

Proposed Standard: APES 210 Conformity with Auditing and Assurance Standards

[Supersedes APES 210 Conformity with Auditing and Assurance Standards issued in September 2024]

EXPOSURE DRAFT 03/26

ISSUED October 2026

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Commenting on this Exposure Draft

This Exposure Draft, Proposed Standard APES 210 *Conformity with Auditing and Assurance Standards*, was developed and approved by the Accounting Professional & Ethical Standards Board Limited (APESB).

The proposals in this Exposure Draft may be modified in light of comments received before being issued in final form. **Comments are requested by 9 November 2026.**

Comments should be addressed to:

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APESB would prefer that respondents express a clear overall opinion on whether the proposed amendments, as a whole, are supported and that this opinion be supplemented by detailed comments, whether supportive or critical, on any matter. APESB regards both critical and supportive comments as essential to a balanced view of the proposed amendments.

Respondents are asked to submit their comments electronically via the APESB website at <https://apesb.org.au/current-projects/>.

Please submit comments in both a PDF and Word file. All comments will be considered a matter of public record and will ultimately be posted on the website www.apesb.org.au.

APESB prefers that comments be submitted via its website. However, if there are practical difficulties, comments can also be sent to sub@apesb.org.au or mailed to the address noted above. While APESB prefers formal submissions, we also encourage opinions and comments to be sent via email to sub@apesb.org.au.

Obtaining a copy of this Exposure Draft

This Exposure Draft is available on the APESB website: www.apesb.org.au

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Reasons for issuing Exposure Draft 03/26

APESB is proposing to revise APES 210 *Conformity with Auditing and Assurance Standards* to address recent revisions to APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)* (the Code) that have incorporated provisions relating to Sustainability Reporting and Assurance.

Key requirements and guidance in Exposure Draft 03/26

This Exposure Draft sets out the proposed amendments to extant APES 210. The key revisions to APES 210 proposed in ED 03/26 include:

- amendments to paragraph 3.2 to clarify the applicability of the independence requirements in Part 5 *Australian Ethics Standards for Sustainability Assurance (including Independence Standards)* (Part 5) of the Code;
- amendments to paragraphs 3.1 and 3.3 to incorporate references to Sections within Part 5 of the Code;
- the addition of definitions for *Sustainability Assurance Engagement*, *Sustainability Assurance Practitioner* and *Sustainability Information*;
- amendments to the definitions of *Assurance Engagement*, *Auditing and Assurance Standards*, *Firm* and *Professional Activity* to align with the Code; and
- minor editorial and other consequential amendments.

A marked-up version of ED 03/26 compared to the extant APES 210 can be found [here](#).

Proposed Operative Date

It is proposed that this Standard will be effective for engagements commencing on or after 1 January 2027.

Early adoption of the revised Standard will be permitted.

APES 210 Conformity with Auditing and Assurance Standards

[Supersedes APES 210 Conformity with Auditing and Assurance Standards issued in [September 2024](#) ~~July-2019~~]

REVISED: ~~XXX 2026X~~ September-2024

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1. Scope and application

- 1.1 The objectives of APES 210 *Conformity with Auditing and Assurance Standards* are to specify a **Member's** professional and ethical obligations in respect of:
- fundamental responsibilities when the **Member** performs an **Assurance Assignment** or an **Assurance Engagement**;
 - compliance with applicable independence requirements;
 - compliance with **Auditing and Assurance Standards**; and
 - consideration of relevant **Auditing and Assurance Guidance**.
- 1.2 Accounting Professional & Ethical Standards Board Limited (APESB) has revised professional standard APES 210 *Conformity with Auditing and Assurance Standards* (**the Standard**), which is effective from 1 January ~~2025~~**2027** and supersedes APES 210 issued in ~~September 2024~~**July 2019**. Earlier adoption of this Standard is permitted.
- 1.3 APES 210 sets the standards for **Members** to comply with **Auditing and Assurance Standards** when they conduct **Assurance Assignments** or **Assurance Engagements**. The mandatory requirements of this Standard are in **bold-type**, preceded or followed by discussion or explanations in normal type. APES 210 should be read in conjunction with other professional duties of **Members**, and any legal obligations that may apply.
- 1.4 In undertaking work, including honorary work that is within the scope of an **Assurance Engagement**, a **Member in Business** is a **Member in Public Practice** for the purpose of this Standard.
- 1.5 **Members in Australia shall follow the mandatory requirements of APES 210.**
- 1.6 **Members outside of Australia shall follow the provisions of APES 210 to the extent to which they are not prevented from so doing by specific requirements of local laws and/or regulations.**
- 1.7 **Members shall comply with other applicable Professional Standards and be familiar with relevant guidance notes when performing Professional Activities. All Members shall comply with the fundamental principles outlined in the Code.**
- 1.8 The Standard is not intended to detract from any responsibilities which may be imposed by law or regulation.
- 1.9 All references to **Professional Standards**, guidance notes and legislation are references to those provisions as amended from time to time.
- 1.10 In applying the requirements outlined in APES 210, **Members** should be guided not merely by the words but also by the spirit of this Standard and the **Code**.
- 1.11 In this Standard, unless otherwise specified, words in the singular include the plural and vice versa, words of one gender include another gender, and words referring to persons include corporations or organisations, whether incorporated or not.

2. Definitions

Defined terms are shown in the body of the Standard in title case.

For the purpose of this Standard:

Assignment means an instruction, whether written or otherwise, by an employer to a [Member in Business](#) relating to the provision of [Professional Activities](#) by a [Member in Business](#). However, consultations with the employer prior to such instruction are not part of an Assignment.

Assurance Assignment means an [Assignment](#) in which a conclusion is expressed by a [Member in Business](#) designed to enhance the degree of confidence of the intended users about the outcome of the evaluation or measurement of a subject matter against criteria.

Assurance Engagement means an [Engagement](#) in which a [Member in Public Practice](#) aims to obtain sufficient appropriate evidence in order to express a conclusion designed to enhance the degree of confidence of the intended users other than the responsible party about the subject matter information.

This includes an [Engagement](#) in accordance with the *Framework for Assurance Engagements* issued by the [AUASB](#) or in accordance with specific relevant standards, such as International Standards on Auditing, for Assurance Engagements.

(For guidance on Assurance Engagements, see the *Framework for Assurance Engagements* issued by the [AUASB](#). The *Framework for Assurance Engagements* describes the elements and objectives of an Assurance Engagement and identifies [Engagements](#) to which *Australian Auditing Standards* (ASAs), *Standards on Review Engagements* (ASREs), ~~and~~ *Standards on Assurance Engagements* (SAEs) [and Australian Standards on Sustainability Assurance \(ASSAs\)](#) apply.)

[In Part 4B, the term “Assurance Engagement” addresses Assurance Engagements other than audit engagements, review engagements, or Sustainability Assurance Engagements addressed in Part 5.](#)

AUASB means the Australian statutory body called the Auditing and Assurance Standards Board established under section 227A of the *Australian Securities and Investments Commission Act 2001*.

Auditing and Assurance Guidance means the guidance statements and other guidance publications, as defined in the *Foreword to AUASB Pronouncements*, issued by the [AUASB](#).

Auditing and Assurance Standards means the [AUASB](#) standards, as described in ASA 100 *Preamble to AUASB Standards*, ASA 101 *Preamble to [AUASB](#) ~~Australian Auditing~~ Standards* and the *Foreword to AUASB Pronouncements*, issued by the [AUASB](#), and operative from the date specified in each standard.

Client means an individual, firm, entity or organisation to whom or to which [Professional Activities](#) are provided by a [Member in Public Practice](#) in respect of [Engagements](#) of either a recurring or demand nature.

Code means APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)*.

Engagement means an agreement, whether written or otherwise, between a [Member in Public Practice](#) and a [Client](#) relating to the provision of [Professional Services](#) by a [Member in Public Practice](#). However, consultations with a prospective [Client](#) prior to such agreement are not part of an Engagement.

Firm means:

- (a) A sole practitioner, partnership, corporation or other entity of professional accountants or Sustainability Assurance Practitioners;
- (b) An entity that controls such parties, through ownership, management or other means;
- (c) An entity controlled by such parties, through ownership, management or other means; or
- (d) An Auditor-General's office or department.

Member means a member of a **Professional Body** that has adopted this Standard as applicable to their membership, as defined by that **Professional Body**.

Member in Business means a **Member** working in areas such as commerce, industry, service, the public sector, education, the not-for-profit sector, or in regulatory or professional bodies, who might be an employee, contractor, partner, director (executive or non-executive), owner-manager or volunteer.

Member in Public Practice means a **Member**, irrespective of functional classification (for example, audit, tax or consulting) in a **Firm** that provides **Professional Services**. This term is also used to refer to a **Firm** of Members in Public Practice and means a practice entity and a participant in that practice entity as defined by the applicable **Professional Body**.

Professional Activity means an activity requiring professional ~~accountancy or related~~ skills undertaken by a **Member** or a Sustainability Assurance Practitioner, including accounting, auditing, sustainability reporting or assurance, tax, ~~management~~-consulting, and financial management.

Professional Bodies means Chartered Accountants Australia and New Zealand, CPA Australia and the Institute of Public Accountants.

Professional Services means **Professional Activities** performed for **Clients**.

Professional Standards means all standards issued by Accounting Professional & Ethical Standards Board Limited and all professional and ethical requirements of the applicable **Professional Body**.

Sustainability Assurance Engagement means an engagement in which a Sustainability Assurance Practitioner aims to obtain sufficient appropriate evidence in order to express a conclusion designed to enhance the degree of confidence of the intended users about the Sustainability Information.

A Sustainability Assurance Engagement can be either a:

- Reasonable Assurance Engagement – An Assurance Engagement in which the practitioner reduces engagement risk to an acceptably low level in the circumstances of the engagement as the basis for the practitioner's conclusion. The practitioner's conclusion is expressed in a form that conveys the practitioner's opinion on the outcome of the measurement or evaluation, including presentation and disclosure, of the underlying subject matter against applicable criteria; or
- Limited Assurance Engagement – An Assurance Engagement in which the practitioner reduces engagement risk to a level that is acceptable in the circumstances of the engagement but where that risk is greater than for a reasonable Assurance Engagement as the basis for expressing a conclusion in a form that conveys whether, based on the procedures performed and evidence obtained, a matter(s) has come to the practitioner's attention to cause the practitioner to believe the Sustainability Information is materially misstated. The nature, timing and extent of procedures performed in a limited Assurance Engagement is limited compared with that necessary in a reasonable Assurance Engagement but is planned to obtain a level of assurance that is, in the practitioner's professional judgement, meaningful. To be meaningful, the level of assurance obtained by the practitioner is likely to enhance the intended users' confidence about the Sustainability Information to a degree that is clearly more than inconsequential.

Sustainability Assurance Practitioner means the individual(s) conducting a Sustainability Assurance Engagement (usually the engagement leader or other members of the engagement team, or, as applicable, the firm).

Sustainability Information means information about sustainability matters.

Sustainability matters are environmental, social, governance or other sustainability-related matters as defined or described in law or regulation or relevant sustainability reporting frameworks, or as determined by the entity for purposes of preparing or presenting Sustainability Information.

Sustainability Information includes information that may be:

- Expressed in financial or non-financial terms.
- Historical or forward-looking.
- Prepared for internal purposes or for mandatory or voluntary disclosure.
- Obtained from an entity or its value chain.
- Related to the quantitative or qualitative evaluation of an entity's past or expected performance over the short, medium or long term.
- Described in an entity's governance structure, policies, plans, goals, commitments or representations.
- About the effects (including risks and opportunities) of environmental, social, governance or other sustainability-related matters on an entity's business model, activities, services or products.
- About the effects of an entity's business model, activities, services or products on the environment, society or economy.

3. Fundamental responsibilities of Members

Public interest

- 3.1 In accordance with Section 100 *Complying with the Code* or Section 5100 *Complying with Part 5* of the **Code**, as applicable, Members shall observe and comply with their public interest obligations when they perform an **Assurance Assignment** or an **Assurance Engagement**.

Independence

- 3.2 When engaged to perform an **Assurance Engagement**, a **Member in Public Practice** shall comply with:
- Part 4A *Independence for Audit and Review Engagements* ~~or~~;
 - Part 4B *Independence for Assurance Engagements Other than Audit Engagements*, ~~and~~ *Review Engagements*, and Sustainability Assurance Engagements Addressed in Part 5; or
 - Part 5 *Australian Ethics Standards for Sustainability Assurance (including Independence Standards)*
- of the **Code**, as applicable.

Professional competence and due care

- 3.3 In accordance with Subsection 113 *Professional Competence and Due Care* or [Subsection 5113 Professional Competence and Due Care](#) of the Code, [as applicable](#), a [Member in Public Practice](#) who is performing an [Assurance Engagement](#) shall ensure that the [Member](#) or the [Firm](#) has the requisite professional knowledge and skill or shall engage a suitably qualified external person. If the [Member](#) is unable to engage a suitably qualified person when required, the [Member](#) shall decline the [Engagement](#).

4. Auditing and Assurance Standards

- 4.1 Except for the circumstances described in paragraph 4.2, a [Member](#) shall comply with [Auditing and Assurance Standards](#).
- 4.2 Where legislation or other government authority requires a departure from [Auditing and Assurance Standards](#), a [Member](#) shall disclose that fact in the [Member's](#) report. In these circumstances, a [Member](#) shall not assert compliance with any of those standards in the [Member's](#) report.
- 4.3 The limited circumstances in which paragraph 4.2 is likely to have applicability is in respect of [Assurance Engagements](#) performed by an Auditor-General's office or department.

5. Auditing and Assurance Guidance

- 5.1 A [Member](#) should follow relevant [Auditing and Assurance Guidance](#).

Conformity with International Pronouncements

The International Ethics Standards Board for Accountants (IESBA) has not issued a pronouncement equivalent to APES 210.

Appendix 1 - Summary of revisions to the previous APES 210 (Issued in September 2024~~July 2019~~)

APES 210 *Conformity with Auditing and Assurance Standards* was originally issued in September 2008 and revised in November 2011, October 2015, ~~and July 2019~~ and September 2024 (extant APES 210). APES 210 has been revised by APESB in ~~XXX 202X~~ September 2024. A summary of the revisions is given in the table below.

Table of revisions*

Paragraph affected	How affected
<u>1.2</u>	<u>Amended</u>
<u>2 – Definition of Assurance Engagement</u>	<u>Amended</u>
<u>2 – Definition of Auditing and Assurance Standards</u>	<u>Amended</u>
<u>2 – Definition of Firm</u>	<u>Amended</u>
<u>2 – Definition of Professional Activity</u>	<u>Amended</u>
<u>2 – Definition of Sustainability Assurance Engagement</u>	<u>Added</u>
<u>2 – Definition of Sustainability Assurance Practitioner</u>	<u>Added</u>
<u>2 – Definition of Sustainability Information</u>	<u>Added</u>
<u>3.1</u>	<u>Amended</u>
<u>3.2</u>	<u>Amended</u>
<u>3.3</u>	<u>Amended</u>

* Refer Technical Update 2026/X