

9 January 2013

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Ms Merran Kelsall Chairman Auditing and Assurance Standards Board PO Box 204 Collins Street West MELBOURNE VIC 8007

Email: edcomments@auasb.gov.au

Dear Ms Kelsall

RE: Comments on proposed ASRE 2400 (Revised) Review of Financial Report Performance by an Assurance Practitioner who is not the auditor of the entity

Hayes Knight is pleased to be given the opportunity to provide comments on the ASRE 2400 (Revised).

We are responding on behalf of the Hayes Knight Australian Network of firms, each of which is a separate and legal entity.

We are a member firm of Morison International, the winners of the 2012 International Accounting Bulletin Awards for "Association of the year" and "Rising Star Association".

Overall Comments

We are supportive of the various clarifications and guidance provided in the ASRE 2400 (Revised) that will help assist the practitioners in performing review engagements and provide better clarity for users about the nature of the review engagement.

However, we believe that some practitioners (in particular those that do not perform audit engagements on a regular basis) may face difficulties in determining what is "sufficient appropriate" evidence in a review engagement as against what is "sufficient appropriate" evidence in an audit engagement.

Furthermore, the standard should state that while reviews involve the application of audit skills and techniques, they do not usually involve many of the procedures ordinarily performed during an audit.

Our response to the specific questions are included in Appendix 1.

We would be pleased to discuss any comments further.

Please contact me on (02) 9221 6666 if you require any further information.

Yours faithfully, Hayes Knight (NSW) Pty Ltd

Pran Rathod - Director Audit Services Registered Company Auditor



Request for Comments

Question 1

Have applicable laws and regulations been appropriately addressed in the proposed standard?

We believe that all applicable laws and regulations have been appropriately addressed in the proposed standard.

Question 2

Are there any references to relevant laws or regulations that have been omitted?

We are not aware of any omission of relevant laws and regulations.

Question 3

Are there any laws or regulations that may, or do, prevent or impede the application of the proposed standard, or may conflict with the proposed standard?

No.

Question 4

What, if any, are the additional significant costs to/benefits for assurance practitioners and the business community arising from compliance with the main changes to the requirements of this proposed Standard on Review Engagements? If there are significant costs, do these outweigh the benefits to the users of assurance services?

We believe that whilst additional costs may arise, the benefits will outweigh these costs. Please also refer to our comments in the covering letter.

Question 5

Are there any other significant public interest matters that constituents wish to raise?

We are not aware of any other significant public interest matters.