

## Drafting Guidelines for the Restructured IESBA Code<sup>1</sup> As of November 2017

### I. Background

1. This document is prepared by the IESBA Staff and summarizes the general drafting guidelines that were adhered to in restructuring the extant Code. It also includes a description of the approach used to develop safeguard-related revisions to the extant Code arising from the Safeguards project. This document is not intended to be comprehensive.
2. The compilation of texts being put forward for IESBA approval in December 2017 (i.e., the restructured Code) result from the work of the Structure of the Code (Structure), Safeguards, Part C – Applicability and Professional Skepticism projects. The compilation is included in **Agenda Item 2-C** and does not include inducement provisions which is a separate work-stream. The IESBA approved proposed text for exposure to revise the extant inducement provisions in June 2017. The comment period for the [Inducements Exposure Draft](#) ends on December 8, 2017 and the IESBA anticipates finalizing this work-stream in 2018.

### Overview of Restructured Code

3. The compilation of texts includes a combination of revised and restructured texts and is included in **Agenda Item 2-C**. The following texts are revised from that which formed part of the extant Code:
  - Safeguard-related text (all text shaded in gray).
  - Paragraphs R120.4 and R300.5 to 300.5 A1.
  - Paragraphs 120.5 A1 to 120.5 A2; and 120.13 A1 to 120.13 A2.
4. The remaining texts are restructured from the extant Code, including the finalized [NOCLAR pronouncements](#), [long association](#) and [Part C Phase 1](#) provisions.

### Matters Relevant to Restructuring Extant Texts

5. Avoid changing meaning when redrafting unless approved by the Board. Care is needed not to weaken the extant Code by deleting existing requirements, except where the Board has determined on a change of substance.
6. A requirement may be considered for deletion if it is clearly unnecessary to the substance or understandability of the Code (for example, if it is already covered by another requirement). It may also be considered for deletion if it can be covered through cross-referencing to the overarching requirements of the conceptual framework, provided that there is no loss of substance and specificity. The tests included in paragraph 30 might help.
7. Alert the Board to matters that the Task Force believes require Board decision, for example, whether a matter could potentially involve a substantive change that would go beyond the scope of the Structure of the Code project.
8. In developing initial proposed restructured texts, the disposition of the material of the extant Code needs to be capable of being tracked. Generally, proposed changes should be shown by way of mark-up of the text. However, if the mark-up becomes incomprehensible, a mapping table of comparison should be used.

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<sup>1</sup> This set of guidelines is a working reference document for future drafting purposes. Paragraphs 1-4 will be deleted once the text of the restructured Code has been approved.

## II. General Drafting Conventions

### Use of the Term “Fundamental Principles” Versus “Principles”

9. The phrase “fundamental principles” is used when referring to the fundamental principles in their entirety. When referring to individual fundamental principle(s), the Code uses the word “principle(s)” only (e.g. “the principle of integrity” or “the principles of integrity [and/or] objectivity”).

### Use of the Term “Facts and Circumstances”

10. The term “facts and circumstances” is used in a broader context as an “umbrella” term to encompass “...facts and circumstances, including professional activities (services), interests and relationships...” The term “...facts and circumstances, including professional activities (services in Section 300), interests and relationships...” is used in situations where the Code requires a more specific reference to, or emphasis of, “relationships” or “interests” (see paragraphs 120.5 A1 and 300.1).

### Definitions or Descriptions

11. Consider whether a term should be included in the glossary section based on whether it is essential to the understanding of the Code. If so, include it in the glossary section.
12. Consider whether the wording is a definition or a description of what the term might include. A signal as to whether something is descriptive is when the section of the Code states that the [term] includes [this or that].
13. Repeating terms that are already included in a definition should be avoided. For example, “those charged with governance” is sufficient and it is unnecessary to add “of the organization, such as a board of directors or the audit committee.”

### Use of the Terms “Professional Accountant”, “Firm” and “Network Firm”

14. “Professional accountant” is used in Part 1 - *Complying with the Code, Fundamental Principles and Conceptual Framework* and in Part 2 – *Professional Accountants in Business*, where it is relevant to a professional accountant’s compliance with a fundamental principle or application of the conceptual framework because it relates to the behavior of an individual accountant. “Professional accountant” is also used in the introductory material in Part 3 – *Professional Accountants in Public Practice*.
15. In certain circumstances where it is required by the context, particular provisions refer to specific individuals instead of to professional accountants, for example:

“510.10 A1 A self-interest threat might be created if an audit team member knows that a close family member has a direct or material indirect financial interest in the audit client.”
16. “Firm” is used where the context requires the use of the word firm, for example: “higher levels of management within the firm” or “the financial statements on which the firm will express an opinion;” or in the application material on conflicts of interest where the situations or actions to be taken presume the involvement of more than one professional accountant; and in the discussion of network firms. “Firm” is also used in relation to examples or in general descriptive material, for example, “...The engagement partner having authority within the firm for decisions concerning compliance with the fundamental principles, including decisions about accepting or providing services to a client.”
17. “Firm” on its own is used in Part 4A - *Independence for Audits and Reviews* and Part 4B - *Independence for Assurance Engagements Other than Audit and Review Engagements* where the context of a requirement applies only to a firm, for example, “a firm shall not hold a financial interest ...” In Parts 4A and 4B, “firm” is also used for ease of reference to refer to those in a firm who have responsibility for compliance with independence requirements.

18. The term “firm” is not used to include “network firm.” Rather, in Part 4A, the term “firm or network firm” is used:
  - Where the circumstances described in a requirement (a “shall” statement) or an exception to a requirement specifically apply to both a firm and a network firm.
  - In application material:
    - Where the material specifically refers back to a requirement that refers to a firm or network firm.
    - Where the material sets out specific circumstances which are not addressed by a specific requirement, but in which both the firm and network firm must be considered.
19. The term ‘network firm’ is used almost exclusively in Part 4A. Examples of circumstances that are relevant to a network firm (as well as to the firm) include where a network firm holds a financial interest in an audit client or provides non-assurance services to an audit client.
20. Acceptable combinations of references to individuals, firms and network firms in Parts 4A and 4B are specifically identified individuals in the firm or their family members, and a firm or a network firm (or some combination of references as appropriate to the circumstances that a particular provision addresses).

### **Introductory Paragraphs**

21. Each section within Parts 2, 3, 4A and 4B includes introductory paragraphs to relate back to the underpinning material in Part 1, as described below:
  - (a) For overall introductory sections (200, 300, 400 and 900), include:
    - A requirement to comply with the fundamental principles and apply the conceptual framework; and
    - In the overall introductory independence sections (400 and 900), a requirement to be independent
  - (b) For other specific sections addressing a particular topic, and subtopic, (for example 210, 310, 410, 510, and 800, 910 and 999) include:
    - A reference to the requirement to comply with the fundamental principles and apply the conceptual framework, and, in the specific independence sections (for example 410, 510 and 910), to be independent.
    - A description of the category(ies) of threat(s) that might be created, unless most or all of the categories of threat might be created, such as in Sections 210, 310, 800 and 999;
    - In Parts 2 and 3, a description of the specific fundamental principle(s) with which compliance might be threatened. In some of those sections, compliance with most or all of the fundamental principles might be threatened. In that case, the introductory paragraphs refer to “one or more of the fundamental principles” and reference to specific principle(s) is included in application material, as appropriate. In Parts 4A and 4B, the introductory paragraphs in the sections refer to threats to independence rather than to threats to compliance with specific fundamental principle(s); and
    - A statement that the section sets out specific requirements and application material relevant to the topic being addressed by the section.

- (c) For Section 600 (which addresses in overall introductory terms, non-assurance services provided to an audit client), include:
    - A reminder of the requirement to comply with the fundamental principles, be independent, and apply the conceptual framework to threats to independence;
    - A brief overview description of the type(s) of threat(s) that might be created; and
    - A statement that the section sets out specific requirements and application material relevant to topics being addressed by subsections.
  - (d) For Subsections 601 to 699, include:
    - A reference to the Section 600 requirement to apply the conceptual framework;
    - A brief overview description of the type(s) of threat(s) that might be created; and
    - A statement that the material in Section 600 applies to the subsection and that the subsection sets out specific requirements and application material relevant to the topic being addressed by the subsection.
    - A reference to some services being prohibited, where applicable.
22. Include in the introductory section only material which is necessary to clarify the context/scope of the section. Avoid unnecessary exposition of the topic in the introductory section to minimize the potential for confusion over the status of such material. Consider whether any material in the introductory paragraphs is better placed in application material relating to a requirement.

### **Describing “Threat(s)”**

23. The Code includes a general description of each of the categories of threats (i.e., self-interest, self-review, advocacy, familiarity and intimidation) in Section 120, 200 and 300. Sections 200 and 300 describe how Parts 2 and 3 respectively use the term “threats” to refer to threats to compliance with the fundamental principles. Sections 400 and 900 describe how, for those Parts, firms are required to apply the conceptual framework to threats to independence and to threats to compliance with the fundamental principles that are linked to independence.
24. Except for Sections 210 and 310, each section of Parts 2, 3, 4A and 4B of the Code includes examples of specific facts and circumstances that might create threats. Depending on the nature of the topic in the section of the Code, this material is included either:
- As a general statement in the introductory paragraphs;
  - With specific descriptive details about the circumstance(s) that might create the threat in an application material paragraph; or
  - Both.
25. The approach used achieves the right balance between avoiding unnecessary repetition while at the same time providing adequate guidance to explain when and how a fact and circumstance might create a threat, including where possible, the specific type of threat(s). Reference is made to specific categories of threats as described below:
- The introductory and application material paragraphs in Parts 2, 3, 4A and 4B. Except for in Sections 200, 210, 300, 310, 400 and 900, a reference is made to the circumstances that might create the specific category of threat(s), (i.e., whether the threat is a “self-interest” or “familiarity” threat).

- The term “threat(s)” is used in a general manner, with no additional description, in the general Sections of the Code (i.e., 200, 300, 400 and 900) that further explain how to apply the conceptual framework. In Sections 400 and 900 reference is made to “threats to independence.”

### **Examples of Factors Relevant to Evaluating Threats**

26. Parts 2, 3, 4A, and 4B of the Code include application material paragraphs with examples of “Factors that might be relevant in evaluating the level of ... threat(s)” (i.e., factors paragraphs). The factors paragraphs are tailored based on material being discussed in the respective sections of the Code. The tailored approach minimizes repetition in the Code, while also providing professional accountants with specific guidance for evaluating the level of threats. For example:
- Factors paragraphs that are positioned immediately after a paragraph that describes a specific category of threat use the word “such” to refer back to that threat. When there is a reference to one category of threat, “such a threat” is used; and when there is a reference to more than one category of threats, “such threats” is used.
  - In some circumstances, it is appropriate for a factors paragraph also to refer to the circumstances that create the threat(s). This is done if the material that immediately precedes the factors paragraph does not include that information.

### **Examples of Actions to Address Threats**

27. Examples of “safeguards” that were included in the extant Code that are not effective in reducing the level of a threat to an acceptable level are either re-characterized as “factors that are relevant to evaluating ...” or deleted. The Code includes application material with “examples of actions that might eliminate ....threat(s)” and “examples of actions that might be safeguards to address... threat(s)” (i.e., action paragraphs).
28. In describing actions taken to address threats, a reference is made to the specific threat(s) that the actions are intended to eliminate or reduce to an acceptable level. Similar to the approach used to develop the factors paragraphs, the actions paragraphs are tailored based on material being discussed in the respective sections of the Code in order to minimize repetition while simultaneously providing guidance for addressing specific threats. For example:
- In some circumstances, it is appropriate for an action paragraph to refer to the circumstances that create the threat(s). This is done if the material that immediately precedes the action paragraph does not include that information.
  - Action paragraphs that are positioned immediately after a paragraph that describes a specific category of threat use the word “such” to refer back to that threat and include the category(ies) of threat(s). When there is a reference to one category of threat, “such a [category] threat” is used; and when there is a reference to more than one category of threats, “such a [category1 or category 2] threat” is used.
  - When an action paragraph includes a bulleted list of examples to address the same threat(s), the lead in statement that precedes that list refers to the specific threat(s). In other cases, a reference is made to the specific threat within the bullet point that describes the action that might address the threat. This is to provide a direct link between the action(s) and the threat(s) that it is intended to address.

### **Ordering of Requirements and Application Material**

29. The order of the requirements and application material reflects the principles basis of the Code, as described below:

- Application material related to applying the conceptual framework is set out first, followed by specific requirements.
- Where a section includes requirements and application material that pertain to public interest entities, those provisions should be placed after any specific provisions that pertain to non-public interest entities.
- Application material that is specific to a particular requirement should follow the related requirement as closely as possible.
- If a section addresses several subtopics (for example, Section 410 – *Fees*), the material is grouped by subtopic first and the above order is then followed within each subtopic.

### **Requirements (including Prohibitions)**

30. When determining whether a particular provision is to be drafted as a requirement or not, the following tests might help:
  - If the Board has determined that the matter represents an obligation (that is, is a “shall” statement), it is a requirement. It might be possible to cover the matter by cross-referencing to the overarching requirements of the conceptual framework, provided that there is no loss of substance and specificity”
  - If it adds to another requirement, it is a requirement. Consider adding application material to spell out the relationship between the two.
  - If it makes an exception to another requirement, it is a requirement. Consider adding application material to spell out the relationship between the two.
  - If it explains that, in a particular context, compliance with another requirement means doing x, it is application material.
  - If it repeats the substance of another requirement, perhaps using different wording, it is redundant and potentially confusing to the reader. Consider whether it is a separate requirement, is application material or is not necessary at all.
  - If it describes a circumstance that simply alerts the professional accountant that a threat might be created, and therefore the conceptual framework must be applied, it is application material.
31. Use “shall” for a requirement to take action and “shall not” to prohibit action. (“May not” might suggest to some users that they could choose whether or not to do it.) Both “shall” and “shall not” statements, if the context requires, can be conditional in nature. Limit inclusion of “essential” explanatory material in the requirements section to those instances where it is necessary to clarify the scope of a requirement. Explanatory material that uses the phrase “for example” creates confusion when included as part of a requirement. Examples are normally reserved for application material.
32. Avoid using qualifiers in application material relating to the activities of the professional accountant such as “ordinarily,” “generally,” “normally” and “usually” where these might create ambiguity as to whether these activities are requirements. If such qualifiers are used, they should be limited to statements of fact (not actions), for example, “Usually, such a position is seen to imply a close association with the entity.”
33. Use “if” to state a condition that might not be met. Keep “where”/“when” for situations that routinely arise.
34. In a Part, abbreviate “professional accountant in business” or “professional accountant in public practice” to “professional accountant” once it is established which type of professional accountant the Part relates to.
35. Consider whether each requirement is correctly addressed to:

- A professional accountant – which is defined to include a firm of professional accountants in public practice, where appropriate.
- A firm (which is defined in some Parts to include the professional accountant).

As a general guideline, sections related to independence refer to the firm or, in the case of audits and reviews, a firm or network firm, unless otherwise explained in the Section. (See paragraphs 14 to 20.)

36. When the application of a requirement depends on whether something is “material” (or “significant”), make it clear to whom the materiality or significance assessment applies.
37. With very few specific exceptions, requirements should not make cross references to application material because requirements should be self-contained. One of the specific exceptions to this guideline is illustrated by Sections 800 or 999 which address permitted modifications in specific circumstances that might affect both requirements and application material. For example, rather than repeat the description of all of the individuals to whom an exception set out in paragraph R800.13 applies, the paragraph simply refers back to the application material that describes those individuals.

#### *Exceptions to Requirements*

38. If there is an exception to a specific requirement:
  - It is designated “as an exception to RXXX.X, ”,
  - It follows as closely as possible the related requirement; and
  - The related requirement includes language to signal that an exception exists (for example, “Subject to ...”).

When conveying permission in an exception it is appropriate to use “may.”

#### **Application Material**

39. The present tense should not be used in application material for actions that the professional accountant or firm should take unless those actions have been mandated by requirements. For example, it would be acceptable to use the present tense to say “Paragraph XXX requires ...” or “The conceptual framework requires”
40. Be careful not to extend or contradict a requirement within the application material. An example of this is where a requirement states: “The professional accountant shall (do something)”, and the application material states: “(Doing something) includes doing X, Y and Z.”, or the application material states “If (doing something) cannot be done, then (something else) might be done”. If it is important to the clarity of the requirement, then include it as part of the requirement. If it is strictly application material, then use appropriate qualifiers (e.g., (Doing something) might include consideration of such matters as, for example...).
41. In order to avoid using the present tense, consider the following:
  - If it simply paraphrases a requirement in the Code, is it needed at all, or can a cross-reference suffice?
  - Can “might” or “for example” be inserted to highlight the action as a suggested or possible procedure? For example, “Given the exceptional nature of the circumstances, the professional accountant might consider it appropriate to seek legal advice when deciding whether to withdraw from an engagement...,” or “Examples of matters that the professional accountant might consider include [X, Y, Z].”
42. Not all requirements need application material. However, in some cases, development of application material (even if only a few sentences) may be appropriate. Such application material will normally relate

to applying the conceptual framework to the general topic covered by a section, while more specific application material will follow a specific requirement within the section.

43. Use the word “may” for when a matter is permitted and use the word “might” with reference to a matter where there is a possibility that something will or will not occur.

### Numbering

44. The numbering system clearly distinguishes requirements and application material as follows:

<b>R700.3</b>	Requirement
700.3 A1	Application material
700.3 A2	Application material

In some cases, application material may not relate directly to a specific requirement; such application material uses a different sequential number from a paragraph immediately before or after it. In addition:

- Introductory material is numbered sequentially and is not designated by an “R” or an “A”.
- Sequential numbering is used with respect to A1, A2, A3 for application material grouped under a “general” heading.
- Application material that relates to a requirement follows the requirement (e.g., R240.3) and is numbered sequentially as A1, A2, A3, etc., (e.g. 240.3 A1, 240.3 A2).

### Cross-References

45. Where necessary, place cross-references at the end of a component of a requirement (that is, where a requirement has more than one component and there is application material related to that component, the cross-reference should be made at that point). The format for cross-references is (Ref: Para. XXX.XX AX, YYY.YY AY).
46. Avoid repetition of numeric references if such references affect the readability of the text. This might be achieved by using a short narrative description instead of numbers although, if such paraphrasing creates ambiguity or inaccuracy, a numeric reference is preferable.

### Use of Headings and Subheadings

47. Keep headings as short as possible, preferably no more than one line. To be useful each heading should aim to indicate as closely as possible the nature of the text that follows and all relevant text must appear under its heading. Conventionally headings are used when there is a change of subject matter. In addition:
- Where there are no specific requirements for non-PIE or PIE audits (which includes Section 600 itself but not its subsections), group material that applies on an overall basis to a topic (or subtopic) near the beginning of the topic (or subtopic) under the heading “General”, followed by any more specific material with separate descriptive headings.
  - In *International independence Standards* where there are references to non-PIE and PIE audit clients (e.g., Sections 410, 524, 540 and in all of the subsections in Section 600 NAS series) use “All Audit Clients” instead of “General” as a heading to introduce the provisions that apply on an overall basis in the subsection or subtopic. Position any specific provisions that apply to non-PIEs (“Audit Clients that are not Public Interest Entities”), followed by any PIE provisions (“Audit Clients that are Public Interest Entities”) under those subheadings as a subset of “All Audit Clients.”



- If application material deals with a specific matter beyond general matters it should have a sub-heading, exercising discretion if the use of too many subheadings becomes distracting.
- Insert a subheading for an “R” paragraph or group of “R” paragraphs where there is a change of topic, exercising discretion if the use of too many subheadings becomes distracting or the requirement flows naturally from the preceding material.

## **Formatting**

48. Heading styles to be used, starting from a main section heading (e.g., requirements), are as follows:

**14 POINT, BOLD UPPERCASE (Titles of Parts, Sections, Subsections)**

**12 Point, Bold (e.g., Requirements)**

**10 Point, Bold**

*10 Point, Italicized*

10 Point, Plain Text

10 point, plain text

10 point, indented plain text

## Appendix 1

### Considerations to Enhance Clarity and Readability of Text

#### Clarity and Ease of Reading

##### *Keep it Short*

1. Aspire to short sentences so there are not more than two lines to the next full stop or paragraph break. Split sentences, reduce wordiness, or introduce list format (bullets or numbers). Aim for a maximum average sentence length of 20 words.
2. Whenever clarity of responsibility is relevant, use the active voice instead of the passive voice. This shortens text as well as clarifying who is to do what. In application material, where reflecting the context and environmental factors that are important to the explanatory nature of the material, the passive voice may be used.
3. Remove duplication. Remove words that add no new meaning. Consider replacing text with a cross-reference but not if the cross-reference makes a requirement dependent on application material, other than in Sections 800 or 999, which address permitted modifications in specific circumstances that might affect both requirements and application material.
4. Where the term “professional accountant” has been used once in a paragraph, then any following reference to that same professional accountant is normally to an “accountant.”
5. Where the term “audit client” has been used once in a paragraph, then any following reference to that same client is normally to “client.”

##### *Prefer Short, Familiar Words to Complex or Unusual Ones*

6. Use “consider” when the professional accountant is required to think about several matters, or when it may be appropriate for the professional accountant to do so, but not necessarily to arrive at a particular determination.
7. Use “evaluate” when the professional accountant has to assess and weigh the significance of a matter.
8. Use “determine” when the professional accountant has to conclude and make a decision.
9. Apply the preferences in this Table.

Try to edit out of extant Code	Prefer
Discontinue	End
Impose an obligation on	Require <sup>2</sup>
Person	Individual
Purchaser	Buyer
Contains	Sets out (Usually used in “formal” context; “describes” is sometimes used in less formal context.)
Staff	Personnel
Terminate	End
With regard to	To (unless context requires otherwise)

<sup>2</sup> If “require” is used in the context of requirements use “impose an obligation on” as it is more elegant than “requirements require.”

Employer	Employing organization (Usually used in the context of “employer” mainly in Parts 1 and 2, and if used more than once in a sentence or paragraph, additional reference may be made simply to “organization”. “Entity” is used as a more all-encompassing term in Parts 3 and 4, unless the context requires “organization”.)
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### *Make it Easy to Translate*

10. Consider whether a word is known to be difficult to translate and consider alternative wording or define.
11. Unless it is clear in context, avoid references to “it” or “this” – repeat the noun so the translator will not have to work out meaning from context.
12. Where the meaning is clear prefer the use of possessive nouns, i.e., “or that individual’s immediate (close) family member” instead of “an immediate (close) family member of that individual.”
13. Aspire to a reading grade for each section of the Code equivalent to not more than a university graduate level.<sup>3</sup>
14. Use sub-lettering (e.g., (a), (b)) when expressing a complete list. This is usually the case when dealing with lists in the requirements section. Use bullet points when expressing a list that is not intended to be complete. This is usually the case when dealing with lists of examples in application material to the requirements. Use sub-lettering/bullet points wherever possible. For example:

#### Bulleted List

Requirements using a list and lists using “and”/“or”

R111.2 A professional accountant shall not knowingly be associated with reports, returns, communications or other information where the accountant believes that the information:

- (a) Contains a materially false or misleading statement;
- (b) Contains statements or information provided recklessly; or
- (c) Omits or obscures required information where such omission or obscurity would be misleading.

#### Incomplete List

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

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

<sup>3</sup> Staff will use available electronic analysis tools in conjunction with a plain English editor.

15. When enumerating a list, make sure that the definite or indefinite article is included in the list rather than before the colon immediately preceding the list. For example, use:

“The following condition shall be met:

- The services are provided for only a short period of time.
- The situation is discussed with those charged with governance.”

rather than:

“The following condition shall be met, namely the:

- Services are provided for only a short period of time.
- Situation is discussed with those charged with governance.”

16. Avoid using:

- The word “deem.”
- Superfluous adjectives and adverbs.
- Archaic terms, e.g., herein, heretofore, thereon, and notwithstanding.

#### *Other Matters*

17. Use “professional body” and/or “regulatory body” instead of “member body” unless context requires otherwise. Where “regulatory body” is used, consider whether also to refer to “oversight authority”.
18. Try to use “circumstances” not “situations”. Sometimes “cases” is appropriate and more succinct.
19. Refer to “the Code” not “this Code”.
20. When referring to a Part, section or subsection within that Part, section or subsection, use “this Part”, “this section” or “this subsection”. Otherwise refer to “Part X”, “Section Y”, “Subsection Z”.
21. Audit means “audit or review” in Part 4A, but where necessary reference is occasionally made to “audit, review and other assurance engagements/services” or a reference to an “audit” is used in an example.
22. Avoid splitting the infinitives of verbs, for example, use “to review objectively” not “to objectively review”..
23. Avoid using footnotes.