

Transparency Report 2021

EY Ireland
Volume 2

The EY logo is displayed in large, white, three-dimensional letters on the glass facade of a modern building. A yellow diagonal bar is positioned above the letters. The building's facade is a grid of dark grey window frames reflecting the sky and surrounding environment. In the foreground, there is a teal-colored metal railing and a glass revolving door leading into the building.The EY logo is located in the bottom right corner of the page. It consists of the letters 'EY' in a bold, white, sans-serif font, with a yellow diagonal bar above the 'Y'. The background of the entire page is a photograph of a modern building with a glass and brick facade, featuring a teal railing in the foreground.

Building a better
working world

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About us



Legal structure, ownership and governance

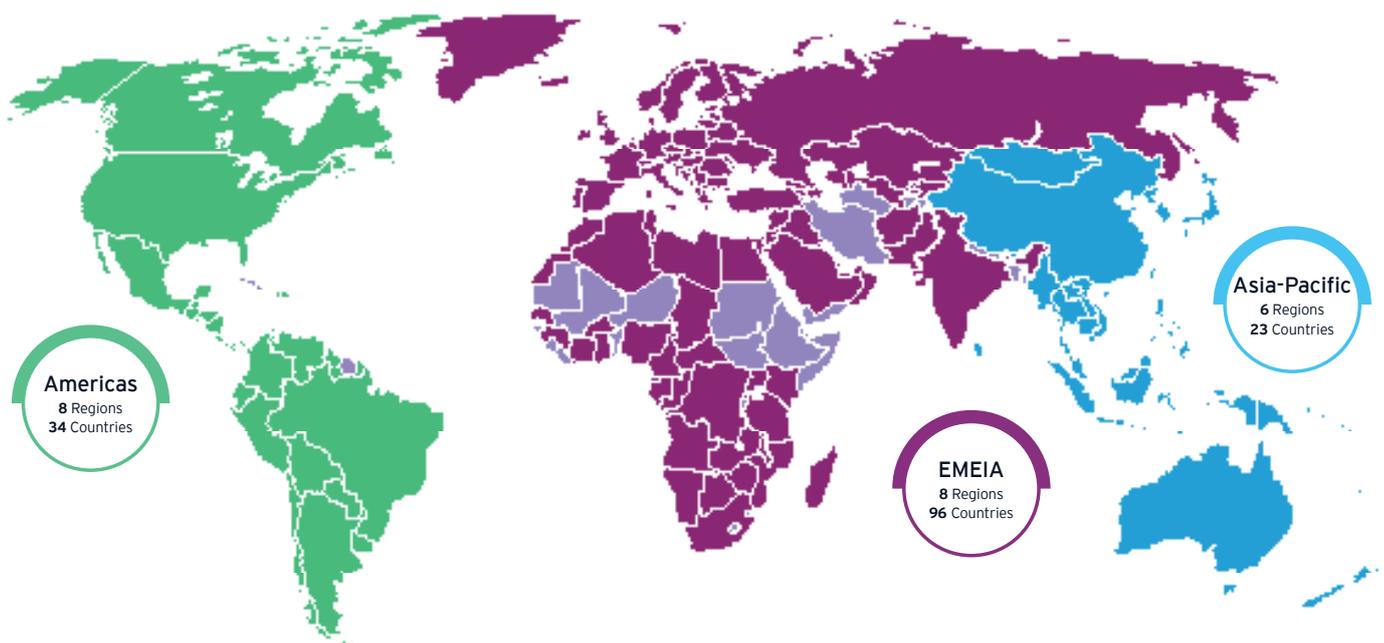
In Ireland, there are five partnerships; Ernst & Young Chartered Accountants, Ernst & Young Business Advisors, Ernst & Young Business Advisory Services, Ernst & Young Business Consultants and Ernst & Young Consultants. All are member firms of Ernst & Young Global Limited, a UK company limited by guarantee (EYG). In this report, we refer to ourselves as “EY Ireland,” “we,” “us” or “our.” EY refers collectively to the global organisation of the member firms of EYG. References to Ireland throughout this document (volume 2) are to the Republic of Ireland only.

At 30 June 2021, EY Ireland had 86 partners and operates from offices in Dublin, Cork, Galway, Waterford and Limerick.

EYG member firms are grouped into three geographic Areas: Americas; Asia-Pacific; and Europe, Middle East, India and Africa (EMEIA). The Areas comprise multiple Regions. Regions are groupings of member firms (and in the case of the US member firm within that member firm) along geographical lines with the exception of the Financial Services Organisation (FSO) Regions, which comprise the financial services activities of the relevant member firms within an Area.

EY Areas, Regions and Countries

*Figures are as of 1 July 2021





EY Ireland is part of the EMEIA Area, which comprises EYG member firms in 96 countries. Within the EMEIA Area, there were previously 10 Regions, and, from 1 July 2021, the number has reduced to 8. EY Ireland is part of the UK and Ireland Region (UK&I). Its financial services activities are part of the FSO Region.

Ernst & Young (EMEIA) Limited (EMEIA Limited), an English company limited by guarantee, is the principal coordinating entity for the EYG member firms in the EMEIA Area. EMEIA Limited facilitates the coordination of these firms and cooperation between them, but it does not control them. EMEIA Limited is a member firm of EYG, has no financial operations and does not provide any professional services.

Each Region elects a Regional Partner Forum (RPF), whose representatives advise and act as a sounding board to Regional leadership. The partner elected as Presiding Partner of the RPF also serves as the Region's representative on the Global Governance Council (see page 6).

In Europe, there is a holding entity, EY Europe SCRL (EY Europe). EY Europe is a Limited Liability Cooperative Company (SCRL or CVBA) incorporated in Belgium. It is an audit firm registered with the Institut des Reviseurs d'Entreprises (IRE-IBR) in Belgium, but it does not carry out audits or provide any professional services.

To the extent permitted by local legal and regulatory requirements, EY Europe has acquired or will acquire voting control of the EYG member firms operating in Europe. EY Europe is a member firm of EYG. EY Europe acquired voting control of EY Ireland as of 30 June 2012. The Board of Directors of EY Europe is made up of senior partners of EYG member firms in Europe. It has authority and accountability for strategy execution and management of EY Europe.

► EY Ireland Leadership Team

The EY Ireland Leadership team is appointed by the EY Ireland Managing Partner (subject to the approval of the Regional Managing Partner and the Regional Service Line Leaders) and has authority to deal with general and operational management of EY Ireland, together with

accountability for strategic execution. Members of the Leadership Team serve for such term as is appropriate having regard to their experience and their other roles and responsibilities.

The Leadership Team is responsible for the commercial, financial and reputational standing of EY Ireland, the admission of new partners, and the general and operational management of EY Ireland as a whole. The Leadership Team is chaired by the EY Ireland Managing Partner. In executing its role, the Leadership Team has approved the delegation of certain duties to Leadership Team members and other nominees. Meetings of Leadership Team members and their nominees are held on a monthly basis with additional meetings held as needed.

EYOC

Certain decisions of EY Ireland must be approved by EY Ireland's oversight company, EYOC Limited. The board of the oversight company comprises Frank O'Keeffe and Mike McKerr for EY Ireland, Eoin MacManus for EY Ireland FSO and Lynn Rattigan for the UK&I Region. The board meets quarterly in January, April, July and October of each year. Directors may either be appointed by (i) the existing directors acting as a board subject to EY Europe's approval, or (ii) by EY Europe itself, as the sole voting shareholder in EYOC Limited, in general meeting.

Bios of the members of the Leadership Team and the EYOC Board follow.

EY Ireland Leadership Team and Board Members of EYOC

The EY Ireland Managing Partner is responsible for the strategic direction of EY Ireland and promoting the interests of EY Ireland, in accordance with the provisions contained in the Partnership Agreements. In addition to acting as chair of the Leadership Team, and sitting on the board of EYOC Limited, the duties of the Managing Partner also include representing EY Ireland at EMEIA Area level and EYG, and maintaining liaison with EYG and its member firms. The Managing Partner is appointed by the Regional Managing Partner following partner consultation.



Frank O'Keeffe was appointed EY Ireland Managing Partner from 1 July 2018 and became Managing Director of EYOC Limited on the same date. Prior to his current role, Frank was Head of Assurance and a member of the Irish Leadership Team between 2014 and 2018. He is also member of the UK&I regional leadership team. Frank joined EY in 1997 and served as an audit partner for over 13 years. He has over 25 years' experience serving a range of large national and multinational clients.

He was Partner in Charge of the EY Entrepreneur Of The Year™ programme between 2009 and 2014 and has also previously served as the Diversity & Inclusion Sponsor Partner for EY Ireland. Frank is a Fellow of the Chartered Association of Certified Accountants.



Mike McKerr is Chair of EY Ireland and a board member of EYOC Limited. He has been a Strategy and Transactions (SaT) partner for 24 years and is the former Managing Partner of EY Ireland. He was appointed Global Leader – Market Solutions from 1 July 2018 with responsibility for Alternative Business Models until February 2021 when he was appointed Global Service Delivery Model Transformation Leader. Mike joined EY in 1986, was appointed Irish Head of Markets in 2008 and was appointed Managing Partner in 2009. Mike is a Fellow of the Institute of Chartered Accountants in Ireland.



Eoin MacManus is a member of the EY Ireland Leadership Team and board member of EYOC Limited. He is the Market Segment Leader for the Financial Services practice in Ireland, and the Regional Deputy Managing Partner EMEIA Financial Services Organisation. Eoin is an audit partner and provides audit services to a wide range of financial services companies. Eoin is a Fellow of the Institute of Chartered Accountants in Ireland.



Luke Charleton was appointed to the EY Ireland Leadership Team in June 2016. He leads EY Ireland's SaT service line and is on the UK&I SaT leadership team. He has been with EY for 27 years, during which he spent 15 years with EY in the UK. Luke is a Chartered Accountant (Institute of Chartered Accountants of Scotland) and a licenced Insolvency Practitioner. As part of the EY-Parthenon Turnaround & Restructuring Strategy

team, Luke advises companies, financial institutions and private equity in respect of insolvency, restructuring and turnaround situations across a variety of sectors.



Breffni Maguire leads EY Ireland's Assurance practice and is a member of the EY Ireland Leadership Team since July 2018. Breffni has been an audit partner for over 15 years and has over 25 years' experience serving predominantly listed clients. Breffni previously held various leadership roles in EY Ireland from 2006 to 2014 and is a Fellow of the Institute of Chartered Accountants in Ireland.



Barry McCarthy leads EY Ireland's Consultancy practice and is a member of the EY Ireland Leadership Team since January 2020. Barry joined EY in 2015 and has over 20 years' experience with a wide range of Irish and international companies as a consultant supporting clients in leading major technology, change and transformation initiatives.



Kevin McLoughlin is a member of the EY Ireland Leadership Team and leads EY Ireland's Tax practice. He joined EY Ireland in 1987 and became a partner in 2005. He has over 30 years' experience with a wide range of Irish and international companies. Kevin was the Partner in Charge of the EY Entrepreneur of The Year™ Programme between 2015 and 2019. Kevin is a law graduate, Fellow of the Institute of Chartered Accountants in Ireland and an Associate of the Irish Taxation Institute.



Lynn Rattigan is a board member of EYOC Limited. Lynn has spent her entire career in professional services. She has been a partner at EY UK since 2001 and has held a number of leadership positions during that time. In January 2015, Lynn joined the EY UK Management Team as the Chief Operating Officer for UK and Ireland. From a client perspective, Lynn has had an extensive and diverse range of client experiences throughout her career, having worked with a number of FTSE 100 companies and private equity houses, specialising in the delivery of Corporate Finance services.

Colin Ryan replaced Eoin MacManus as the Market Segment Leader for the Financial Services practice in Ireland on 1 September 2021 and became a board member of EYOC Limited effective 8 July 2021.

➤ Organisational and governance structure – Financial Services

This report sets out details of the legal structure of the firm and several general partnerships, the EY Ireland Leadership team and our oversight company (EYOC Limited), along with their governance bodies.

In line with our commitment to comply with the disclosure requirements of EU Audit Regulation and Irish company law we also include this description of the legal and structural arrangements of our Financial Services Organisation.

As with other member firms, EY Ireland consists of two industry business units, our Financial Services Organisation (FSO) and non-Financial Services (UK&I). One business unit focuses activity on the financial services industry, the other encompasses all other sectors.

This relationship reflects the way our clients do business and engage with our services, and therefore how we serve them. The operating models of these business units are specifically designed to accommodate the service delivery and operational support functions that enable us to provide the highest levels of service to clients.

The globally-integrated nature of EY and the requirement to serve cross-border engagements requires the FSO and UK&I business units to routinely coordinate their efforts. This necessitates regular collaboration and the use of mutual global processes and systems to operate consistently within EY Ireland and across our network firms.

While there is a division of certain operating functions, for the reasons described, the FSO and UK&I business units do not displace the legal and organisational structure or the overall governance structure set out in this Transparency Report.

Partnership matters

The partners discuss matters relating to the five partnerships as required. Certain matters are reserved to the partners and these are set out in the relevant Partnership Agreements.

Partnership forum

The Regional Partner Forum (RPF) has partner representation from EY Ireland. It meets regularly to discuss matters of relevance to the respective partnerships in the UK and Ireland Region including people matters, strategy and business updates. John Higgins and Aidan Walsh, partners in EY Ireland, are members of the RPF.

Network arrangements

EY is a global leader in assurance, tax, strategy and transactions, and consulting services. Worldwide, over 312,000 people in member firms in more than 150 countries share a commitment to building a better working world, united by shared values and an unwavering commitment to quality, integrity and professional scepticism. In today's global market, the integrated EY approach is particularly important in the delivery of high-quality multinational audits, which can span nearly every country in the world.

This integrated approach enables EY member firms to develop and draw upon the range and depth of experience required to perform such diverse and complex audits.

EYG coordinates the member firms and promotes cooperation among them. EYG does not provide services, but its objectives include the promotion of exceptional high-quality client service by member firms worldwide. Each member firm is a separate legal structure. Each member firm's obligations and responsibilities as a member of EYG are governed by the regulations of EYG and various other agreements.

The structure and principal bodies of the global organisation, described below, reflect the principle that EY, as a global organisation, has a common shared strategy.

At the same time, the network operates on a Regional level within the Areas. This operating model allows for greater stakeholder focus in the Regions, permitting member firms to build stronger relationships with clients and others in each country, and be more responsive to local needs.

➤ Global Governance Council

The Global Governance Council (GGC) is a key governance body of EYG. It comprises one or more representatives from each Region, other member firm partners as at-large representatives and independent non-executives (INEs). The Regional representatives, who otherwise do not hold senior management roles, are elected by their RPFs for a three-year term, with provision for one successive reappointment. The GGC advises EYG on policies, strategies, and the public interest aspects of its decision-making. The GGC approves, in some instances upon the recommendation of the Global Executive (GE), certain matters that could affect EY.

► Independent Non-Executives

Up to six Independent Non-Executives (INEs) are appointed from outside EY. The INEs are senior leaders from both the public and private sectors and reflect diverse geographic and professional backgrounds. They bring to the global organisation, and the GGC, the significant benefit of their varied perspectives and depth of knowledge. The INEs also form a majority of the Public Interest Sub-Committee (PIC) of the GGC. The role of the PIC includes public interest aspects of decision-making and stakeholder dialogue, issues raised under whistleblowing policies and procedures, and engagement in quality and risk management discussions. The INEs are nominated by a dedicated committee, approved by the GE and ratified by the GGC.

Appointment

The INEs are nominated by the INE Nominating Committee comprising the Chairman/CEO of EYG, the presiding partner of the Global Governance Council, and other persons as the Chairman/CEO and the presiding partner in their discretion deem appropriate. The nominations require approval by the Global Executive and ratification by the GGC.

Support

INEs are entitled to receive information about global affairs. To facilitate their effectiveness, they receive administrative support and any independent professional advice that may be required.

Term

The term of an INE is three years with provision for one re-appointment at the request of the INE Nominating Committee and the GE.

Disagreements

Any disagreement between an INE and others on the GGC would be resolved by mediation by the Chairman/CEO of EYG through a defined process of notification and consultation.

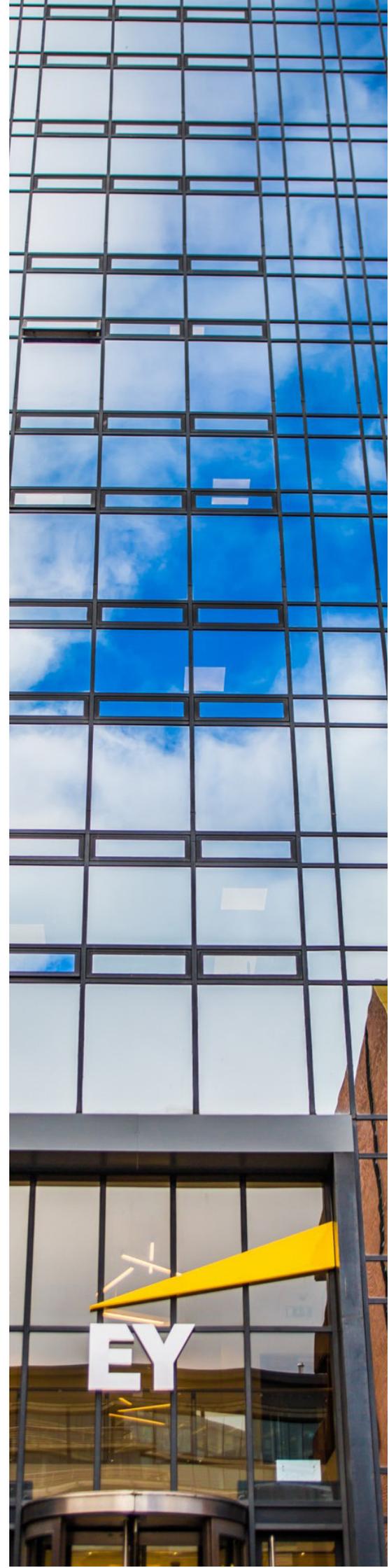
Independence

EYG has considered the auditor independence standards as they apply to INEs in their role as members of the GGC, and EYG is satisfied these standards have been met.

EY's INEs

Sir CK Chow (Hong Kong) is the Chairman of the Urban Renewal Authority in Hong Kong and the former Chairman of the Hong Kong Exchanges and Clearing Ltd. He is an Independent Non-executive Director of the AIA Group. Previously he was the Chief Executive of MTR Corporation (HK), Brambles Industries Ltd (Australia and UK) and GKN PLC (UK). In public service, he is a non-official member of the Executive Council of the Hong Kong Special Administrative Region, chairman of the Advisory Committee on Admission of Quality Migrants and Professionals, and a member of the Financial Leaders Forum and Human Resources Planning Commission. He is a chartered engineer.

Jürgen Kluge (Germany) is managing partner of Kluge & Partner and former CEO of Franz Haniel & Cie. He is Director Emeritus of McKinsey & Company where he spent almost 25 years of his career, including 8 years as country manager for McKinsey Germany and Austria, and 9 years as member of the Global Shareholders Council. He is an advisor to many organizations, including senior advisor and member of the Global Advisory Council, Bank of America, Member of the Board of Directors, Fastems Oy Ab, Finland. He is honorary consul for



Finland in the German States of North Rhine-Westphalia and Rhineland-Palatinate, and Chairman of the Foundation Lindau Nobel Laureate Meetings.

Atsushi Saito (Japan) is Commissioner of Nippon Professional Baseball Organisation and Senior Fellow to KKR Global Institute, KKR Japan (served as Chairman from 2015-2017). Previously he was the Group CEO, President and CEO of Japan Exchange Group, the President and CEO of Tokyo Stock Exchange, the President and CEO of the Industrial Revitalization Corporation of Japan (IRCJ), CEO of Sumitomo Life Investment, and various executive roles including Executive Vice President at Nomura Securities. Atsushi ceased to be an INE effective 1 July 2021.

David Thorburn (UK) is chair of the EY Public Interest Sub-Committee. He is also the Chair of the Audit Board for EY's UK member firm. David spent 36 years in retail and commercial banking, latterly as CEO of Clydesdale & Yorkshire Banks. He is a former INE of the Bank of England's Prudential Regulatory Authority and is the Chair of the Board Risk Committee of Barclays UK. David has held a number of other external roles over his career, including Chair of CBI Scotland, President of the Chartered Institute of Bankers in Scotland, and as a member of the Board of the British Bankers Association. In December 2016 David was appointed Chair of the Chartered Banker Institute 2025 Foundation.

➤ Global Executive

The GE brings together EY's leadership functions, services and geographies. As of 1 July 2021, it is chaired by the Chairman and CEO of EYG, and includes its Global Managing Partners of Client Service and Business Enablement; the Area Managing Partners; the global functional leadership for Talent; the leaders of the global service lines – Assurance, Consulting, Strategy and Transactions, and Tax; and one EYG member firm partner on rotation.

The GE also includes the Global Vice Chair of Markets, the Global Vice Chair of Transformation, the Chief Client Technology Officer, the Chair of the Global Accounts Committee, the Chair of the Emerging Markets Committee, as well as a representative from the Emerging Markets practices.

The GE and the GGC approve nominations for the Chairman and CEO of EYG and ratify appointments of the Global Managing Partners. The GE also approves appointments of Global Vice Chairs. The GGC ratifies the appointments of any Global Vice Chair who serves as a member of the GE.

The GE's responsibilities include the promotion of global

objectives and the development, approval and, where relevant, implementation of:

- ▶ Global strategies and plans
- ▶ Common standards, methodologies and policies to be promoted within member firms
- ▶ People initiatives, including criteria and processes for admission, evaluation, development, and reward and retirement of partners
- ▶ Quality improvement and protection programs
- ▶ Proposals regarding regulatory matters and public policy
- ▶ Policies and guidance relating to member firms' service of international clients, business development, and markets and branding
- ▶ EY's development funds and investment priorities
- ▶ EYG's annual financial reports and budgets
- ▶ GGC recommendations on certain matters

The GE also has the power to mediate and adjudicate disputes between member firms.

➤ GE committees

Established by the GE, and bringing together representatives from across the organisation, the GE committees are responsible for making recommendations to the GE. In addition to the Global Audit Committee, examples of other committees include Assurance, Consulting, Tax, Strategy and Transactions, Global Markets and Investments, Global Accounts, Emerging Markets, Talent and Risk Management.

➤ Global Practice Group

The Global Practice Group brings together the members of the GE, GE committees, Regional leaders and sector leaders. It seeks to promote a common understanding of EY's strategic objectives and helps drive consistency of execution across the organisation.

➤ EYG member firms

Under the regulations of EYG, member firms commit themselves to pursue EY's objectives, such as the provision of high-quality services worldwide. To that end, the member firms undertake the implementation of global strategies and plans, and work to maintain the prescribed scope of service capability. They are required to comply with common standards, methodologies and policies, including those regarding audit methodology, quality and risk management, independence, knowledge sharing, talent and technology.

Above all, EYG member firms commit to conducting their professional practices in accordance with applicable professional and ethical standards, and all applicable requirements of law. This commitment to integrity and doing the right thing is underpinned by the EY Global Code of Conduct and EY values (see page 16).

Besides adopting the regulations of EYG, member firms enter into several other agreements covering aspects of their membership in the EY organisation, such as the right and obligation to use the EY name, and knowledge sharing.

EY Ireland is subject to reviews to evaluate adherence to EYG requirements and policies governing issues, such as independence, quality and risk management, audit methodology and HR. Member firms unable to meet quality commitments and other EYG membership requirements may be subject to termination from the EY organisation.

► The Irish Audit Firm Governance Code

The Irish Audit Firm Governance Code (the Code) was published by the Chartered Accountants Regulatory Board, now the Professional Standards Department of Chartered Accountants Ireland, in June 2012 and applicable to firms who chose to apply it for years commencing on or after 1 January 2013.

Whilst the Code is not a regulatory requirement and many of its provisions were already in place at EY Ireland, we have embraced the Code as providing a benchmark of good governance practices for firms who chose to comply with its provisions. One of the principles of the code is that audit firms appoint INEs within their governance structures either locally or through a wider international network. The objective is that, through their involvement, they collectively enhance confidence in decision making, channel stakeholder dialogue and act as a safeguard of reputational risks.

EY is a global organisation with a high level of integration which includes its governance arrangements. Through the process of global integration, member firms are subject to oversight from higher levels of Area leadership. All member firms are subject to regular review of their actions and performance across all areas of business activity and benchmarked relative to comparable firms elsewhere in the world.

As a Global organisation, EY took the decision to appoint its INEs at a global level, rather than to focus their activities solely on EY Ireland and to reflect the more integrated operating model and broader governance structure. EY Ireland believes this INE model is effective at meeting the objectives of the Code.

► EY Ireland's internal control system

Effectiveness of EY Ireland's system of internal control

The Irish Audit Firm Governance Code requires the firm to conduct, at least annually, a review of the effectiveness of its system of internal controls.

In maintaining a sound system of internal control and risk management and reviewing its effectiveness, EY Ireland has a risk universe which provides a view of the risks threatening the Irish firm. EY Ireland maintains a key risk register containing details of the most significant risks faced by it, the controls and procedures implemented to mitigate these risks as well as the mechanisms for monitoring the most significant controls. The content and update of the register is facilitated through an annual Risk Management Workshop and regular discussion among senior management team members.

The internal control system is designed to manage rather than eliminate the risk of failure to achieve the objectives of EY Ireland, and can only provide reasonable and not absolute assurance against material misstatement or loss.

A balanced approach allows the degree of controllability to be taken into account when considering the effectiveness of mitigation, recognising that some activities carry inherent risk which may be outside EY Ireland's control.

Statement on the effectiveness of EY Ireland's system of internal control.

As part of its annual review procedures and in compliance with the Code, EY Ireland confirms that it has performed a review of the effectiveness of the system of internal control, including considering the:

- ▶ Process undertaken to update the risk register for significant risks, controls and monitoring mechanisms. In summary, this involved meetings with senior members of the firm's management, to whom all significant risks are assigned. This was followed by a meeting of the Risk Forum members, to challenge and approve the updated risk register
- ▶ Reports and findings from regulatory reviews and the firm's audit quality reviews

In the course of this review of effectiveness of internal control we have not identified any significant weaknesses but have identified actions which we believe will strengthen controls to mitigate significant risks. On the basis of the reviews carried out, EY Ireland is satisfied that its system of internal control is operating effectively.

Creating long-term value for society

While capitalism has created enormous global prosperity, it has also left too many people behind. Extreme poverty is already on the rise as a result of the COVID-19 pandemic, and climate change is threatening to deepen inequality still further as vulnerable communities are hit first and worst by its effects. EY believes an economic system that is fairer, more trustworthy and capable of addressing humanity's most profound challenges is urgently needed.

From advising governments on how to build more sustainable and inclusive economies, to encouraging businesses to focus and report on their creation of long-term value for all stakeholders, EY services already play a vital role in this. However, more can and must be done.

As a proud participant in the United Nations Global Compact (UNGC) since 2009, EY is committed to integrating the UNGC Ten Principles and the UN Sustainable Development Goals (SDGs) into EY strategy, culture and operations.

Among other things, this commitment is reflected in:

▶ Corporate responsibility governance structures

Corporate responsibility across EY is coordinated by the EY Corporate Responsibility Governance Council (CRGC). This body includes members of the EY Global Executive and provides senior leadership representation from across EY service lines, functions and geographic areas.

▶ The EY social impact ambition

The global corporate responsibility program, [EY Ripples](#), brings together the global EY network with a goal of positively impacting one billion lives by 2030. To date, EY Ripples initiatives have cumulatively benefited more than 45 million people, aided by:

- ▶ A rigorous focus on three areas (supporting the next generation workforce, working with impact entrepreneurs, and accelerating environmental sustainability) where the distinctive skills, knowledge and experience of EY people can make the biggest difference.
- ▶ A collaboration with other like-minded organisations to build ecosystems capable of creating change at scale. For example, the TRANSFORM initiative with Unilever and the UK Foreign, Commonwealth and Development Office, which aims to change the lives of 150 million people across sub-Saharan Africa and South Asia by 2030, by tackling inequality.

▶ The EY carbon ambition

EY was carbon negative in 2021 and aims to be net zero in 2025. EY endeavors to achieve this by significantly reducing absolute carbon emissions, and then removing or offsetting more than the remaining amount every year. To reach net zero by FY25, EY member firms plan to reduce absolute emissions by 40% across Scopes 1, 2 and 3 (versus an FY19 baseline), consistent with a 1.5°C science-based target approved by the Science Based Targets initiative (SBTi). Specific actions include:

- ▶ Reducing business travel emissions, with a target to achieve a 35% reduction by FY25 against the FY19 baseline
- ▶ Reducing overall office electricity usage, and procuring 100% renewable energy for remaining needs, earning RE100 membership by FY25
- ▶ Structuring electricity Power Purchase Agreements (PPAs) to introduce more renewable electricity than EY consumes into national grids
- ▶ Using nature-based solutions and carbon-reduction technologies to remove from the atmosphere or offset more carbon than emitted, every year
- ▶ Providing EY teams with tools to calculate, then work to reduce, the amount of carbon emitted in carrying out client work
- ▶ Requiring 75% of EY suppliers, by spend, to set science-based targets by no later than FY25
- ▶ Investing in EY services and solutions that help clients create value from decarbonising their businesses and provide solutions to other sustainability challenges and opportunities

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It is crucial that Ireland as a nation commits fully to achieving its 2050 ambition of carbon neutrality as well as the more imminent 51% reduction in greenhouse gas emissions by 2030. The business community has a key part to play in realising this ambition



Stephen Prendiville
Head of Sustainability,
EY Ireland

Commitment to Sustainable Audit Quality



Infrastructure supporting quality

► Quality in the EY service lines

NextWave is the EY global strategy and ambition to deliver long-term value to clients, people and society. It has put EY in a strong position to adapt and innovate, while the EY purpose of *Building a better working world* continues to inspire EY people not only to serve clients, but also to use EY knowledge, skills and experiences to support the communities in which we live and work. The insights and quality services we deliver help build trust and confidence in the capital markets and in economies around the world.

In response to disruptions in the environment, EY member firms, including EY Ireland, adapted to maintain the delivery of high-quality audits. EY provided its audit professionals with additional training and enablement to help detect fraud. In addition, through a data-first approach enabled by analytics and digital tools, teams were able to deliver high quality audits with independence, integrity, objectivity and professional scepticism.

EY Ireland continues to develop the audit of the future, including ever more sophisticated data analytics, efficiently delivering greater insight and assurance in support of the high quality audits that are valued by the companies that EY audits and the capital markets.

Our people are our greatest asset in delivering quality and value and building trust. We are elevating their experiences, using data and technology, so they can spend more time addressing risks and exercising professional judgment. By applying cutting-edge technologies and sophisticated data analytics, all while serving the public interest, our people are able to connect and contribute to the overall EY purpose of *Building a better working world*.

EYG member firms and their service lines are accountable for delivering high-quality engagements. EY member firms' service lines manage the overall process for quality reviews of completed engagements and input to the quality of in process engagements, which helps achieve compliance with professional standards and EY policies.

The Global Vice Chair of Assurance coordinates member firms' compliance with EY policies and procedures for services provided by Assurance.

► Global Audit Quality Committee

The EY Global Audit Quality Committee (GAQC) is an important element of the culture of continuous improvement. It comprises senior leaders from across the EY organisation with extensive, diverse and highly relevant experience. The GAQC advises EY Assurance leadership on the many aspects of the organisation's business, operations, culture, talent strategy, governance and risk management that affect audit quality.

The committee develops innovative ideas and approaches to delivering high-quality audits and is a forum for sharing best practices of EY member firms. The committee also helps develop audit quality indicators (AQIs) and other forms of quality monitoring that feed into the continuous improvement cycle.

► Quality Enablement Leaders

The EY Quality Enablement Leaders (QEL) network is a group of senior Assurance leaders around the world who drive improvements in audit quality by providing support to engagement teams.



Their responsibilities include: coaching teams; supporting internal and external inspections; advising teams on remediating the root causes of significant audit deficiencies; driving practice and project management; supporting portfolio risk analyses; and implementing processes related to the EY system of quality management, including global AQIs.

Using EY Canvas and Milestones (see page 15), as well as ever more sophisticated artificial intelligence (AI) tools, the QELs are able to build a picture of audit quality performance in real time. This, in turn, gives greater clarity over where resources should be deployed to support audit teams and the companies they audit. Dermot Daly, as EY Ireland QEL leads these initiatives in Ireland. On 1 July 2021, George Deegan took over as the EY Ireland QEL.

► Professional Practice

The Global Vice Chair of Professional Practice, referred to as the Global Professional Practice Director (PPD), is overseen by the Global Vice Chair of Assurance and works to establish global audit quality control policies and procedures. Each of the Area PPDs as well as the Global Delivery Service centre PPD is overseen by the Global PPD and the related Area Assurance Leader. This helps provide greater assurance as to

the objectivity of audit quality and consultation processes.

The Global PPD also leads and oversees the Global Professional Practice group. This is a global network of technical subject-matter specialists in accounting and auditing standards who consult on accounting, auditing and financial reporting matters; and perform various practice monitoring and risk management activities.

The Ireland PPD, Marie Treacy, leads the Professional Practice Group in Ireland and is the Audit Compliance Principal for the Irish Firm. Marie Treacy is also the principal point of contact in EY Ireland for audit regulators.

The Global PPD oversees the development of the EY Global Audit Methodology (EY GAM) and related audit policies and technologies so that they are consistent with relevant professional standards and regulatory requirements.

The Global Professional Practice group also oversees the development of the guidance, training and monitoring programs, and processes used by member firm professionals to execute audits consistently and effectively. The Global, Area, Regional and Country PPDs, together with other professionals who work with them in each member firm, are knowledgeable about EY people, clients and processes, and they are readily accessible for consultation with audit engagement teams.

Assurance Governance*



* Illustrative to show global alignment; actual reporting lines may vary based on legal, regulatory and structural considerations

Additional resources often augment the Global Professional Practice group, including networks of professionals focused on:

- ▶ Internal-control reporting and related aspects of the EY audit methodology
- ▶ Accounting, auditing and risk issues for specific topics, industries and sectors
- ▶ Event-specific issues involving areas of civil and political unrest; pandemics; or sovereign debt and related accounting, auditing, reporting and disclosure implications
- ▶ General engagement matters and how to work effectively with audit committees

► Risk Management

Risk Management (RM) coordinates organisation-wide activities designed to help EY people meet global and local compliance responsibilities and support client-facing teams in delivering quality and exceptional client service. Responsibility for high-quality service and ownership of the risks associated with quality is placed with the member firms and their service lines.

Among other things, the Global RM Leader helps monitor the identification and mitigation of these risks, as well as other risks across the organisation as part of the broader enterprise risk management (ERM) framework. The ERM priorities are communicated to member firms.

The Global RM Leader is responsible for establishing globally consistent risk management execution priorities and coordinating risk management across EY. EY Ireland partners are appointed to lead risk management initiatives (supported by other staff and professionals), including coordinating with the service lines on such matters.

There have been additional complexities as the world continued to deal with the COVID-19 pandemic and which required EY Ireland to respond appropriately. This required a coordinated response across EY via activation of the EY Ireland crisis management plan (CMP). The CMP details specific actions to be taken to both protect the EY workforce and respond in the event of a COVID-19 infection within an EY workspace. However, while individual offices had to deal with issues around contact tracing and safe workspace practices, there was a need to provide a set of uniform guidance across all EY Areas. Even before the World Health Organisation (WHO) declared the existence of a pandemic, the EY Global Crisis Management Program (GCMP) was activated.

The GCMP allowed for the creation of a Steering Committee led by the Global RM Leader who convened key Global and Area leadership daily for six months (and thereafter regularly but less frequently) to address issues relevant to all geographies and service lines.

The Steering Committee issued regular guidance on EY's COVID-19 response protocols and addressed issues related to travel, meetings and events as well as adoption and promotion of best practices, and relayed specific safe working practices guidance from the WHO. Guidance is still being issued and risk factors are being monitored during the second year of the global pandemic.

In implementing the GCMP and the EY Ireland CMP, our goal was to keep people safe and informed, manage confirmed cases, adjust the handling of travel and events, enable a fully remote workforce and plan for recovery.

With a robust GCMP in place, we were able to act quickly to keep EY people safe – the top priority throughout the entire process. Throughout the pandemic, the GCMP team:

- ▶ Created guidance for various stages of the pandemic and developed a resource library on the Global Security SharePoint portal to serve as a centralised repository
- ▶ Maintained a daily list of high-risk locations and provided a consolidated daily report for each Area
- ▶ Produced a daily report for leadership on the Global, Area, Region and local impacts

The GCMP also had a role in managing confirmed cases by:

- ▶ Developing pandemic checklists for local crisis management teams to manage confirmed cases in the workforce
- ▶ Conducting training on how to respond to confirmed cases
- ▶ Assisting Talent with contact tracking for confirmed cases
- ▶ Providing input and advice on travel, meetings and events, resulting in several global directives
- ▶ Identifying international travellers to help them return to their home countries safely

Now that the focus has shifted to a safe return to the office, the GCMP and the EY Ireland CMP teams have developed recovery plans that include:

- ▶ Leading the effort to develop return-to-work protocols and track the easing of government restrictions
- ▶ Creating a timeline for reopening offices
- ▶ Determining worksite leader responsibilities and procedures for building management, office setup, workspaces and meetings
- ▶ Establishing personal responsibilities including office entry, workspaces, breaks and meetings
- ▶ Developing a post-vaccine recovery plan

➤ Global Confidentiality Policy

Protecting confidential information is ingrained in the everyday activities of EYG member firms including EY Ireland. Respect for intellectual capital and all other sensitive and restricted information is required by the EY Global Code of Conduct, which provides a clear set of principles to guide the behaviours expected of all those who work with EY. The Global Confidentiality Policy further details this approach to protect information and reflect ever-changing restrictions on the use of data. This policy provides added clarity for those who work with EY member firms and forms the fundamental broader guidance that includes key policies on conflicts of interest, personal data privacy and records retention. Other guidance includes:

- ▶ Social media guidance
- ▶ Information-handling requirements

In addition, the global policy on reporting fraud, illegal acts and other noncompliance with laws and regulations, and EY's Global Code of Conduct requires EY professionals to speak up on observing behaviour that is believed to be a violation of a law or regulation, the applicable standard or EY's Global Code of Conduct. This includes the unauthorised or improper disclosure of confidential information.

➤ Global Personal Data Protection Policy

The global policy on personal data protection supports and builds upon provisions within the EY Global Code of Conduct, regarding respecting and protecting personal information, in accordance with applicable law, regulatory frameworks and professional standards. This has been updated to be consistent with the EU General Data Protection Regulation (GDPR) and other local regulations across the globe.

➤ Cybersecurity

Managing the risk of major and complex cyberattacks is a part of conducting business for all organisations. While no systems are immune from the threat of cyberattacks, EY Ireland is vigilant in the steps it takes to secure and protect client data. The EY approach to cybersecurity is proactive and includes the implementation of technologies and processes necessary to manage and minimise cybersecurity risks globally. EY information security and data privacy programs, consistent with industry practices and applicable legal requirements, are designed to protect against unauthorised access to systems and data. There is a dedicated team of cybersecurity specialists, who constantly monitor and defend EY systems. Beyond technical and process controls, all EY people are required to annually affirm in writing their understanding of the principles

contained in the EY Global Code of Conduct and their commitment to abide by them. There are also required security awareness learning activities. Various policies outline the due care that must be taken with technology and data, including, but not limited to, the Global Information Security Policy, and a global policy on the acceptable use of technology. EY cybersecurity policies and processes recognise the importance of timely communication. EY people receive regular and periodic communications reminding them of their responsibilities outlined in these policies and of general security awareness practice.

➤ Components of our audit quality control program

In the following sections, we describe the principal components of the audit quality control program, which EY Ireland follows:

- ▶ Instilled professional values
- ▶ Internal quality control system
- ▶ Client acceptance and continuance
- ▶ Performance of audits
- ▶ Review and consultation
- ▶ Rotation and long association
- ▶ Audit quality reviews
- ▶ External quality assurance reviews
- ▶ Root cause analysis
- ▶ Compliance with legal requirements

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Cyber-attacks are becoming more frequent, more damaging, longer lasting and harder to anticipate. Irish businesses overall express confidence in their ability to manage evolving threats. Where improvement can be made is by creating heightened awareness of these threats at board and executive level. With the regulatory burden rapidly increasing, however, boards are beginning to wake up to the threat posed and to the level of resourcing required, and not before time.



Carol Murphy

Consulting Partner and Head of Technology Risk, EY Ireland

Instilled professional values

➤ Sustainable Audit Quality

Quality is the foundation of our work and central to EY member firms' responsibility to provide confidence to the capital markets. This is reflected in the Sustainable Audit Quality (SAQ) program, which continues to be the highest priority for EY member firms' Assurance practices. SAQ establishes a strong governance structure that enables each member firm to provide high-quality audits. It is implemented in EY Ireland, and coordinated and overseen globally. The word "sustainable" in SAQ is used to demonstrate that this is not a one-off, short-term initiative, but an ongoing process of improvement.

There are six SAQ pillars: tone at the top; exceptional talent; simplification and innovation; audit technology and digital; enablement and quality support; and accountability. These pillars are supported by a foundation of serving the public interest.

Significant progress has been made through SAQ. EY member firms' internal and external inspection findings globally are improving, and there is greater consistency in execution. The trend in results also reflects the involvement of the QEL network and a focus on culture and behaviours. Details of EY Ireland inspection results are contained on page 26. EY has deployed leading technological tools that enhance the quality and value of EY audits, including the EY Canvas online audit platform, EY Helix analytics platform and EY Atlas research platform.

EY Canvas facilitates the use of the "Milestones" project management functionality, which helps audit teams stay on pace with their audit execution and drive executive involvement. The EY Canvas Client Portal, which is a component of EY Canvas, magnifies its importance in having a secure and user-friendly platform in transmitting data between engagement teams and the companies audited while effectively monitoring the pacing of the audit. This suite of tools played a key role in helping EY navigate this past year: having the right technology and tools in place for EY audit teams to work together effectively in a remote environment continues to be a key success factor and differentiator. Additionally, EY Helix and the entire suite of data analytic tools represent key ways to address the risk of fraud in audit execution. Increasing the required use of these tools provides a more robust response to audit risks associated with companies facing economic challenges, especially in light of the pandemic. Broader adoption of these data analytic tools is occurring this year.

EY Atlas is a cloud-based platform for accessing and searching accounting and auditing content, including external

standards, EY interpretations and thought leadership. Current SAQ initiatives are focused on supporting EY teams in understanding the business of the companies audited. By leveraging data and technology and executing enhanced engagement risk assessment, EY is continuing to drive quality audit execution. Additionally, a network of coaches is actively supporting engagement teams in staying on track with respect to the pace of their audits, driving timely executive involvement and providing positive direction and enablement when necessary.

Audit quality is something that every team member must understand and be committed to implementing locally. SAQ is essential to all our goals and ambitions, and each Regional and Area leader has a role in achieving these goals.

The SAQ infrastructure demonstrates that audit quality is the single most important factor in our decision-making and the key measure on which our professional reputation stands.

➤ Tone at the top

EY Ireland's leadership is responsible for setting the right tone at the top and demonstrating EY's commitment to building a better working world through behaviour and actions. While the tone at the top is vital, EY people also understand that quality and professional responsibility start with them and that within their teams and communities, they are leaders too. EY shared values, which inspire EY people and guide them to do the right thing, and the EY commitment to quality are embedded in who we are and in everything we do.

The EY approach to business ethics and integrity is contained in the EY Global Code of Conduct and other policies and is embedded in the EY culture of consultation, training programs and internal communications. Senior leadership regularly reinforce the importance of performing quality work, complying with professional standards, adhering to EY policies and leading by example. EY Ireland assesses the quality of professional services provided as a key metric in evaluating and rewarding EY professionals.

The EY culture strongly supports collaboration and places special emphasis on the importance of consultation in dealing with complex or subjective accounting, auditing, reporting, regulatory and independence matters. We believe it is important to determine that engagement teams and clients correctly follow consultation advice, and we emphasise this when necessary.

The consistent stance of EY Ireland has been that no client is more important than our professional reputation – the reputation of EY Ireland and the reputation of each of our professionals.

➤ Global Code of Conduct

We promote a culture of integrity among our professionals. The EY Global Code of Conduct provides a clear set of principles that guide our actions and our business conduct and are to be followed by all EY personnel. The EY Global Code of Conduct is divided into five categories:

- ▶ Working with one another
- ▶ Working with clients and others
- ▶ Acting with professional integrity
- ▶ Maintaining our objectivity and independence
- ▶ Protecting data, information and intellectual capital

Through our procedures to monitor compliance with the EY Global Code of Conduct and through frequent communications, we strive to create an environment that encourages all personnel to act responsibly, including reporting misconduct without fear of retaliation.

➤ Whistleblowing

The EY Ethics Hotline provides EY people, clients and others outside of the organisation with a means to confidentially report activity that may involve unethical or improper behaviour, and that may be in violation of professional standards or otherwise inconsistent with the EY shared values or Global Code of Conduct. Globally, the hotline is operated by an external organisation that provides confidential and, if desired, anonymous hotline reporting.

When a report comes into the EY Ethics Hotline, either by phone or internet, it receives prompt attention. Depending on the content of the report, appropriate individuals from Risk Management, Talent, Legal or other functions are involved in addressing the report. The same procedures are followed for matters that are reported outside of the EY Ethics Hotline.

➤ Diversity and inclusiveness

EY has a long-standing commitment to diversity and inclusiveness (D&I). This commitment to building high-performing, diverse and inclusive teams is especially important in audit, where diverse perspectives drive professional scepticism and critical thinking. Greater diversity and inclusive environments drive better decision-making, stimulate innovation and increase organisational agility. EY has been on a D&I journey for decades, and while substantial progress has been made, under the global NextWave strategy and ambition EY has committed to increasing D&I progress throughout the organisation. The Global Executive has made a visible commitment to EY people and to the market to accelerate D&I at EY through signing the Global Executive Diversity & Inclusion Statement. Not only does this reinforce that D&I is a key business lever, it ensures that EY member firms hold themselves accountable for progress, starting with the tone at the top.

There has been a particular focus on promoting gender diversity over recent years. In 2021, 36.8% of new audit partners, globally, were women. A strong pipeline of female leadership has been built, supported by 52.4% of all audit hires across the globe in 2020 being female.

Inclusive organisations maximise the power of all differences. Employees need to feel they are working for an organisation that not only values them as individuals, but also sees differences as strengths and values their contributions. Fostering this sense of belonging is critical to helping the EY organisation attract the most talented individuals, and helping our professionals stay motivated and engaged. In the November 2020 employee listening survey, 82% of auditors said the EY organisation prepares them to work effectively with clients and colleagues from different countries and cultures, and 86% agreed that the people they work with make them feel that they belong to a team. Leaders across EY make D&I a priority and it is a key metric across all the organisation's talent management programs. To enable greater accountability across the EY organisation, the Global D&I Tracker helps track progress with consistent diversity and inclusiveness metrics and reporting across the organisation globally. EY also created the Global Social Equity Task Force (GSET) to develop cohesive action plans specifically addressing inequity and discrimination, including racism. It includes EY leaders with a wide range of backgrounds and perspectives, spanning geographies, service lines and functions.

Our values: who we are

- 1 People who demonstrate integrity, respect, teaming and inclusiveness
- 2 People with energy, enthusiasm and the courage to lead
- 3 People who build relationships based on doing the right thing

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We know that the best people want to work in an environment that has a diverse and inclusive culture. We're committed to recruiting diverse talent in terms of background, experience, skillset and ethnicity and creating an environment that promotes diversity of thought, background and personality.



Frank O'Keefe
Managing Partner, EY Ireland



Internal quality control system

Structure

EY Ireland's reputation for providing high-quality professional audit services independently, objectively and ethically is fundamental to our success as independent auditors. We continue to invest in initiatives to promote enhanced objectivity, independence and professional scepticism. These are fundamental attributes of a high-quality audit.

At EY Ireland, our role as auditors is to provide assurance on the fair presentation of the financial statements of the companies audited. We bring together qualified teams to provide audit services, drawing on our broad experience across industry sectors and services. We continually strive to improve quality and risk management processes so that the quality of our service is at a consistently high level.

In today's environment, characterised by continuing globalisation, rapid movement of capital and the impact of technological changes, the quality of our audit services has never been more important. As part of NextWave, there is a continued and strong investment in the development and maintenance of the EY audit methodology, tools and other resources needed to support high-quality audits.

While the market and stakeholders continue to demand high-quality audits, they also demand an increasingly effective and efficient delivery of audit services. In addition to the investments mentioned, EY continues to seek ways to improve the effectiveness and efficiency of its audit methodology and processes, while improving audit quality.

EY works to understand where member firms' audit quality may not be up to their own expectations and those of stakeholders, including independent audit regulators. This includes seeking to learn from external and internal inspection activities and to identify the root causes of adverse quality occurrences to enable a continual improvement of audit quality.

Effectiveness of the quality control system

EY has designed and implemented a comprehensive set of global audit quality control policies and practices. These policies and practices meet the requirements of the International Standards on Quality Control issued by the International Auditing and Assurance Standards Board (IAASB). EY Ireland has adopted these global policies and procedures and has supplemented them as necessary to

comply with local laws and professional guidelines, and to address specific business needs.

We also execute the EY Audit Quality Review (AQR) program to evaluate whether our system of audit quality control has operated effectively to provide reasonable assurance that EY Ireland and our people comply with applicable professional standards, internal policies and regulatory requirements.

The results of the AQR program and external inspections are evaluated and communicated within EY Ireland to provide the basis for continual improvement in audit quality, consistent with the highest standards in the profession.

The Global Executive has responsibility for the coordination of quality improvement implementation. As such, it reviews the results of the internal AQR program and external audit firm regulatory reviews, as well as any key actions designed to address areas for improvement.

The recent results of such monitoring, together with feedback from independent audit regulators, provide EY Ireland with a basis to conclude that our internal control systems are designed appropriately and are operating effectively.

Audit quality indicators

Audit quality is not defined in professional standards, and stakeholders may have different views on how it should be measured. While no single reportable metric or set of metrics can be viewed as a sole indicator of audit quality, a set of metrics can be used to give an indication of audit quality.

Assurance leadership monitors the execution of the EY strategy and vision by local geographies through a combination of metrics or audit quality indicators (AQIs). These include: external and internal inspection results; Milestones performance; people surveys; and retention rates.

AQI dashboards help to inform the leadership about whether particular actions are having the intended effect, to provide an early warning where intervention is warranted and to support the effectiveness of the overall EY system of quality management.

Update to the control framework – ISQM 1

In September 2020, the IAASB approved a quality management standard that includes significant changes to the way professional accountancy firms manage quality. The International Standard on Quality Management 1 (ISQM 1) will replace the current International Standard on Quality

Control 1 (ISQC 1) and requires a more proactive and risk-based approach to managing quality at the firm level.

ISQM 1 requires firms to design, implement, monitor and evaluate the overall system of quality management (SQM) that provides reasonable assurance a firm will meet prescribed quality objectives.

The standard includes more robust requirements for the governance, leadership and culture of professional accountancy firms, and introduces a risk assessment process for firms to assess risks to achieving quality objectives and design responses that address those risks. It also requires more extensive monitoring of the SQM to identify deficiencies that require corrective actions and to provide the basis for evaluating the overall effectiveness of the SQM.

The EY approach is to design an SQM that is consistently applied across the entire network of member firms to promote consistent engagement quality and operating effectiveness. This is especially important in a global economy where many audits are transnational and involve the use of other EY member firms.

The standard requires firms to design and implement a system of quality management by December 2022. EY Ireland has commenced work to implement the new standard alongside the EY System of Quality Management transformation program. Our initial steps have included:

- ▶ Identifying the functions and service lines that provide support for, or perform engagements within the scope of ISQM 1
- ▶ Establishing a program governance structure to manage design and implementation of a system of quality management that complies with ISQM 1 with representatives from various functions and service lines
- ▶ Identifying and assessing quality risks, and documenting responses in accordance with the network-developed approach
- ▶ Identifying and understanding network resources and their implementation or use by the country in its SQM
- ▶ Challenging and identifying enhancements to the existing quality control system to achieve compliance with the new standard

We believe that implementing the requirements within ISQM 1 will be useful to improving quality at the firm and engagement level, because an effective system of quality management is foundational to achieving consistent engagement quality.

Client acceptance and continuance

▶ Global policy on client and engagement acceptance

The EY global policy on client and engagement acceptance sets out principles for member firms to determine whether to accept a new client or a new engagement, or to continue with an existing client or engagement. These principles are fundamental to maintaining quality, managing risk, protecting EY people and meeting regulatory requirements. The objectives of the policy are to:

- ▶ Establish a rigorous process for evaluating risk and making decisions to accept or continue clients or engagements
- ▶ Meet applicable independence requirements
- ▶ Identify and deal appropriately with any conflicts of interest
- ▶ Identify and decline clients or engagements that pose excessive risk
- ▶ Require consultation with designated professionals to identify additional risk management procedures for specific high-risk factors
- ▶ Comply with legal, regulatory and professional requirements

In addition, the EY global policy on conflicts of interest defines global standards for addressing categories of potential conflicts of interest and a process for identifying them. It also includes provisions for managing potential conflicts of interest as quickly and efficiently as possible, using appropriate safeguards. Such safeguards may include obtaining client consent to act for another party where a conflict of interest may exist, establishing separate engagement teams to act for two or more parties, implementing appropriate separations between engagement teams or declining an engagement to avoid an identified conflict.

The EY global policy on conflicts of interest and associated guidance considers the increasing complexity of engagements and client relationships, and the need for speed and accuracy in responding to clients. They also align with the latest International Ethics Standards Board for Accountants (IESBA) standards and the Ethical Standard for Auditors (Ireland) issued by the Irish Auditing and Accounting Supervisory Authority (IAASA).



▶ Putting policy into practice

We use the EY Process for Acceptance of Clients and Engagements (PACE), an intranet-based system, for efficiently coordinating client and engagement acceptance and continuance activities in line with global, service line and member firm policies. PACE takes users through the acceptance and continuance requirements, and identifies the policies and references to professional standards needed to assess both business opportunities and associated risks.

As part of this process, we carefully consider the risk characteristics of a prospective client or engagement and the results of due diligence procedures. Before taking on a new engagement or client, we determine whether we can commit sufficient resources to deliver quality service, especially in highly technical areas, and if the services the client wants are appropriate for us to provide. The approval process is rigorous, and no new audit engagement may be accepted without the approval of Regional or EY Ireland PPD.

In the EY annual client and engagement continuance process, we review our service and ability to continue to provide a quality service, and confirm that clients share EY Ireland's commitment to quality and transparency in financial reporting. The lead audit engagement partner of each audit, together with our Assurance leadership, annually reviews our relationship with the audit client to determine whether continuance is appropriate.

As a result of this review, certain audit engagements are identified as requiring additional oversight procedures during the audit (close monitoring), and some audit clients are discontinued. As with the client acceptance process, our Regional and EY Ireland PPD is involved in the client continuance process and must agree with the continuance decisions. Decisions about acceptance or continuance of clients and engagements consider the engagement team's assessment of several risk factors across a broad range of categories including management's attitude, internal controls and related parties.

▶ Performance of audits

EY continuously invests in improving audit methodologies and tools, with the goal of performing the highest-quality audits in the profession. This investment reflects the EY commitment to building trust and confidence in the capital markets, and in economies the world over.

▶ Working in a virtual world

There are two types of consideration when delivering a high-quality audit in an increasingly virtual business environment. The first category includes how EY member firms work, how their people can work remotely in an effective way, and how that can impact their own risks. The second category covers how businesses are evolving to work in a virtual world, where transactions are carried out online, across borders, without the need for physical interaction.

EY Ireland understands the risks that a virtual world can have on the way its people work; this incorporates concerns about mental health and well-being, and the need to establish an appropriate work/life balance for an individual. However, it is also understood that the businesses that EY Ireland works with face similar issues. High turnover of staff can create risks, and evolving business practices can create new risks, which in turn requires an evolution in audit planning and practices.

▶ Audit methodology

EY GAM provides a global framework for delivering high-quality audit services through the consistent application of thought processes, judgments and procedures in all audit engagements, regardless of the size. EY GAM also requires compliance with relevant ethical requirements, including independence from the audited entity. Making risk assessments; reconsidering and modifying them as appropriate; and using these assessments to determine the nature, timing and extent of audit procedures are fundamental to EY GAM. The methodology also emphasises applying appropriate professional scepticism in the execution

of audit procedures. EY GAM is based on International Standards on Auditing (ISAs) and is supplemented in EY Ireland to comply with the local Ireland auditing standards and regulatory or statutory requirements.

Using an online tool, EY Atlas, an EY auditor is presented with a version of EY GAM, organised by topic, and is designed to focus the audit strategy on the financial statement risks, and the design and execution of the appropriate audit response to those risks. EY GAM consists of two key components: requirements and guidance; and supporting forms and examples. The requirements and guidance reflect both auditing standards and EY policies. The forms and examples include leading practice illustrations and assist in performing and documenting audit procedures.

EY GAM can be “profiled” or tailored to present the relevant requirements and guidance, depending on the nature of the entity being audited – e.g., there are profiles for listed entities (Regulation (EU) 537/2014: public interest entities) and for those considered non-complex entities.

EY GAM has been transformed with a new approach that puts data at the heart of the audit. Known as Digital GAM, this methodology facilitates the analysis of full populations of an organisation’s data to produce a fuller picture of the business, driving higher quality through a data-first audit approach.

Digital GAM enhances and often replaces the traditional audit testing approach with new, risk-based, technology-enabled techniques that simplify and refine the focus of EY auditors on to relevant risks. In turn, EY auditors can analyse whole populations of an organisation’s data from multiple perspectives, building a body of evidence and producing a deeper view into the operational environment.

Other enhancements have been made to address emerging auditing issues and matters, implementation experiences and external and internal inspection results. Recently, enhancements have been made to EY GAM to emphasise the holistic approach to identifying, assessing and responding to fraud risks. This approach includes applying the fraud triangle as a lens on the information obtained from our risk assessment procedures. This approach also emphasises evaluating the results of our audit procedures in the context of responding to the risk of material misstatement in the financial statements due to fraud.

In addition, current and emerging developments are monitored, and timely audit planning and execution communications are issued that emphasise areas noted during inspections as well as other key topics of interest to local audit regulators and the International Forum of

Independent Audit Regulators (IFIAR). With respect to the impact that COVID-19 is having on the global economy, we continue to refresh guidance to address the accounting and financial reporting concerns that audited entities are facing, as well as audit considerations when performing audits in the current environment.

► Technology

EY audit engagement teams use technology to assist in executing and documenting the work performed in accordance with EY GAM.

EY Canvas, the global EY audit platform, lies at the heart of the audit and enables us to provide a high-quality audit. EY Canvas is built using state-of-the-art technology for web applications. This allows us to provide data security and to evolve our software to respond to changes in the accounting profession and regulatory environment.

Through the use of profile questions, audit engagements in EY Canvas are automatically configured with information relevant to an entity’s listing requirements and industry. This helps to keep audit plans customised and up-to-date, and provides direct linkage to audit guidance, professional standards and documentation templates. EY Canvas is built with a user interface that allows the team to visualise risks and their relationship to the planned response and work performed in key areas. It also enables a linkage for group audit teams to communicate inter-office risks and instructions so that the primary audit team can direct execution and monitor performance of the group audit.

EY Canvas includes the EY Canvas Client Portal to assist teams in communicating with clients and streamlining their client requests. Mobile applications are integrated with EY Canvas to help our people in their audit work – e.g., in monitoring the status of the audit, capturing audit evidence securely and performing inventory observations.

EY Atlas is the EY global technology platform that enables EY auditors to access the latest accounting and auditing content, including external standards, EY interpretations and thought leadership.

Audit engagement teams use other applications, data analysers and forms during various phases of an audit to assist in executing procedures, making and documenting audit conclusions, and performing analysis. This includes EY Smart Automation, a collection of applications that are being developed and deployed globally through EY Canvas to digitally enable EY audit professionals in executing audit procedures and processes.

➤ Data analytics and the EY Digital Audit

At EY, we are making data analysis integral to our audits. EY audit teams use of data and analysis is not about additive procedures or visualisations. It is about taking large populations of company data and applying globally consistent technology (EY Helix) and methodology (EY GAM) to audit that data. EY Helix is a library of data analysers for use in audits. These data analysers are transforming the audit through the analysis of larger populations of audit-relevant data; identifying unseen patterns and trends in that data; and helping to direct audit efforts. The use of data analytics also allows EY teams to obtain better perspectives, richer insights, and a deeper understanding of transactions and areas of risk. We are deploying data analysers to analyse the business operating cycles of audited companies, supported by analytics-based audit programs to aid the application of these data analysers.

Using the EY Helix library of data analysers, EY audit engagement teams can enhance their audit risk assessment, enabling the audit of higher-risk transactions, and assisting EY people in asking better questions about audit findings and evaluating the outcomes.

➤ Formation of audit engagement teams

The assignment of professionals to an audit engagement is made under the direction of our Assurance leadership. Factors considered when assigning people to audit teams include engagement size and complexity; specialised industry knowledge and experience; timing of work; continuity; and opportunities for on-the-job training. For more complex engagements, consideration is given to whether specialised or additional expertise is needed to supplement or enhance the audit engagement team.

In many situations, internal specialists are assigned as part of the audit engagement team to assist in performing audit procedures and obtaining appropriate audit evidence. These professionals are used in situations requiring special skills or knowledge, such as tax, forensics, information systems, asset valuation and actuarial analysis.

When certain conditions exist, EY Ireland's policies require the approval of the assignment of individuals to specific audit roles by our Assurance leadership and the EY Ireland PPD.

This is carried out, among other things, to make sure that the professionals leading audits of listed entities and other public-interest entities possess the appropriate competencies (e.g., the knowledge, skills and abilities) to fulfill their engagement responsibilities and are in compliance with applicable auditor rotation regulations.

➤ Fraud

As part of ongoing improvement efforts, there is recognition of the need to evolve how audits are performed to better address fraud. At a global level, EY is committed to leading the profession more widely to address stakeholder questions about the auditor's role in fraud detection.

Companies have never been as data rich as they are today, providing new opportunities to detect material frauds through data mining, analysis and interpretation. Auditors are ideally placed to carry out this role and are increasingly using data analytics to identify unusual transactions and patterns of transactions that might indicate a material fraud.

Technology is not a panacea, however, and professional judgment also comes into play. There is a responsibility for all involved, including management, boards, auditors and regulators, to focus more on corporate culture and behaviours to support fraud detection. The EY organisation is taking additional actions to address this important area of the audit, including:

- ▶ Using additional internal and external data and information to enable more nimble responses to external risk indicators, such as short selling and whistleblowers
- ▶ Developing a proprietary fraud risk assessment framework for use with audit committees and those charged with governance
- ▶ Requiring the use of forensic specialists in the audit on a targeted-risk basis
- ▶ Using electronic confirmations for audit evidence wherever possible
- ▶ Mandating annual fraud training for all audit professionals that incorporates the experiences of EY forensics professionals

➤ Environmental, social and governance (ESG) reporting

EY member firms provide assurance services on a wide range of ESG-related information. The EY Sustainability Assurance Methodology (EY SAM) is a global framework for the application of a consistent approach to all assurance engagements on ESG and sustainability information. EY SAM provides for the delivery of high-quality assurance services through the consistent application of thought processes, judgments, and procedures in all engagements regardless of the level of assurance required. EY SAM is also adaptable to the nature of both the ESG reporting, and the criteria applied by the client in producing that report.

The methodology emphasises applying appropriate professional scepticism in the execution of procedures inclusive of the changing landscape in ESG reporting and criteria. EY SAM is based on the International Standards on Assurance Engagements and is supplemented in EY Ireland to comply with local assurance standards and regulatory or statutory requirements. As part of our obligation for high-quality assurance services related to ESG reporting, EY has developed guidance, training and monitoring programs, and processes used by member firm professionals to execute such services consistently and effectively. Guidance has also been developed for audit engagement teams to assess the impact of climate-risk on financial reporting under International Financial Reporting Standards (IFRS) or other financial reporting frameworks. The Global, Area and Regional PPDs, EY quality functions and IFRS desks, together with other professionals who work with teams in each member firm, are knowledgeable about EY people, clients and processes, and are readily accessible to support ESG assurance engagement teams.

EY provides input to a number of public and private initiatives to improve the quality, comparability and consistency of ESG reporting, including climate-risk. These activities take place at a global, regional and national level. Examples include drafting ESG metrics and ESG reporting proposals for the Embankment Project on Inclusive Capitalism (EPIC) and the World Economic Forum's International Business Council (WEF-IBC). EY also makes resources available to standard-setters in the area of sustainability reporting.

Review and consultation

Reviews of audit work

EY policies describe the requirements for timely and direct senior professional participation, as well as the level of review required for the work performed. Supervisory members of an audit engagement team perform a detailed review of the audit documentation for technical accuracy and completeness. Senior audit executives and engagement partners perform a second-level review to determine the adequacy of the audit work as a whole and the related accounting and financial statement presentation. Where appropriate, and based on risk, a tax professional reviews the significant tax and other relevant working papers. For listed entities, public interest entities and certain other companies, an engagement quality reviewer (described below) reviews important areas of accounting, financial reporting and audit execution, as well as the financial statements of the audited company and the auditor's report.

The nature, timing and extent of the reviews of audit work depend on many factors, including:

- ▶ Risk, materiality, subjectivity and complexity of the subject matter
- ▶ Ability and experience of audit team members preparing the audit documentation
- ▶ Level of the reviewer's direct participation in the audit work
- ▶ Extent of consultation employed

EY policies also describe the roles and responsibilities of each audit engagement team member for managing, directing and supervising the audit, as well as the requirements for documenting their work and conclusions.



➤ Consultation requirements

EY consultation policies are built upon a culture of collaboration, whereby audit professionals are encouraged to share perspectives on complex accounting, auditing and reporting issues. As the environment in which EY Ireland works has become more complex and globally connected, the EY culture of consultation has become even more important to help member firms reach the appropriate conclusions for entities that they audit on a timely basis. Consultation requirements and related policies are designed to involve the right resources so that audit teams reach appropriate conclusions.

The EY culture of consultation enables engagement teams to deliver seamless, consistent and high-quality services that meet the needs of audited entities, their governance bodies and all stakeholders.

For complex and sensitive matters, there is a formal process requiring consultation outside of the audit engagement team with other personnel who have more experience or specialised knowledge, primarily Professional Practice and Independence personnel. In the interests of objectivity and professional scepticism, EY policies require members of Professional Practice, Independence and certain others to withdraw from a consultation if they currently serve, or have recently served, the client to which the consultation relates. In these circumstances, other appropriately qualified individuals would be assigned.

EY policies also require that all consultations are documented, including written concurrence from the person or persons consulted, to demonstrate their understanding of the matter and its resolution.

➤ Engagement quality reviews

EY engagement quality review policies address audit and assurance engagements. Engagement quality reviewers are experienced professionals with significant subject-matter knowledge. They are independent of the engagement team and provide an objective evaluation of the significant judgments the engagement team made, and the conclusions reached in formulating the auditor's report. The performance of an engagement quality review, however, does not reduce the responsibilities of the partner in charge of the engagement for the engagement and its performance. In no circumstances may the responsibility of the engagement quality reviewer be delegated to another individual.

The engagement quality review spans the entire engagement cycle, including planning, risk assessment, audit strategy and execution. Policies and procedures for the performance and documentation of engagement quality reviews provide specific guidelines on the nature, timing and extent of the procedures to be performed, and the required documentation evidencing their completion. In all circumstances, the engagement quality review is completed before the date of the auditor's or assurance report. For audits, engagement quality reviews are performed by audit partners in compliance with professional standards for audits of all listed companies, all public-interest entities and those considered to need close monitoring. Our Regional Audit Leader and our Regional and the EY Ireland PPD approve all required audit engagement quality review assignments.

➤ Audit engagement team resolution process for differences of professional opinion

EY has a collaborative culture that encourages and expects people to speak up, without fear of reprisal, if a difference of professional opinion arises or if they are uncomfortable about a matter relating to a client engagement. Policies and procedures are designed to empower members of an audit engagement team to raise any disagreements relating to significant accounting, auditing or reporting matters.

These policies are made clear to people as they join EY, and we continue to promote a culture that reinforces a person's responsibility and authority to make their own views heard and seek out the views of others.

Differences of professional opinion that arise during an audit are generally resolved at the audit engagement team level. However, if any person involved in the discussion of an issue is not satisfied with the decision, they refer it to the next level of authority until an agreement is reached or a final decision is made, including consultation with Professional Practice if required.

Furthermore, if the engagement quality reviewer makes recommendations that the engagement partner does not accept or the matter is not resolved to the reviewer's satisfaction, the auditor's report is not issued until the matter is resolved.

Differences of professional opinion that are resolved through consultation with Professional Practice are appropriately documented.



Rotation and long association

EY supports mandatory audit partner rotation to help reinforce auditor independence. EY Ireland complies with the audit partner rotation requirements of the IESBA Code, Regulation (EU) 537/2014 of the European Parliament and of the Council of 16 April 2014 (EU 537/2014) and Ethical Standard for Auditors (Ireland) issued by the Irish Auditing and Accounting Supervisory Authority (IAASA) as well as the U.S. Securities and Exchange Commission (SEC), where required. EY Ireland supports audit partner rotation because it provides a fresh perspective and promotes independence from company management, while retaining expertise and knowledge of the business. Audit partner rotation, combined with independence requirements, enhanced systems of internal quality controls and independent audit oversight, helps strengthen independence and objectivity, and is an important safeguard of audit quality.

The Ethical Standard for Auditors (Ireland) issued by the Irish Auditing and Accounting Supervisory Authority (IAASA) requires the lead engagement partner and other partners who make key decisions or judgments on matters significant to the audit (together the “key audit partners”) of public interest entities to be rotated after five years. Upon completing the maximum service period for rotation, a key audit partner may not be involved in services to the PIE audit client until after completing a cooling-off period. The revised Ethical Standard, which took effect on 15 July 2021, reduced this period from five to three years.

Similarly, the engagement quality reviewer must be rotated after seven years and may not be involved in services to the PIE audit client until at least five years have elapsed.

For PIEs, the EY Global Independence Policy requires the lead engagement partner, the engagement quality reviewer and other audit partners who make key decisions or judgments on matters significant to the audit, (together, the “key audit partners”), to be rotated after seven years. For a new PIE, (including a newly listed company), key audit partners may remain in place for an additional two years before rotating off the team if they have served the company for six or more years prior to the listing.

Upon completing the maximum service period for rotation, a key audit partner may not lead or coordinate professional services to the PIE audit client until after completing a cooling-off period. This period is five years for a lead audit engagement partner, three years for an engagement quality reviewer and two years for other partners, subject to rotation.

Where the required cooling-off period for the lead audit engagement partner established by the local legislative body or regulator is less than five years, the higher of that cooling-off period or three years may be substituted for the otherwise required five-year cooling-off period. This jurisdictional exception for the lead audit engagement partner may only be applied for audit periods beginning prior to 15 December 2023.

In addition to the key audit partner rotation requirements applicable to PIE audit clients, EY has established a long association safeguards framework. This is consistent with the requirements of the IESBA Code and Article 17 of 537/2014, and includes consideration of the threats to independence created by the involvement of professionals over a long period of time and a safeguards framework to address such threats.

We employ tools to effectively monitor compliance with internal rotation, and requirements for audit partners and other professionals who have had a long association with the audit client as well as gradual rotation. There is also a process for rotation planning and decision-making that involves consultation with, and approvals by, our Professional Practice and Independence professionals.

External rotation

For public interest entities, we comply with the external audit firm rotation requirements of Art. 17 (1) of the EU Audit Regulation.



Audit quality reviews

The EY Global AQR program is the cornerstone of the EY process to monitor audit quality. EY Ireland executes the Global AQR program, reports results and develops responsive action plans. The primary goal of the program is to determine whether systems of quality controls, including those of EY Ireland, are appropriately designed and followed in the execution of audit engagements to provide reasonable assurance of compliance with policies and procedures, professional standards and regulatory requirements. The Global AQR program complies with requirements and guidelines in the ISQC 1, as amended, and is supplemented, where necessary, to comply with Ireland professional standards and regulatory requirements. It also aids EY Ireland's continual efforts to identify areas where we can improve our performance or enhance our policies and procedures.

Executed annually, the program is coordinated and monitored by representatives of the Global PPD network, with oversight by the Global Assurance leadership.

The engagements reviewed each year are selected on a risk-based approach, emphasising audit engagements that are large, complex or of significant public interest, including elements of unpredictability. The Global AQR program includes detailed risk-focused file reviews covering a large sample of listed and non-listed audit engagements, and public interest entities and non-public interest entities, to measure compliance with internal policies and procedures; EY GAM requirements; and relevant local professional standards and regulatory requirements. It also includes reviews of a sample of non-audit assurance engagements performed by audit engagement teams. These measure compliance with the relevant professional standards, and internal policies and procedures that should be applied in executing non-audit assurance services. In addition, practice-level reviews are performed to assess compliance with quality control policies and procedures in the functional areas set out in ISQC 1.

The Global AQR program complements external practice monitoring and inspection activities, such as inspection programs executed by audit regulators and external peer

reviews. It also informs us of our compliance with regulatory requirements, professional standards, and policies and procedures.

In 2021, EY Ireland's AQR resulted in the inspection of 20 audit engagements all of which were rated as having no material findings or deficiencies. These results compare to 15 engagements reviewed in 2020 all of which were rated as having no material findings or deficiencies.

A root cause analysis is undertaken if findings are deemed to be material so as to identify actions that could be taken to improve audit quality across our practice. A remediation action plan is prepared in respect to each finding. Lessons learnt from the findings will be built into training.

AQR reviewers and team leaders are selected for their skills and professional competence in accounting and auditing, as well as their industry specialisation. They have often participated in the Global AQR program for a number of years and are highly skilled in the execution of the program. Team leaders and reviewers are independent of the engagements and teams they are reviewing, and are normally assigned to inspections outside of their home location.

The COVID-19 pandemic continues to place restrictions on travel and face-to-face interaction. Utilising EY Canvas and other collaboration tools, and leveraging from the lessons learned in 2020, the AQR program was effectively completed in EY Ireland.

The results of the AQR process are summarised globally (including for Areas and Regions), along with any key areas where the results indicate that continued improvements are required. Summarised results are shared within the network. Measures to resolve audit quality matters noted from the Global AQR program, regulatory inspections and peer reviews are addressed by Assurance leadership and our EY Ireland PPD. These programs provide important practice monitoring feedback for our continuing quality improvement efforts.



External quality assurance review

EY Ireland's audit practice is subject to annual inspection by the Irish Auditing and Accounting Supervisory Authority (IAASA) for Public Interest Audits. As part of its inspections, IAASA evaluates quality control systems and reviews selected engagements.

IAASA Inspections

The most recent completed quality assurance inspection by IAASA took place in 2020. The final report on the inspection was issued on 15 March 2021. The inspection included a review of a sample of statutory audits of Public Interest Entities as defined by EU Audit legislation as well as a review of areas of the firm's quality control procedures in place under the requirements of ISQC1. Five files were reviewed and none of the files reviewed were noted as requiring more than limited improvements.

As part of the firm wide quality control review, one quality control recommendation was noted indicating that an improvement was required on a less than significant matter.

We respect and benefit from IAASA's inspection process. We thoroughly evaluate the points raised during the inspection in order to identify areas where we can improve audit quality. Engagements with significant findings are subject to root cause analysis (see next section).

IAASA is currently conducting a quality assurance inspection of the firm which is ongoing and is expected to conclude later in 2021.

Information about IAASA, along with publicly available inspection reports can be found on its website: iaasa.ie.

PSD Inspections

EY Ireland is also subject to triennial inspection by the Professional Standards Department of the Institute of Chartered Accountants Ireland (PSD) for non-Public Interest Entity Audits.

PSD is currently conducting a quality assurance inspection of the firm which is ongoing and is expected to conclude later in 2021.

The firm was last subject to a quality assurance inspection by PSD in June 2018 and which was an inspection of the statutory audits of a sample of non EU Public Interest Entity clients. The firm was very satisfied with the conclusions of the report on the firm which stated that the quality of the files was generally good.

Information on the above-mentioned regulator can be found on its website: charteredaccountants.ie.

Inspections by overseas audit monitoring authorities

EY Ireland is also registered with the Public Company Accounting and Oversight Board (PCAOB) in the US and the Japanese Financial Services Agency.

The firm was subject to inspection by the PCAOB in September 2019. A report on the inspection of the firm was published by the PCAOB on 11 February 2021. As part of its inspections, the PCAOB evaluates quality control systems and reviews selected engagements.

Three files were reviewed as part of this inspection. We have considered the findings set out in the PCAOB inspection report and are implementing the remedial actions to address the matters and strengthen our policies in these areas.

Information about the PCAOB, along with publicly available inspection reports can be found on its website: pcaobus.org

Together with the AQR process, external inspections provide valuable insight into the quality of EY audits. These insights enable us to effectively execute high-quality audits.

Root cause analysis

Root cause analysis is a central part of the EY quality improvement framework, providing an in-depth assessment of the root causes that underlie an audit's favorable or unfavorable inspection outcome. This enables the identification of the key factors that can impact audit quality and the taking of responsive actions.

EY Ireland's audit practice identifies and evaluates the causal factors when a root cause analysis is performed. Analysing this research enables a better understanding of the drivers behind both positive and negative inspection outcomes. Responsive action plans are developed to address the root causes for significant engagement-related findings. EY Ireland's audit practice reviews the nature and prevalence of root causes to determine if systemic issues exist and if so, further action plans are developed. EY's Global Remediation Taskforce is responsible for addressing any pervasive root causes across the network and implementing responsive action plans on a larger scale.

Compliance with legal requirements

The EY Global Code of Conduct provides clear guidance about EY actions and business conduct. EY Ireland complies with applicable laws and regulations, and EY's values underpin our commitment to doing the right thing. This important commitment is supported by a number of policies and procedures, explained in the paragraphs below.

➤ Anti-bribery

The EY Global Anti-bribery Policy provides EY people with direction on certain unethical and illegal activities. It emphasises the obligation to comply with anti-bribery laws and provides a definition of what constitutes bribery. It also identifies reporting responsibilities when bribery is discovered. In recognition of the growing global impact of bribery and corruption, efforts have been sustained to continue to embed anti-bribery measures across EY.

➤ Insider trading

Securities trading is governed by many laws and regulations, and EY personnel are obliged to comply with applicable laws and regulations regarding insider trading. This means EY personnel are prohibited from trading in securities, while in possession of material, non-public information.

The EY Global Insider Trading Policy reaffirms the obligation of EY people not to trade in securities when in possession of insider information, provides detail on what constitutes insider information, and identifies with whom EY people should consult if they have questions regarding their responsibilities.

➤ Economic and trade sanctions

It is important that we are aware of the ever-changing situation with respect to international economic and trade sanctions. EY monitors sanctions issued in multiple geographies and provides guidance to EY people on impacted activities.

➤ Data privacy

The EY global policy on personal data protection, revised and reissued in 2018, sets out the principles to be applied to the collection, use and protection of personal data, including that relating to current, past and prospective personnel, clients, suppliers and business associates. This policy is consistent with the strict requirements of the European Union's GDPR, and other applicable laws and regulations concerning data protection and privacy. EY also has binding corporate rules approved by EU regulators in place to facilitate the movement of personal data within the EY network. Furthermore, we have a policy to address our specific Ireland data privacy requirements and business needs.

➤ Document retention

EY global and related local policies on records and information retention and disposition apply to all engagements and personnel. These policies address document preservation whenever any person becomes aware of any actual or reasonably anticipated claim, litigation, investigation, subpoena or other government proceedings involving us or one of our clients that may relate to our work. It also addresses Ireland legal requirements, applicable to the creation and maintenance of working papers, relevant to the work performed.

Independence practices



The EY Global Independence Policy requires EY Ireland and our people to comply with the independence standards applicable to specific engagements, e.g., the IESBA Code of Ethics and the Ethical Standard for Auditors (Ireland) issued by the Irish Auditing and Accounting Supervisory Authority (IAASA).

We consider and evaluate independence with regard to various aspects, including our financial relationships and those of our people; employment relationships; business relationships; the permissibility of services we provide to audit clients; applicable firm and partner rotation requirements; fee arrangements; audit committee pre-approval, where applicable; and partner remuneration and compensation.

Failure to comply with applicable independence requirements will factor into decisions relating to a person's promotion and compensation, and may lead to other disciplinary measures, including separation from EY Ireland.

EY Ireland has implemented EY's global applications, tools and processes to support us, our professionals and other employees in complying with independence policies.

➤ EY Global Independence Policy

The EY Global Independence Policy contains the independence requirements for member firms, professionals and other personnel. It is a robust policy predicated on the IESBA Code and supplemented by more stringent requirements in jurisdictions, where prescribed, by the local legislative body, regulator or standard-setting body. The policy also contains guidance designed to facilitate an understanding and the application of the independence rules. The EY Global Independence Policy and EY UK and Ireland Independence Policies are readily accessible and easily searchable on the EY intranet.

➤ Global Independence System (GIS)

The GIS is an intranet-based tool that helps EY professionals identify the entities for which independence is required and the independence restrictions that apply. Most often, these are listed audit clients and their affiliates, but they can also be other types of attest or assurance clients. The tool includes family-tree data relating to affiliates of listed audit clients and is updated by client-serving engagement teams. The entity data includes notations that indicate the independence rules that apply to each entity, helping our people determine the type of services that can be provided or other interests or relationships that can be entered into.

➤ Global Monitoring System (GMS)

The GMS is another important global tool that assists in identifying proscribed securities and other impermissible financial interests. Professionals ranked as manager and above are required to enter details about all securities they hold, or those held by their immediate family, into the GMS. When a proscribed security is entered or if a security they hold becomes proscribed, professionals receive a notice and are required to dispose of the security. Identified exceptions are reported through an independence incident reporting system for regulatory matters.

GMS also facilitates annual and quarterly confirmation of compliance with independence policies, as described below.

➤ Independence compliance

EY has established several processes and programs aimed at monitoring the compliance with independence requirements of EY member firms and their people. These include the following activities, programs and processes.

➤ Independence confirmation

Annually, EY Ireland is included in an Area-wide process to confirm compliance with the EY Global Independence Policy and process requirements, and to report identified exceptions, if any.

All EY professionals, and certain others, based on their role or function, are required to confirm compliance with independence policies and procedures at least once a year. All partners are required to confirm compliance quarterly.

➤ Independence compliance reviews

EY conducts internal procedures to assess member firm compliance with independence matters. These reviews include aspects of compliance related to non-audit services, business relationships with the companies we audit and financial relationships of member firms.

➤ Personal independence compliance testing

Each year, the EY Global Independence team establishes a program for testing compliance with personal independence confirmation requirements and with reporting of information into GMS. For the 2021 testing cycle, EY Global tested 78 partners and other personnel from EY Ireland.

➤ Non-audit services

EY monitors compliance with professional standards, laws and regulations governing the provision of non-audit services to audit clients through a variety of mechanisms. These include the use of tools, such as PACE (see page 19) and the Service Offering Reference Tool (SORT) (see over), and training and required procedures completed during the performance of audits and internal inspection processes. There is also a process in place for the review and approval of certain non-audit services in advance of accepting the engagement.

➤ Global independence learning

EY develops and deploys a variety of independence learning programs. All EY professionals and certain other personnel are required to participate in annual independence learning to help maintain independence from the companies EY member firms audit.

The goal is to help EY people understand their responsibilities and to enable each of them, and their member firms, to be free from interests that might be regarded as incompatible with objectivity, integrity and impartiality in serving an audit client.

The annual independence learning program covers independence requirements, focusing on recent changes to policy, as well as recurring themes and topics of importance. Timely completion of annual independence learning is required and is monitored closely. EY Ireland supplements this program with local content to cover local independence requirements under the Ethical Standard for Auditors (Ireland) issued by the Irish Auditing and Accounting Supervisory Authority (IAASA) that differ from the EY Global Independence Policy.

In addition to the annual learning program, independence awareness is promoted through events and materials, including new-hire programs, milestone programs and core service line curricula.

➤ Service Offering Reference Tool (SORT)

We assess and monitor our portfolio of services on an ongoing basis to confirm that they are permitted by professional standards, laws and regulations, and to make sure that we have the right methodologies, procedures and processes in place as new service offerings are developed. We restrict services from being provided that could present undue independence or other risks. SORT provides EY people with information about EY service offerings. It includes guidance on which services can be delivered to audit and non-audit clients, as well as independence and other risk management issues and considerations.

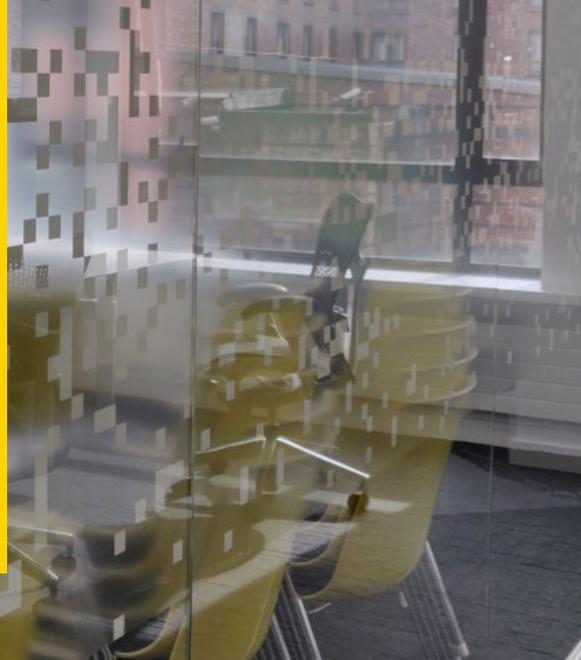
➤ Business Relationship Evaluation Tool (BRET)

EY people are required to use BRET in many circumstances to identify, evaluate and obtain advance approval of a potential business relationship with an audit client, thereby supporting our compliance with independence requirements.

➤ Audit committees and oversight of independence

We recognise the important role audit committees and similar corporate governance bodies undertake in the oversight of auditor independence. Empowered and independent audit committees perform a vital role on behalf of shareholders in protecting independence and preventing conflicts of interest. We are committed to robust and regular communication with audit committees or those charged with governance. Through the EY quality review programs, we monitor and test compliance with EY standards for audit committee communications, as well as the pre-approval of non-audit services, where applicable.

Continuing education and investing in exceptional talent



Development of EY people

Professional development

The continuous development of our people's skills and knowledge is critical to achieving our purpose of enhancing confidence in the capital markets.

Providing opportunities for the right experiences, learning and coaching helps our people grow and achieve their potential at a variable pace of progression. The day-to-day experiences gained are assigned locally in a systematic way, while the EY audit learning core curriculum is globally consistent. This is supported throughout by on-the-job coaching from more experienced professionals that helps to transform knowledge and experience into practice.

Learning is delivered through the award-winning Audit Academy, which combines "on-demand" e-learning modules with interactive physical or virtual classroom-based simulations and case studies, plus relevant reinforcement and application support.

This is supplemented by learning programs that are developed in response to changes in accounting and reporting standards, independence and professional standards, new technology and emerging issues.

Where an EYG member firm audits and reviews International Financial Reporting Standards (IFRS) financial statements, relevant team members undertake learning to become IFRS-accredited.

EY Ireland requires audit professionals to obtain at least 20 hours of continuing professional education each year and at least 120 hours over a three-year period. Of these hours, 40% (eight hours each year and 48 hours over a three-year period) must cover technical subjects related to accounting and auditing.

Knowledge and internal communications

In addition to professional development and performance management, we understand the importance of providing client engagement teams with up-to-date information to help them perform their professional responsibilities. There is significant EY investment in knowledge and communication networks to enable the rapid dissemination of information to help people collaborate and share best practices. This has been of increasing importance to address emerging risks arising as a result of the pandemic. Some EY resources and tools include:

- ▶ EY Atlas, which includes local and international accounting and auditing standards, as well as interpretive guidance
- ▶ Publications such as International GAAP, IFRS developments and illustrative financial statements
- ▶ Global Accounting and Auditing News – weekly update covering assurance and independence policies, developments from standard-setters and regulators, as well as internal commentary thereon
- ▶ Practice alerts and webcasts covering a range of global and country-specific matters designed for continuous improvement in member firms' Assurance practices



Building the highest performing teams, mentoring and developing our people, giving everyone a clear career path and progression opportunities to move up in our firm, is central to our business and people strategy.



Frank O'Keeffe
Managing Partner, EY Ireland

➤ Performance management

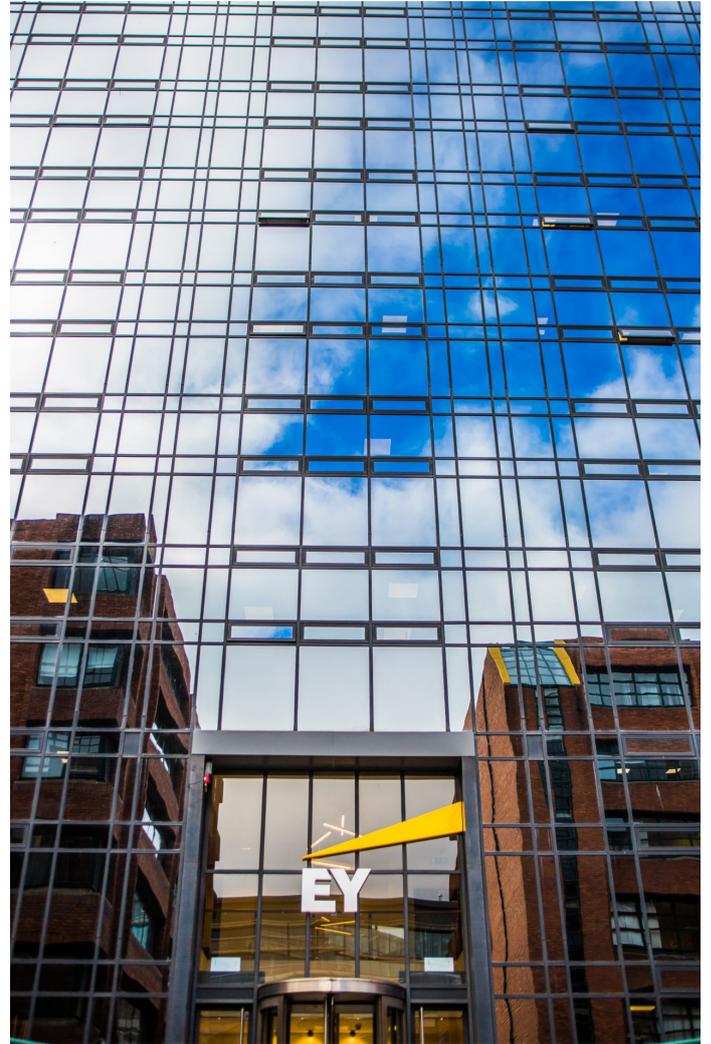
LEAD is a framework that connects EY people's career, development and performance. Through ongoing feedback, development, counselor excellence and career conversations, LEAD aligns individuals with the NextWave strategy and enables a focus on the future. It supports the growth and development of EY people at all stages of their careers. An individual's dashboard provides a snapshot of performance against the Transformative Leadership dimensions, including quality, risk management and technical excellence, and assesses performance against peers. Feedback received during an annual cycle is aggregated and used as an input to compensation and reward programs.

Regular discussions with a counselor, on topics such as diverse career journeys, applying emerging technology, experiencing new teams and learning, help identify opportunities for further development and to build future-focused skills.

Impact of COVID-19

The shift to remote working during the COVID-19 pandemic has provided new challenges for our people. From maintaining vitality to working in a virtual team, adopting an agile mindset that embraces change has been critical. These circumstances have further highlighted the need to maximise the use of available technology.

Additional counselling has also been provided to help EY people stay connected and engaged.



Revenue and remuneration



Financial information

Revenue represents combined, not consolidated, revenues, and includes expenses billed to clients, and revenues related to billings to other EYG member firms. Revenue amounts disclosed in this report include revenues from both audit and non-audit clients.

Revenue is presented in accordance with EU Regulation No 537/2014 and included revenues from:

1. Statutory audit of annual and consolidated financial statements of PIEs, and entities belonging to a group of undertakings whose parent undertaking is a PIE
2. Statutory audit of annual and consolidated financial statements of other entities
3. Permitted non-audit services to entities audited by the statutory auditor or the audit firm
4. Non-audit services to other entities

Financial information for the period ended on 30 June 2021 expressed in euro thousand

Service	Revenue	Percent
Statutory audits and directly related services for PIEs	17,801	4%
Statutory audit of annual and consolidated financial statements of other entities	117,630	30%
Non-audit services provided to companies we audit	17,825	5%
Non-audit services provided to other entities	239,794	61%
Total revenue	393,050	100%

Total revenue includes expenses and disbursements on clients which represents certain amounts recharged by other EY member firms.

Excluding expenses and disbursements on clients, total revenue was €350.5 m in FY21 and €315.0m in FY20 (year on year increase of 11%).

Partner remuneration

Quality is at the centre of the EY strategy and is a key component of EY performance management systems. EY Ireland partners are evaluated and compensated based on criteria that include specific quality and risk management indicators, covering both actions and results.

LEAD for partners, principals, executive directors and directors (PPEDDs) applies to all partners in EYG member firms around the world. LEAD for PPEDDs reinforces the global business agenda by continuing to link performance to wider goals and values. The process includes goal setting, ongoing feedback, personal development planning and performance review, and is tied to partners' recognition and reward. Documenting partners' goals and performance is the cornerstone of the evaluation process. A partner's goals are required to reflect various global priorities, one of which is quality.

EY policies prohibit evaluating and compensating lead audit engagement partners and other key audit partners on an engagement based on the sale of non-Assurance services to companies they audit. This reinforces to EY partners their professional obligation to maintain independence and objectivity. For audits conducted in accordance with the requirements of Directive 2014/56/EU of the European Parliament and of the Council of 16 April 2014, EY prohibits evaluating and compensating any partner or professional involved in, or able to influence the carrying out of, an engagement based on the sale of non-Assurance services to their audit clients. This reinforces that professionals are obligated to maintain independence and objectivity.

Specific quality and risk performance measures have been developed to account for:

- ▶ Providing technical excellence
- ▶ Living the EY values as demonstrated by behaviours and attitude
- ▶ Demonstrating knowledge of, and leadership in, quality and risk management
- ▶ Complying with policies and procedures
- ▶ Complying with laws, regulations and professional duties
- ▶ Contributing to protecting and enhancing the EY brand

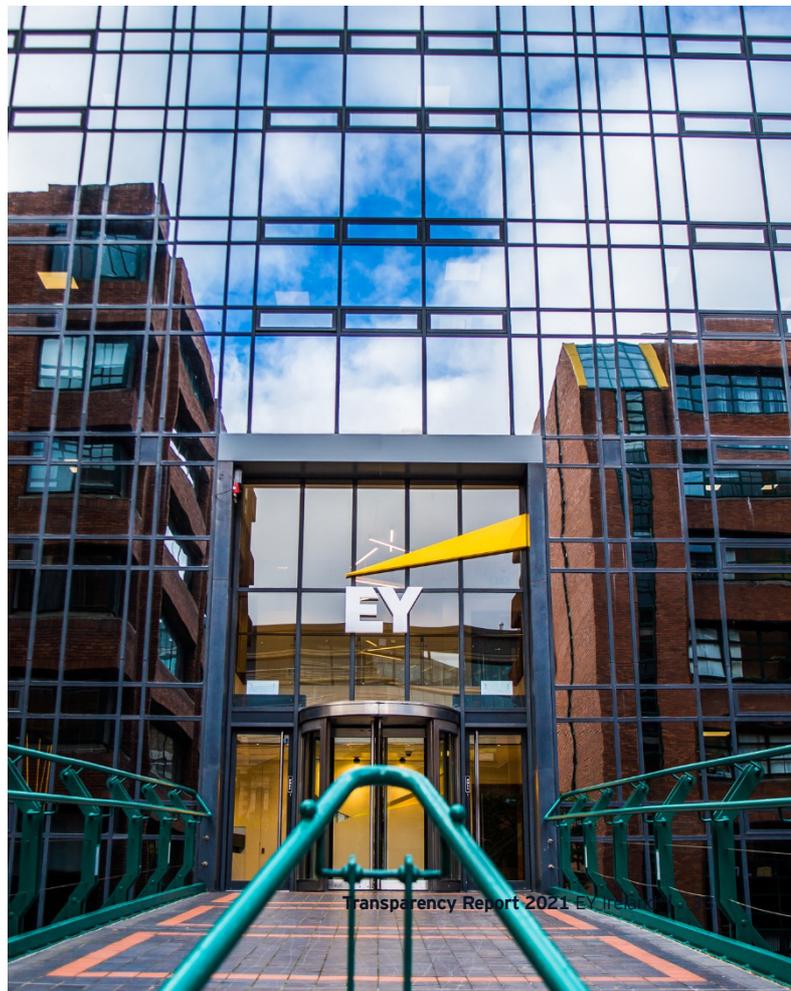
The EY partner compensation philosophy calls for meaningfully differentiated rewards based on a partner's level of performance, as measured within the context of LEAD. Partners are assessed by their firms annually on their performance in delivering quality, exceptional client service and people engagement, alongside financial and market metrics.

We operate under a system that requires quality to be a significant consideration in a partner's overall year-end rating.

To recognise different market values for different skills and roles, and to attract and retain high-performing individuals, the following factors are also considered when we determine our partners' total reward:

- ▶ Experience
- ▶ Role and responsibility
- ▶ Long-term potential

Instances of non-compliance with quality standards result in remedial actions, which may include performance evaluation, compensation adjustment, additional training, additional supervision or reassignment. A pattern of non-compliance or particularly serious non-compliance may result in actions that include separation from EY Ireland.



Appendix 1

List of PIEs audited by EY Ireland

EY Ireland PIE audit clients

In the fiscal year that ended on 30 June 2021, EY Ireland performed audits of the following PIEs:

Aetna Health Insurance Company of Europe DAC

ALD RE Designated Activity Company

Alexandria Capital Public Limited Company

Alum Bay Designated Activity Company

Amethyst Structured Finance Public Limited Company

Appletree Securities Designated Activity Company

Ardmore Securities No.1 Designated Activity Company

Ark Life Assurance Company Designated Activity Company

Aryzta Euro Finance Designated Activity Company

Athora Ireland Public Limited Company

Atlantis International Umbrella Fund

Aviation Public Limited Company

Beazley Insurance Designated Activity Company

Beechwood Structured Finance Public Limited Company

Benbulbin Capital Public Limited Company (formerly Brookfields Capital Public Limited Company)

BG UMBRELLA FUND PLC

Bilbao CLO I Designated Activity Company

BlackRock Alternative Strategies II

Blackrock Institutional Pooled Funds Public Limited Company

Blackstone US Loan USD Feeder Fund (Ireland) (formerly Blackstone / GSO US Loan USD Feeder Fund (Ireland))

Bluestep Mortgage Securities No. 4 Designated Activity Company

BNY Mellon Liquidity Funds Public Limited Company

Canaccord Genuity Investment Funds Public Limited Company

Carlyle Global Market Strategies Euro Clo 2014-3 Designated Activity Company

Carlyle Global Market Strategies Euro Clo 2015-3 Designated Activity Company

Classic Brand (Europe) Limited

Clwyd Managed Futures and Hedge Fund Strategy

Coriolanus Designated Activity Company

Cork Street CLO Designated Activity Company

CRH SMW Finance Designated Activity Company

Cuardaithe Designated Activity Company

dbInvestor Solutions 2 Public Limited Company

dbInvestor Solutions Public Limited Company

DME Airport Designated Activity Company

Dunmore Securities No.1 Designated Activity Company

Eirles One Designated Activity Company

Eirles Three Designated Activity Company

Eirles Two Designated Activity Company

Eperon Finance Public Limited Company

Espaccio Securities Public Limited Company

European Residential Loan Securitisation 2018-1 Designated Activity Company

European Residential Loan Securitisation 2019-NPL1 Designated Activity Company

European Residential Loan Securitisation 2019-PL1 Designated Activity Company

FCA Capital Re Designated Activity Company

Fundlogic Alternatives Public Limited Company

Golden Arches Insurance Designated Activity Company

Greenstreet Structured Financial Products Public Limited Company

List of PIEs audited by EY Ireland (Cont'd)

HANetf ICAV

Harvest CLO IX Designated Activity Company

Harvest CLO V Designated Activity Company

Harvest CLO VII Designated Activity Company

Harvest CLO VIII Designated Activity Company

Harvest CLO X Designated Activity Company

Harvest CLO XI Designated Activity Company

Harvest CLO XII Designated Activity Company

Harvest CLO XIV Designated Activity Company

Harvest CLO XIX Designated Activity Company

Harvest CLO XV Designated Activity Company

Harvest CLO XVI Designated Activity Company

Harvest CLO XVIII Designated Activity Company

Harvest CLO XX Designated Activity Company

Institutional Cash Series Public Limited Company

Ipanema Capital Public Limited Company

Ixion Public Limited Company

Kingspan Group Public Limited Company

KPN Insurance Company Designated Activity Company

Legal & General UCITS ETF Public Limited Company

Leverage Shares Public Limited Company

Libretto Capital Public Limited Company

Lunar Funding V Public Limited Company

MBDA Reinsurance Designated Activity Company

Mol Reinsurance Co Designated Activity Company

Montanaro European Smaller Companies Public Limited Company

Neuberger Berman Investment Funds II Public Limited Company

Neuberger Berman Investment Funds Public Limited Company

Nimrod Capital Public Limited Company

Nomura Next Funds Ireland Public Limited Company

Opal Financial Products Public Limited Company

Ottam Mexican Capital Trust Designated Activity Company

Partner Reinsurance Europe SE

PartnerRe Ireland Finance Designated Activity Company

PartnerRe Ireland Insurance Designated Activity Company

Porsche International Reinsurance Designated Activity Company

Probus Insurance Company Europe Designated Activity Company

Profile Finance Public Limited Company

Prysmian Re Company Designated Activity Company

Recolte Securities Public Limited Company

Renaissance Reinsurance Of Europe Unlimited Company

Rosneft International Finance Designated Activity Company

RZD Capital Public Limited Company

SCF Capital Designated Activity Company

SEB Life International Assurance Company Designated Activity Company

Silverstate Financial Investments Public Limited Company

Standard Life International Designated Activity Company

Taberna Europe CDO I Public Limited Company

Taberna Europe CDO II Public Limited Company

UDG Healthcare Public Limited Company

Ulster Bank Ireland Designated Activity Company

Ulster Bank Limited

Vermillion Protective Bond Portfolio Public Limited Company

Vespucci Structured Financial Products Public Limited Company

Vigado Capital Public Limited Company

Volkswagen Insurance Company Designated Activity Company

Volkswagen Reinsurance Company Designated Activity Company

Voya Euro CLO I Designated Activity Company

Voyce Investments Public Limited Company

VTB Eurasia Designated Activity Company

Waterford Capital Investments Public Limited Company

Waves Financial Investments Public Limited Company

Wisdomtree Issuer ICAV (formerly Wisdomtree Issuer Public Limited Company)

Wisdomtree Multi Asset Issuer Public Limited Company

Appendix 2

Approved EYG member firms

▶ List of approved EYG member firms in an EU or EEA member state

As of 30 June 2021, the following EYG member firms are approved to carry out statutory audits in an EU or EEA member State:

Member State	Statutory auditor or audit firm
Austria	Ernst & Young Wirtschaftspruefungsgesellschaft mbH
Belgium	EY Assurance Services SRL
	EY Bedrijfsrevisoren SRL
	EY Europe SCRL
Bulgaria	Ernst & Young Audit OOD
Croatia	Ernst & Young d.o.o.
Cyprus	Ernst & Young Cyprus Limited
	Ernst & Young
	Ernst & Young CEA (South) Services Ltd
	Ernst & Young CEA (South) Holdings Plc
Czech Republic	Ernst & Young Audit, s.r.o.
Denmark	EY Godkendt Revisionspartnerselskab
	EY Grønland Statsautoriseret Revisionspartnerselskab
	EY Net Source A/S
Estonia	Ernst & Young Baltic AS
	Baltic Network OU
Finland	Ernst & Young Oy
France	Artois
	Auditex
	Ernst & Young Audit
	Ernst & Young et Autres
	EY & Associés
Picarle et Associes	
Germany	Ernst & Young GmbH Wirtschaftsprüfungsgesellschaft
	Ernst & Young Heilbronner Treuhand-GmbH Wirtschaftsprüfungsgesellschaft
	EY Revision und Treuhand GmbH Wirtschaftsprüfungsgesellschaft
	Treuhand-Süd GmbH Wirtschaftsprüfungsgesellschaft Steuerberatungsgesellschaft
	Schitag Schwäbische Treuhand GmbH Wirtschaftsprüfungsgesellschaft

Member State	Statutory auditor or audit firm
Greece	Ernst & Young (Hellas) Certified Auditors Accountants SA
Hungary	Ernst & Young Könyvvizsgáló Korlátolt Felelősségű Társaság
Iceland	Ernst & Young ehf
Ireland	Ernst & Young Chartered Accountants
Italy	EY S.p.A.
Latvia	Ernst & Young Baltic SIA
Liechtenstein	Ernst & Young AG, Basel
	Ernst & Young GmbH Wirtschaftsprüfungsgesellschaft
	Ernst & Young AG, Vaduz
Lithuania	Ernst & Young Baltic UAB
Luxembourg	Compagnie de Révision S.A.
	Ernst & Young Luxembourg S.A.
	Ernst & Young S.A.
Malta	Ernst & Young Malta Limited
Netherlands	Ernst & Young Accountants LLP
Norway	Ernst & Young AS
Poland	Ernst & Young Audyt Polska sp. z o.o.
	Ernst & Young Audyt Polska Spółka z ograniczoną odpowiedzialnością Finance spółka komandytowa
	Ernst & Young Audyt Polska spółka z ograniczoną odpowiedzialnością Doradztwo Podatkowe spółka komandytowa
	Ernst & Young Audyt Polska spółka z ograniczoną odpowiedzialnością sp. k.
	Ernst & Young Usługi Finansowe Audyt sp. z o.o.
Portugal	Ernst & Young Audit & Associados – SROC, S.A.
Romania	Ernst & Young Assurance Services S.r.l.
	Ernst & Young Support Services SRL
Slovakia	Ernst & Young Slovakia, spol. s r.o.
Slovenia	Ernst & Young d.o.o.
Spain	ATD Auditores Sector Público, S.L.U
	Ernst & Young, S.L.
Sweden	Ernst & Young AB

Total turnover for the year ended on 30 June 2021 for these EYG member firms, (and for the UK and Gibraltar firms up to the end of the Brexit transition period of 31 December 2020), resulting from statutory audits of annual and consolidated financial statements was approximately €2.6 billion.

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