.







## JURISDICTION **PROFILES**

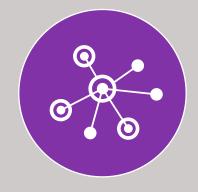
















## ARGENTINA



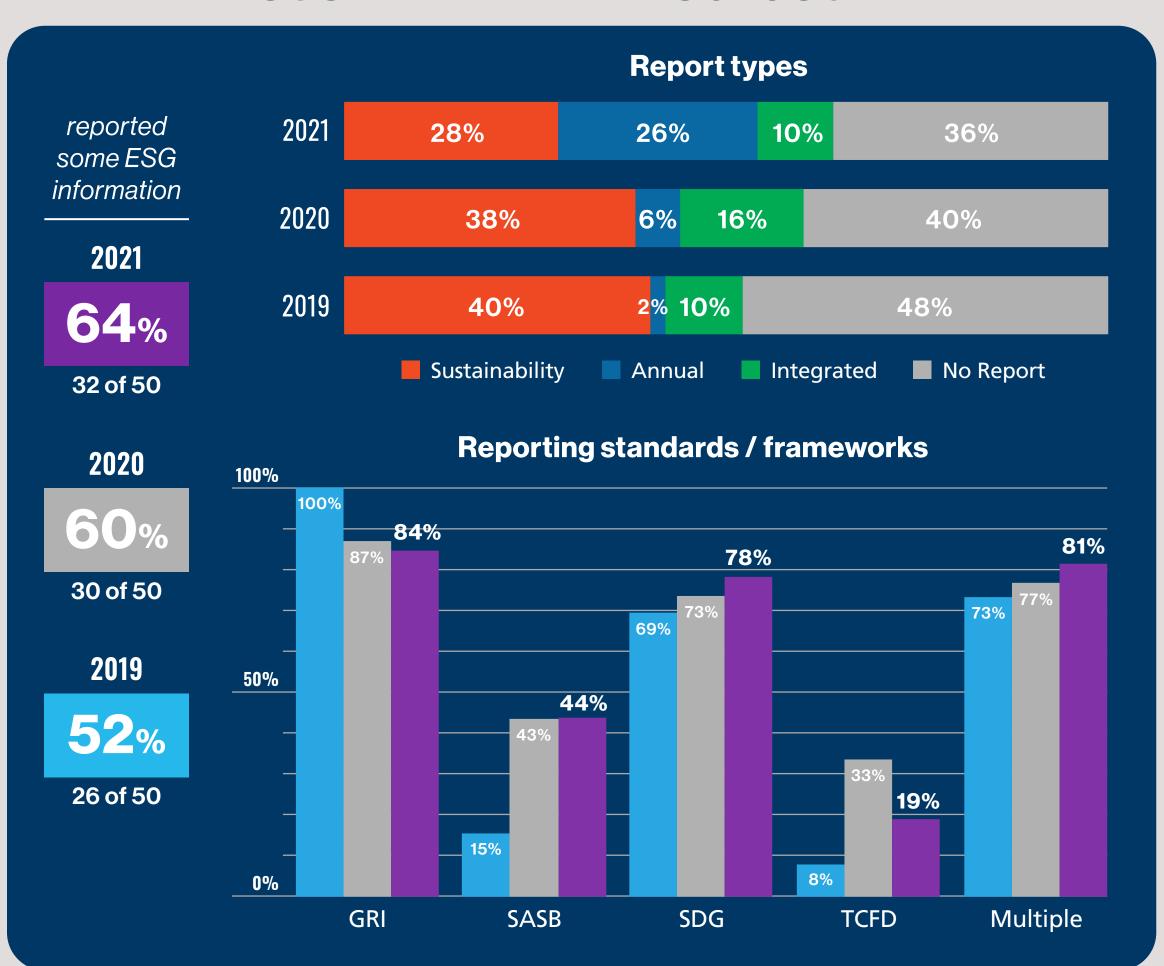
#### **DISCLOSURE**

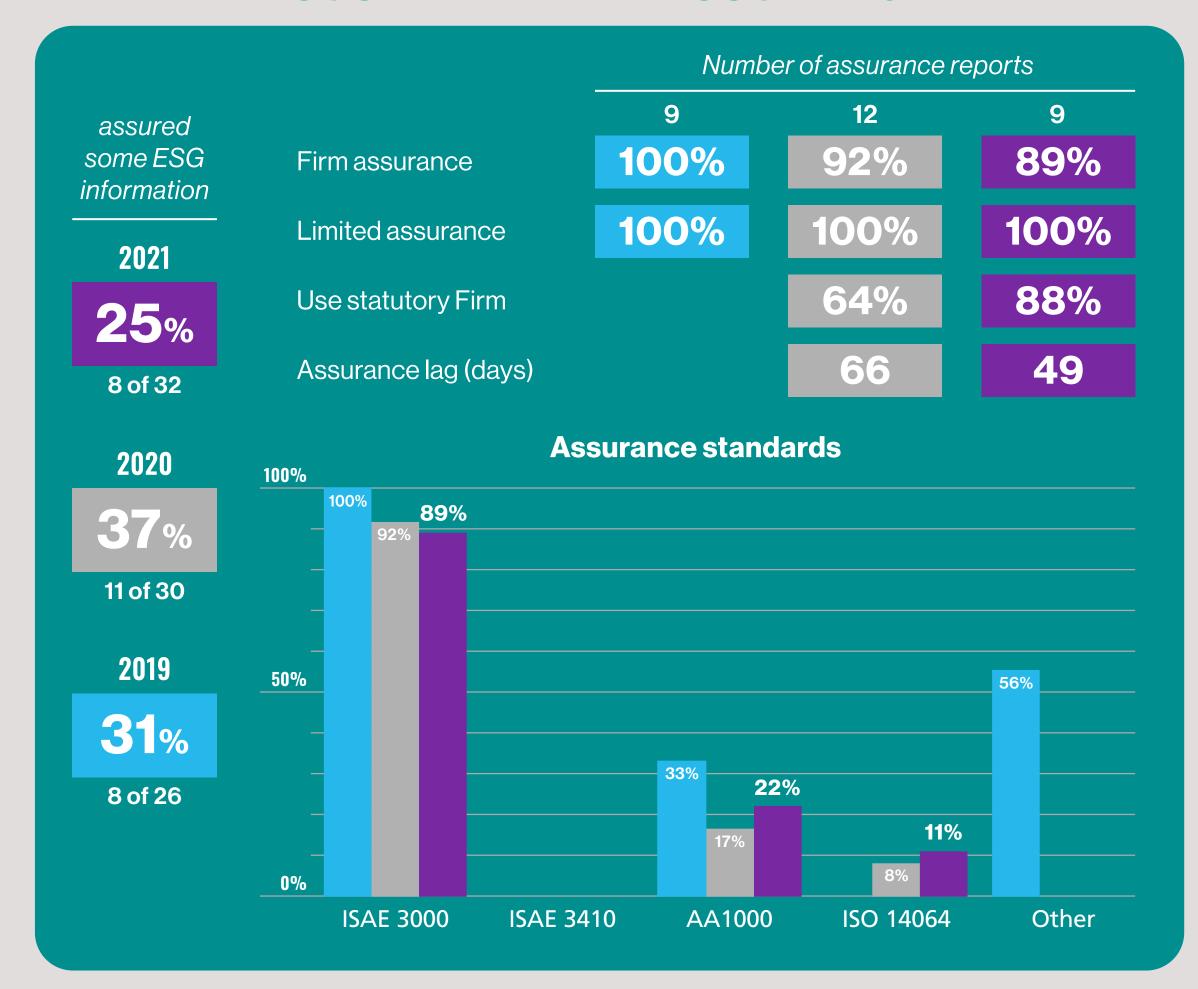
• Lowest rate of emissions reduction targets (14%) globally

#### **ASSURANCE**

• One of two jurisdictions with a decreased assurance rate (-6%) over three years

#### **SUSTAINABILITY DISCLOSURE**











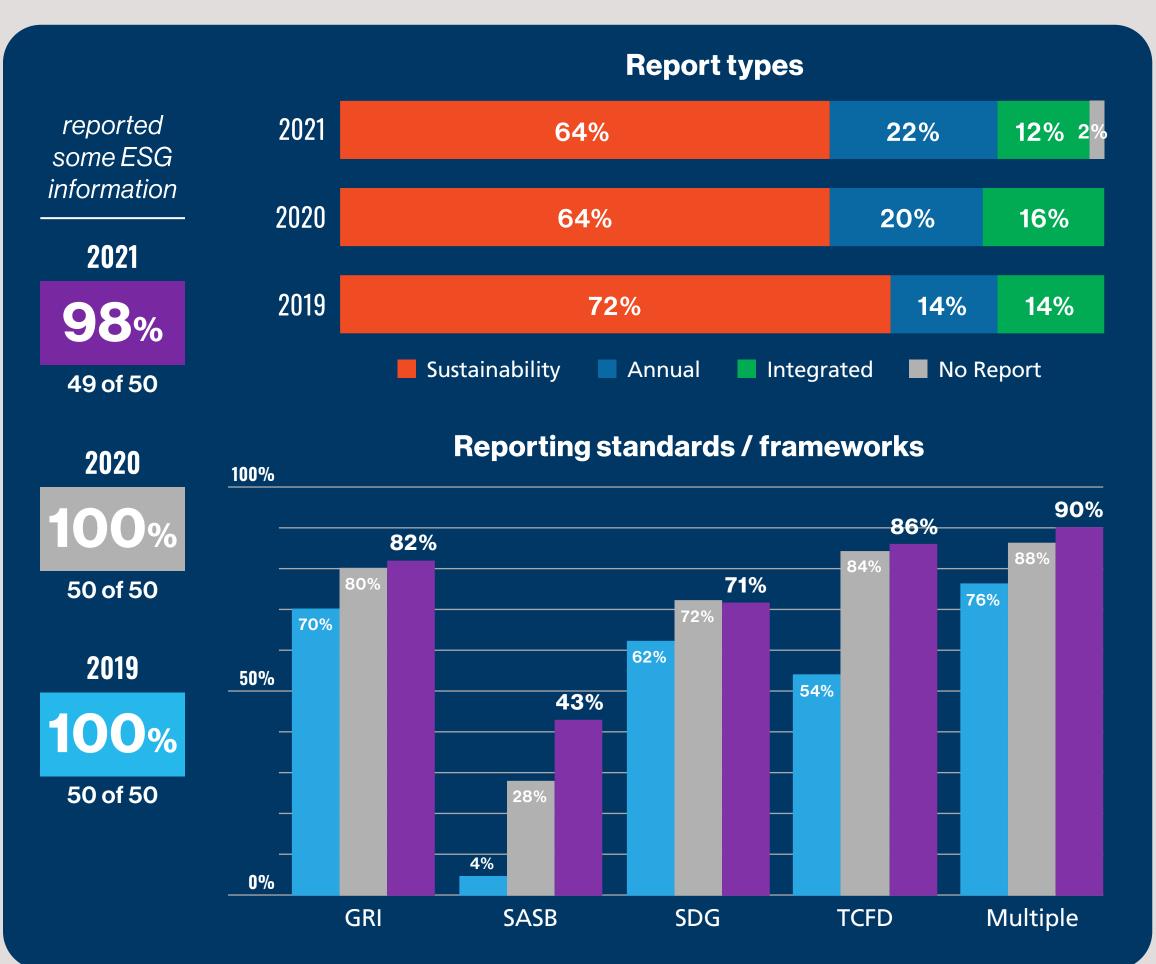


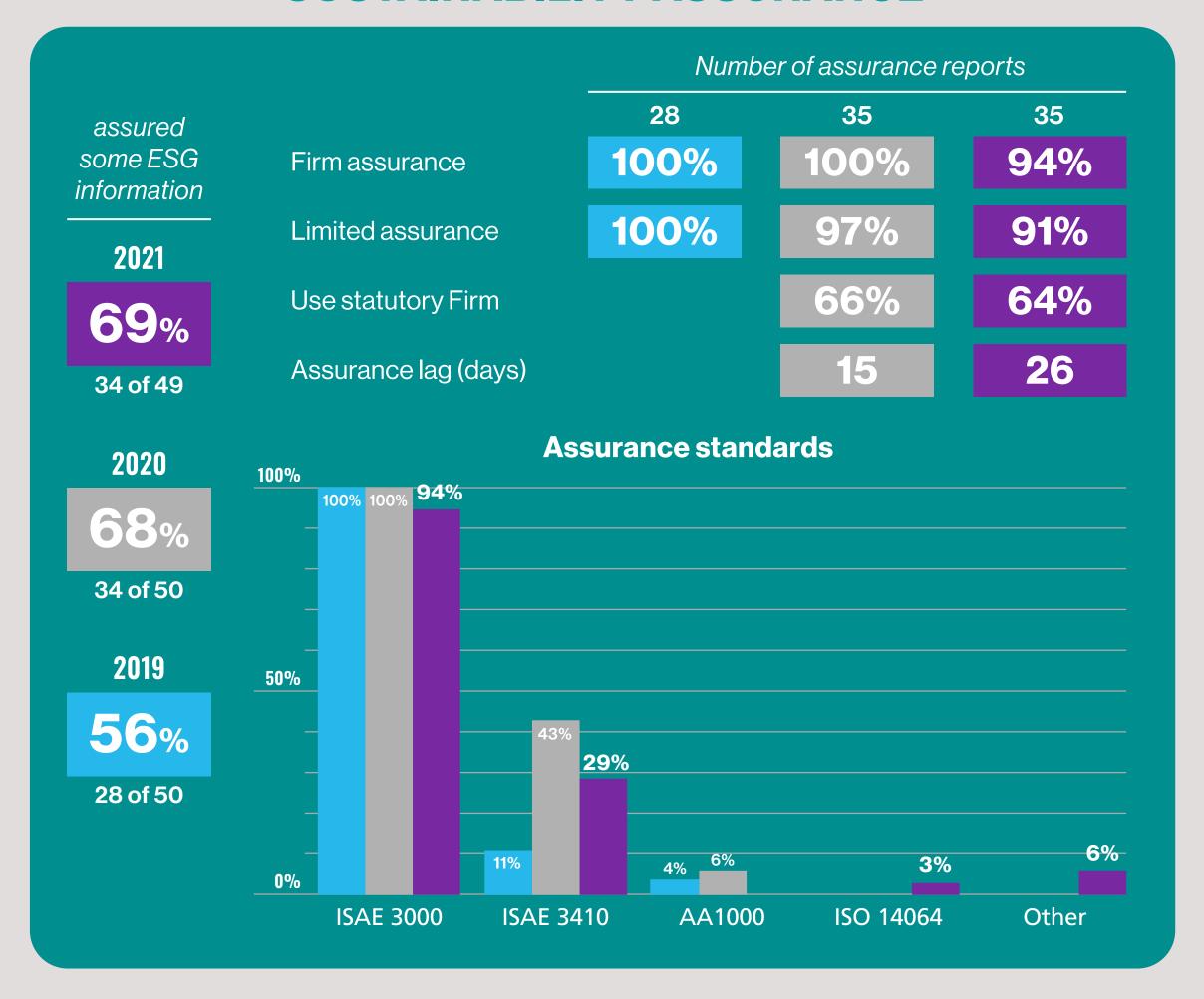
 Second highest rate of net zero emissions targets (76%) globally

#### **ASSURANCE**

• Highest audit firm assurance market share (94%) in Asia-Pacific

#### **SUSTAINABILITY DISCLOSURE**











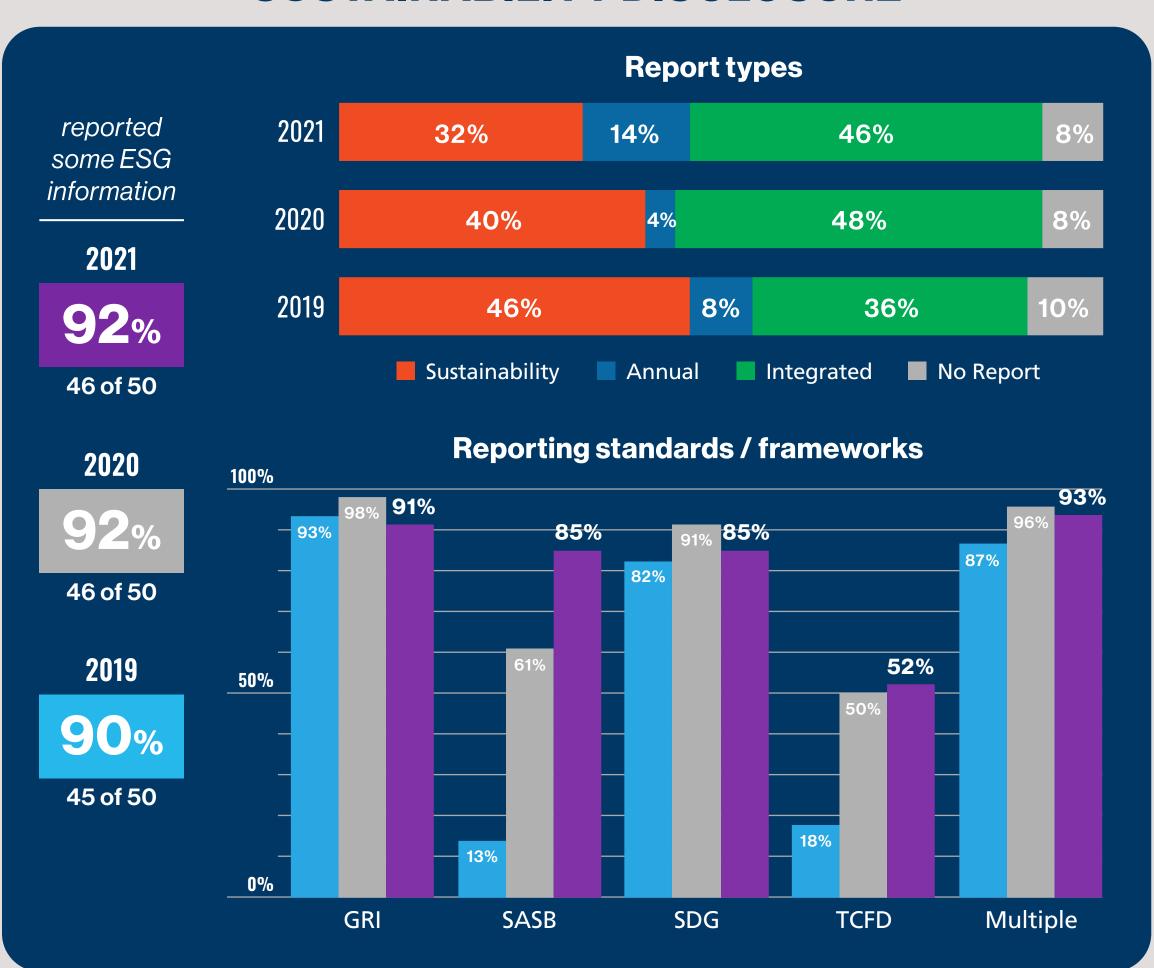


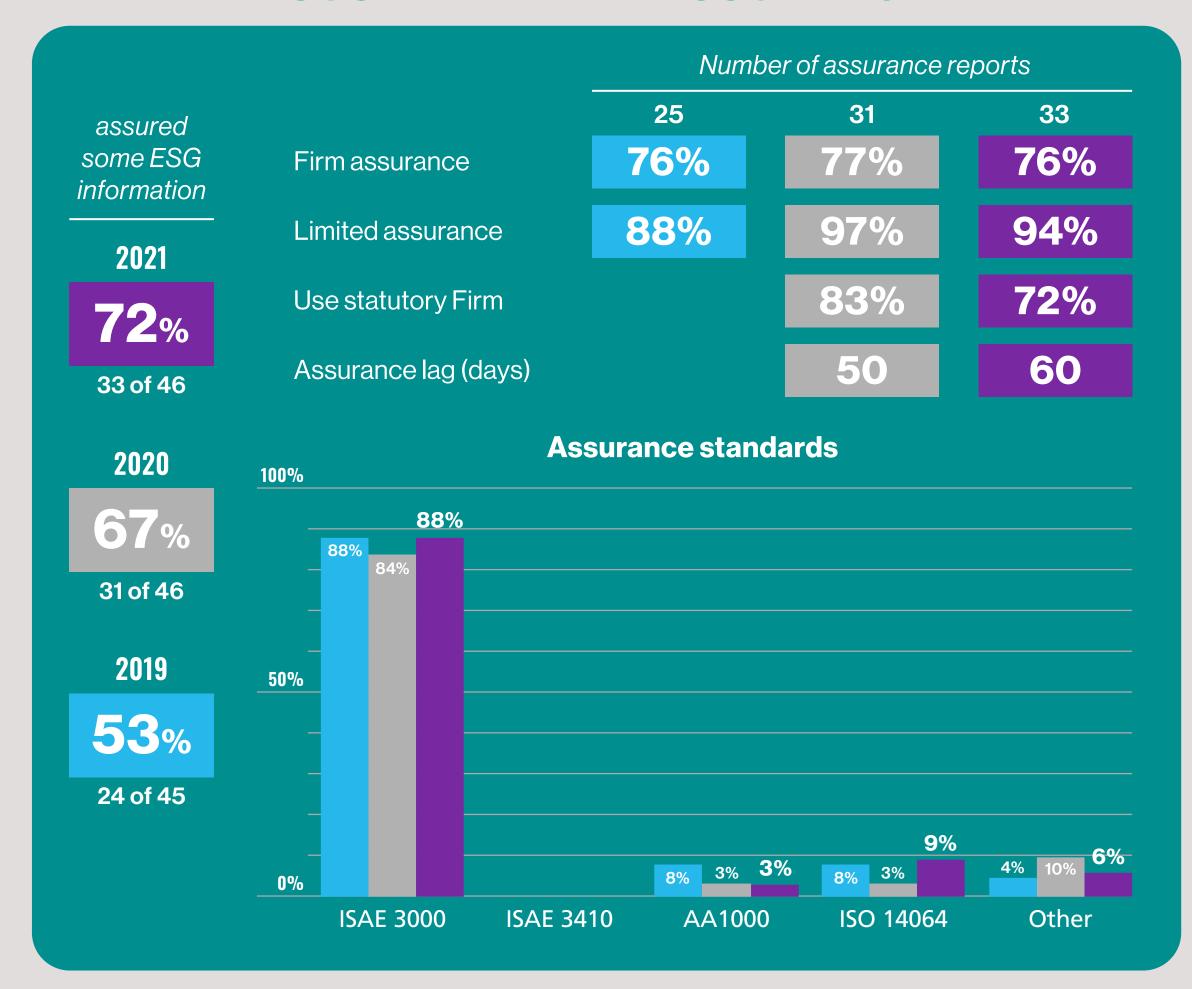
 Highest rate of Integrated Reporting (46%) in the Americas

#### **ASSURANCE**

 Second shortest assurance lag (60 days) in the Americas

#### **SUSTAINABILITY DISCLOSURE**











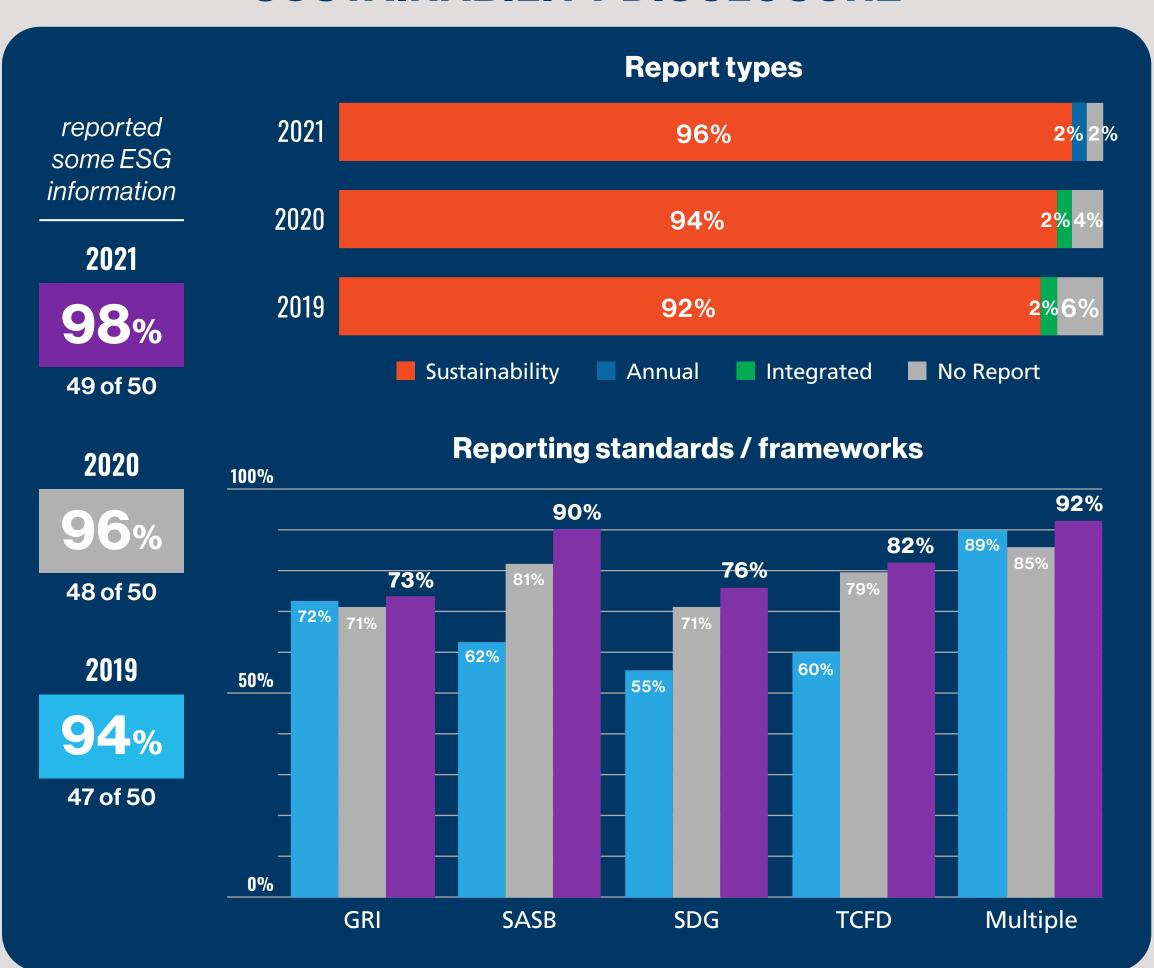


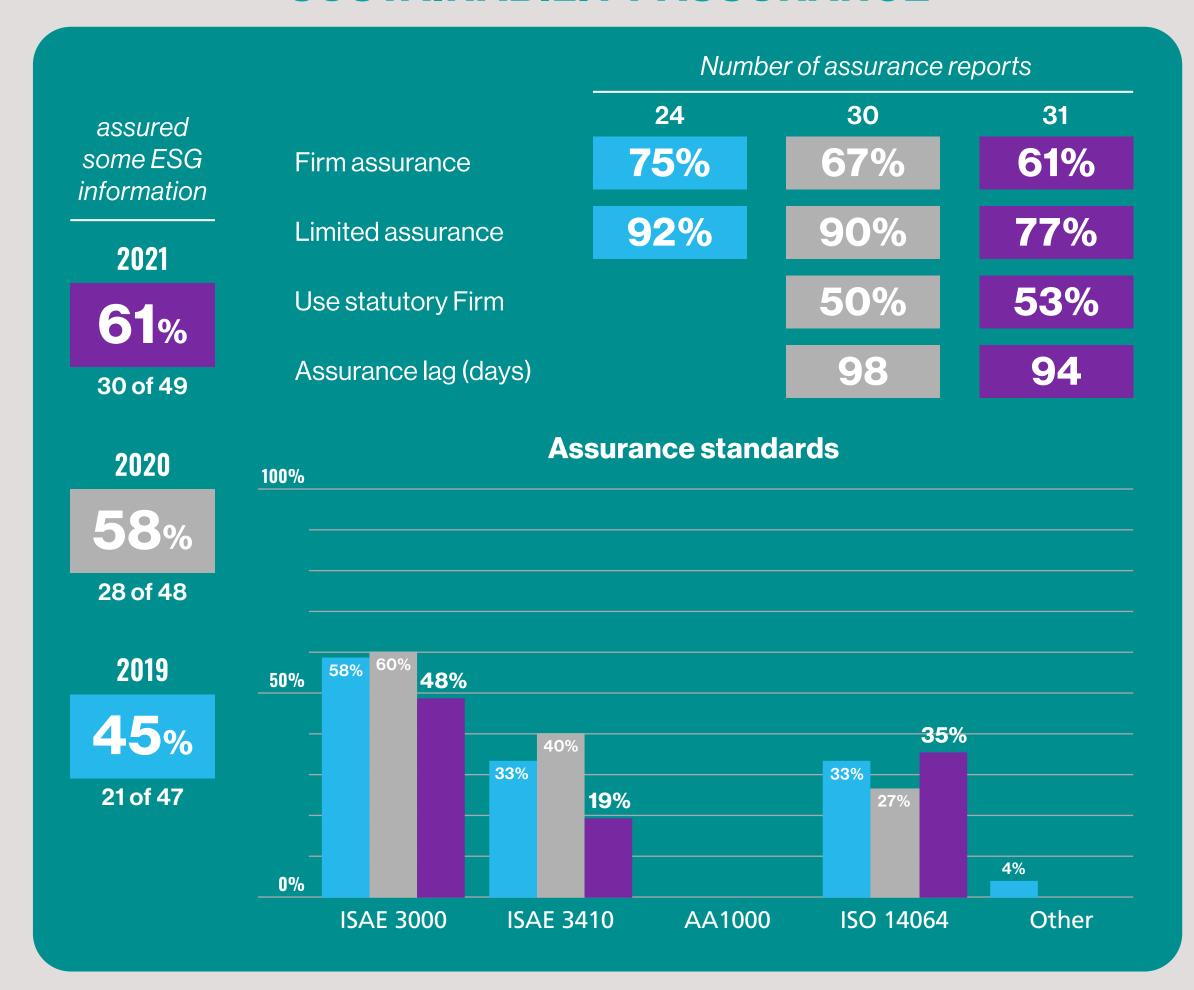
• Highest use (96%) of standalone Sustainability Reports

#### **ASSURANCE**

• Largest three-year decline (-14%) in Audit Firm assurance market share in the Americas

#### **SUSTAINABILITY DISCLOSURE**









## CHINA's mainland



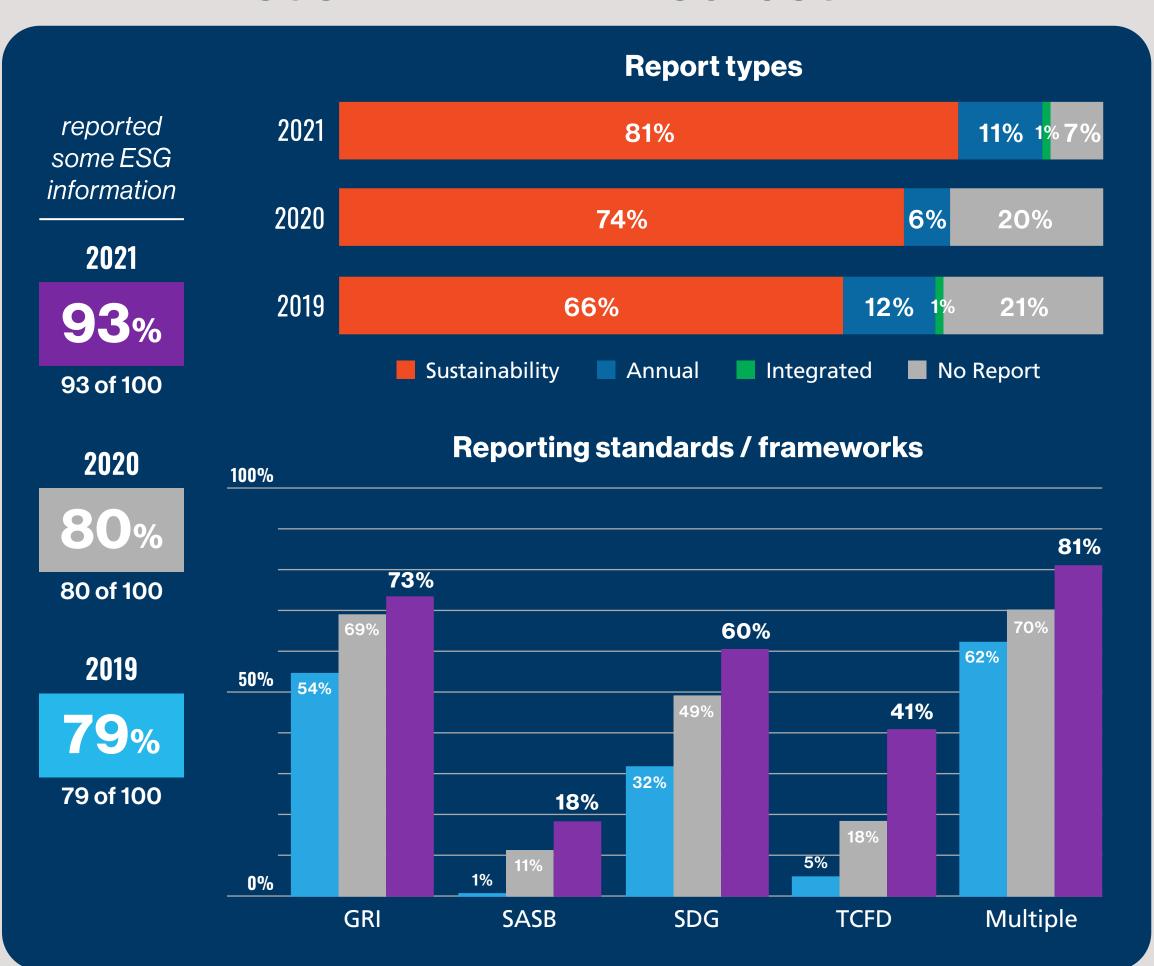
#### **DISCLOSURE**

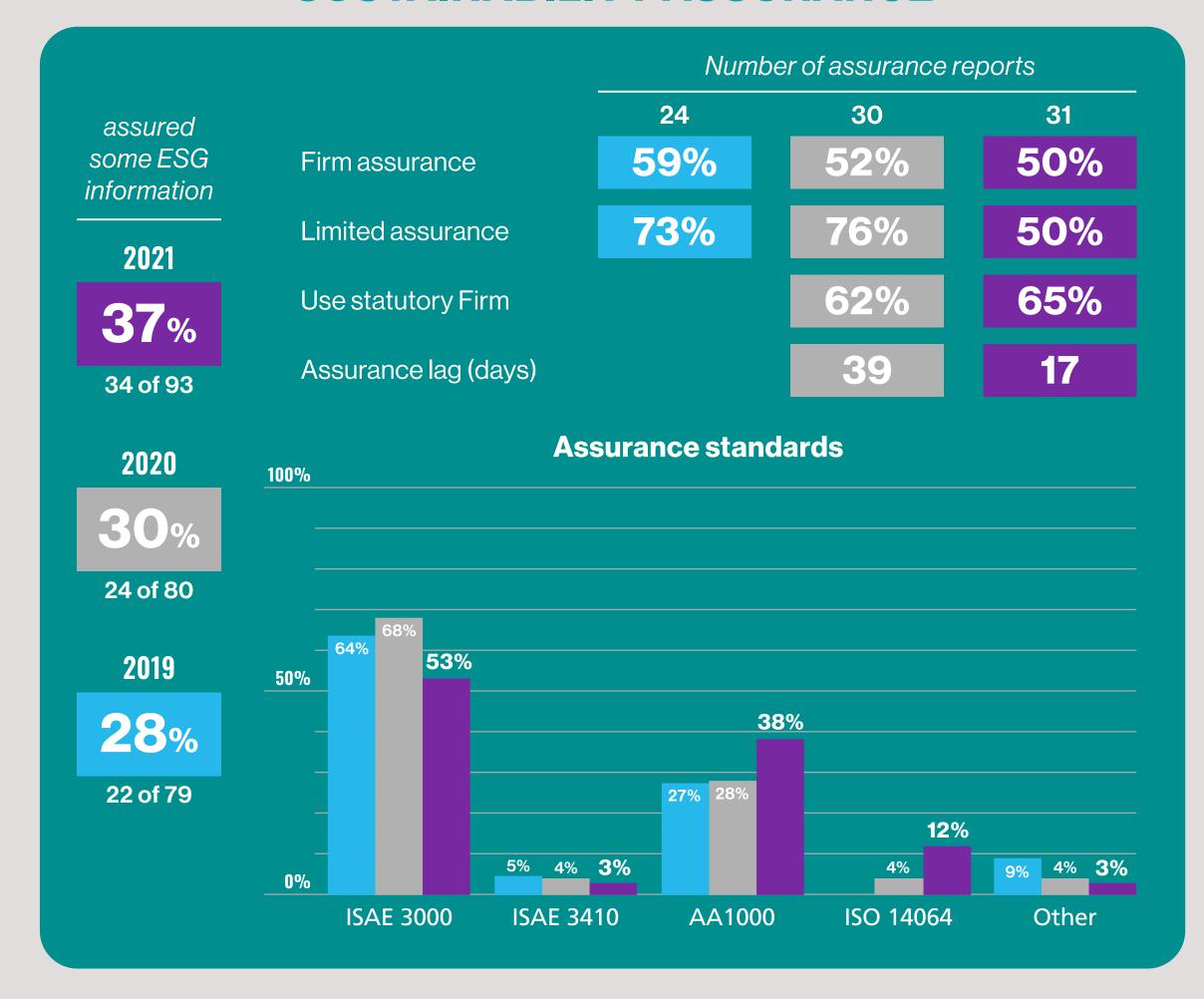
• Third largest three-year sustainable reporting growth (14%) globally

#### **ASSURANCE**

 Shortest assurance lag (17 days) outside of the EU

#### **SUSTAINABILITY DISCLOSURE**











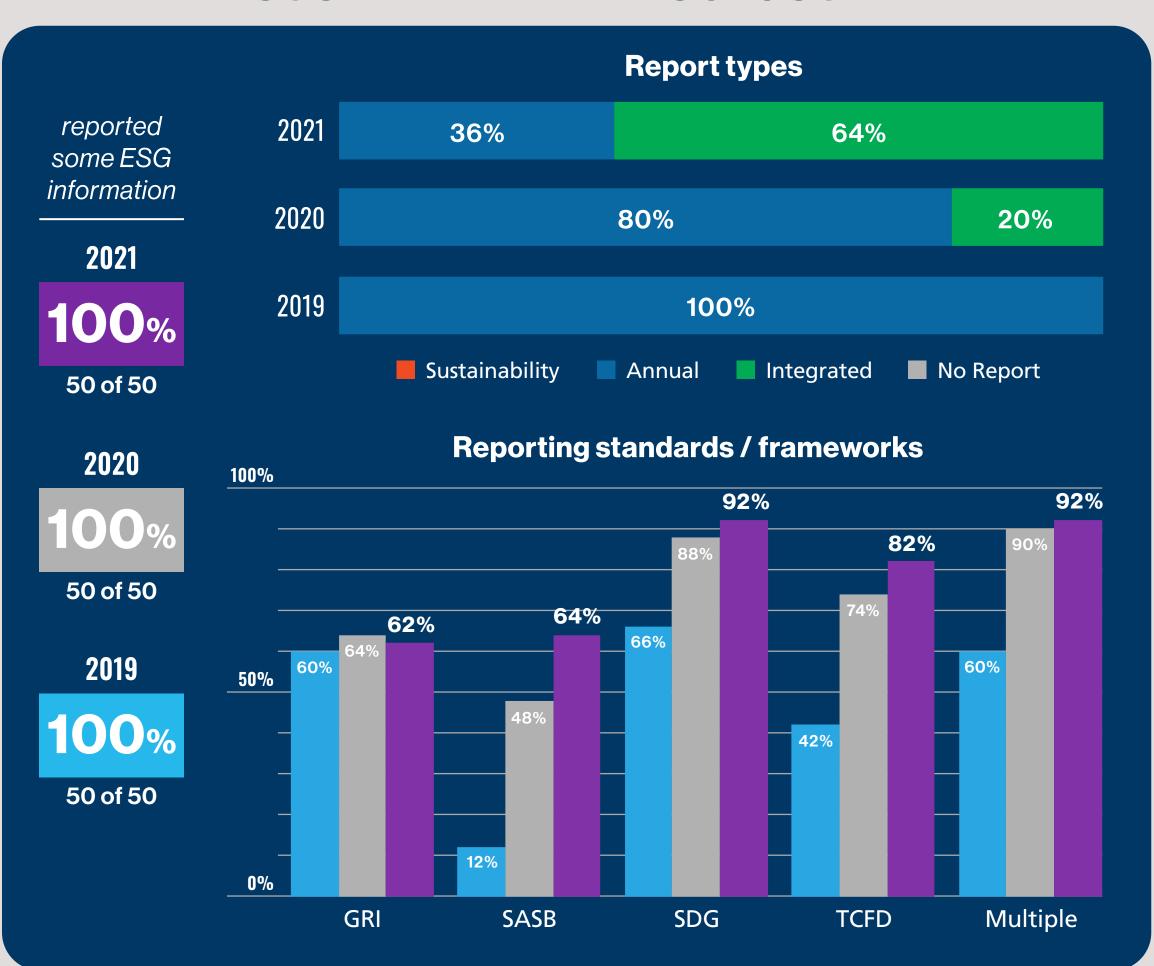


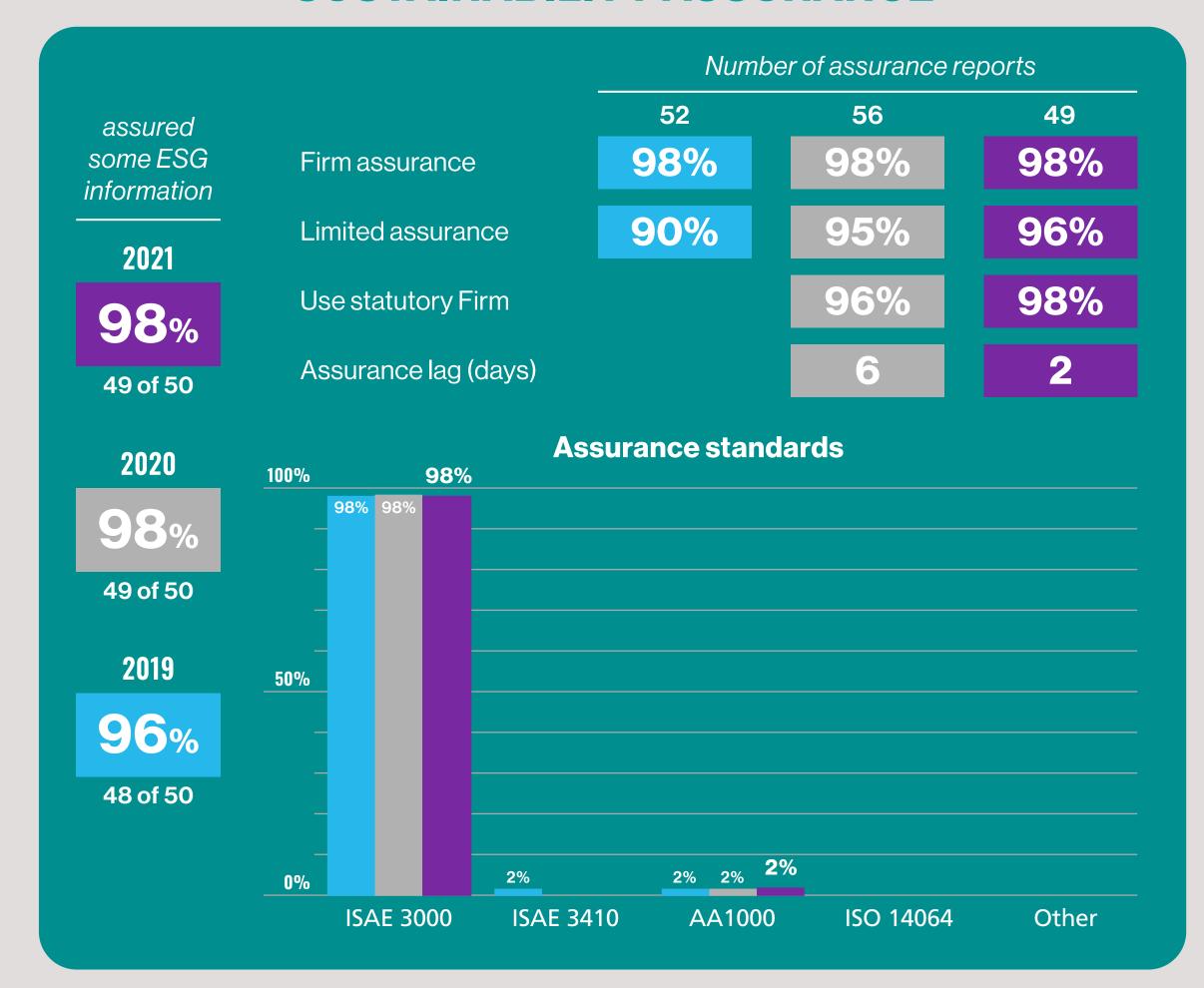
• Largest three-year increase in use of Integrated Reports (64%)

#### **ASSURANCE**

 Highest rate of using statutory audit firm for sustainable assurance (98%) globally

#### **SUSTAINABILITY DISCLOSURE**











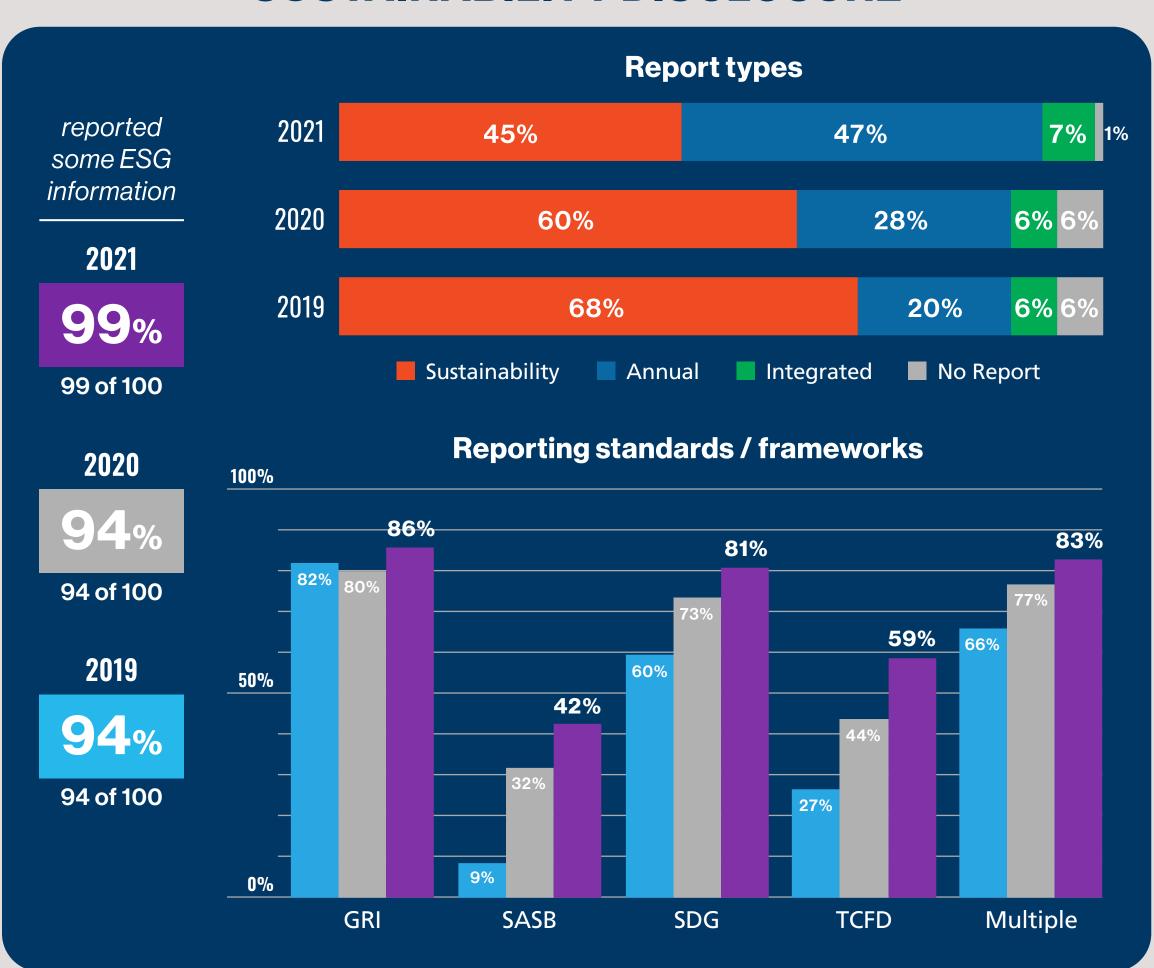


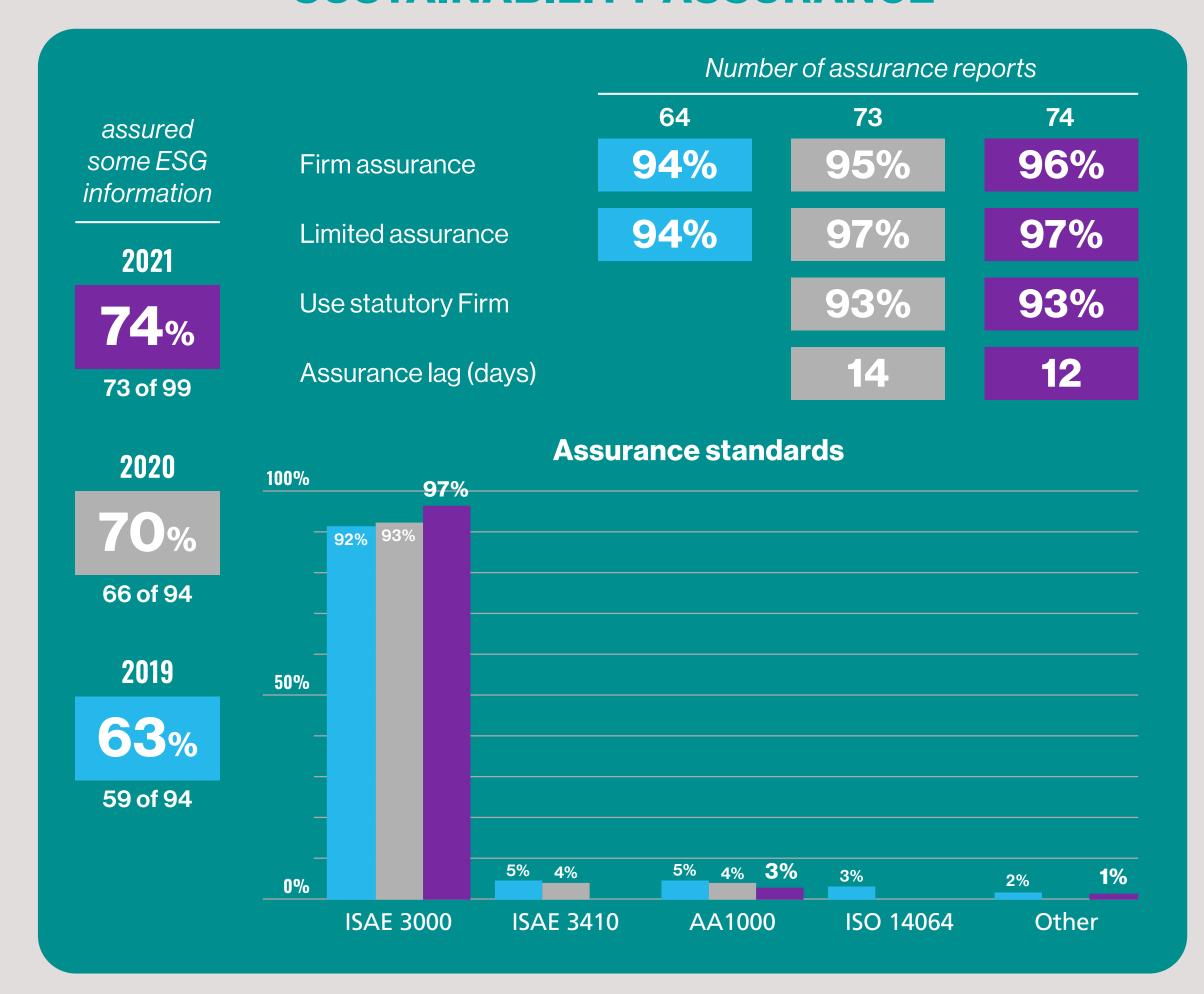
• Third highest use of Annual Reports (47%) globally

#### **ASSURANCE**

• Lowest rate of assurance (74%) among EU jurisdictions

#### **SUSTAINABILITY DISCLOSURE**









## HONG KONG S.A.R.



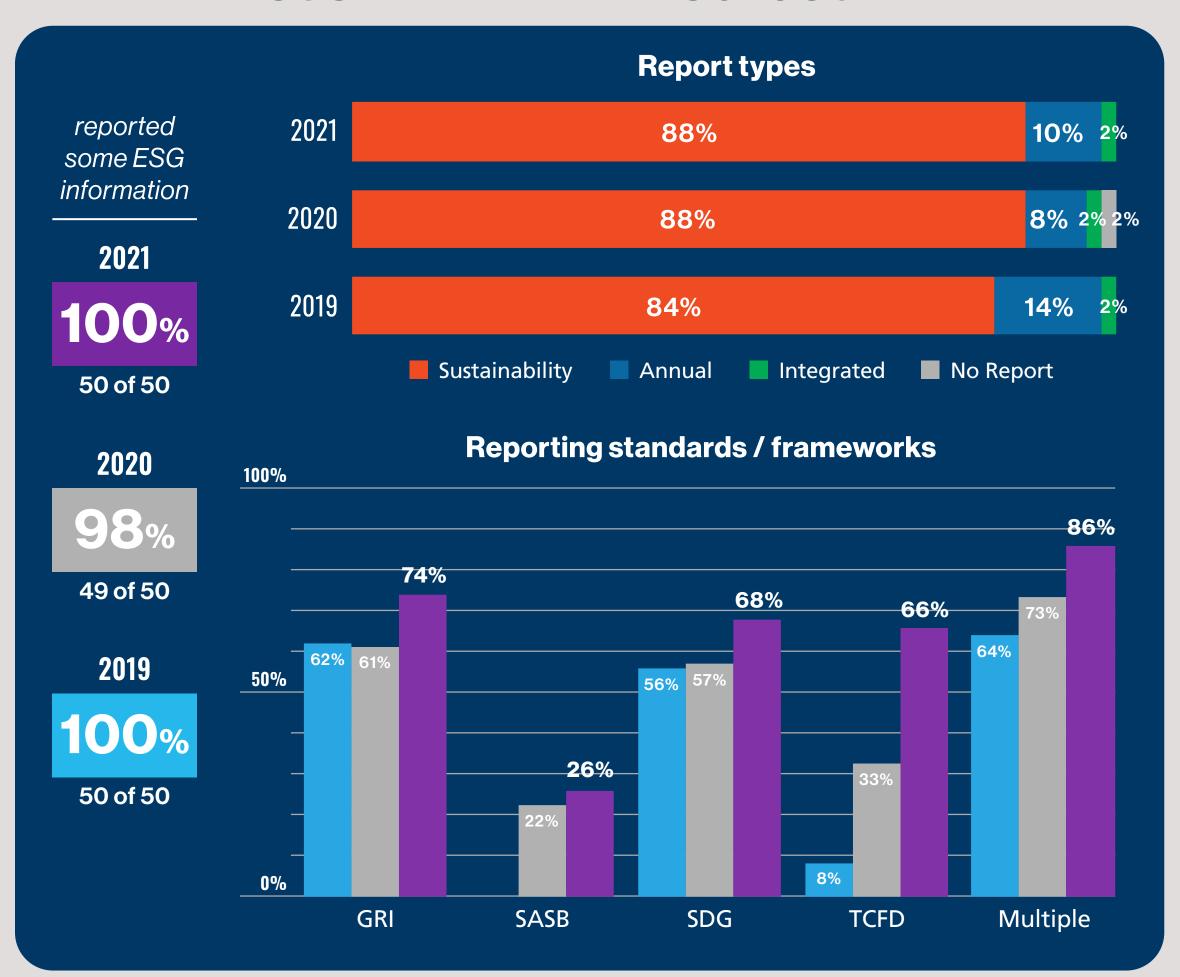
#### **DISCLOSURE**

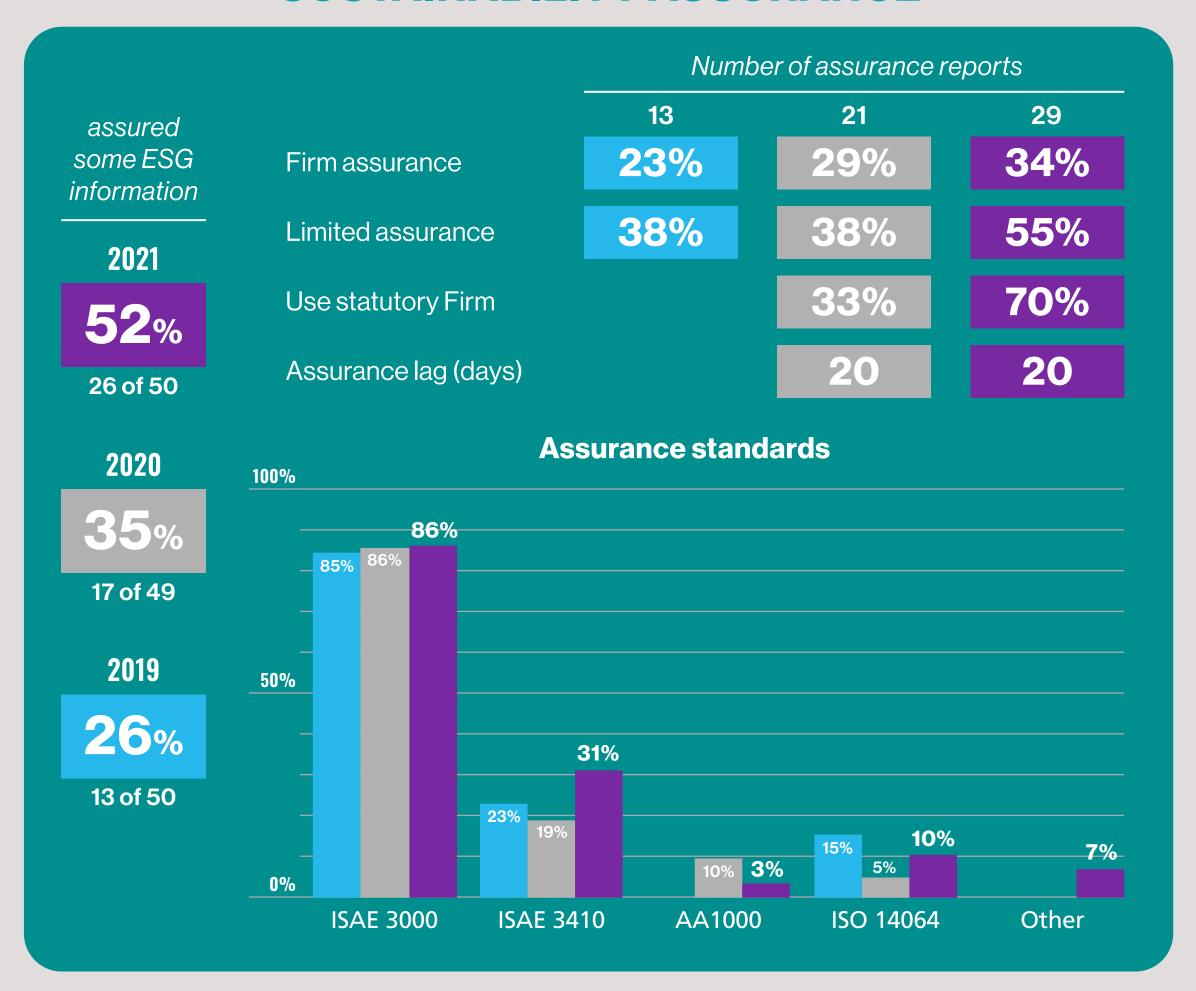
• Third highest use (88%) of standalone Sustainability Reports

#### **ASSURANCE**

 Highest rate of reasonable assurance (34%) globally

#### **SUSTAINABILITY DISCLOSURE**











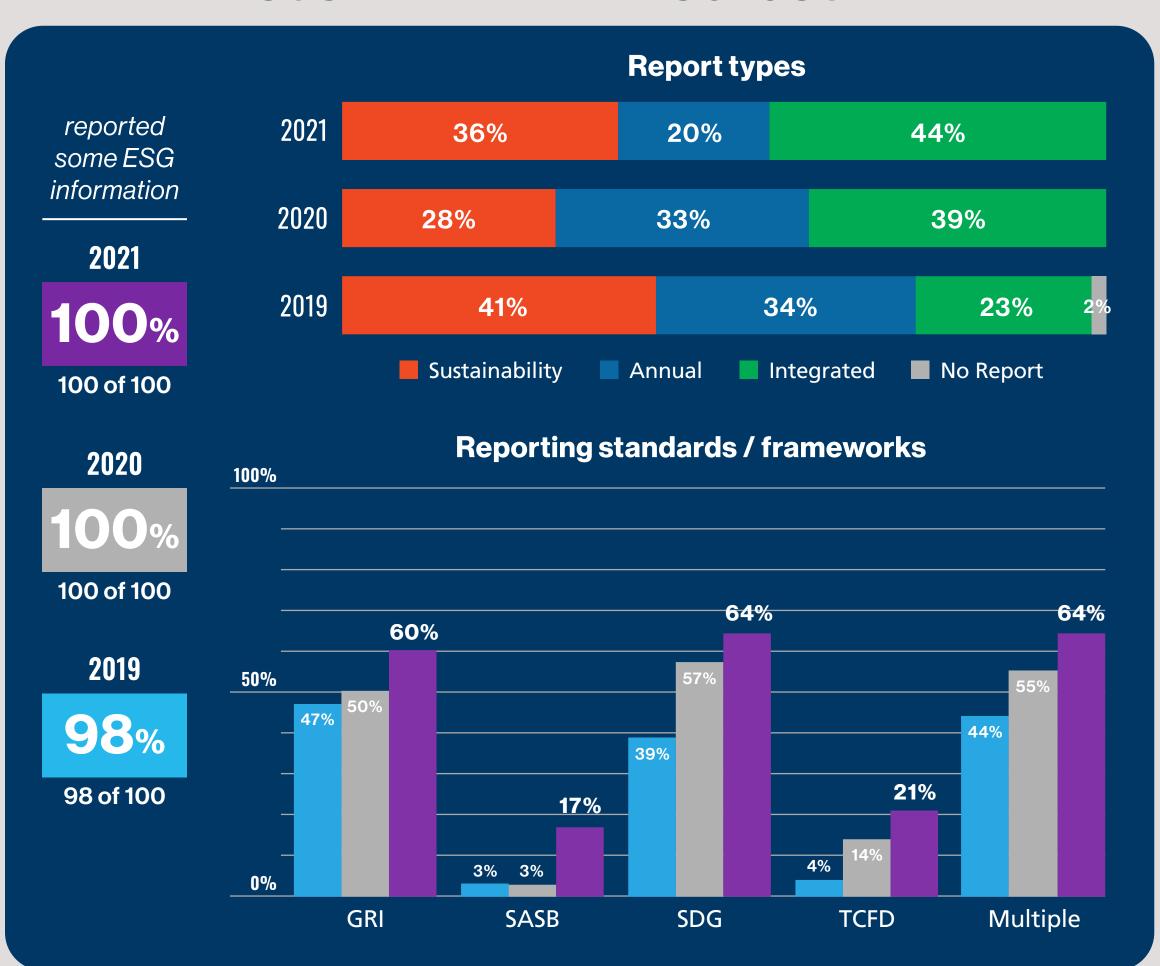


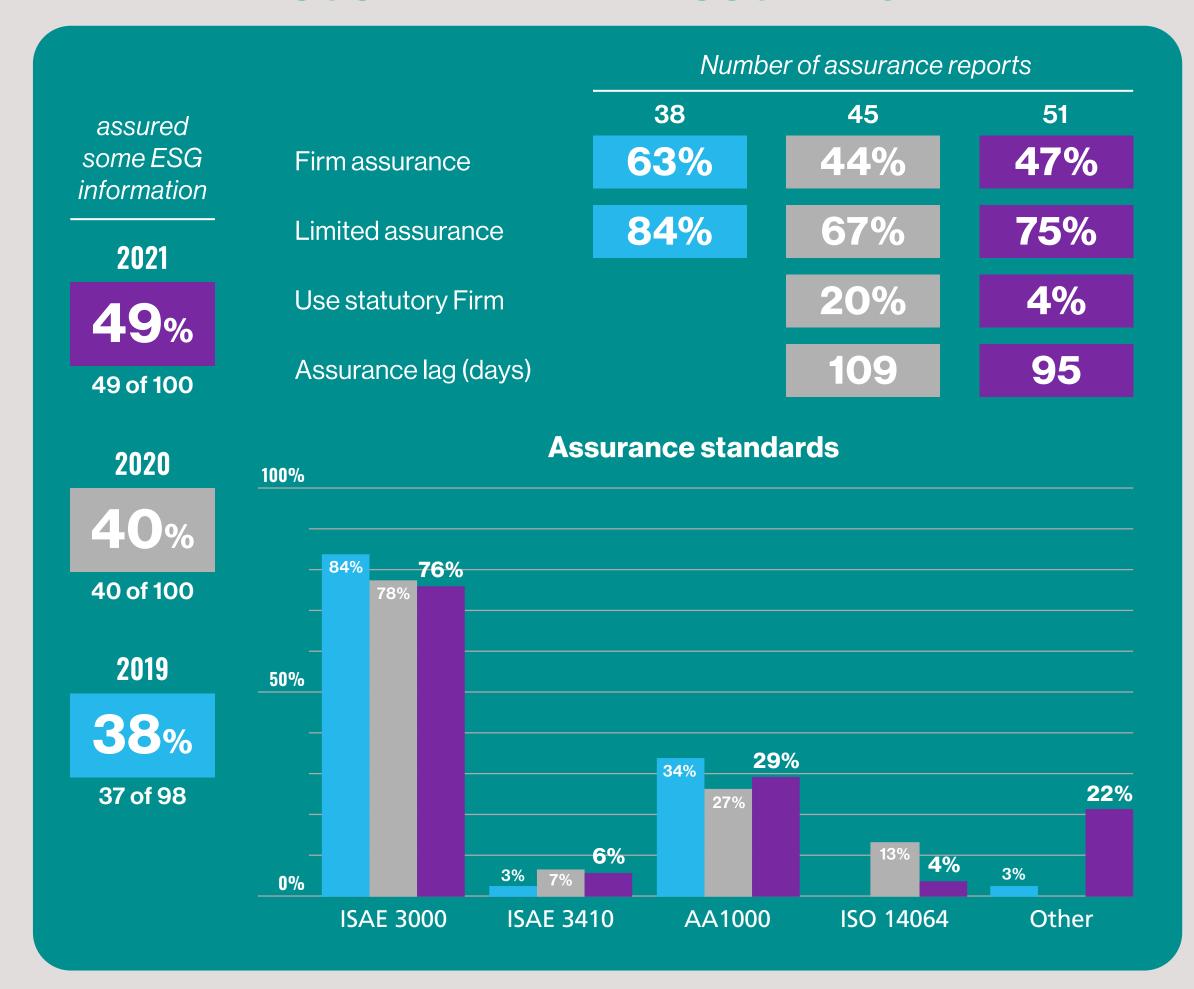
• Lowest use of SASB Standards (17%) and second lowest use of TCFD (21%) in Asia-Pacific

#### **ASSURANCE**

 Second longest assurance lag (95 days), globally

#### **SUSTAINABILITY DISCLOSURE**









## INDONESIA



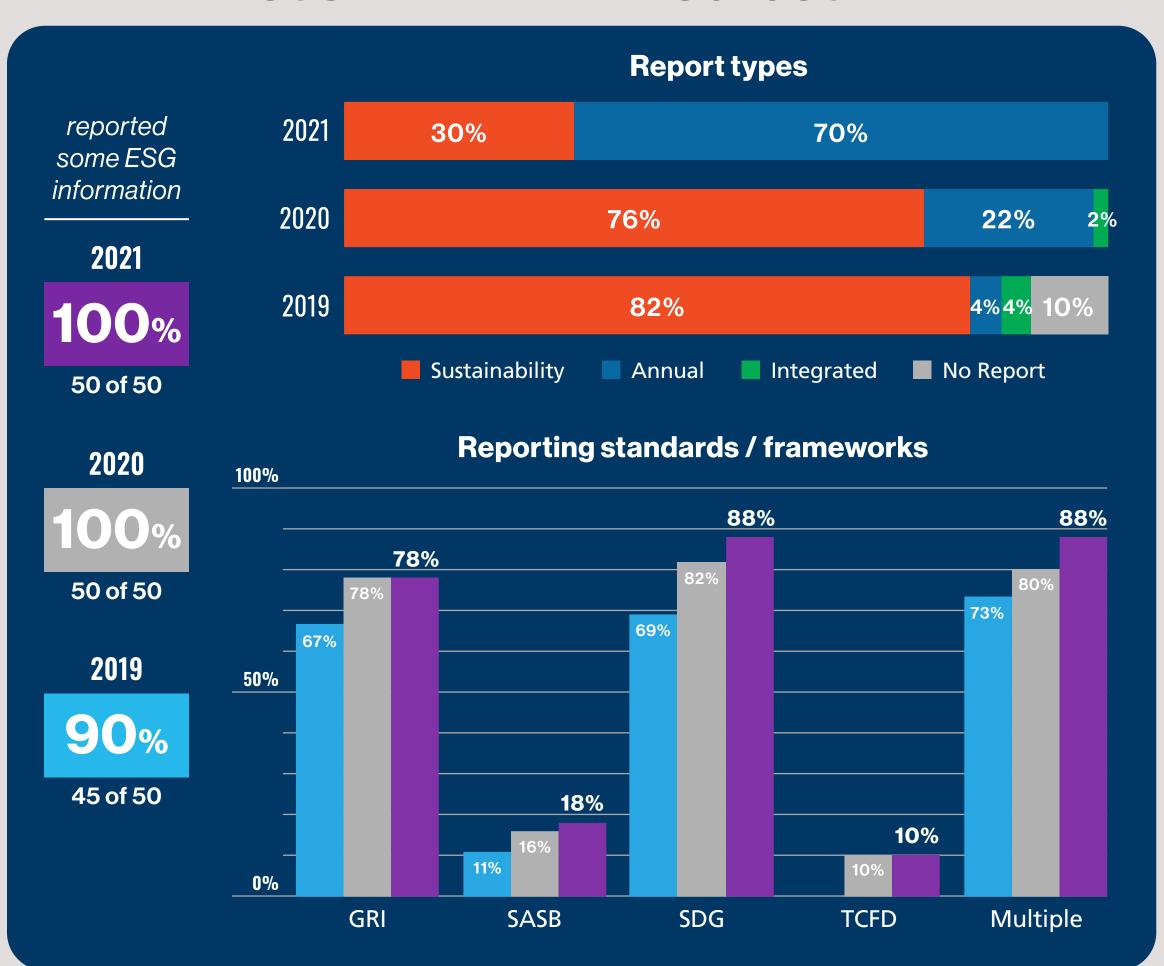
#### **DISCLOSURE**

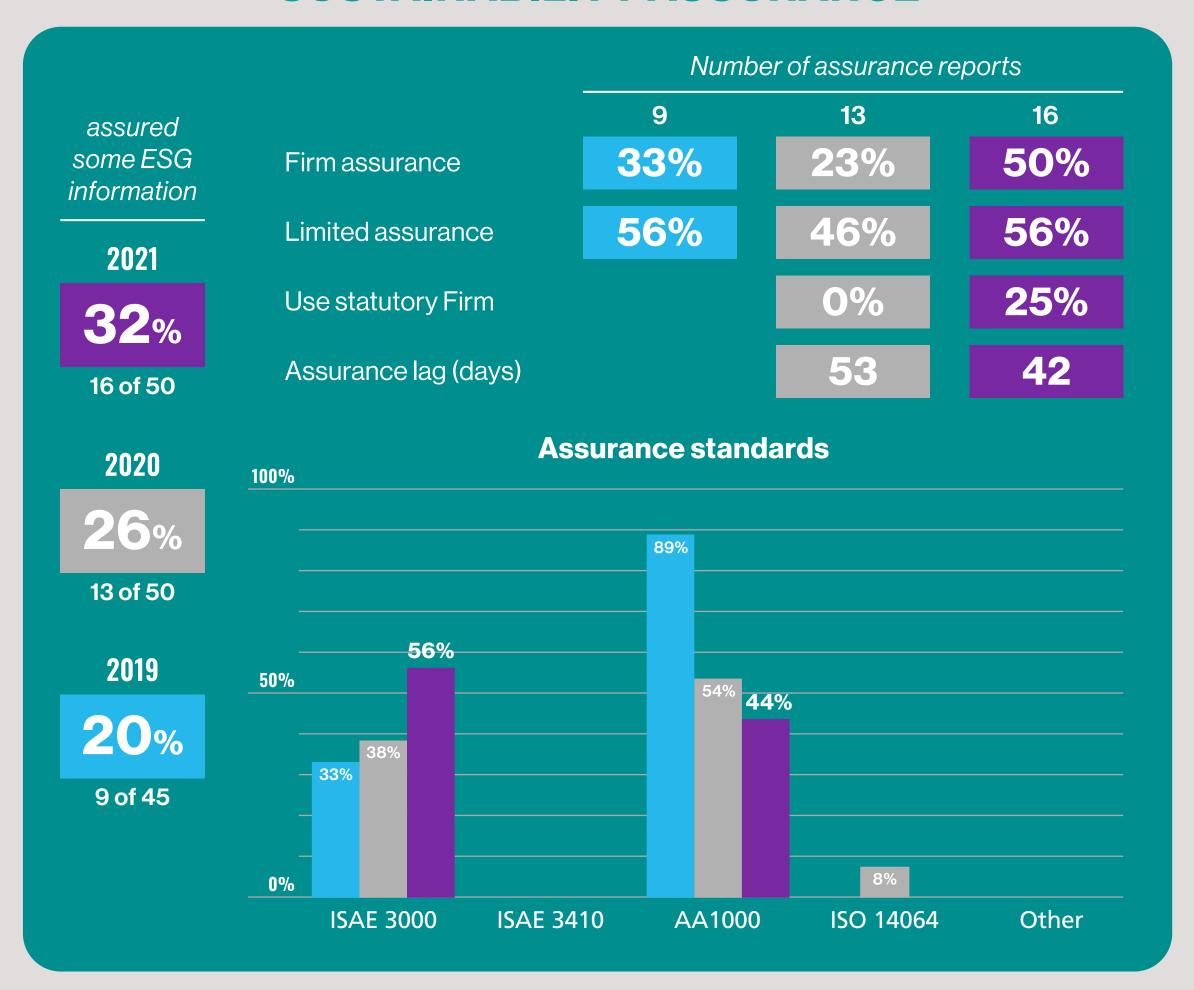
• Highest use of Annual Reports (70%), globally

#### **ASSURANCE**

• Highest use of AA1000 assurance standards (44%), globally

#### **SUSTAINABILITY DISCLOSURE**











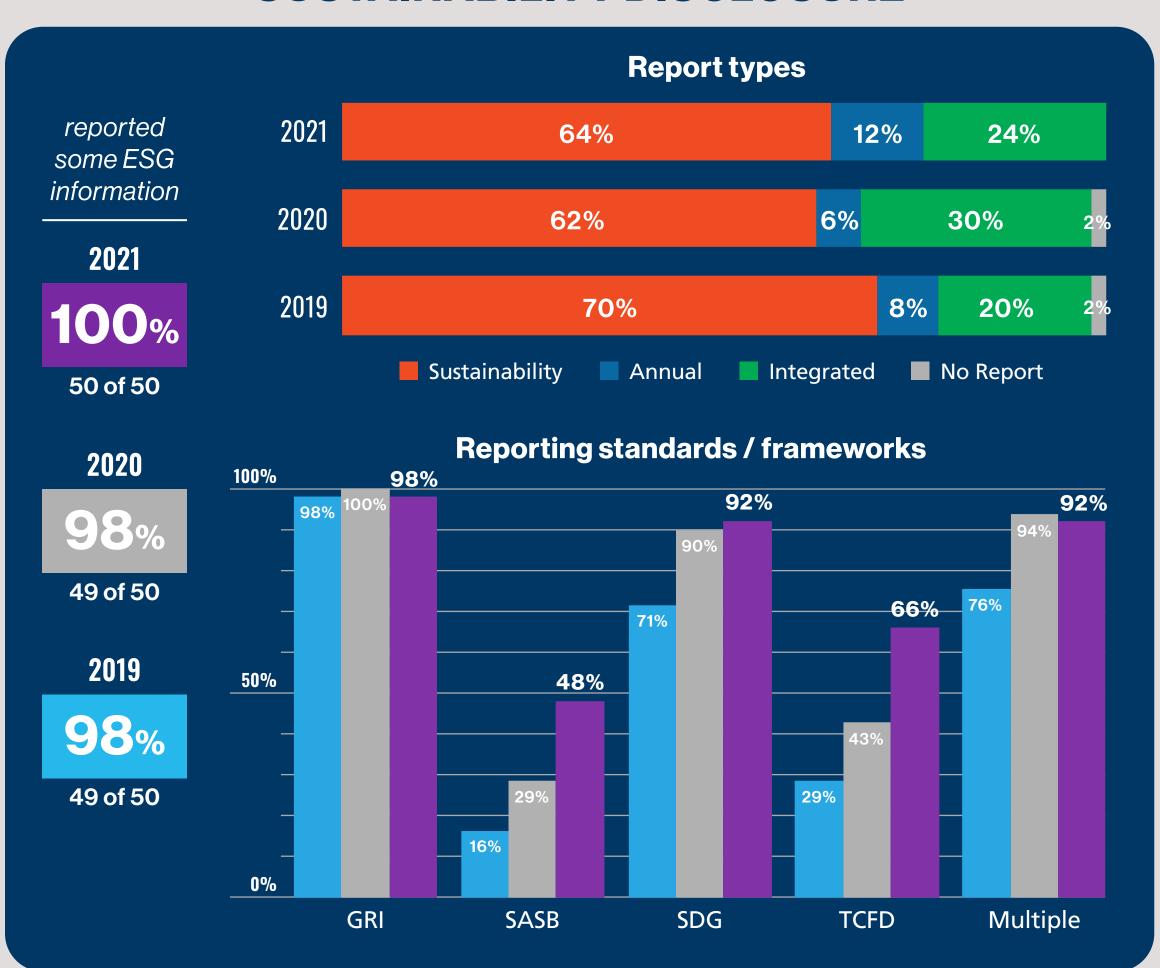


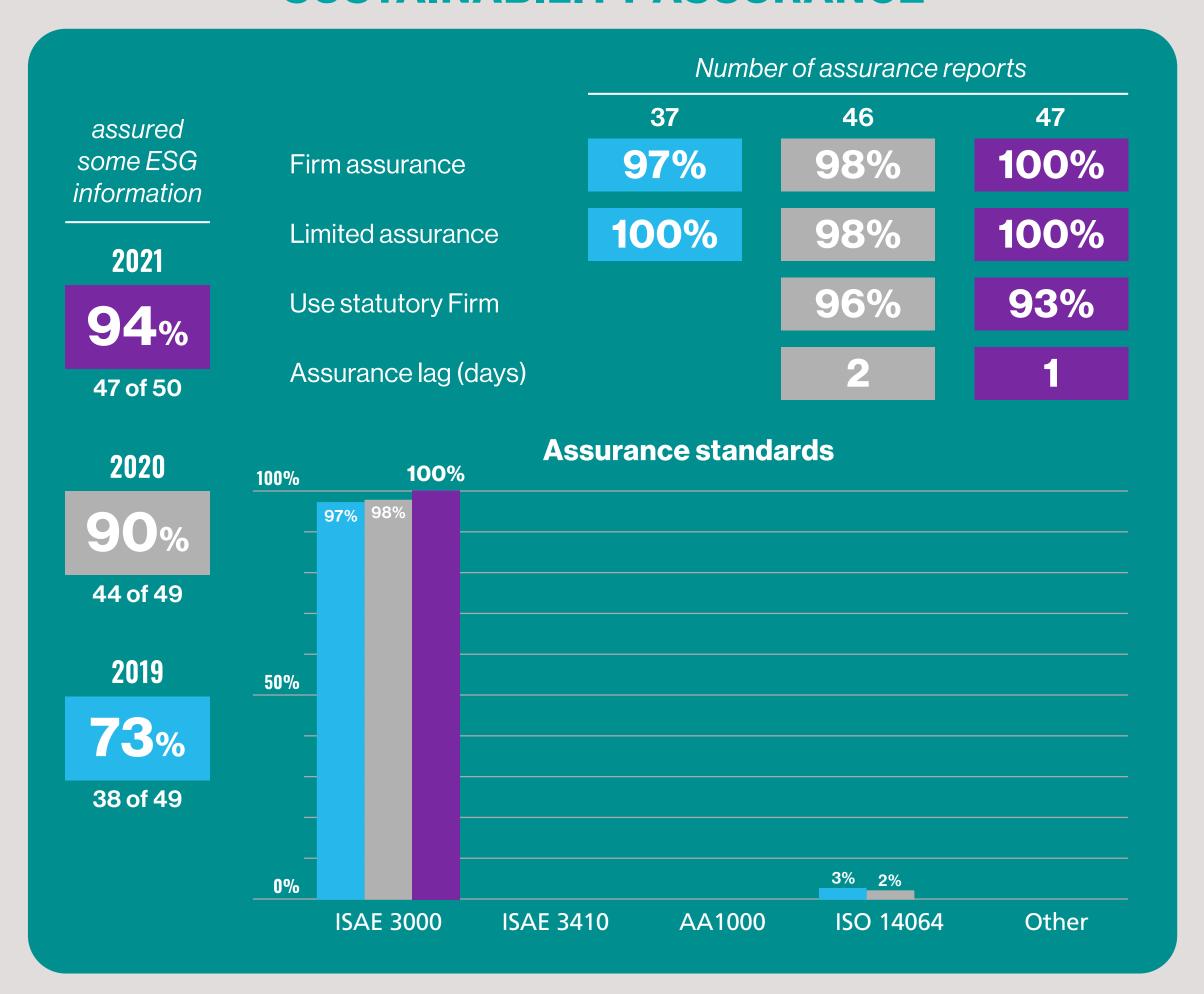
Highest use of standalone Sustainability
 Reports (64%) in the EU

#### **ASSURANCE**

• Shortest lag (1 day) between statutory and sustainability assurance, globally

#### **SUSTAINABILITY DISCLOSURE**











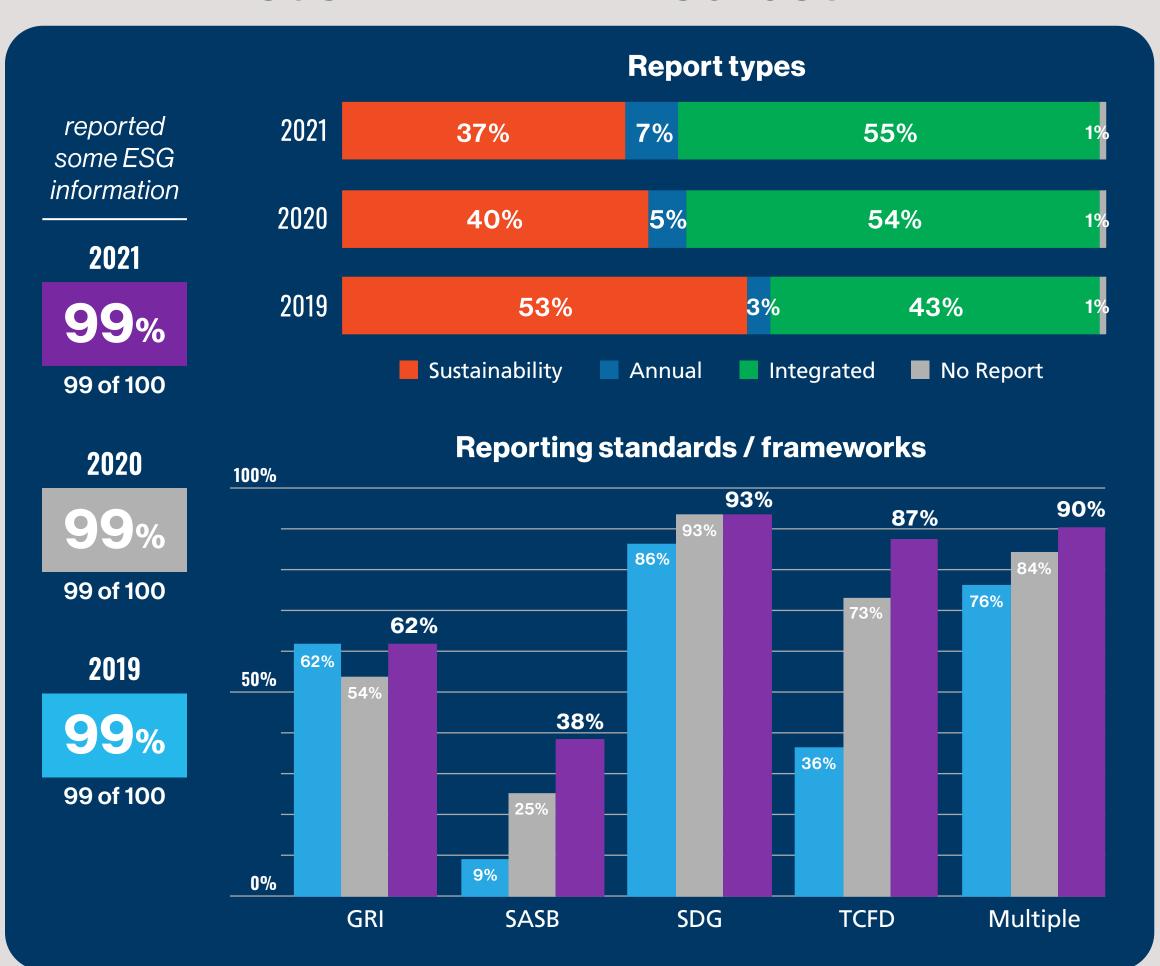


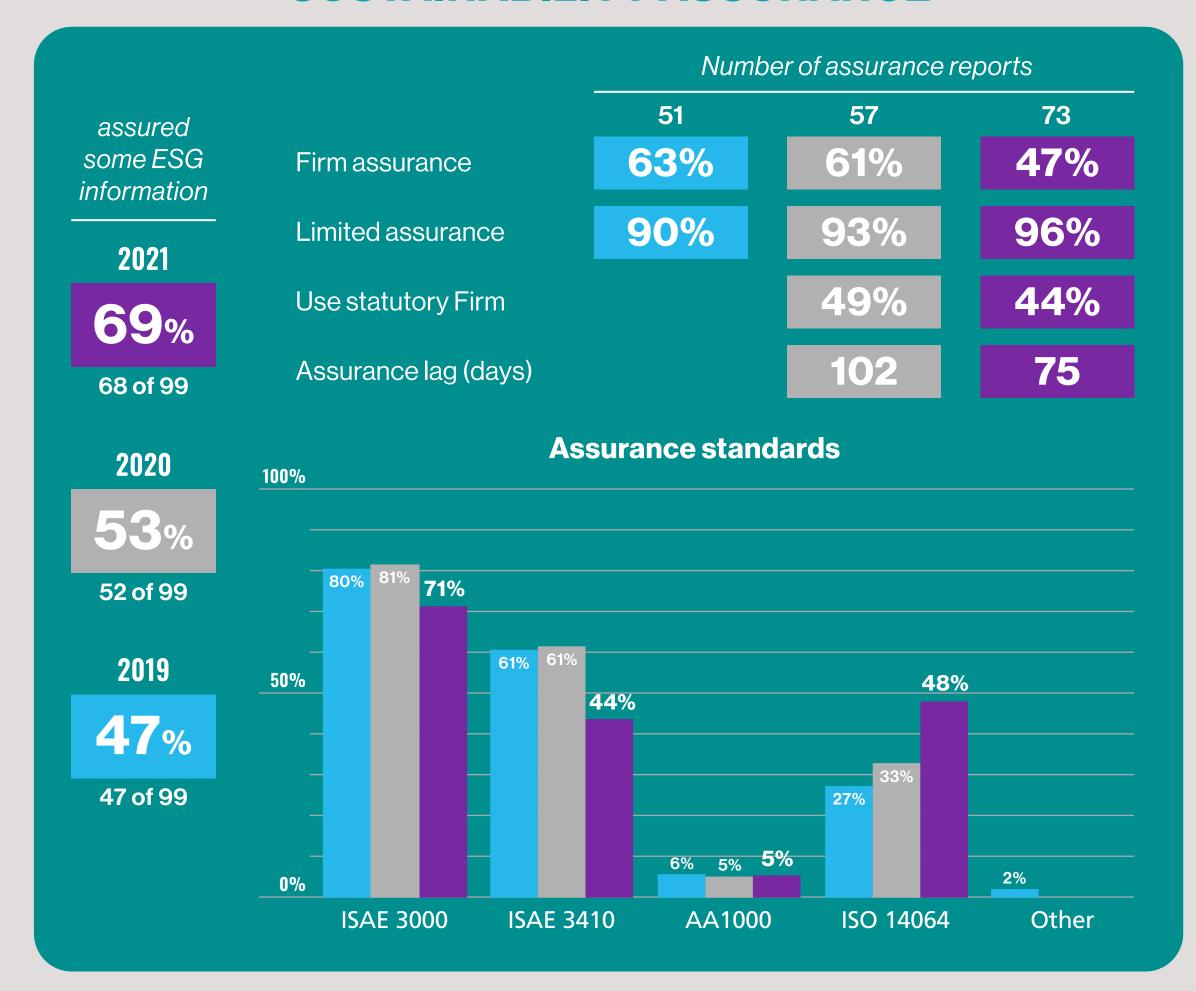
• Highest use of Integrated Reports (55%) in Asia-Pacific

#### **ASSURANCE**

 Second highest use of ISO GHG assurance standards (48%) globally

#### **SUSTAINABILITY DISCLOSURE**











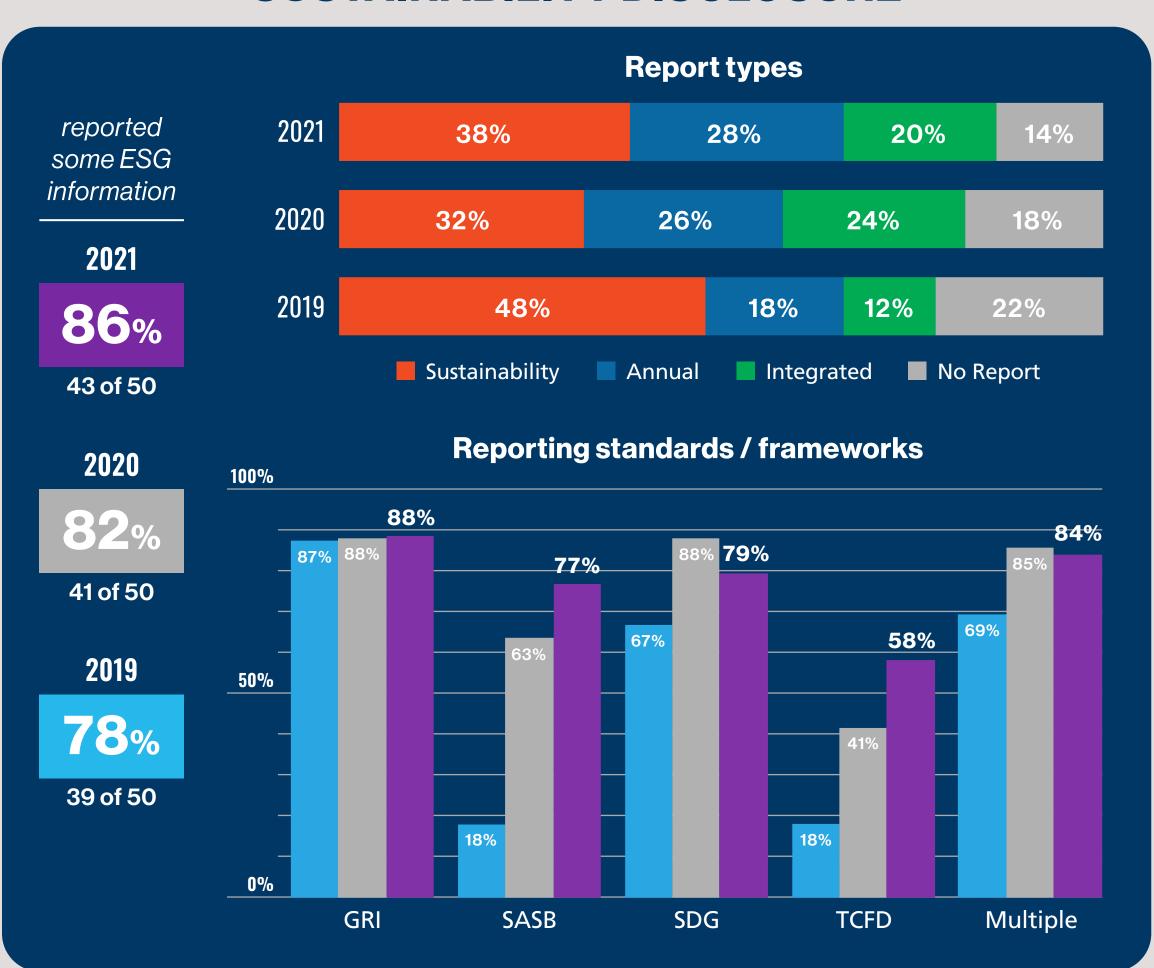


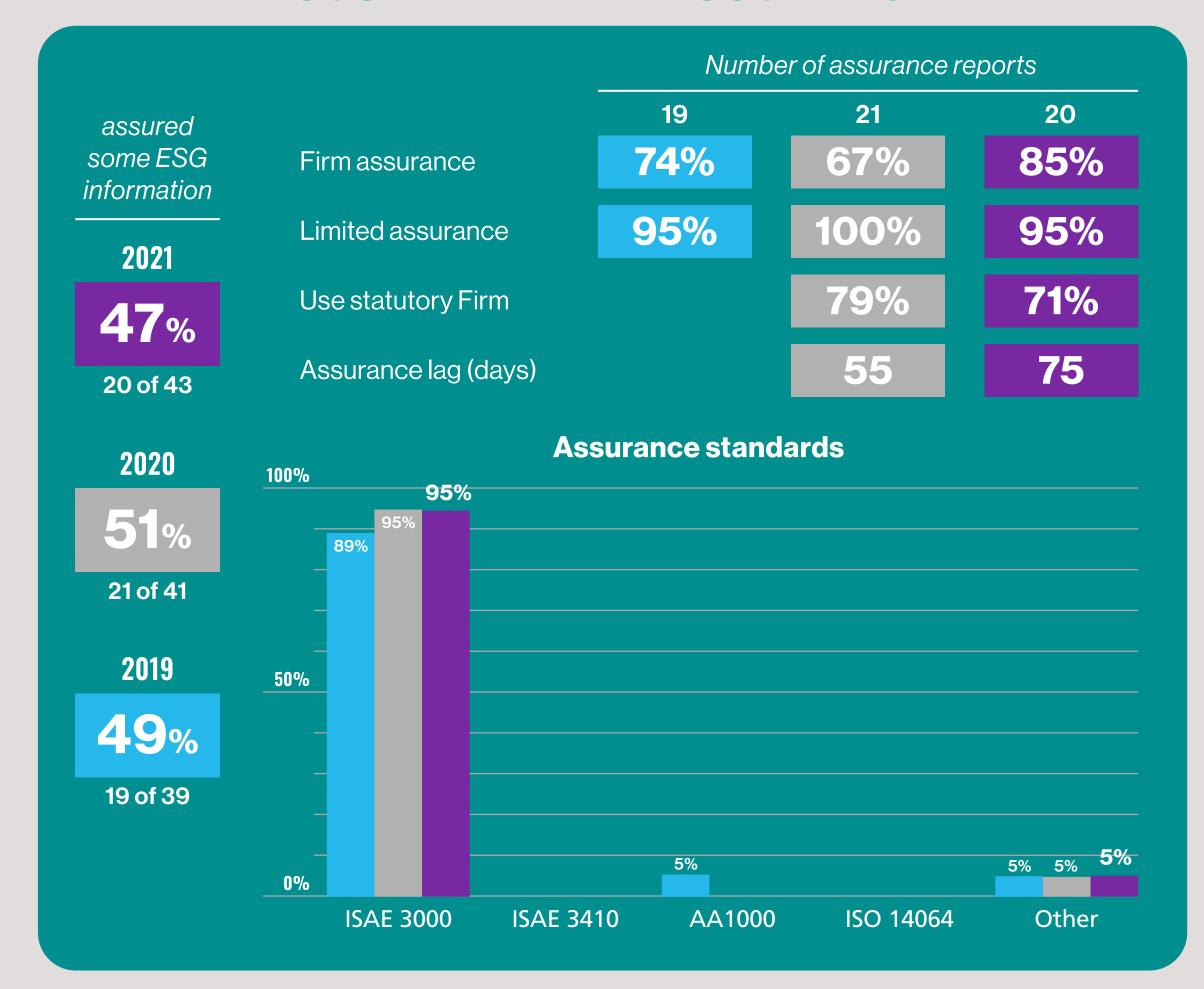
• Third lowest rate (86%) of sustainability disclosure globally

#### **ASSURANCE**

• One of two jurisdictions with a decreased assurance rate (-2%)

#### **SUSTAINABILITY DISCLOSURE**









# SAUDI ARABIA



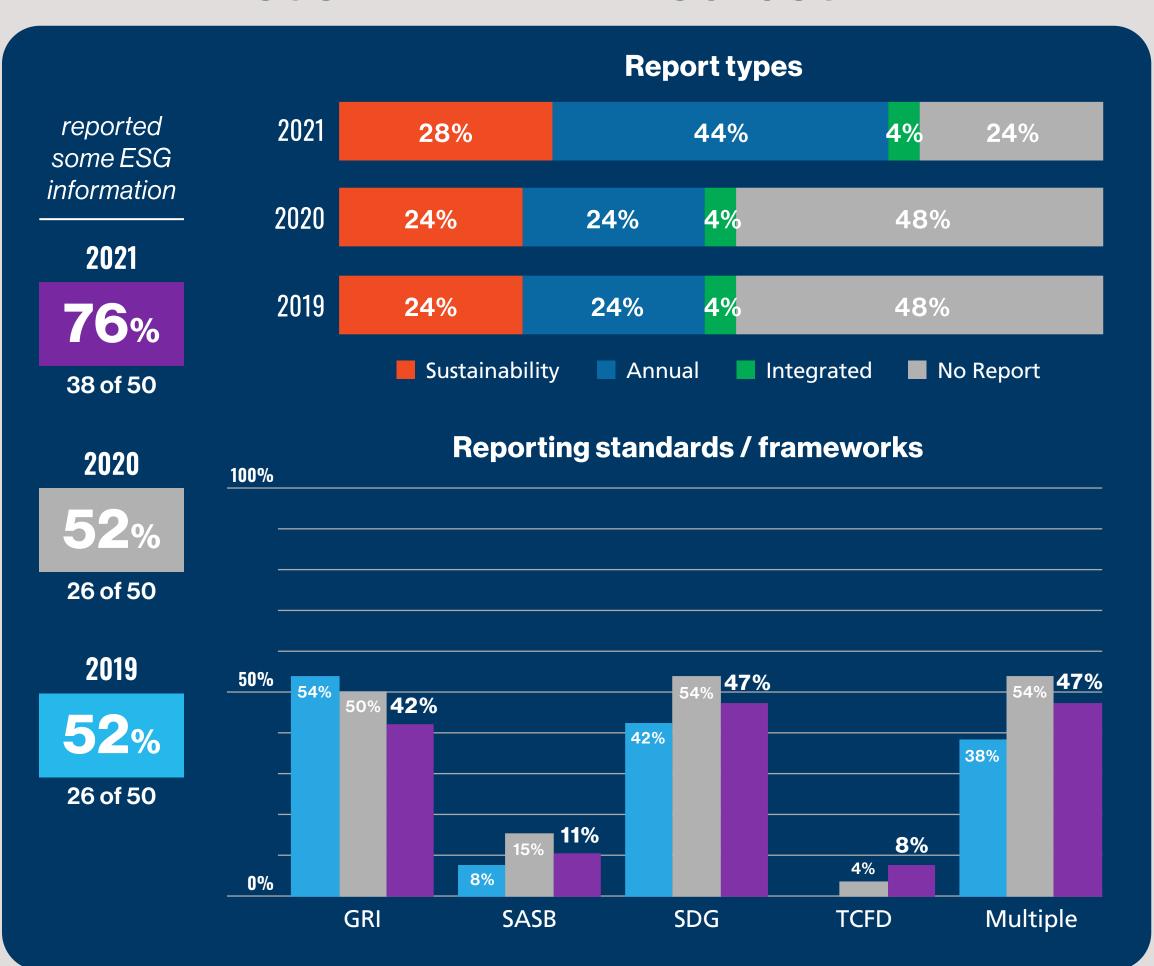
#### **DISCLOSURE**

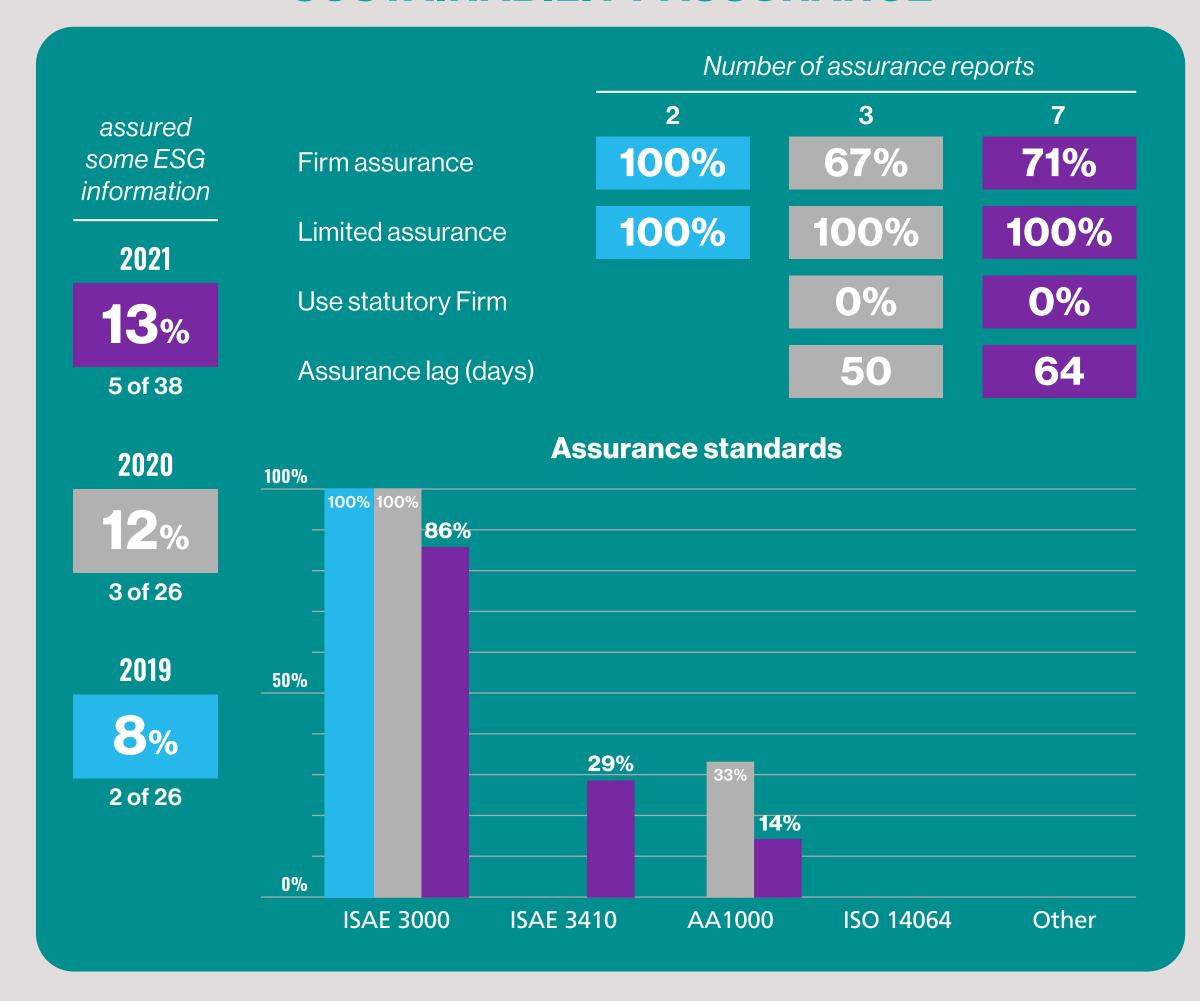
• Largest three-year growth of sustainability reporting (24%) from 52% to 76%

#### **ASSURANCE**

 Lowest rate of sustainable assurance (13%) globally

## **SUSTAINABILITY DISCLOSURE**









# SINGAPORE



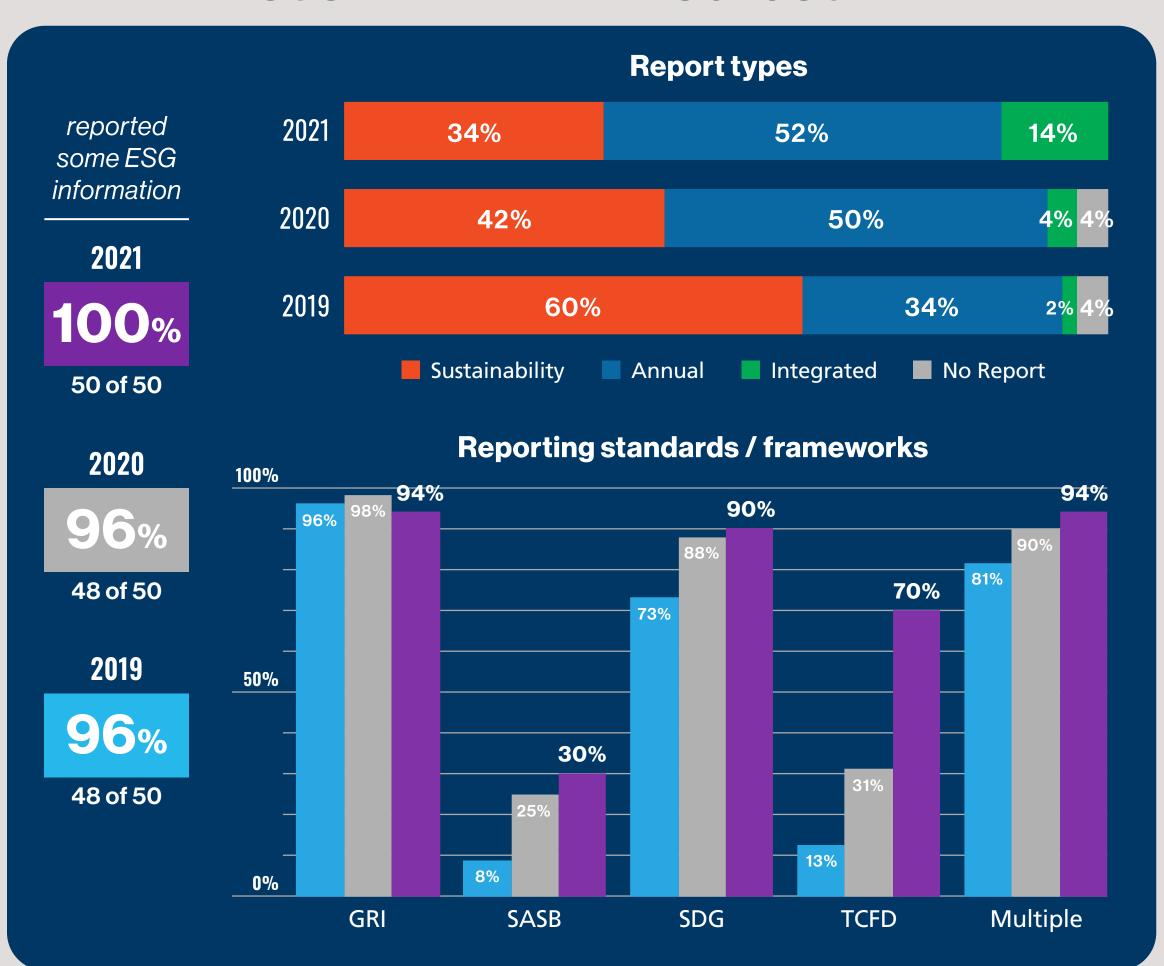
#### **DISCLOSURE**

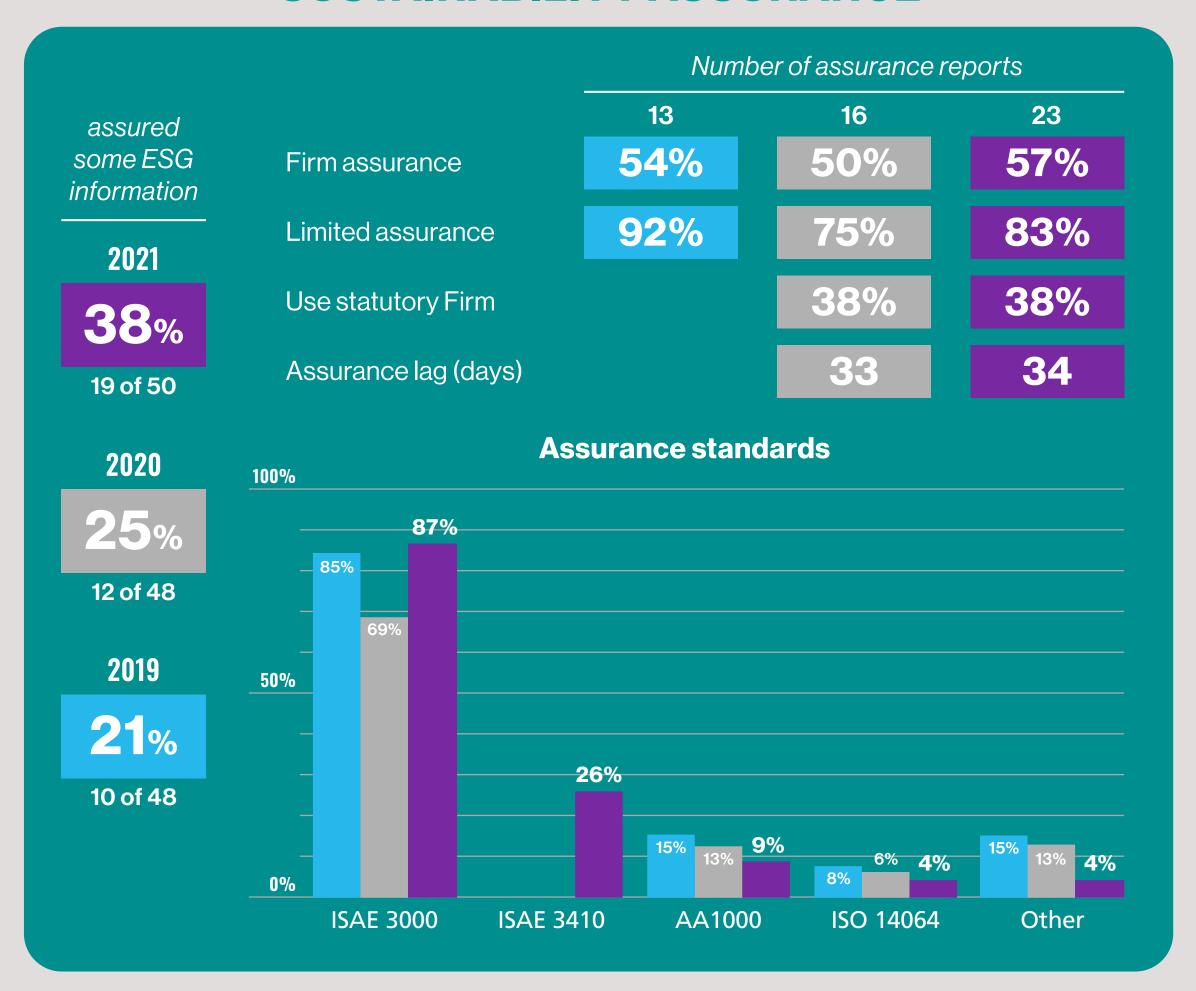
 Second largest three-year decline (26%) in use of standalone Sustainability Reports

#### **ASSURANCE**

 Second highest audit firm market share (57%) in Asia-Pacific

## **SUSTAINABILITY DISCLOSURE**









# SOUTH AFRICA



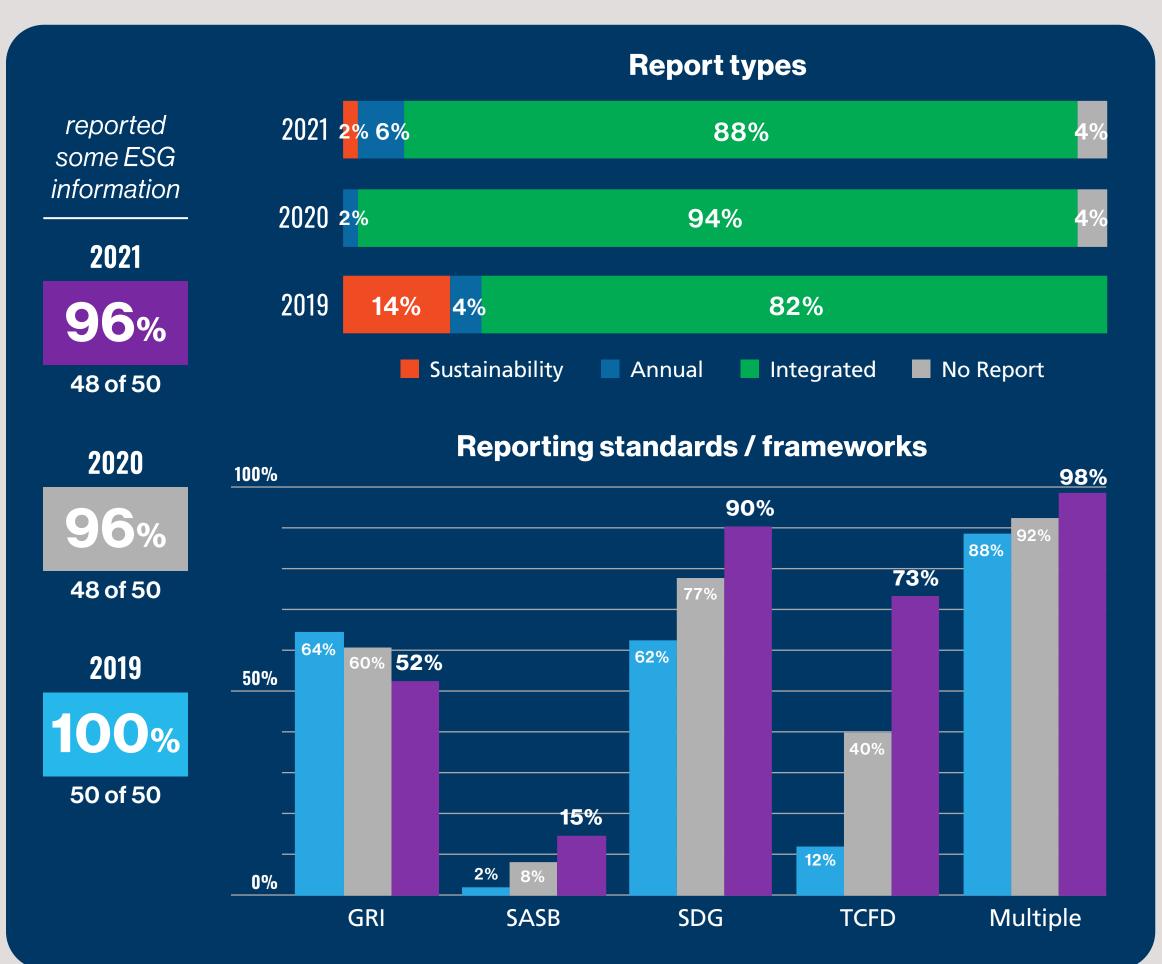
#### **DISCLOSURE**

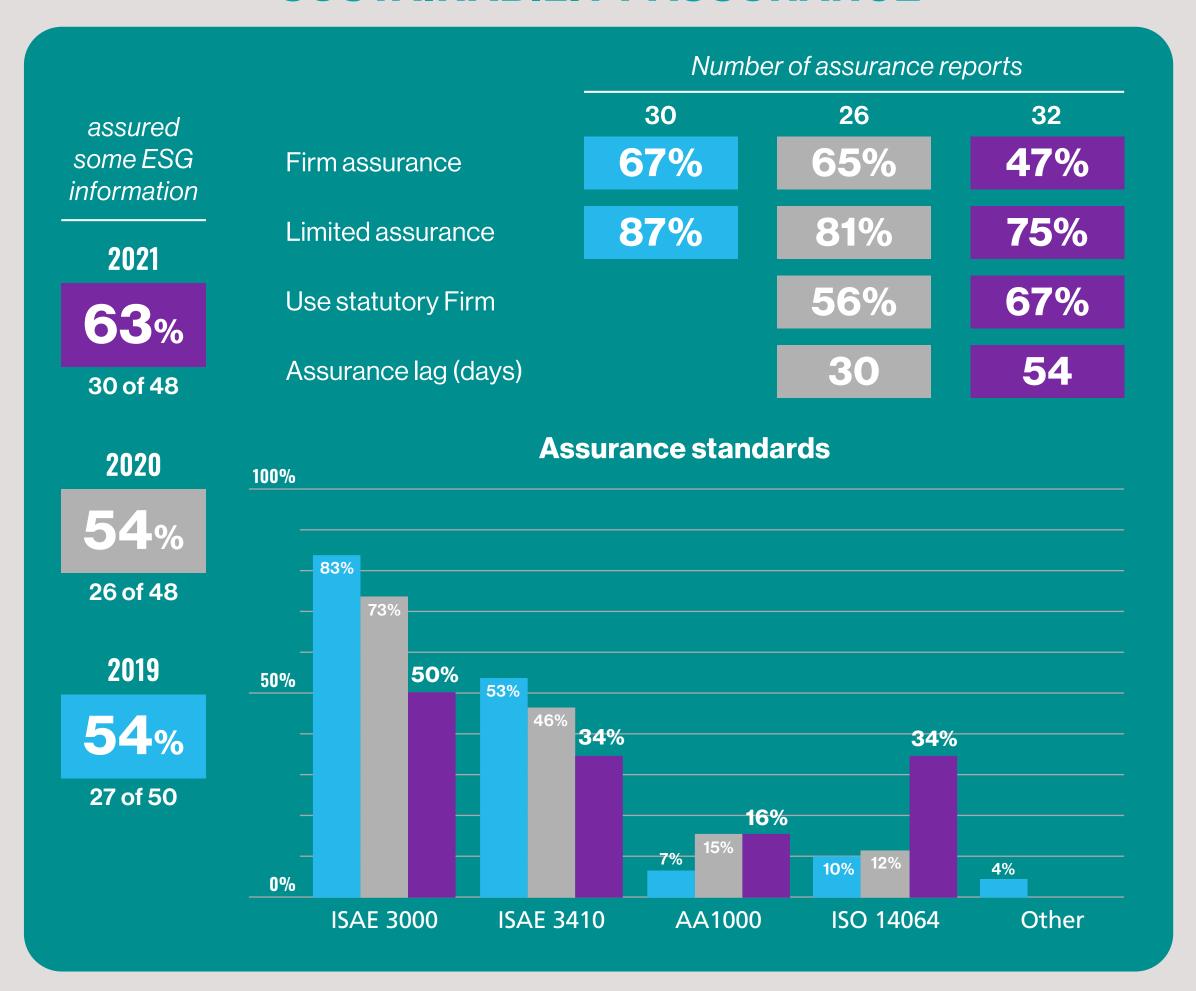
• Highest use of Integrated Reports (88%), globally

#### **ASSURANCE**

 Largest decrease in the use of ISAE 3000(R) (33%) globally

# **SUSTAINABILITY DISCLOSURE**









# SOUTH KOREA



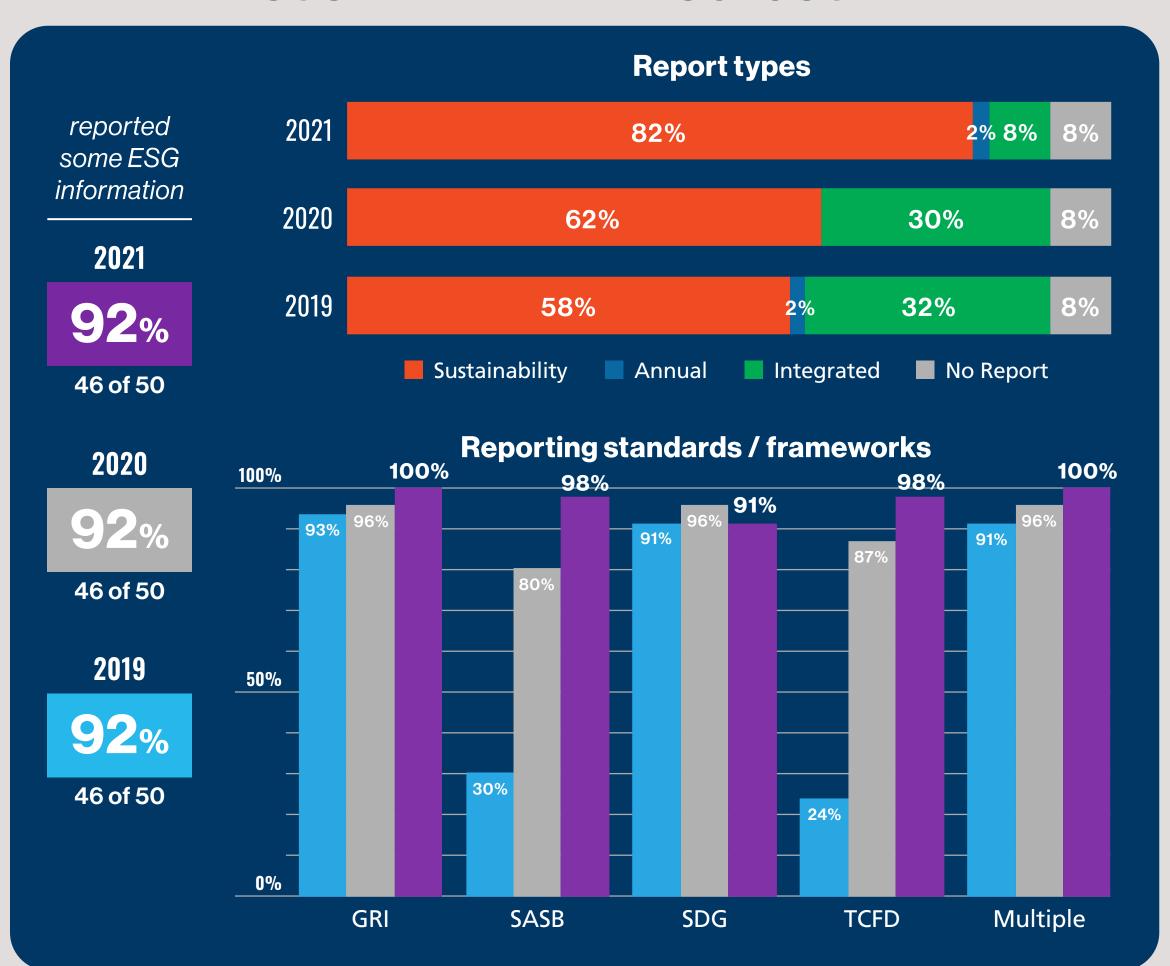
#### **DISCLOSURE**

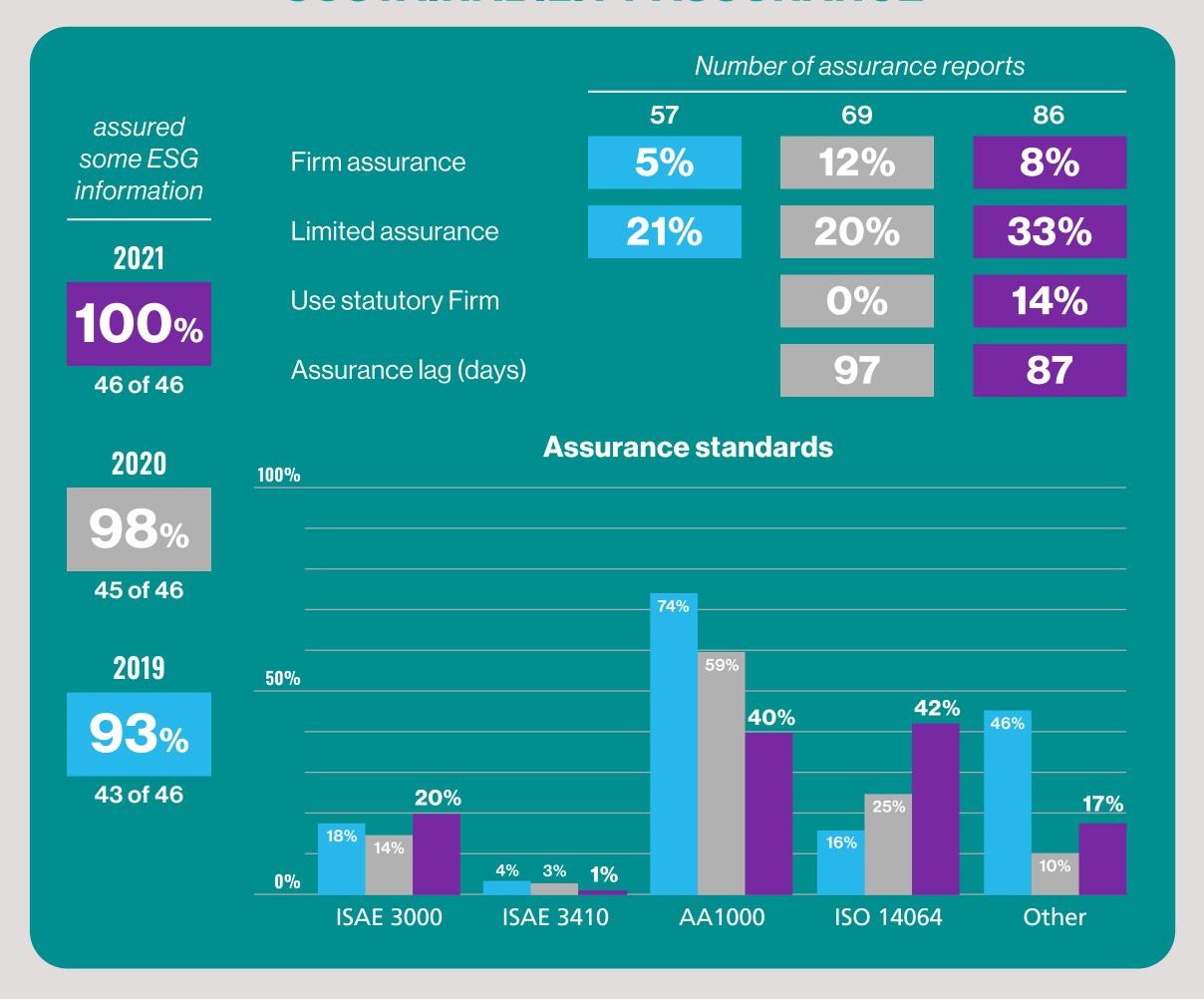
• 89% of companies that disclosed sustainability information incorporated all four reporting standards / frameworks

#### **ASSURANCE**

Most companies with more than one assurance report

## **SUSTAINABILITY DISCLOSURE**













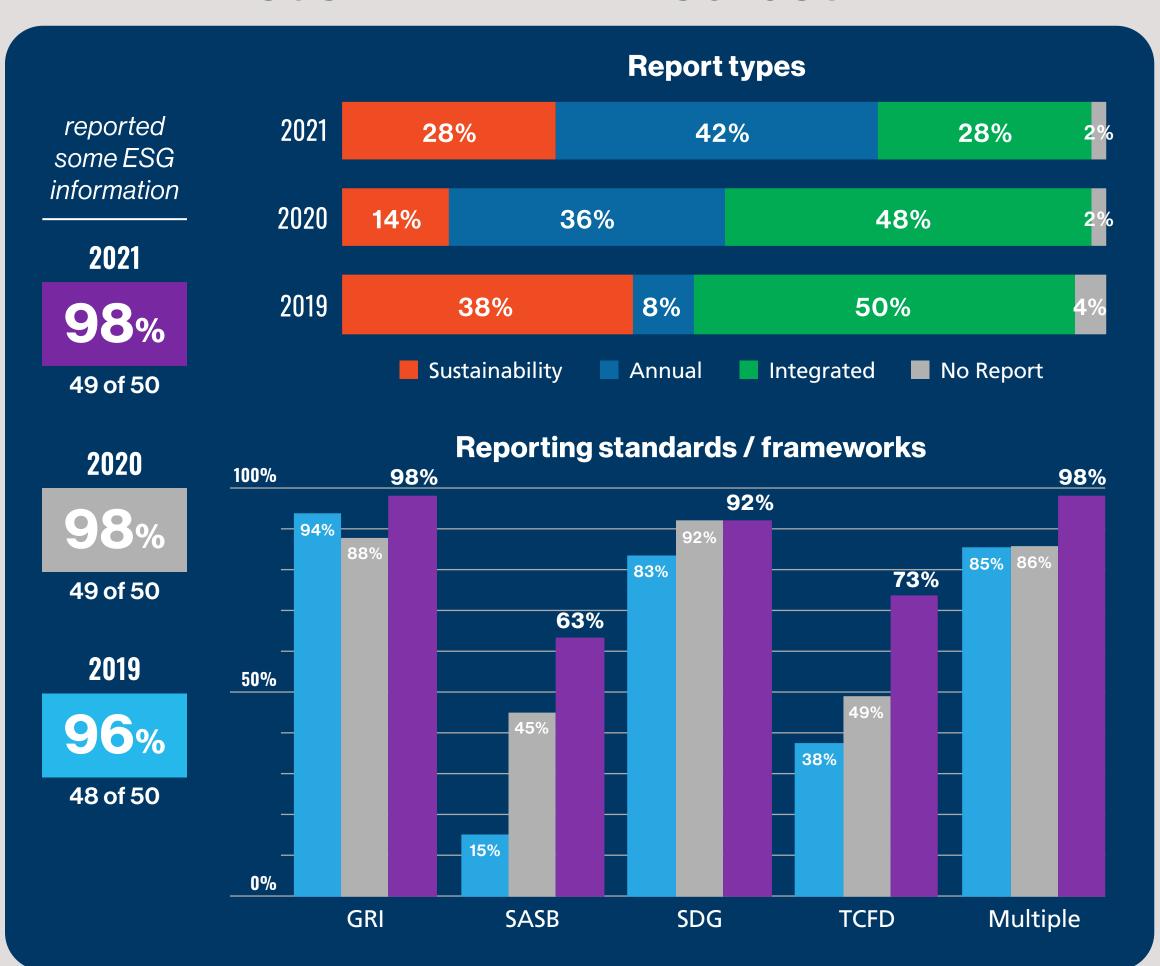
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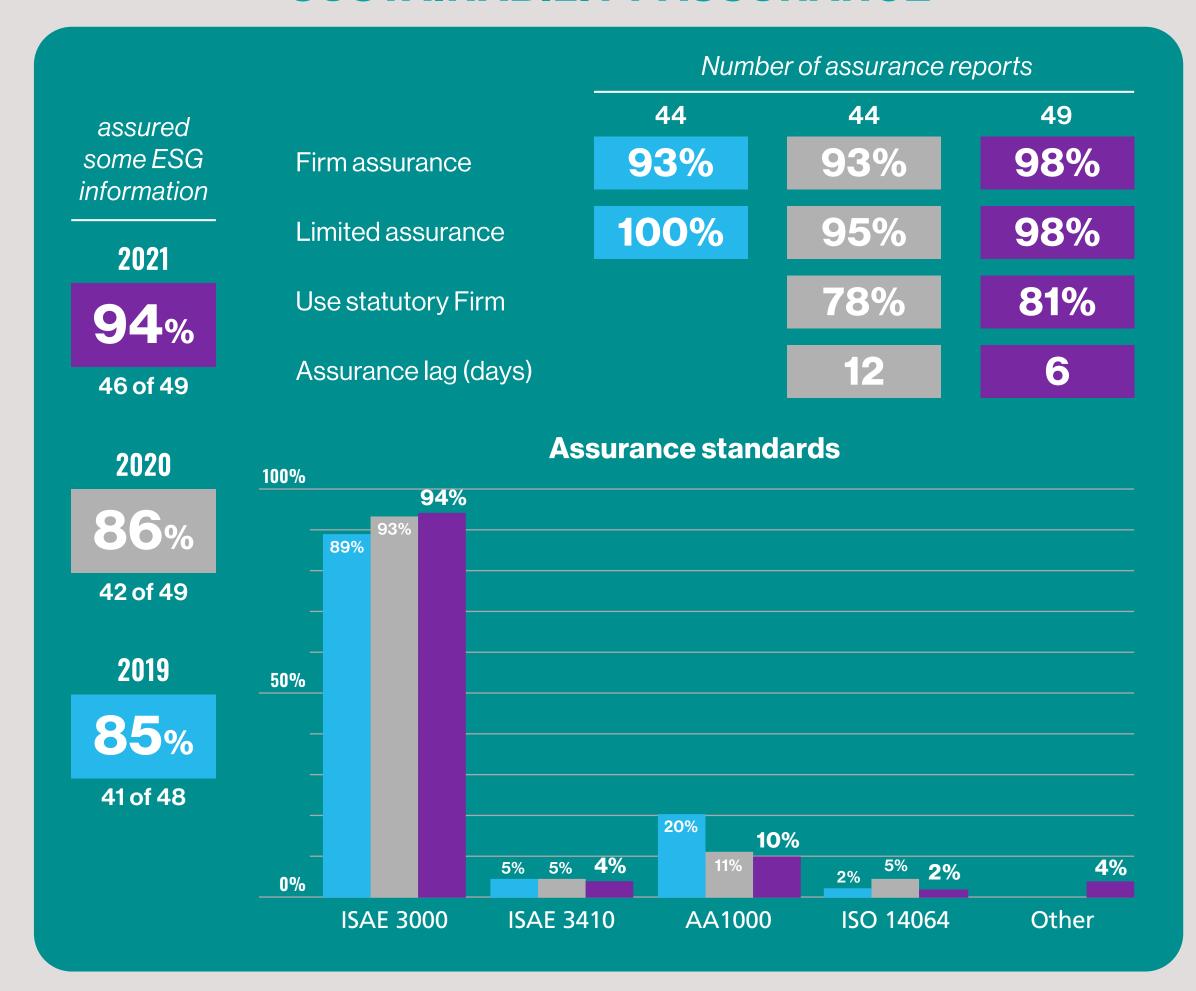
 Second largest three-year growth of Annual Reports (34%) from 8% to 42%

#### **ASSURANCE**

• Tied for second highest audit firm assurance market share (98%) globally

## **SUSTAINABILITY DISCLOSURE**













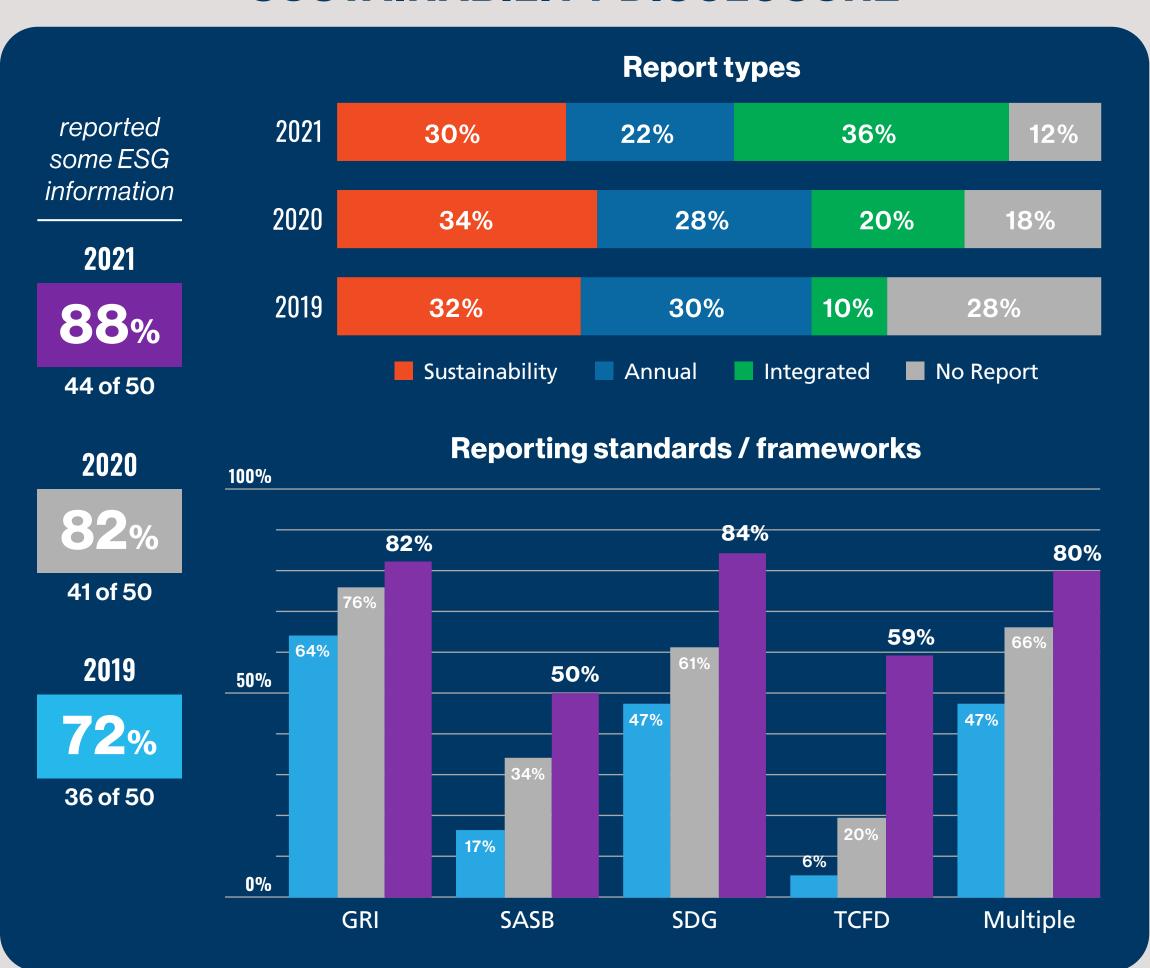
#### **DISCLOSURE**

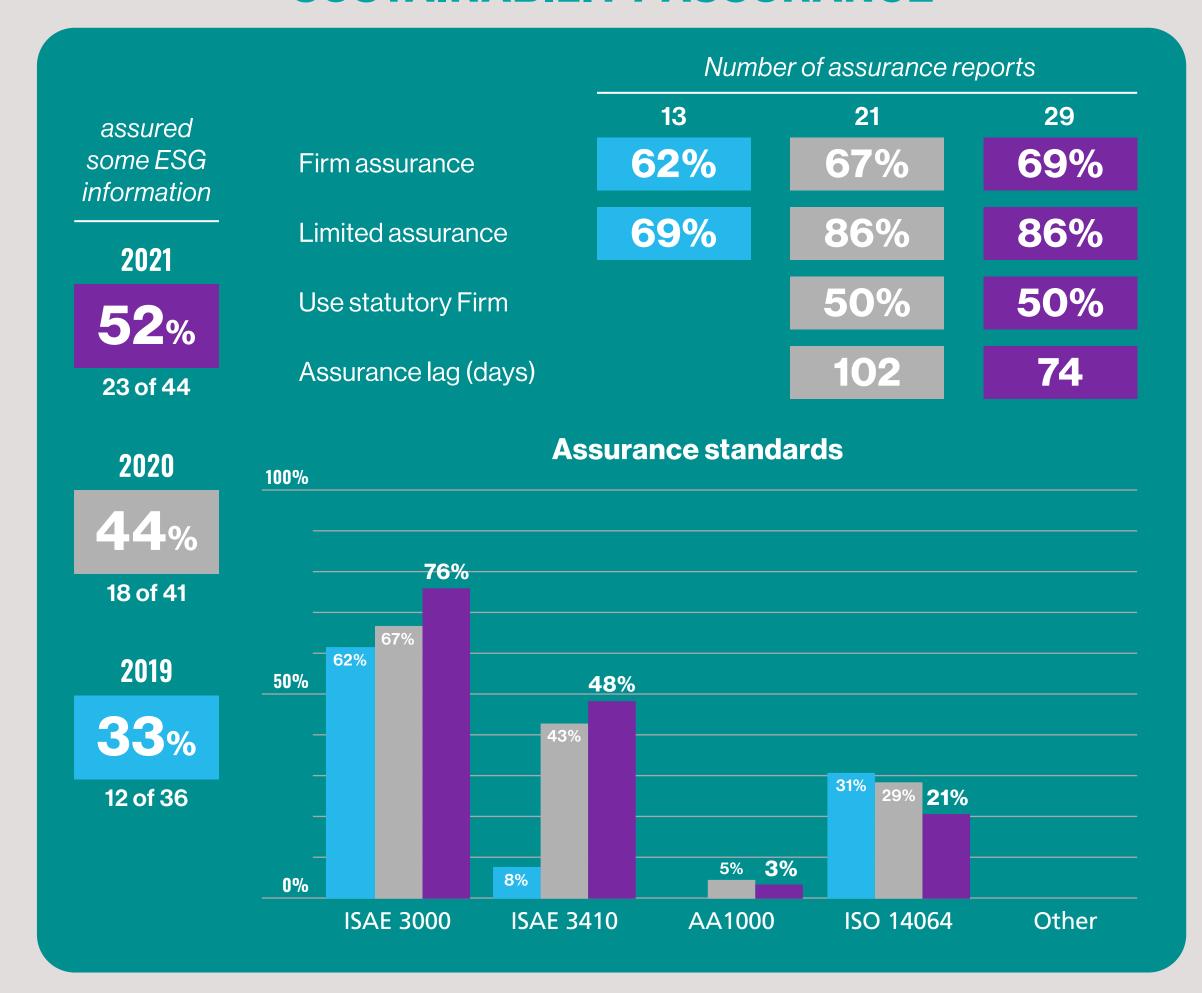
 Second largest three-year growth of sustainability reporting (16%) from 72% to 88%

#### **ASSURANCE**

 Biggest assurance lag improvement (28 days) globally

## **SUSTAINABILITY DISCLOSURE**









# UNITED KINGDOM Region: OTHER E



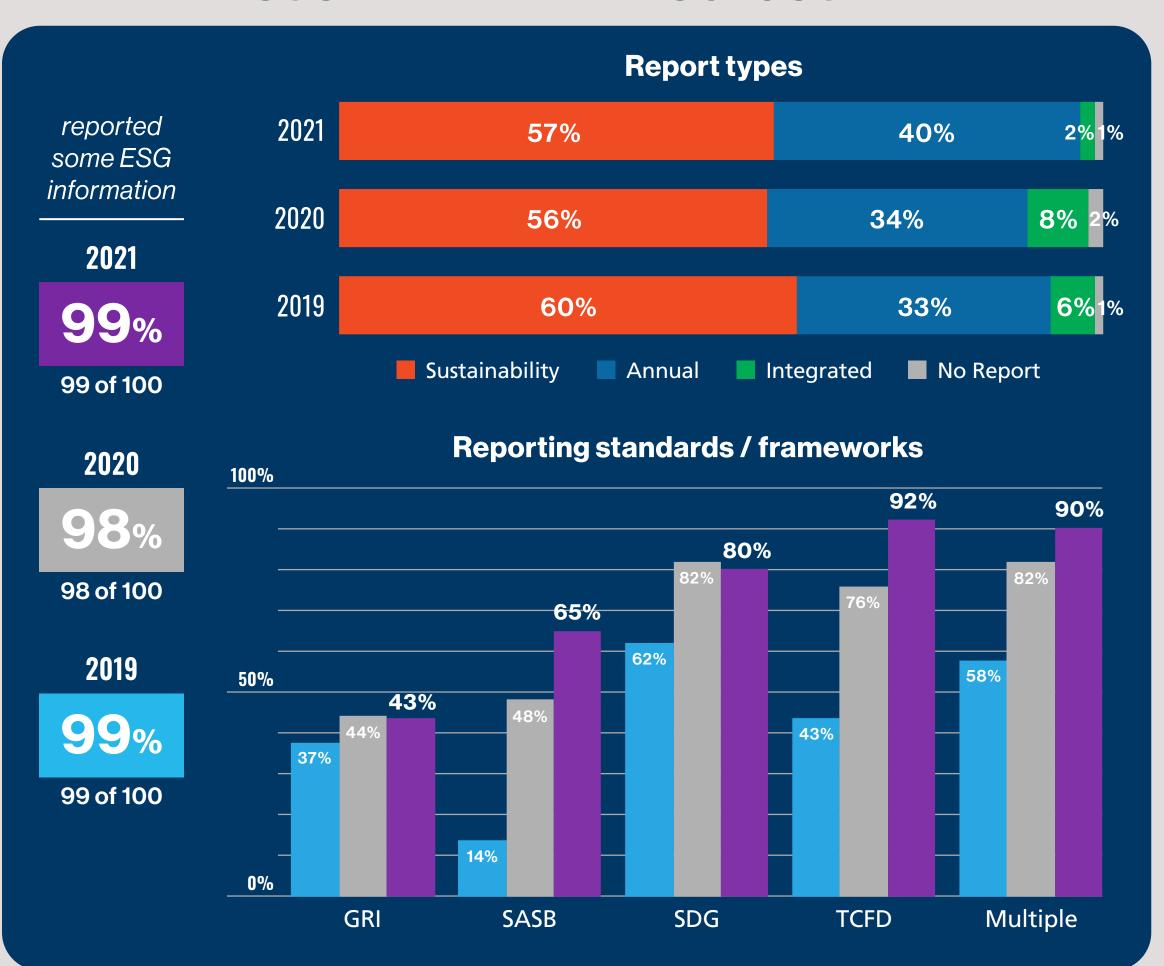
#### **DISCLOSURE**

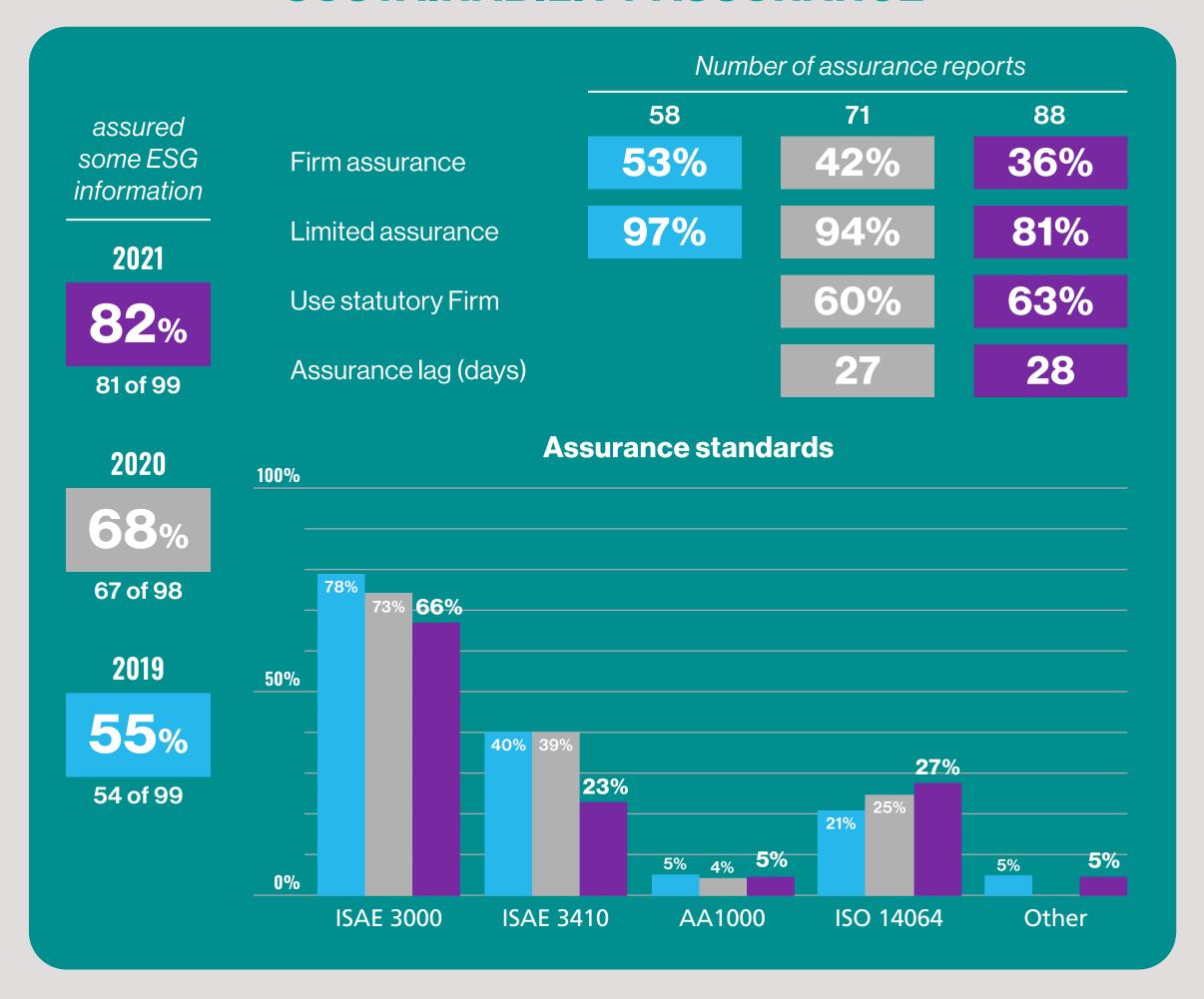
 Highest rate of net zero emissions reduction targets (79%) globally

#### **ASSURANCE**

• Largest three-year growth of assurance rates (27%) globally

## **SUSTAINABILITY DISCLOSURE**









# UNITED STATES



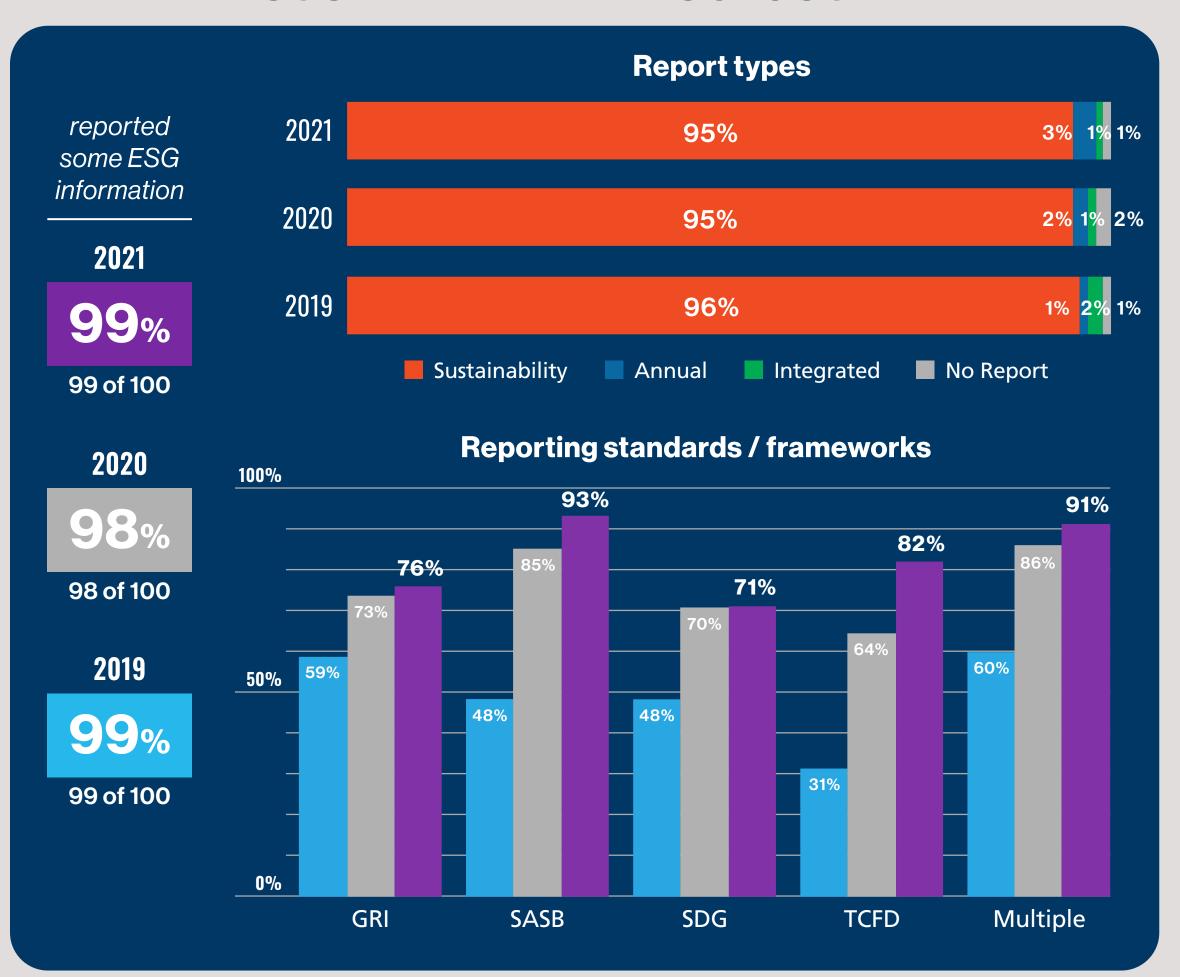
#### **DISCLOSURE**

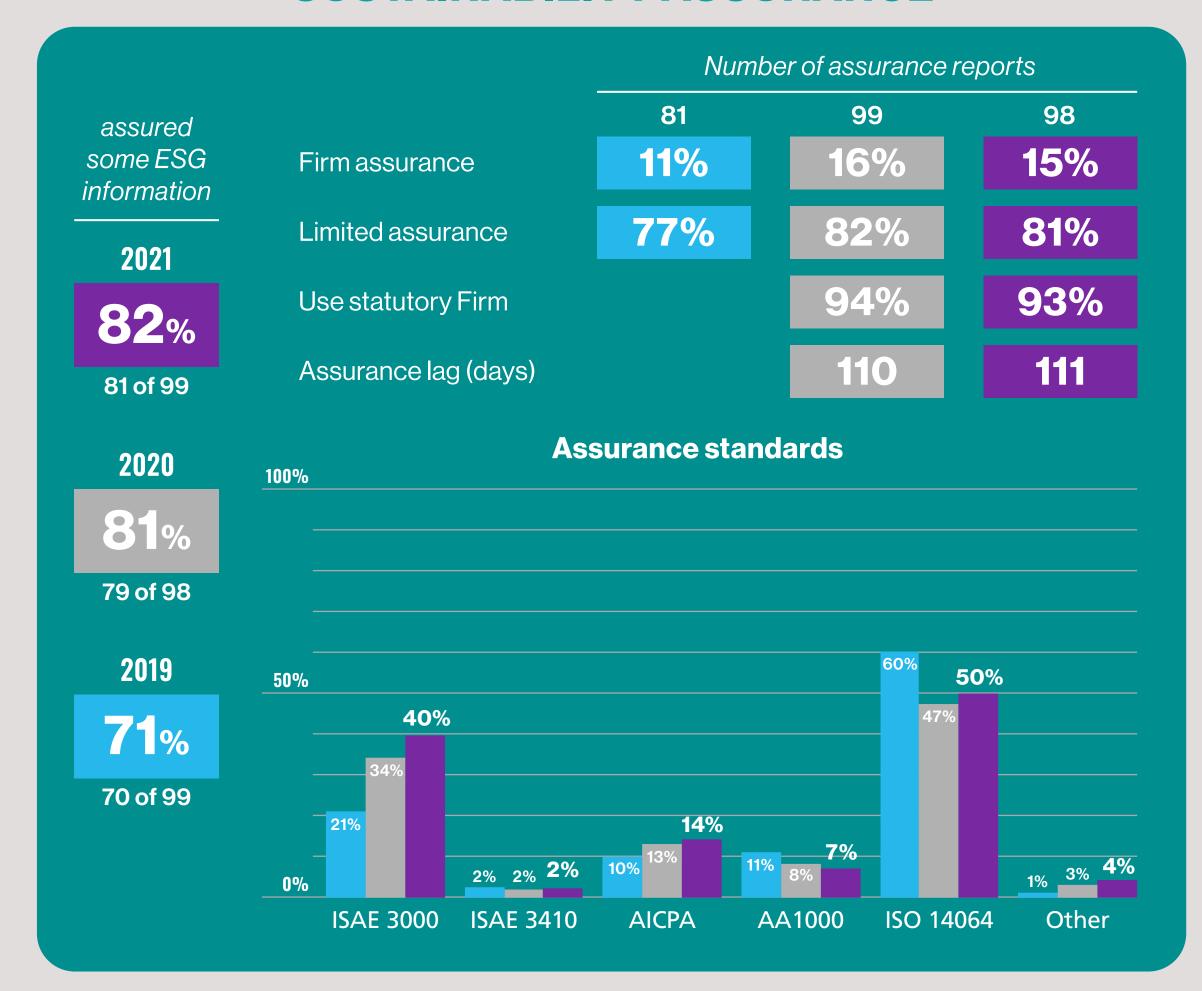
 Highest rate of emissions reduction targets (97%) globally

#### **ASSURANCE**

 Second lowest audit firm assurance market share (15%) globally

## **SUSTAINABILITY DISCLOSURE**









# METHODOLOGY

















# METHODOLOGY

This study reviewed the largest companies in each jurisdiction by market capitalization as of approximately March 21, 2021, for fiscal years 2019 and 2020, and March 21, 2022, for fiscal year 2021. Company jurisdiction was based on the location of the company's headquarters. The largest 50 companies were reviewed in 16 jurisdictions for fiscal years 2019 and 2020, and 15 jurisdictions for fiscal year 2021. The largest 100 companies were reviewed in the six largest economies (denoted with an asterisk). The jurisdictions that make up the G20, Spain, Hong Kong S.A.R., and Singapore were selected to ensure the jurisdictions had at least 50 listed companies to review. Jurisdictions with 100 companies reviewed were selected based on the largest nominal GDP as of March 21, 2021.

Americas	Europe, Middle East, and Africa (EMEA)	Asia-Pacific
<ul> <li>Argentina</li> <li>Brazil</li> <li>Canada</li> <li>Mexico</li> <li>United States of America*</li> </ul>	<ul> <li>France</li> <li>Germany*</li> <li>Italy</li> <li>Russia</li> <li>Saudi Arabia</li> <li>South Africa</li> <li>Spain</li> <li>Turkey</li> </ul>	<ul> <li>Australia</li> <li>China's mainland*</li> <li>Hong Kong S.A.R.</li> <li>India*</li> <li>Indonesia</li> <li>Japan*</li> <li>Singapore</li> <li>South Korea</li> </ul>
	<ul><li>United Kingdom*</li></ul>	

Russia was excluded for fiscal year 2021 due to issues accessing public company documents and websites. Excluding Russia from prior results would have resulted in 52% of companies receiving assurance in 2019 (instead of 51%) and 60% audit firm market share in 2020 (instead of 61%). The impact on other reported information was deemed immaterial.

### DATA COLLECTION METHODOLOGY



Reports were located on a company's website in one of four places:

- 1. Dedicated sustainability web page for stakeholders
- 2. Sustainability web page under "About the Company" section
- 3. Annual reports or downloads section of investor relations web page
- **4.** Sustainability section of investor relations web page

If a report could not be located on a company's website, the company name was searched with the term "2021 sustainability report." If a report was still not located, the company was search in the GRI Database of sustainability reports. For Hong Kong Stock Exchange (HKEx) listed companies, the exchange website was used to collect reports if a report could not be found on a company's website. This only impacted companies located in China's mainland and Hong Kong S.A.R.

Emissions reduction targets and transition plans were collected as of fiscal year 2021. Emissions reduction targets and transition plans were usually located in one of six places:

- 1. Sustainability Report
- 2. Annual Report
- **3.** Integrated Report
- **4.** Company Website
- **5.** TCFD Website
- **6.** Other climate report

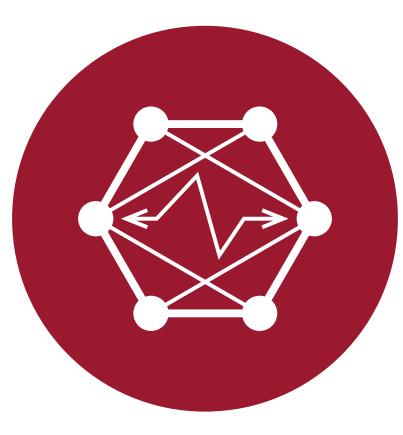
Emissions reduction targets and transition plans were not always located together. All locations were reviewed for each company to ensure all targets or transition plans were observed. For targets and transition plans that were located on a website, date of publication was used to ensure targets and transition plans related to fiscal year 2021 or earlier.





# METHODOLOGY

# REPORT CLASSIFICATION



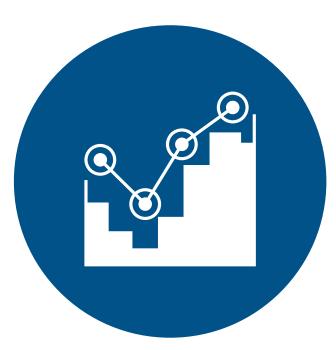
Reports were classified into three groups: sustainability reports, annual reports, and integrated reports.

Sustainability reports were identified as those published for the sole or main purpose of informing stakeholders of environmental, social, or governance activities and performance. Annual reports were identified as those published for the main purpose of informing stakeholders of financial performance. Annual reports were

only collected if they included sustainability or ESG reporting. Integrated reports were identified as those published pursuant to the <IR> framework issued by the International Integrated Reporting Council.

For companies that issued more than one report, a hierarchy was used to determine which report to collect. If an integrated report was published, the company was counted as reporting in an integrated report, regardless of any other publications. If a company published both an ESG report and published this ESG information within an annual report, the company was counted as reporting in an annual report.

# REPORTING STANDARDS



Reporting standards were collected from the "About this Report" section. Both reporting standards and reporting frameworks were captured due to inconsistent disclosure regarding their use as standards or frameworks. Next, any standards or frameworks indexed in the appendix were collected. Finally, a text search for the Global Reporting Initiative (GRI), Sustainability Accounting Standards Board (SASB), United Nations Sustainable Development Goals (SDG), and Task force on Climate-related Financial Disclosures (TCFD) was used to find additional references within the body of the report. Standards and frameworks must have been used to report primary information to stakeholders.

#### **ASSURANCE**



A company was determined to have obtained assurance if an assurance report that covered ESG data was found within a report, on the company's website, or in the CDP database. Verification statements were not counted, nor were references to assurance where a specific assurance report was not available. If a report included more than one assurance report, each report was reviewed separately.











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