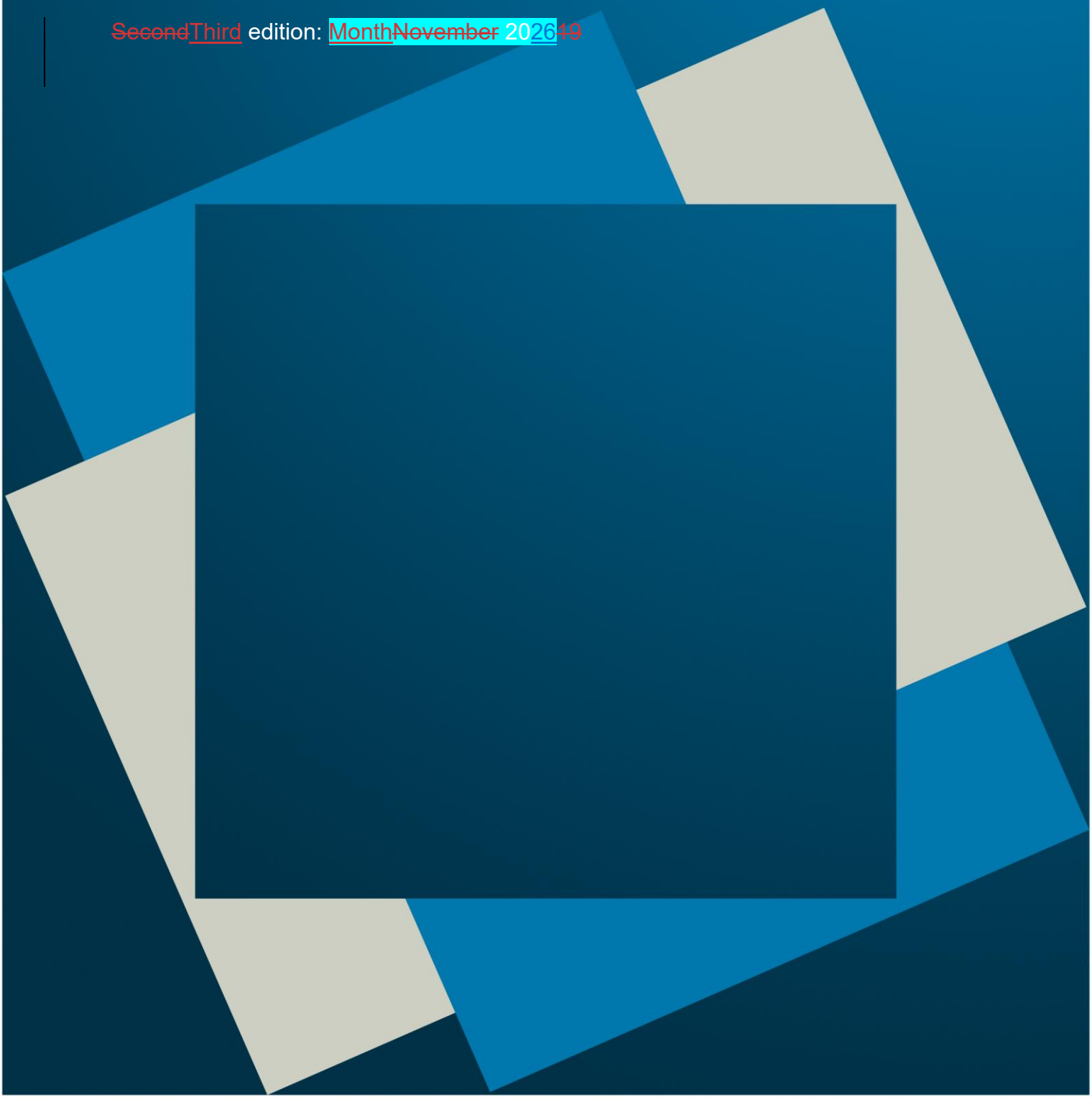
APESB
Accounting Professional & Ethical Standards Board

Audit Partner and Sustainability Assurance Leader rotation requirements in Australia Technical Staff Questions & Answers

~~Second~~Third edition: Month~~November~~ 2026~~19~~



Purpose

Independence of auditors and assurance practitioners is fundamental to maintaining public confidence in financial reporting, sustainability reporting, and the broader integrity of capital markets. Professional and ethical requirements on independence highlight the rotation of partners and leaders as a key action to address familiarity and self-interest threats created by long association with an audit, assurance or sustainability assurance client. The rotation requirements help ensure that Members and Practitioners remain objective and are able to bring a renewed perspective to audit and assurance engagements.

This publication outlines the Australian audit partner and sustainability assurance leader rotation requirements set out in APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)* (the Code). This third edition incorporates the long association provisions in the Code that apply to sustainability assurance engagements from 1 January 2026, as well as the *Corporations Act 2001* requirements for sustainability reporting and assurance.

The two previous editions of this publication are available on the APESB website:

- the first edition, issued in 2017, covered Australian professional and ethical requirements in Sections 290 and 291 of the Code relating to audit partner rotation for periods beginning on or after 1 January 2019. The publication covered the interaction of the Code requirements with requirements in the *Corporations Act 2001*, as well as the application of transitional relief from 1 January 2019 to 31 December 2023. ~~To assist the Australian accounting profession with this change, the Technical Staff of the Accounting Professional & Ethical Standards Board Limited (APESB) released the first edition of the Technical Staff Questions & Answers (Q&A) publication in 2017.~~
- the second edition, issued i~~I~~n ~~November~~ 2019~~8~~, was updated to reflect the provisions (Sections 540 and 940) in ~~APESB issued a~~the restructured ~~APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)* (the~~ Code~~), with an~~ effective from~~date of~~ 1 January 2020 and included 12 additional Q&As based on stakeholder feedback and queries. ~~This Questions & Answers (Q&A) publication has been updated to reflect the provisions (Sections 540 and 940) in the restructured Code, along with additional Q&As based on stakeholders' feedback and enquiries.~~

The provisions released in Australia align with the *International Code of Ethics for Professional Accountants (including International Independence Standards)* released by the International Ethics Standard Board for Accountants (IESBA). The IESBA's equivalent publication *IESBA Staff Questions & Answers – Long Association of Personnel with an Audit Client (issued May 2017 and revised in May 2019)* has been utilised as the base document in the preparation of this publication in relation to audit partner rotation.

Important note

This publication has been prepared by Technical Staff of the APESB. It does not constitute an authoritative or official pronouncement of APESB.

This publication and the examples contained within are provided for illustrative purposes only and are not intended to be, and cannot be, all-inclusive. The examples in this publication are provided to illustrate the requirements of the Code and are not intended to address all possible circumstances.

The publication does not amend or override the Code, the text of which alone is authoritative. Reading this publication is not a substitute for reading the full text of the Code and other relevant APESB pronouncements.

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A. Introduction

All Members in Public Practice and Sustainability Assurance Practitioners who perform audit, assurance and sustainability assurance services need to be aware of their professional and ethical obligations relating to long association and rotation requirements.

This publication outlines the current Australian audit partner and sustainability assurance leader rotation requirements set out in APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)* ("the Code"). It covers the long association requirements for both audit engagements and sustainability assurance engagements, and the interaction with relevant Australian laws and regulations, such as the *Corporations Act 2001* and APRA Prudential Standards. The updated requirements in the Code relating to Sustainability Assurance Engagements became effective from 1 January 2026.

~~An individual needs to cool-off from an Audit, Assurance or Sustainability Assurance Engagement if it is determined that there are familiarity and self-interest threats to Independence. The period of cooling-off will need to be determined by the Member and the Firm.~~

For Members in Public Practice who perform audits or reviews of Financial Statements for Public Interest Entities (PIEs), or perform Sustainability Assurance Engagements for PIEs, the requirements are more prescriptive and set out specific time-on and cooling-off periods for specific roles undertaken by Key Audit Partners and Key Sustainability Assurance Leaders. Members and Firms will need to consider the type of PIE they are auditing and whether there are specific laws and regulations that impact rotation requirements that apply. Refer to the section Public Interest Entities below for information on PIEs.

An individual needs to cool-off from an Audit, Assurance or Sustainability Assurance Engagement if it is determined that there are familiarity and self-interest threats to Independence. The period of cooling-off will need to be determined by the Member and the Firm.

Key ~~changes~~ features of~~to~~ audit partner and sustainability assurance leader rotation requirements

~~In April 2018, APESB revised the provisions in the Code on the long association of personnel with an Audit or Assurance Client.[1] The most significant changes affect audit partners of Public Interest Entities (PIEs). The changes see an increase in the time required for an audit partner of a PIE to cool-off if they are either an Engagement Partner (EP) or the Engagement Quality Control Review (EQCR) Partner.~~

The ~~auditor~~ rotation rules primarily impact ~~a~~:

- ~~-~~Key Audit Partners who can be classified as an Engagement Partner (EP), Engagement Quality ~~Control~~ Reviewers (EQ~~C~~R) ~~Partner~~ or other Key Audit Partners (KAP); and~~.~~
- Key Sustainability Assurance Leaders who can be classified as an Engagement Leader (EL), Engagement Quality Reviewers (EQR) or other Key Sustainability Assurance Leaders (KSAL).

~~The impact on these three roles is set out below.~~

~~Engagement Partners~~

~~Where current laws or regulations apply which specify a cooling-off period of two years (such as the *Corporations Act 2001*), the cooling-off period for Engagement Partners on PIE audits increases from two years to three years effective for periods beginning on or after 1 January 2019.[2] This cooling-off period of three years is only applicable for periods beginning on or after 1 January 2019 and prior to 31~~

~~[1] Amendments first included in APES 110 *Code of Ethics for Professional Accountants* in Sections 290 and 291 in April 2018. In the restructured Code, effective from 1 January 2020, these provisions are now in Sections 540 and 940.~~

~~[2] If the Engagement Partner has not completed the two-year cooling-off period before 1 January 2019, the cooling-off period will be three years.~~

December 2023 (**transition period**). Subsequent to the end of the transition period, the Engagement Partner will be subject to a five-year cooling-off period.

Where there are no applicable laws and regulations specifying a cooling-off period, then the cooling-off period for Engagement Partners on PIE audits increased from two years to five years for periods beginning on or after 1 January 2019.[3]

Engagement Quality Control Review (EQCR) Partner

For periods beginning on or after 1 January 2019 the cooling-off period for EQCR Partners increased from two years to three years.

Other Key Audit Partners

For all other Key Audit Partners, the cooling-off period remains unchanged at two years.

A summary of the changes to the current rotation requirements is set out in Tables 1 and 2 below.

Table 1 sets out the requirements for PIEs such as Listed Entitieslisted companies, listed registered schemes, registrable superannuation entities and APRA regulated entities, where rotation requirements a shorter cooling-off period (i.e. two years) isare also mandated inby laws and regulations.

In these circumstances during the transition period a cooling-off period of three years must be used (i.e. higher of three years in the Code or two years in the laws or regulations). Table 2 sets out the requirements for all other PIEs where a shorter cooling-off isrotation requirements are not mandated by laws and regulations.

Note that for both tables:

- the cooling-off period is the minimum number of consecutive years that a Key Audit Partner or Key Sustainability Assurance Leader must cool-off from the Audit or Sustainability Assurance Engagement, and
- the time-on period is the maximum number of cumulative (but not necessarily consecutive) years the applicable audit partner or sustainability assurance leader can perform a Key Audit Partner or Key Sustainability Assurance Leader role on an engagement (Refer to Questions 54 andto 6).

[3] If the Engagement Partner has not completed the two-year cooling-off period before 1 January 2019, the cooling-off period will be five years.

Table 1: Rotation requirements for ~~L~~listed companies, listed registered schemes, registrable superannuation ~~E~~entities and APRA regulated entities

Role	~~Current~~		~~Transition (1 Jan 2019 to pre 31 Dec 2023)~~		~~Full Provisions (from 31 Dec 2023)~~Rotation requirements	
	~~Time on (yrs)~~	~~Cooling off (yrs)~~	~~Time on (yrs)~~	~~Cooling off (yrs)~~	Time on (yrs)	Cooling off (yrs)
Engagement Partner	~~5/7**~~	~~2~~	~~5/7**~~	~~3~~	5/7**	5
Engagement Leader					5/7**	5
EQ~~C~~R ~~Partner~~	~~5/7**~~	~~2~~	~~5/7**~~	~~3~~	5/7**	3
Other Key Audit Partners	~~7~~	~~2~~	~~7~~	~~2~~	7	2
Other Key Sustainability Assurance Leaders					7	2

*** In accordance with applicable laws and regulations, ~~Audit~~ Engagement Partners, Engagement Leaders and EQ~~C~~R ~~Partner~~s can serve in the same role for a maximum of five years[4], but may be extended by the ~~Audit~~ Client or a regulator in accordance with applicable laws and regulations.[5]*

Pursuant to paragraphs R540.~~9~~11 and R5540.11 of the Code, Firms may have the opportunity for relief from the partner rotation requirements in the Code based on an exemption provided by a relevant regulator, subject to conditions being imposed.[6] Where such relief is available, the individual could remain as a Key Audit Partner (for example, as the Engagement Partner) on the Audit Engagement or as a Key Sustainability Assurance Leader (for example, as the Engagement Leader) in accordance with any conditions specified under such relief.

[4] Refer to s324DA of the *Corporations Act 2001* for Audit Partner rotation requirements for listed companies, listed registered schemes or registrable superannuation entities in Australia~~Listed Entities~~. APRA Prudential Standards CPS 510 *Governance* (~~July 2019~~November 2023) and SPS 510 *Governance* (~~July 2017~~June 2024) provides partner rotation requirements for APRA regulated entities.

[5] Refer also to s324DAA of the *Corporations Act 2001* in respect of extension of Audit Partner time-on periods for audits of listed companies, listed registered schemes or registrable superannuation entities in Australia~~Listed Entities~~.

[6] Refer to s342A of the *Corporations Act 2001* which specifies that the Australian Securities and Investment Commission (ASIC) may grant extensions. APRA has the authority to grant extensions for Audit Partners of APRA regulated entities.

Table 2: Rotation requirements for all PIEs other than ~~L~~listed companies, listed registered schemes, registrable superannuation ~~E~~entities and APRA regulated entities

Role	~~Current~~		~~Full provisions from 1 Jan 2019)~~Rotation requirements	
	~~Time on (yrs)~~	~~Cooling off (yrs)~~	Time on (yrs)	Cooling off (yrs)
Engagement Partner	~~7~~	~~2~~	7	5
Engagement Leader			7	5
EQ~~C~~R ~~Partner~~	~~7~~	~~2~~	7	3
Other Key Audit Partners	~~7~~	~~2~~	7	2
Other Key Sustainability Assurance Leaders			7	2

For audit partners and sustainability assurance leaders of all other entities where laws and regulations do not mandate ~~the cooling-off period~~rotation requirements, additional requirements and guidance have been included in the Code, such as the need to address familiarity and self-interest threats to Independence by determining an appropriate cooling-off period for Key Audit Partners and Key Sustainability Assurance Leaders.

Refer to Appendices A to ~~D~~ C for flowcharts which map out the ~~original and amended audit partner~~ rotation requirements in the Code.

For the full details of the ~~changes to the~~ audit partner and sustainability assurance leader rotation provisions please refer to the Code on the APESB website.

~~Who do the changes apply to?~~

~~The changes to the auditor partner rotation requirements in the Code are substantial and therefore all Members in Public Practice who perform audit and assurance services need to consider the impact of these changes.~~

~~An individual will need to cool-off from an Audit or Assurance Engagement if it is determined that there are familiarity and self-interest threats to Independence. The period of cooling-off will need to be determined by the Member and the Firm.~~

~~For Members in Public Practice who perform audits or reviews of Financial Statements for PIEs, the changes are more prescriptive and set out specific time-on and cooling-off periods for specific roles undertaken by Key Audit Partners. Members and Firms will need to consider the type of PIE they are auditing and whether there are specific laws and regulations that impact the cooling-off period during the transition period. Refer to the section Public Interest Entities below for information on PIEs and to Questions 4 to 14 for further information on shorter cooling-off periods applicable during the transition period.~~

~~Further details of these changes are available in the Code.~~

Public Interest Entities

The Code includes a definition of a PIE and its meaning in paragraphs 400.~~8~~13 to 400.15 and paragraphs R400.22 to ~~AUST 400.8.1 A1~~R400.26. The definition of PIE includes the following:

- a Publicly TradedListed Entity (including an listed entity that is listed, as defined in Section 9 of the *Corporations Act 2001*);
- an entity one of whose main functions is to take deposits from the public;
- an entity one of whose main functions is to provide insurance to the public; or
- an entity specified as such (a) defined by law, regulation or professional standards to meet the purpose set out in paragraph 400.15 of the Codelegislation as a public interest entity or (b) for which the audit is required by regulation or legislation to be conducted in compliance with the same Independence requirements that apply to the audit of Listed Entities. Such regulation may be promulgated by any relevant regulator, including an audit regulator.

In determining whether an entity is a PIE it is important for a Member in Public Practice or Firm to consider the specifics of the entity such as whether there is significant public interest in the financial condition of the entity, the nature of the business, including its size and the number of employees, and whether there are a large number and wide range of stakeholders.

In Australia, entities that would generally meet the definition of PIEs (as per paragraph AUST R400.823.1 A1) include:

- Authorised deposit-taking institutions (ADIs) and authorised non-operating holding companies (NOHCs) regulated by the Australian Prudential Regulatory Authority (APRA) under the *Banking Act 1959*;
- Authorised insurers and authorised NOHCs regulated by APRA under Section 122 of the *Insurance Act 1973*;
- Life insurance companies and registered NOHCs regulated by APRA under the *Life Insurance Act 1995*;
- Private health insurers regulated by APRA under the *Private Health Insurance (Prudential Supervision) Act 2015*;
- Disclosing entities as defined in Section 111AC of the *Corporations Act 2001*;
- Registrable superannuation entity (RSE) licensees, and RSEs under their trusteeship that have five or more members, regulated by APRA under the *Superannuation Industry (Supervision) Act 1993*; and
- Other issuers of debt and equity instruments to the public.

Transitional provisions for periods ending before 31 December 2023 (now expired)

Paragraphs R540.22 and AUST R540.22.1 of the Code set out relief provisions to assist entities transition to more rigorous rotation requirements. The relief applied to Engagement Partners who performed audits and reviews for PIEs, such as listed companies, listed registered schemes, registrable superannuation entities and APRA regulated entities, where a shorter cooling-off period is mandated by laws or regulations. It allowed the cooling-off period for Engagement Partners on PIE audits to be three years rather than five years. This modified cooling-off period of three years was only applicable for periods beginning on or after 1 January 2019 and prior to 31 December 2023 (transition period).

As the transitional provisions have expired, the Q&As relating to these provisions have been removed from this edition of the rotation requirements publication. Information on the transitional provisions and the relevant Q&As can be accessed in the second edition of this publication or by referring to paragraphs R540.22 and AUST R540.22.1 in the Code (available on the APESB website).

~~Effective date for the amended requirements~~

~~The changes to the audit partner rotation requirements came into effect for periods beginning on or after 1 January 2019. The updated requirements in the restructured Code become effective from 1 January 2020.~~

~~Note that there is transitional relief for Engagement Partners who perform audits and reviews for PIEs, such as Listed Entities, disclosing entities or APRA regulated entities, where a shorter cooling-off period is mandated by laws or regulations (refer to the section Key changes to audit partner rotation requirements above and Question 4).~~

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B. General provisions on partner rotation

Q1. What are the general provisions for the long association of personnel with an Audit, ~~or~~ Assurance Engagement or Sustainability Assurance Engagement?

The Code requires individuals and Firms to perform an assessment as to whether there are any threats to Independence created from an individual being associated over a long period of time with an Audit, ~~or~~ Assurance ~~Client~~, or Sustainability Assurance Client. If threats are identified, the individual and the Firm need to address these threats by eliminating them or reducing them to an Acceptable Level. This can be done by:

- Eliminating the circumstances including interests or relationships, that are creating the threats;
- Applying safeguards, where available and capable of being applied, to reduce the threats to an Acceptable Level; or
- Declining or ending the specific professional activity.

A key safeguard that could be implemented is removing the individual from the Audit, ~~or~~ Assurance or Sustainability Assurance Engagement for a sufficient period to ensure the threat is adequately addressed.

If the engagement is for the A~~a~~udit or Sustainability Assurance Engagement of a PIE, there are additional requirements that must be met by the individual and the Firm. These requirements are set out in:

- ~~-~~paragraphs R540.~~5~~7 to 540.~~20~~23 A1 of the Code, and discussed in Section C of this publication for Audits of PIEs; and
- paragraphs R5540.7 to 5540.23 A1 of the Code, and discussed in Section D of this publication for Sustainability Assurance Engagements of PIEs.

However, if threats to Independence are identified, the general provisions must be considered (see paragraphs 540.4 A3, R540.12 and 540.12 A1 of the Code) and may override the ~~outlined periods~~periods outlined in the specific requirements for the ~~a~~Audit or Sustainability Assurance Engagement of PIEs.

Q2. What factors should a Firm consider when assessing long association threats under the general provisions in the Code?

In performing an assessment of long association threats under the general provisions of the Code, Firms need to consider the overall relationship and engagement ~~context, and~~context and not merely rely on prescriptive time-on and cooling-off requirements. Relevant factors a Firm may consider include, but are not limited to, those in paragraphs 540.4 A3 and 5540.4 A3 of the Code, along with broader factors identified in practice, such as:

- The nature and extent of the individual's involvement with the client over time. This involves considering the substance of the relationship, including the roles the individual performed on the engagement (including interactions if the individual was at another Firm), the level of judgement exercised, the key decisions made and their ability to influence the outcome of the engagement.
- Changes in senior management or Those Charged with Governance;
- Changes in the client's structure, operations, or risk profile which would include events such as acquisitions, restructures, significant new transactions, increased complexity of transactions, or an increased public interest profile, that have impacted the nature, frequency and extent of interactions with the Client.
- The significance of the client and engagement circumstances, including client size and revenue impact for the individual and the Firm.

- The provision of additional services or performing new roles, including where the individual undertakes additional assurance or sustainability roles.[7]
- The outcomes of internal or external quality reviews.
- Concerns raised by other team members about an individual's objectivity or independence.
- Public perception and the appearance of independence.
- Approaching significant time-on milestones. Even if the prescriptive rotation requirements do not apply to the engagement, they can be used as a trigger to re-evaluate long-association threats.

Firms should maintain documentation of the long association threat assessment performed, the factors considered, the safeguards applied and the basis for concluding that objectivity has been maintained (see paragraphs 400.60 and 5400.60 of the Code).[8]

~~Q2.~~Q3. Section~~s~~ 540 and 5540 of the Code measure~~s~~ time-on and cooling-off periods in years. Does the reference to years refer to a financial or calendar year?

The term 'year' refers to the client's financial year, which is ordinarily a 12-month period. It does not refer to a calendar year or the time it takes to perform the audit.

Refer to ~~Questions 23~~Questions 34 and ~~24~~35 for examples of a client's financial year being longer or shorter than a 12-month period.

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[7] Members in Public Practice and Sustainability Practitioners should refer to Sections 600 *Provision of Non-Assurance Services to an Audit Client* and 5600 *Provision of Non-Assurance Services to a Sustainability Assurance Client* of the Code to determine if the non-assurance service provided would be a permissible service.

[8] In October 2025, ASIC released *Report 817 Building trust: Auditor compliance with independence and conflict of interest obligations* which outlines the regulators' key concerns on compliance with the rotation requirements in the *Corporations Act 2001* and the Code. This included the lack of documentation and internal policies by Firms on how they evaluate, assess and address threats created through long association with a Client, especially when the general provisions on long association in the Code apply.

C. Specific provisions for audits of PIEs in Section 540 of the Code

~~Q3.~~Q4. Are the audit partner rotation requirements the same for all PIEs?

No. In addition to the audit partner rotation requirements in the Code, there are laws and regulations in Australia which set out audit partner rotation requirements for some entities, such as ~~L~~listed companies, listed registered schemes, registrable superannuation e~~E~~ntities and APRA regulated entities. The impact of complying with these laws and regulations, as well as the Code requirements, creates different rotation requirements for the Key Audit Partners of these PIEs.

The Code also specifies different rotation requirements for the different roles undertaken by audit partners and Key Sustainability Assurance Leaders in relation to the Audit Engagement. While the time-on period for ~~all~~Key ~~a~~Audit ~~p~~Partners is the same maximum number of years, there are different cooling-off periods required for the different roles.

Refer to ~~Questions 4~~ Question 5 ~~and 5~~ for the specific audit partner rotation requirements where ~~a shorter cooling-off period is mandated by~~ laws and regulations mandate rotation requirements (applicable to ~~L~~listed companies, listed registered schemes, registrable superannuation ~~E~~entities and APRA regulated entities ~~during the transition period~~).

Refer to Question 6 for the specific audit partner rotation requirements for entities where laws and regulations do not apply (applicable to PIEs excluding listed companies, listed registered schemes, registrable superannuation entities~~Listed~~ and APRA regulated entities).

Appendices A to C~~D~~ set out the ~~audit partner~~ rotation requirements in flowcharts.

~~Q4.~~Q5. What are the requirements whe~~nre a shorter cooling-off period is allowed under~~ laws and regulations mandate rotation requirements (i.e. for ~~L~~listed companies, listed registered schemes, registrable superannuation entities and APRA regulated entities)?

In Australia, Engagement Partners of PIEs are required to comply with audit partner rotation requirements set out in specific laws and regulations, such as for listed companies, listed registered schemes, registrable superannuation entities ~~Listed Entities~~ subject to the *Corporations Act 2001* and APRA regulated entities[9], in addition to the requirements in the Code~~.~~[10], including the restrictions on activities during the cooling-off period. These audit partners must follow the stricter requirements of the Code or the relevant law or regulation to ensure compliance with all relevant requirements.

For example, ~~Another important factor in determining the rotation requirements for these Engagement Partners is that the amended requirements in the Code allow a shorter cooling-off period during the transition period. The~~ if the~~shorter~~ cooling-off period ~~is the higher of three years or the period~~ specified in ~~the~~ laws and regulations is ~~(i.e.~~ two years and the Code specifies a cooling-off period of five years, the Engagement Partner must comply with the stricter requirement and undertake a five year cooling off period to ensure they meet their rotation requirements~~) and will be applicable as long as the time-on period does not exceed seven years (paragraphs R540.19 and AUST R540.19.1 of the Code). These provisions will only apply during the transition period. After that date, the cooling-off period will be five years~~.

A summary of the audit partner rotation requirements for listed companies, listed registered schemes, registrable superannuation entities ~~Listed Entities~~ and APRA regulated entities that are PIEs is set out in Table 1 in Section A, and Appendix~~ces~~ B ~~and C~~.

[9] Listed companies, listed registered schemes and registrable superannuation ~~E~~entities as defined in the *Corporations Act 2001* and APRA regulated entities including those covered by APRA Prudential Standards CPS 510 *Governance* (~~July 2019~~November 2023) and SPS 510 *Governance* (~~July 2017~~June 2024).

[10] Legislative instrument ASA 102 *Compliance with Ethical Requirements when Performing Audits, Reviews and Other Assurance Engagements* provides legislative backing for the Code. Accordingly, the Code has the force of law for audits and reviews performed of entities subject to the *Corporations Act 2001* and is a mandatory requirement.

~~Q5. **A shorter cooling-off period can be substituted for the specific cooling-off period during the transition period where it is allowed under laws and regulations (as per paragraph R540.1922 of the Code) and the cooling-off period is for a minimum of three years. For the substitution to meet the provisions in the Code, does the shorter cooling-off period need to be completed by the end date of the transition period?**~~

~~No. The shorter cooling-off period can be applied as long as the specified conditions in paragraph R540.19 of the Code are met and the cooling-off period commences prior to 1 January 2024, for example if the Engagement Partner begins cooling-off from the start of the 12 month financial year starting on 1 January 2023.~~

~~For example, if an Engagement Partner of a Listed or APRA regulated entity commences a cooling-off period on 1 July 2023 (in relation to a 30 June year end audit), the applicable cooling-off would be three years (years ending 30 June 2024, 2025 and 2026) and the partner could return in any Key Audit Partner role for the year ended 30 June 2027.~~

~~However, if an Engagement Partner of a Listed or APRA regulated entity commenced a cooling-off period on 1 January 2024 (in relation to a 31 December year end audit), the cooling-off period would need to be for five years, meaning the partner could return in any Key Audit Partner role for the year ended 31 December 2029.~~

Q6. What are the requirements where ~~a shorter cooling-off period is not allowed~~laws and regulations do not mandate rotation requirements (i.e. all PIEs other than listed companies, listed registered schemes, registrable superannuation entities~~Listed~~ or APRA regulated entities)?

When there are no specific laws and regulations that apply to the PIE, the audit partners must comply with the specific requirements of the Code set out in paragraphs R540.~~5~~7 to R540.~~18~~21 and paragraphs R540.~~20~~23 to 540.2~~30~~ A1.

~~Paragraph R540.19 of the Code, allowing the substitution of a shorter cooling-off period, will generally not apply to Audit Engagements for PIEs other than Listed and APRA regulated entities in Australia. This also means that there will be no transition period where the cooling-off period gradually steps up to the full provisions of the Code.~~

A summary of the audit partner rotation requirements for PIEs ~~that are~~other than listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities ~~unable to substitute a shorter cooling-off period~~ is set out in Table 2 in Section A and Appendix C.

~~**Q7. What are the audit partner rotation requirements during the transition period, when an Engagement Partner has been performing two different types of audits for an Audit Client to meet different reporting requirements and the shorter cooling-off period substitution is allowed for one of the audits but not for the other (for example, a non-listed APRA regulated PIE requires a statutory financial audit (with an audit partner rotation requirement of a 5-year cooling-off period) and an audit for APRA prudential requirements (with an audit partner rotation requirement of a 3-year cooling-off period)?**~~

~~In the case where there are multiple requirements relating to the audits performed by an Engagement Partner for an Audit Client, the Engagement Partner must comply with the stricter audit partner rotation requirements and the restrictions on activities during the cooling-off period.~~

~~For example, the required cooling-off period for an Engagement Partner who performs the audit of APRA prudential requirements for an APRA regulated non-listed PIE is 3 years during the transition period, as they are allowed to substitute a shorter cooling-off period required by local laws and regulations. However, the required cooling-off period for the same Engagement Partner who performs the statutory audit for the same APRA regulated non-listed PIE is 5 years, as they cannot access the substituted shorter cooling-off period allowed in paragraphs R540.19 and AUST R540.19.1 of the Code.~~

~~In addition, paragraph R540.20 imposes restrictions on the activities the Engagement Partner can undertake during a cooling-off period, including prohibiting any involvement with senior management or Those Charged with Governance.~~

~~Based on consideration of all these requirements and in this circumstance, the Engagement Partner should comply with the stricter rotation requirements, meaning completing a 5-year cooling-off period if they are going to continue performing the statutory and APRA required audits for the client.~~

Engagement Partner on a Subsidiary of a Public Interest Entity

~~Q8.~~Q7. **Individual A has served as the Engagement Partner for the audit of a PIE (P) for five years. Individual B has served as the Engagement Partner on the audit of a subsidiary (S) of P for five years. How long is the cooling-off period for individuals A and B if P is a ~~L~~listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity?**

Individual A

In accordance with paragraph~~s~~ R540.13~~19 and AUST R540.19.1~~ of the Code, ~~for audits of Financial Statements during the~~ , individual A will be required to ~~cool-off~~ from the Audit Engagement for ~~three consecutive years (i.e. higher of three years specified in the Code or two years in laws or regulations).~~

~~If the audit was for Financial Statements beginning on or after 31 December 2023,~~ individual A will be required to cool-off from the Audit Engagement for five consecutive years.

Note that the length of the cooling-off periods will be the same if the Audit Client or the regulator permits individual A to increase their time-on period to seven years.

Individual B

To determine the appropriate cooling-off period for individual B it is necessary to consider B's role in the context of the audit of S and the group audit of P.

When reviewing B's role in the audit of S, the first consideration is whether S is a PIE. If S is a PIE, then the second consideration is whether that PIE is itself a ~~L~~listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity.

If S is a ~~L~~listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity, then the cooling-off periods for individual B will be consistent with the cooling-off periods for individual A. ~~For audits of Financial Statements during the transition period, individual B will be required to cool-off from the engagement for three consecutive years. For audits of Financial Statements beginning on or after 31 December 2023~~Therefore, the cooling-off period for individual B must be for five consecutive years.

If S is a PIE other than a ~~L~~listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity the cooling-off period for individual B must be 5 years. However, individual B may serve a further two years on the Audit Engagement before the relevant cooling-off periods become applicable.

From the perspective of the group audit of P, it is necessary to determine if B is a Key Audit Partner. This determination would depend, for example, on the significance of the subsidiary to the group and whether individual B makes key decisions or judgements with respect to the group audit. If individual B was a Key Audit Partner in respect of P's group audit, he or she is required to serve a two-year cooling-off period from the group audit. However, individual B may serve a further two years on the Audit Engagement before the relevant cooling-off periods become applicable. (See also Question 11~~2~~)

If individual B was not a Key Audit Partner in P's group audit, there is no cooling-off requirement for individual B from the group audit. However, individual B will be subject to the general provisions set out in paragraphs 540.~~3~~4 A1 to R540.~~4~~5 of the Code.

~~Q9.~~Q8. **Individual C has served for seven years as the Engagement Partner for the audit of a PIE (Q) that is not a ~~l~~Listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity. Individual D has served as the Engagement Partner on the audit of a subsidiary (T) of Q for five years. How long is the cooling-off period for individuals C and D?**

Individual C

A cooling-off period of five consecutive years applies to individual C, as the Engagement Partner responsible for the audit reports issued on behalf of the Firm for the audit of Q. This Engagement Partner is sometimes referred to as the 'Lead Audit Engagement Partner' in a group audit.

Individual D

To determine the appropriate cooling-off period for individual D it is necessary to consider D's role in the context of the audit of T and the group audit of Q.

When reviewing individual D's role in the audit of T, the first consideration is whether T is a PIE. If T is a PIE, then the second consideration is whether that PIE is itself a ~~l~~Listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity.

If T is a ~~l~~Listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity, then ~~the cooling-off periods will be as follows:~~

- ~~For audits of Financial Statements during the transition period, individual D will be required to cool-off from the engagement for three consecutive years.~~

~~For audits of Financial Statements beginning on or after 31 December 2023,~~ the cooling-off period for individual D must be for five consecutive years.

If T is a PIE other than a ~~l~~Listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity, the cooling-off period for individual D must also be five consecutive years. However, individual D may serve a further two years on the Audit Engagement before the relevant cooling-off period~~s~~ becomes applicable.

From the perspective of the group audit of Q, it is necessary to determine if individual D is a Key Audit Partner. This determination would depend, for example, on the significance of the subsidiary to the group and whether individual D makes key decisions or judgements with respect to the group audit. If individual D was a Key Audit Partner in respect of Q's group audit, he or she is required to serve a two-year cooling-off period from the group audit. However, individual D may serve a further two years on the Audit Engagement before the relevant cooling-off periods become applicable. (See also Question 11~~2~~.)

If individual D was not a Key Audit Partner in Q's group audit, there is no cooling-off requirement for individual D from the group audit. However, individual D will be subject to the general provisions set out in paragraphs 540.~~3~~4 A1 to R540.~~4~~5 of the Code.

Engagement Partner on the Audit of a Public Interest Entity moving to a Subsidiary Audit

~~Q10.~~Q9. **Individual A has completed a cumulative period of five years as Engagement Partner on the audit of a PIE (P) that is a ~~Listed~~ Publicly Traded Entity. Could individual A participate in the audit of a subsidiary (S) of P for purposes of the group audit of P without completing the required cooling-off period?**

No. Paragraph R400.~~20~~27 of the Code states that:

a) an Audit Client that is a ~~Listed~~ Publicly Traded Entity includes all of its Related Entities (which include subsidiaries); and

b) for all other Audit Clients, references to an Audit Client include Related Entities over which the client has direct or indirect control (which also would include subsidiaries).

Accordingly, individual A is subject to the same cooling-off period with respect to both P and S, as the reference to the Audit Client P also includes S. ~~For audits of Financial Statements during the transition period, t~~This means individual A is not allowed to participate in the audit of S for purposes of the group audit of P without completing the required cooling-off period of ~~three years. For audits of Financial Statements beginning on or after 31 December 2023, the mandatory cooling-off period would be~~ five consecutive years.

Note that the time-on period for an Engagement Partner of a Listed Entity may be extended by the Audit Client or a regulator in accordance with the provisions of s342A and 324DA of the *Corporations Act 2001*. However, as this extension is not automatically applied and requires specific consent, it has not been applied to the facts in this question.

~~Q11.~~Q10. Individual C has completed a cumulative period of seven years as Engagement Partner on the audit of a PIE (Q) that is not a ~~L~~listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity. Could individual C participate in the audit of a subsidiary (T) of Q for purposes of the group audit of Q without completing the required cooling-off period of five years?

No. Paragraph R400.~~20~~27 of the Code states that:

a) where an Audit Client is a ~~Listed~~ Publicly Traded Entity, references to an Audit Client include its Related Entities (which include subsidiaries); and

b) for all other Audit Clients, references to an Audit Client include Related Entities over which the client has direct or indirect control (which also would include subsidiaries).

Accordingly, individual C is subject to a five-year cooling-off period with respect to both Q and T, as the reference to the Audit Client (Q) also includes T. Individual C is not permitted under the Code to participate in the audit of T for purposes of the group audit of Q without completing the required cooling-off period of five years.

Engagement Partner on the Audit of a Subsidiary moving to the Audit of the PIE Parent

~~Q12.~~Q11. Individual C has completed a cumulative period of seven years as Engagement Partner on the audit of a subsidiary (S) of a PIE (P). Could individual C participate in the group audit of P after completing the seven-year time-on period on the audit of S?

The answer depends on whether individual C was a Key Audit Partner in the group audit of P; and whether S is a ~~Listed~~ Publicly Traded Entity and, if so, whether it is material to P.

If individual C was considered to be a Key Audit Partner in the group audit of P, he or she would not be able to participate in the group audit until the completion of the appropriate cooling-off period. If S is a PIE, individual C would be required to serve a five-year cooling-off period ~~(or a three-year cooling-off period if paragraphs R540.19 and AUST R540.19.1 of the Code apply)~~ in relation to the audit of S.

If individual C was not considered to be a Key Audit Partner with respect to the group audit of P, but S is a ~~Listed~~ Publicly Traded Entity and it is material to P, individual C would not be able to participate in the group audit of P[11]. Under the Related Entity provision in paragraph R400.~~20~~27

[11] If S is material to P, it is likely that the Engagement Partner on S would be a Key Audit Partner in the group audit of P. However, this is not necessarily the case in all circumstances. This is because under the definition of a Key Audit Partner in the Code, whether the individual is a Key Audit Partner depends on whether he or she makes key decisions or judgements on significant matters with respect to the group audit, and not on whether S is material to P.

of the Code, the reference to Audit Client (in this case, S) will also include P[12]. Individual C would therefore not be permitted to participate in the group audit of P without completing the required cooling-off period of five cumulative years ~~(or three years during the transition period)~~.

Signing Partner Different from Engagement Partner

~~Q13.~~Q12. The Code defines the Engagement Partner as the partner or other person in the Firm who is responsible for the engagement and its performance, and for the report that is issued on behalf of the Firm, and who, where required, has the appropriate authority from a professional, legal or regulatory body to sign the audit report. In the situation where the partner who signs the audit report (the signing partner) is not the same individual as the Engagement Partner, which cooling-off provisions apply to the ~~former~~signing partner?

The signing partner, if different, would normally also be treated as an Engagement Partner and would be subject to the same requirements as the Engagement Partner.

Where more than one audit partner is required to sign the audit report, it may not be reasonable or appropriate to treat all the signing partners as Engagement Partners. In this case, determining which cooling-off provisions apply would depend on engagement circumstances and the reasons why there are additional signing partner(s). At a minimum, however, any signing partner who is not the Engagement Partner would be a Key Audit Partner and therefore subject to a minimum two-year cooling-off period as applicable to the audit of a PIE.

~~**Q14. Paragraph R540.19 of the Code allowing a shorter cooling-off period for Engagement Partners will have effect only for audits of Financial Statements of PIEs for periods beginning prior to 31 December 2023. Does this mean that for audits of Financial Statements for periods beginning on or after 31 December 2023 the cooling-off requirement will increase to five consecutive years even though the relevant laws and regulations have not changed?**~~

~~Yes. Paragraph R540.19 of the Code facilitates the transition to the revised cooling-off period of five consecutive years for Engagement Partners on audits of PIEs in those jurisdictions (such as Australia) where a shorter cooling-off period is currently specified by a legislative body or regulator (or organisation authorised or recognised by such legislative body or regulator). The impact of this transitional provision is that the cooling-off period will be three consecutive years as long as the time-on period does not exceed seven years.~~

~~APESB added paragraph AUST R540.19.1 to the Code to clarify how the application of this provision affects Listed Entities subject to the *Corporations Act 2001* and APRA regulated entities (see Questions 4 and 5 for more detailed information).~~

~~The IESBA has committed to review this transitional provision to take account of, among other things, relevant legislative and regulatory developments as well as the experience of the application of the provisions in practice. However, this does not necessarily mean the provisions will change and Members in Public Practice and their Firms need to ensure they have put in place adequate plans to meet the requirements of the Code.~~

[12] The definition of a Related Entity under the Code includes an entity that has direct or indirect control over the client if the client is material to such entity.

D. Specific provisions for sustainability assurance engagements of PIEs in Section 5540 of the Code

Q13. Are the sustainability assurance leader rotation requirements the same for all PIEs?

No. In addition to the sustainability assurance leader rotation requirements in the Code, there are laws and regulations in Australia which set out auditor rotation requirements for some entities, such as listed companies, listed registered schemes, registrable superannuation entities and APRA regulated entities. The impact of complying with these laws and regulations, as well as the Code requirements, creates different rotation requirements for the Key Sustainability Assurance Leaders of these PIEs.

The Code also specifies different rotation requirements for the different roles undertaken by Key Sustainability Assurance Leaders and Key Audit Partners in relation to the Sustainability Assurance Engagement. While the time-on period for all sustainability assurance leaders is the same maximum number of years, there are different cooling-off periods required for the different roles.

Refer to Question 14 for the specific rotation requirements where laws and regulations mandate rotation requirements (applicable to listed companies, listed registered schemes, registrable superannuation entities and APRA regulated entities).

Refer to Question 15 for the specific rotation requirements for entities where laws and regulations do not apply (applicable to PIEs excluding listed companies, listed registered schemes, registrable superannuation entities and APRA regulated entities).

Appendices A to C set out the rotation requirements in flowcharts.

Q14. What are the requirements when laws and regulations mandate rotation requirements (i.e. for listed companies, listed registered schemes, registrable superannuation entities and APRA regulated entities)?

In Australia, Engagement Leaders of PIEs are required to comply with auditor rotation requirements set out in specific laws and regulations, such as for listed companies, listed registered schemes, registrable superannuation entities subject to the *Corporations Act 2001* and APRA regulated entities[13], in addition to the requirements in the Code[14], including the restrictions on activities during the cooling-off period. These Engagement Leaders must follow the stricter requirements of the Code or the relevant law or regulation to ensure compliance with all relevant requirements.

For example, if the cooling-off period specified in laws and regulations is two years and the Code specifies a cooling-off period of five years, the Engagement Leader must comply with the stricter requirement and undertake a five year cooling off period to ensure they meet their rotation requirements.

A summary of the sustainability assurance leader rotation requirements for listed companies, listed registered schemes, registrable superannuation entities and APRA regulated entities that are PIEs is set out in Table 1 in Section A, and Appendix B.

[13] Listed companies, listed registered schemes and registrable superannuation entities as defined in the *Corporations Act 2001* and APRA regulated entities including those covered by APRA Prudential Standards CPS 510 *Governance* (November 2023) and SPS 510 *Governance* (June 2024).

[14] Legislative instrument ASA 102 *Compliance with Ethical Requirements when Performing Audits, Reviews and Other Assurance Engagements* provides legislative backing for the Code. Accordingly, the Code has the force of law for audits and reviews performed of entities subject to the *Corporations Act 2001* and is a mandatory requirement.

Q15. What are the requirements where laws and regulations do not mandate rotation requirements (i.e. all PIEs other than listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities)?

When there are no specific laws and regulations that apply to the PIE, the sustainability assurance leaders must comply with the specific requirements of the Code set out in paragraphs R5540.7 to R5540.21 and paragraphs R5540.23 to 5540.23 A1.

A summary of the sustainability assurance leader rotation requirements for PIEs other than listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities is set out in Table 2 in Section A and Appendix C.

Voluntary Sustainability Assurance Engagement becomes Mandatory

Q16. Individual Z has been the Engagement Leader on a Sustainability Assurance Engagement over voluntary sustainability reporting by a PIE Sustainability Assurance Client for 3 years. The information and assurance report were only reported internally for the first two years. However, for the third year, the information and assurance report were made publicly available.

In the current year the Client is mandatorily required to publicly disclose Sustainability Information in line with new climate reporting and assurance laws and regulations for the first time. The Client has engaged Individual Z's Firm to undertake the Sustainability Assurance Engagement, and have requested Individual Z to continue as the Engagement Leader. When determining the rotation requirements for Individual Z, does the time-on period start from the provision of assurance over the mandatorily reported climate information?

No, the rotation requirements in the Code apply based on time spent as an Engagement Leader and/or a Key Audit Partner, and not on whether the Sustainability Assurance Engagement is on a voluntary basis or due to mandatory assurance over the disclosure of information. The Code clarifies that even when Sustainability Assurance Engagements are performed for Public Interest Entity Clients that are not within the scope of the Independence Standards in Part 5 of the Code, the Firm must include the length of time for those Engagements when determining the time-on period for the Key Sustainability Assurance Leader or Key Audit Partner (see paragraph R5540.10a of the Code).

In this case, Individual Z can serve for seven years[15] in total, as the Engagement Leader. Based on the provision of Sustainability Assurance Engagements for three years for this Client, they could continue as Engagement Leader for four additional years before reaching the cumulative seven-year time-on period. He or she would then need to cool-off for five consecutive years.

Client Services Partner Becoming the Engagement Leader

Q17. Individual X has been the client services partner for a PIE Audit Client for four years. For the upcoming Sustainability Assurance Engagement for that Audit Client, Individual X will serve as the Engagement Leader. How many years may he or she serve on the engagement as the Engagement Leader?

The rotation requirements in the Code apply to time spent as an Engagement Leader and/or a Key Audit Partner. In principle, Individual X can serve for seven years[16] as an Engagement Leader or Key Audit Partner, however, the Firm will need to evaluate whether the role of client services partner meets the definition of a Key Audit Partner. Consideration should be given to whether

[15] If the PIE entity is a listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity the maximum time-on period for the Engagement Partner or EQR may only be five years, unless the relevant regulator grants an extension to the time-on period.

[16] If the PIE entity is a listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity the maximum time-on period for the Engagement Partner or EQR may only be five years, unless the relevant regulator grants an extension to the time-on period.

Individual X made key decisions or judgements on significant matters with respect to the Audit Engagement.

The Firm should also consider the general provisions of the Code to evaluate the threat created by long association, including the overall length of Individual X's association with the client, how long he or she has been on the Engagement Team and the roles that he or she has played should be taken into account (see paragraphs 5540.4 A3 and R5540.12 of the Code). A Firm may decide that it is appropriate to rotate Individual X from the role of Sustainability Assurance Leader at the end of three years, due to his or her association with the PIE Audit Client when acting as the client services partner.

Engagement Partner on the Audit Engagement of a Public Interest Entity moving to a Subsidiary Sustainability Assurance Engagement

Q18. Individual Y has completed a cumulative period of five years as Engagement Partner on the Audit Engagement of a PIE (P) that is a Publicly Traded Entity. Could individual Y participate in the Sustainability Assurance Engagement of a subsidiary (S) of P for the purposes of the Group Sustainability Assurance Engagement of P without completing the required cooling-off period?

No. Paragraph R5400.27 of the Code states that:

c) a Sustainability Assurance Client that is a Publicly Traded Entity includes all of its Related Entities (which include subsidiaries); and

d) for all other Sustainability Assurance Clients, references to a Sustainability Assurance Client include Related Entities over which the client has direct or indirect control (which also would include subsidiaries).

In addition, paragraph R5540.17 of the Code clarifies that where an individual has acted in a combination of Key Sustainability Assurance Leader or Key Audit Partner roles and served as the Engagement Leader or Engagement Partner for four or more cumulative years, the cooling-off period shall be five consecutive years.

Accordingly, individual Y is subject to the same cooling-off period with respect to both P and S, as the reference to the Sustainability Assurance Client P also includes S. This means individual A is not allowed to participate in the Sustainability Assurance Engagement of S for the purposes of the Group Sustainability Assurance Engagement of P without completing the required cooling-off period of five consecutive years.

Note that the time-on period for an Engagement Partner of a listed company, listed registered scheme or registrable superannuation entity may be extended by the Client or a regulator in accordance with the provisions of s342A and 324DA of the *Corporations Act 2001*. However, as this extension is not automatically applied and requires specific consent, it has not been applied to the facts in this question.

Exemption for the new application of the Independence Standards in Part 5 of the Code

Q19. Individual U has served as a Key Sustainability Assurance Leader on a Sustainability Assurance Engagement for a Sustainability Assurance Client for six years cumulatively. Due to a change in laws and regulations, the Independence Standards in Part 5 of the Code are now to be applied to future Sustainability Assurance Engagements for this Client. Does this impact the rotation requirements for Individual U?

Yes, the rotation requirements for Individual U may be impacted by the transition to the new Independence Standards in Part 5 of the Code.

Normally, when an individual has served on a Sustainability Assurance Engagement for a PIE Sustainability Assurance Client as a Key Sustainability Assurance Leader (other than the Engagement Leader or the Engagement Quality Reviewer) for a total of six cumulative years, the individual can serve on the engagement for one further year before needing to cool-off for a period of two consecutive years (see paragraphs R5540.7 and R5540.15 of the Code). However, paragraph R5540.10a of the Code provides an exemption in the instance when the Firm first undertakes a Sustainability Assurance Engagement within the scope of the Independence Standards in Part 5. The exemption allows an individual who has served the Sustainability Assurance Client as a Key Sustainability Assurance Leader or Key Audit Partner for a period of six or more cumulative years to continue to serve for an additional two years in the role of Key Sustainability Assurance Leader before needing to rotate off the Sustainability Assurance Engagement. The Firm, and Individual, require the concurrence of Those Charged with Governance to be able to apply the exemption.[17]

For Individual U, if the Firm receives agreement from Those Charged with Governance of the Sustainability Assurance, he or she could continue on the Sustainability Assurance Engagement for two additional years before needing to undertake a cooling-off period.

Before applying the exemption in the Code, the Firm should consider whether the time-on requirements in the *Corporations Act 2001* apply to the Sustainability Assurance Client and whether the time-on period should be extended by the Sustainability Assurance Client or a regulator in accordance with the provisions of s342A and 324DA of the *Corporations Act 2001*.

Signing Partner Different from the Sustainability Engagement Leader

Q20. The Code defines the Engagement Leader as the individual, appointed by the Firm, who is responsible for the sustainability assurance engagement and its performance, and for the sustainability assurance report that is issued on behalf of the Firm, and who, where required, has the appropriate authority from a professional, legal or regulatory body. In the situation where the partner who signs the sustainability assurance report (the signing partner) is not the same individual as the Engagement Leader, which cooling-off provisions apply to the signing partner?

The signing partner, if different, would normally also be treated as an Engagement Leader and would be subject to the same requirements as the Engagement Leader. This is the case, for example, where the signing partner is also the Engagement Partner responsible for the audit engagement performed for the same client.

Where more than one individual is required to sign the sustainability assurance report, it may not be reasonable or appropriate to treat all the individuals signing as Engagement Leaders. In this case, determining which cooling-off provisions apply would depend on engagement circumstances and the reasons why there are additional signing partner(s). At a minimum, however, any signing partner who is not the Engagement Leader would be a Key Audit Partner

[17] Refer to s324DA of the *Corporations Act 2001* which specifies that the Australian Securities and Investments Commission may grant extensions.

and therefore subject to a minimum two-year cooling-off period as applicable to the sustainability assurance engagement of a PIE.

National Greenhouse and Energy Reporting Audits

Q21. Do the rotation requirements for Sustainability Assurance Engagements as set out in the Independence Standards in Part 5 of the Code apply to an individual who performs a National Greenhouse and Energy Reporting (NGER) audit?

The rotation requirements in the Independence Standards in Part 5 of the Code may apply to individuals performing NGER audits depending on the specific circumstances of the engagement and any other services provided to the same client. The key considerations in determining rotation requirements for NGER audits include:

- Whether the engagement is within the scope of the Independence Standards in Part 5 (see paragraph 5400.3(b) of the Code);
- Whether laws and regulations require the Independence Standards in Part 5 of the Code to be applied (see paragraph 5400.3(c) of the Code);
- Whether laws and regulations outline specific rotation requirements (e.g., S6.59 of the *National Greenhouse and Energy Reporting Regulations 2008* specifies a 2 year cooling-off period for the audit team leader after performing Part 6 audits for 5 consecutive years);
- Which assurance standard is applied to the NGER audit – under the *NGER (Audit) Determination 2009* (compiled November 2025), NGER audits are performed under the auditing and assurance standards as applicable on 1 July 2025, including the:
  - Standard on Assurance Engagements ASAE 3000 *Assurance Engagements Other than Audits or Reviews of Historical Financial Information* (ASAE 3000); or~~and~~
  - Standard on Sustainability Assurance ASSA 5000 *General Requirements for Sustainability Assurance Engagements* (ASSA 5000) which specifically requires the application of the Independence Standards in Part 5 of the Code; and
- Whether the individual is providing other assurance engagements to the client that are within the scope of Part 4A or Part 5 of the Code (see paragraphs 900.10 and 900.11 of the Code).

The Independence Standards in Part 5 of the Code apply to Sustainability Assurance Engagements where the Sustainability Information on which the Sustainability Assurance Practitioner expresses an opinion:

(a) Is reported in accordance with a General Purpose Framework;

(b) Is

  (i) Required to be provided in accordance with law or regulation; or

  (ii) Publicly disclosed to support decision-making by investors or other users.

An NGER audit would be considered a Sustainability Assurance Engagement within the scope of the Independence Standards in Part 5 of the Code, and would need to apply the rotation requirements in that Part, when:

- ASSA 5000 is used for the engagement; or
- Law or regulation defines the engagement as a Sustainability Assurance Engagement, bringing it within the scope of the Independence Standards in Part 5 of the Code; or
- The reporting period falls under a Determination that requires the application of ASSA 5000 for relevant NGER information categories.

If, however, an NGER audit is conducted solely under ASAE 3000 without triggering the use of ASSA 5000 and without falling within a mandated scope of sustainability assurance, then the engagement is not within the scope of the Independence Standards of Part 5 of the Code. Instead, the general independence provisions and Part 4B of the Code apply.

It is important, however, that the individual takes into account the other audit services they provide to the NGER audit client, as this may trigger the application of the rotation requirements in Part 4A or Part 5 of the Code.

If the Firm or the individual are performing an NGER audit within the scope of Part 4B of the Code and an Audit or Review engagement for the same client, the Firm and the individual will need to comply with the rotation requirements in Part 4A of the Code for both engagements (see paragraph 900.10 of the Code).

If the Firm or the individual are performing an NGER audit within the scope of Part 4B of the Code and a Sustainability Assurance Engagement for the same client, the Firm and the individual will need to comply with the rotation requirements in Part 5 of the Code (see paragraph 900.11 of the Code).

Q22. Individual T has performed the role of audit team leader on a National Greenhouse and Energy Reporting (NGER) audit for a PIE client for the past five years. The audit engagement was not previously within the scope of the Independence Standards in Part 5. The client is now mandatorily required to publicly disclose Sustainability Information in line with new climate reporting and assurance laws and regulations and will, therefore, be a Sustainability Assurance Engagement within the scope of the Independence Standards in Part 5 of the Code. Can Individual T serve as a Key Sustainability Assurance Leader on the Sustainability Assurance Engagement for the client?

No. The Code does provides an exemption in paragraph R5540.10a of the Code in the instance when the Firm first undertakes a Sustainability Assurance Engagement within the scope of the Independence Standards in Part 5, which allows the individual to continue on the Engagement for additional time. However, individual T must also meet the rotation requirements specified in laws and regulations. Under s6.59 of the *National Greenhouse and Energy Reporting Regulations 2008* Individual T is required to undertake a 2 year cooling-off period after performing 5 consecutive years on the NGER audit. Therefore, individual T cannot be involved in the Sustainability Assurance Engagement until the 2 year cooling-off period required by laws and regulations is completed.

ED. Entities listed in other jurisdictions

Q15.Q23. Are audit partner rotation requirements impacted if the Audit Client is listed in a foreign jurisdiction?

Potentially.

When an Audit Client is listed in a foreign jurisdiction, the Member in Public Practice or a Firm will need to consider a number of matters to help them determine the applicable audit partner rotation requirements. These matters would include:

- The structure of the entity;
- The jurisdiction where the relevant entity is incorporated and domiciled;
- The laws and regulations that require the entity to prepare Financial Statements;
- The laws and regulations that require an audit to be performed on the Financial Statements;
- Applicable stock exchange listing rules for the jurisdiction where the entity is listed;
- Relevant laws, regulations, and professional and ethical requirements relating to the rotation of audit partners, and audit Firms where applicable;
- Any relief from rotation requirements granted by the appropriate regulator;
- The role of the individual within the group audit (i.e. responsible for the group, parent entity or subsidiary audit);
- The specific Key Audit Partner role of the Member;
- Applicable policies and procedures of the entity relating to the appointment and removal of the auditor (these may be established by the Audit Committee); and
- Applicable policies and procedures of the Firm and Network Firm, where applicable.

In some situations, an entity may also be a dual Ll~~L~~isted E~~e~~ntity. The term 'dual l~~L~~isted e~~E~~ntities' is used to refer to entities that are listed on multiple stock exchanges. The way the dual listing is achieved may vary depending on the requirements in the relevant jurisdictions and the structure of the entity(ies) involved (for example, separate entities established in separate jurisdictions, or a single entity established and registered on the stock exchange in one jurisdiction which is also registered on the stock exchange in another jurisdiction).

The audit partner rotation requirements ~~which will~~that apply to the Key Audit Partners for an entity listed in a foreign jurisdiction or a dual l~~L~~isted E~~e~~ntity may ~~also~~ need to consider the requirements in the relevant jurisdictions that need to be complied with.

The Member or Firm may find, after reviewing the considerations listed above, that they need to comply with multiple audit partner rotation requirements. This may mean that the rotation to be undertaken is a hybrid of applicable audit partner rotation requirements.

Australian domiciled entity listed on both the Australian and New Zealand stock exchanges

~~Q16.~~Q24. Individual E is the Engagement Partner for the audit of Aust Co, an Australian incorporated company that is listed on both the Australian and New Zealand Stock Exchanges.

At 30 June 202618 individual E has served as Engagement Partner on the audit of Aust Co for five years and is now required under audit partner rotation requirements to cool-off. What is the appropriate cooling-off period for individual E?

Matters to Consider

In determining the relevant cooling-off period individual E would have considered the following factors:

- As Aust Co is incorporated in Australia it needs to prepare Financial Statements in accordance with Part 2M of the *Corporations Act 2001*.
- The *Corporations Act 2001* sets out audit partner rotation requirements in s.324DA which apply to individual E as the Engagement Partner of a listed company (i.e. Aust Co).
- Individual E is a Member in Public Practice in Australia who must comply with the audit partner rotation requirements of the Code. In accordance with paragraph~~s~~ R540.~~19~~17 ~~and AUST R540.19.1~~ of the Code, individual E will be required to cool-off from the Audit Engagement for five~~three~~ consecutive years (i.e. higher of ~~three~~ five years specified in the Code or two years in laws or regulations).
- ~~The timing of the cooling-off period and whether it falls within the transition period (as outlined in paragraph AUST R540.19.1). Subsequent to the end of the transition period, the Engagement Partner will be subject to a five-year cooling-off period.~~
- The Australian Stock Exchange (ASX) Listing rules require the audit of Aust Co to be conducted in accordance with the Australian Auditing Standards by a registered company auditor.
- Whether Aust Co is listed on the New Zealand Stock Exchange (NZX) as a NZX Foreign Exempt Issuer as defined in the NZX Listing Rules or whether they are an Issuer of another class of Financial Product quoted on the NZX, with NZX being the home exchange (as this determines the NZX Listing Rules that would be applicable to Aust Co).
- Aust Co must comply with the applicable listing requirements in the NZX Listing Rules. Depending on the manner of how they are listed in NZ, this may include Rule 2.13.3 which requires the Audit Committee of an Issuer (as defined in the NZX Listing Rules) to ensure that the Key Audit Partner is changed at least every five years.
- The NZX Listing Rules allow Aust Co to lodge accounts prepared in accordance with *Corporations Act 2001* requirements instead of the *Financial Management Authority Act 2011* requirements.

Conclusion

Based on the specific facts and circumstances set out in this example individual E will need to cool-off from the Audit Engagement for a minimum period of ~~three~~ five consecutive years. Individual E could come back to the Audit Engagement in any Key Audit Partner role for the 203~~2~~2 audit.

Members are cautioned that the determination of the appropriate cooling-off period to meet audit partner rotation requirements is a matter to be determined based on the particular facts and circumstances. The conclusion for this example is based on the facts and circumstances outlined above and any changes to those facts and circumstances may change the outcome of the required cooling-off period to be undertaken by Key Audit Partners.

New Zealand domiciled entity listed on both the New Zealand and Australian stock exchanges

~~Q17.~~Q25. Individual W is the Engagement Partner for the audit of NZ Co, a New Zealand incorporated company that is listed on both the New Zealand and Australian Stock Exchanges.

At 30 June 2026~~18~~ individual W has served as Engagement Partner on the audit of NZ Co for five years. Can individual W serve an additional two years as Engagement Partner for this Audit Engagement? If individual W needs to cool-off what is the appropriate period?

Matters to Consider

In determining the relevant cooling-off period individual W would have considered the following factors:

- As NZ Co is incorporated in New Zealand it needs to ensure that Financial Statements prepared are audited by a qualified auditor (refer to Section 207 of the *Companies Act 1993 (NZ)*).
- NZ Co must comply with the applicable listing requirements in the New Zealand Stock Exchange (NZX) Listing Rules. This includes Rule 2.13.3 which requires the Audit Committee of an Issuer (as defined in the NZX Listing Rules) to ensure that the Key Audit Partner is changed at least every five years. Note that this listing rule does not apply to NZX Foreign Exempt Issuers.
- Individual W is a Member in Public Practice in New Zealand who must comply with the audit partner rotation requirements of Professional and Ethical Standard 1 *International Code of Ethics for Assurance Practitioners (including International Independence Standards) (New Zealand)* (PES 1). Paragraph R540.11 of PES 1 requires individual W to cool-off from the Audit Engagement for five consecutive years.
- Whether NZ Co is listed on the Australian Stock Exchange (ASX) as a Standard ASX Listing, a Foreign Exempt Listing or an ASX Debt Listing as defined in the ASX Listing Rules (as this determines the ASX Listing Rules applicable to NZ Co).
- The ASX Listing Rules allow NZ Co to lodge accounts prepared in accordance with NZ laws and regulations as long as the accounts comply with the rules of their home exchange, e.g., NZX, and NZ Co is listed on the ASX as a Foreign Exempt Listing.

Conclusion

As NZ Co is a Listed Entity on the NZX, the Audit Committee of NZ Co would have been required to advise individual W to cool-off from the Audit Engagement. Based on the specific facts and circumstances set out in this example, individual W cannot complete a further two years on this Audit Engagement. The minimum period for cooling-off for individual W is five consecutive years off the Audit Engagement. Individual W could come back to the Audit Engagement in any Key Audit Partner role for the 2032~~24~~ audit.

Members are cautioned that the determination of the appropriate cooling-off period to meet audit partner rotation requirements is a matter to be determined based on the particular facts and circumstances. The conclusion for this example is based on the facts and circumstances outlined above and any changes to those facts and circumstances may change the outcome of the required cooling-off period to be undertaken by Key Audit Partners.

FE. Breaks in service

Q18.Q26. How do breaks in service affect the determination of time-on and cooling-off periods for an Engagement Partner, an EQCR Partner or any other Key Audit Partner for the audit of a PIE?

In calculating the time-on period, the count of years may be restarted if the break in service is equal to at least the cooling-off period determined in accordance with paragraphs R540.1113 to R540.1315 of the Code as applicable to the Key Audit Partner role in which the individual served in the year immediately prior to the break in service. Breaks in service that are shorter than the required cooling-off period do not contribute to the consecutive cooling-off period.

For example, if a Key Audit Partner for the audit of a PIE (that is not a Llisted company, listed registered scheme, registrable superannuation entity or APRA regulated entity) has completed five years in the role and is off the engagement for one year due to medical leave, the one year off does not count towards cooling-off and the cumulative time-on period. He or she could therefore return to the engagement as a Key Audit Partner for a further two years (completing a total of seven cumulative years of service) before being required to serve the cooling-off period associated with his or her role on the engagement.

In contrast, if the Key Audit Partner had acted as the EQCR Partner for those five years, followed by three years off the engagement, then he or she will have cooled off and could return to the engagement for a further seven years.

Table 3 below illustrates some examples of how the cooling-off period would apply in the case of an audit of a PIE (which is not a Llisted company, listed registered scheme, registrable superannuation entity or APRA regulated entity) where "X" represents a year in which the individual was not a Key Audit Partner on the audit and met the requirements on restrictions in the cooling-off period in paragraph R540.2023 of the Code. For the purpose of this table, "KAP" refers to an individual who was neither the Engagement Partner nor the EQCR Partner.

Table 3: Effect of Breaks in Service on cooling-off periods for PIEs that are not Llisted companies, listed registered schemes, registrable superannuation entities or APRA regulated entities

Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Cooling-off period
EP	EP	EP	EP	EP	EP	X	EP		Five consecutive years off at the end of Yr 8 (Note 1)
EQCR	EQCR	EQCR	EQCR	X	X	EQCR	EQCR	EQCR	Three consecutive years off at the end of Yr 9 (Note 2)
KAP*	KAP*	KAP*	X	KAP*	KAP*	X	KAP*	KAP*	Two consecutive years off at the end of Yr 9 (Note 3)
KAP*	KAP*	KAP*	X	X					The KAP* could return in Yr 6 for a further seven year period (Note 4)

* KAP = an individual who was neither the Engagement Partner nor the EQCR Partner

Notes

1. The one year off the engagement in year 7 does not constitute cooling-off as it is less than the five consecutive years off required to achieve cooling-off for an Engagement Partner. So, the individual reaches seven cumulative years on the engagement at the end of year 8 after which he or she must serve a cooling-off period of five consecutive years.
2. The two years off the engagement in years 5 and 6 do not constitute cooling-off as they are less than the three consecutive years off required to achieve cooling-off for an EQCR Partner. So, the individual reaches seven cumulative years on the engagement at the end of year 9, after which he or she must serve a cooling-off period of three consecutive years.
3. The two years off the engagement in years 4 and 7 do not constitute cooling-off as they do not add up to two consecutive years off required to achieve cooling-off for an other Key Audit Partner. So, the individual reaches seven cumulative years on the engagement at the end of year 9, after which he or she must serve a cooling-off period of two consecutive years.
4. The individual has effectively served a cooling-off period of two consecutive years in years 4 and 5 (even though not required by the Code as he or she had not completed seven years on the audit) and therefore could return in year 6 in any Key Audit Partner role for a further seven year period.

Table 4 below illustrates further examples for the audit of a PIE that is a listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity. Note "X" represents a year in which the individual was not a Key Audit Partner on the audit and met the requirements on restrictions in the cooling-off period in paragraph R540.2023 of the Code. For the purpose of this table, "KAP" refers to an individual who was neither the Engagement Partner nor the EQCR Partner.

Table 4: Effect of Breaks in Service on cooling-off periods for PIEs that are Listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities

Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Cooling-off period
EP	EP	EP	EP	X	EP	X	X	X	Three consecutive years for periods during the transition period or five consecutive years for periods beginning on or after 31/12/23 at the end of Yr 6 (Note 5)
EQCR	EQCR	X	EQCR	EQCR	EQCR	X	X	X	Three consecutive years off at the end of Yr 6 (Note 6)
KAP*	KAP*	KAP*	X	KAP*	KAP*	X	KAP*	KAP*	Two consecutive years off at the end of Yr 9 (Note 7)
KAP*	KAP*	KAP*	X	X					The KAP* could return in Yr 6 for a further seven year period (Note 8)

* KAP = an individual who was neither the Engagement Partner nor the EQCR Partner

Notes

5. The one year off the engagement in year 5 does not constitute cooling-off as it is less than the required cooling-off period for Engagement Partners. So, the individual reaches five years on the engagement at the end of year 6 after which he or she must serve a cooling-off period of ~~three consecutive years for periods during the~~ transition period ~~or~~ five consecutive years ~~for periods beginning on or after 31 December 2023~~.
6. The EQ~~C~~R has completed five years on this role at the end of year 6. He or she needs to cool-off for three consecutive years to achieve the required cooling-off period for an EQ~~C~~R ~~Partner~~.
7. The two years off the engagement in years 4 and 7 do not constitute cooling-off as they do not add up to the two consecutive years off required to achieve cooling-off for an other Key Audit Partner. So, the individual reaches seven cumulative years on the engagement at the end of year 9, after which he or she must serve a cooling-off period of two consecutive years.
8. The individual has effectively served a cooling-off period of two consecutive years in years 4 and 5 (even though not required by the Code as he or she had not completed 7 years on the audit) and therefore could return in year 6 in any Key Audit Partner Role for a further seven year period.

Break in service between involvement in Audit and Sustainability Assurance Engagements for the same PIE client

Q27. Individual J served as the Engagement Partner for the audit of the financial statements of a Client for seven years and has not been involved with an audit or activities with the Client for two years. The Client is a PIE that is not a listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity. Can individual J be appointed as the Engagement Leader of the Sustainability Assurance Engagement for the next reporting period?

No, Individual J would not be able to be appointed as the Engagement Leader of the Sustainability Assurance Engagement for the next reporting period. The individual has served on the Audit Engagement for a total of seven cumulative years. While the individual has completed two years off the engagement, this break in service does not constitute cooling-off as it is lower than the five consecutive years off required to meet the cooling-off requirement for the Engagement Partner (see paragraph R540.8 of the Code).

Therefore, the individual must complete a further three years' cooling-off before he or she can be involved with either the Audit Engagement or the Sustainability Assurance Engagement for the Client (see paragraphs R540.13 and R540.23 of the Code).

F. Combination of roles

Combination of roles on Audit and Sustainability Assurance Engagements

~~Q19.~~Q28. An individual has undertaken a combination of Key Audit Partner and Key Sustainability Assurance Leader roles on the audit and/or Sustainability Assurance Engagement of a PIE during the seven-year time-on period. How should the required cooling-off period be determined in those circumstances?

The number of required years to cool-off will be determined by the roles undertaken, the type of PIE entity and the periods during which they were performed.

Table 5 below provides some examples of the effect of the combination of roles for PIEs that are not ~~L~~listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities.

Table 6 below provides further examples for PIEs that are ~~L~~listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities.

For the purpose of these tables, "KAP" refers to an individual who was neither the Engagement Partner, Engagement Leader nor the EQ~~C~~R ~~Partner~~. For simplicity, breaks in service (covered in Questions 26 and 27) are ignored. The cooling-off period refers to consecutive years.

A full analysis of the possible combinations and the determination of the required cooling-off period is included in the Appendices of this Publication.

Table 5: Effect of the combination of roles on cooling-off periods for PIEs that are not ~~L~~listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities

Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Cooling-off period
KAP*	KAP*	KAP*	EP	EP	EP	EP	5 years (Note 1)
KAP*	KAP*	KAP*	EQ~~C~~R	EQ~~C~~R	EQ~~C~~R	EQ~~C~~R	3 years (Note 2)
EP	EP	EQ~~C~~R	KAP*	KAP*	KAP*	KAP*	2 years (Note 3)
EQ~~C~~R	EQ~~C~~R	EQ~~C~~R	EQ~~C~~R	EP	EP	EP	5 years[18] (Note 4)
EQ~~C~~R	EQ~~C~~R	EQ~~C~~R	KAP*	KAP*	EP	EP	3 years (Note 5)
EP	EP	KAP*	KAP*	KAP*	EP	EP	5 years (Note 1)
EP	EP	EP	EP	EL	EL	EL	5 years (Note 6)

* KAP = an individual who was neither the Engagement Partner nor the EQ~~C~~R ~~Partner~~.

[18] Firms and Key Audit Partners should refer to the requirement in ASQM 2 *Engagement Quality Reviews* for audit partners to undertake a two-year cooling-off period between the time they finish being an Engagement Partner for an Audit Client and then assuming the role of Engagement Quality Reviewer for the same Client.~~As part of its current project to revise its International Standard on Quality Control (ISQC) 1, *Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements*, the International Auditing and Assurance Standards Board (IAASB) is examining how to address situations where an individual moves into an EQCR role on an Audit Engagement immediately after having served as EP on the same engagement. APESB is monitoring the progress of this ISQC1 project, including its potential implications to APES 320 *Quality Control Management for Firms that provide Non-Assurance Services*.~~

Notes

1. As the individual has served on the Audit Engagement for a total of seven cumulative years in a combination of roles during which he or she was the Engagement Partner for four or more years, the individual must serve a cooling-off period of five consecutive years before he or she can return to the Audit Engagement (see paragraph R540.~~14~~17 of the Code).
2. As the individual has served on the Audit Engagement for a total of seven cumulative years in a combination of roles during which he or she was the EQ~~C~~R ~~Partner~~ for four or more years, the individual must serve a cooling-off period of three consecutive years before he or she can return to the Audit Engagement (see paragraph R540.~~15~~18 of the Code).
3. The individual has served on the Audit Engagement for a total of seven cumulative years but has not served as the Engagement Partner or the EQ~~C~~R ~~Partner~~ for at least four of those seven years. Accordingly, the individual must serve a cooling-off period of two consecutive years before he or she can return to the engagement (see paragraph R540.~~17~~20 of the Code).
4. The individual has served on the Audit Engagement for a total of seven cumulative years in a combination of Engagement Partner and EQ~~C~~R ~~Partner~~ roles during which he or she was the Engagement Partner for three years, the individual must serve a cooling-off period of five consecutive years before he or she can return to the Audit Engagement (see paragraph R540.~~16~~19 (a) of the Code).
5. As the individual has served on the Audit Engagement for a total of seven cumulative years in a combination of Key Audit Partner Roles, with more than four years in Engagement Partner and EQ~~C~~R ~~Partner~~ roles but was the Engagement Partner for less than three years, the individual must serve a cooling-off period of three consecutive years before he or she can return to the Audit Engagement (see paragraph R540.~~16~~19 (b) of the Code).
6. As the individual has served on the Audit Engagement and the Sustainability Assurance Engagement for a total of seven cumulative years in a combination of roles during which he or she was the Engagement Leader or Engagement Partner for four or more years, the individual must serve a cooling-off period of five consecutive years before he or she can return to the Audit Engagement or the Sustainability Assurance Engagement (see paragraphs R540.17 and R5540.17 of the Code).

Table 6: Effect of the combination of roles on cooling-off periods for PIEs that are ~~I~~Listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities

Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Cooling-off period
KAP*	KAP*	KAP*	EP	EP	EP	EP	~~3 years for periods during the transition period or~~ 5 years ~~for periods beginning on or after 31/12/23~~ (Note ~~6~~7)
KAP*	KAP*	KAP*	EQ~~C~~R	EQ~~C~~R	EQ~~C~~R	EQ~~C~~R	3 years (Note ~~7~~8)
EP	EP	EP	KAP*	KAP*	KAP*	KAP*	2 years (Note ~~8~~9)
EQ~~C~~R	EQ~~C~~R	EQ~~C~~R	EQ~~C~~R	EP			3 years (~~Note 9)~~Note 10)
EQ~~C~~R	EQ~~C~~R	EQ~~C~~R	EQ~~C~~R	EQ~~C~~R			3 years (Note 1~~0~~)
EP	EP	KAP*	KAP*	KAP*	EP	EP	~~3 years for periods during the transition period or~~ 5 years ~~for periods beginning on or after 31/12/23~~ (~~Note 6)~~Note 7)

Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Cooling-off period
KAP*	KAP*	KAP*	KAP*	EP	EP	EP	2 years (Note 98)
EP	EP	EP	EP	EL			5 years (Note 12)

* KAP = an individual who was neither the Engagement Partner nor the EQCR Partner

Notes

6.7. As the individual has served on the Audit Engagement for a total of seven cumulative years in a combination of roles during which he or she was the Engagement Partner for four or more years, the individual must serve a cooling-off period of three consecutive years during the transition period or five consecutive years for periods commencing on or after 31 December 2023, before he or she can return to the Audit Engagement (see paragraphs R540.1417, R540.19 and AUST R540.19.1 of the Code).

7.8. As the individual has served on the Audit Engagement for a total of seven cumulative years in a combination of roles during which he or she was the EQCR Partner for four or more years, the individual must serve a cooling-off period of three consecutive years before he or she can return to the Audit Engagement (see paragraph R540.1518 of the Code).

8.9. The individual has served on the Audit Engagement for a total of seven cumulative years in a combination of roles during which he or she was the Engagement Partner for three years and an other Key Audit Partner for four years. Accordingly, the individual must serve a cooling-off period of two consecutive years before he or she can return to the engagement (see paragraph R540.1720 of the Code).

9.10. The individual has served on the Audit Engagement for a total of five consecutive years in a combination of Engagement Partner and EQCR Partner roles during which he or she was the EQCR Partner for four consecutive years. Unless granted an extension, the individual must serve a cooling-off period of three consecutive years before he or she can return to the Audit Engagement (see paragraph R540.1619 (b) of the Code).

10.11. The individual has served on the Audit Engagement for a total of five years as EQCR Partner. Unless granted an extension, the individual is not able to perform the Engagement Partner or ECQR role until he or she has cooled off from the engagement for three consecutive years (see the paragraph R540.1518 of the Code).

12. The individual has served on the Audit Engagement and the Sustainability Assurance Engagement for a total of five consecutive years in a combination of Engagement Leader and Engagement Partner roles. Unless granted an extension by the relevant regulator, the individual must serve a cooling-off period of five consecutive years before he or she can return to the Audit Engagement or the Sustainability Assurance Engagement (see paragraphs R540.17 and R5540.17 of the Code).

Combination of roles on Sustainability Assurance Engagements

Q29. An individual has undertaken a combination of Engagement Leader and/or Key Audit Partner roles on the Sustainability Assurance Engagement and Audit Engagement of a PIE client during the seven-year time-on period. How should the required cooling-off period be determined in those circumstances?

The number of required years to cool-off will be determined by the roles undertaken, the type of PIE entity and the periods during which they were performed.

Table 7 below provides some examples of the effect of the combination of roles for PIEs that are not listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities.

Table 8 below provides further examples for PIEs that are listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities.

For the purpose of these tables, "KSAL" and "KAP" refers to an individual who was neither the Engagement Leader, Engagement Partner nor the EQR. For simplicity, breaks in service (covered in Questions 26 and 27) are ignored. The cooling-off period refers to consecutive years.

A full analysis of the possible combinations and the determination of the required cooling-off period is included in the Appendices of this Publication.

Table 7: Effect of the combination of roles on cooling-off periods for PIEs that are not listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities

Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Cooling-off period
KAP**	KAP**	KAP**	EL	EL	EL	EL	5 years (Note 13)
KSAL*	KSAL*	KSAL*	EQR	EQR	EQR	EQR	3 years[19] (Note 14)
EL	EL	KAP**	KAP**	KAP**	KAP**	EQR	2 years (Note 15)
EQR	EQR	EQR	EQR	EL	EL	EL	5 years (Note 16)
EQR	EQR	EQR	KSAL*	KSAL*	EL	EL	3 years (Note 17)
EL	EL	KSAL*	KSAL*	KSAL*	EL	EL	5 years (Note 13)
EL	EL	EL	EL	EP	EP	EP	5 years (Note 18)

* KSAL = an individual who was neither the Engagement Leader (EL) nor the Engagement Quality Reviewer (EQR).

** KAP = an individual who was neither the Engagement Partner (EP) nor the Engagement Quality Reviewer (EQR).

Notes

13. As the individual has served on the Sustainability Assurance Engagement for a total of seven cumulative years in a combination of roles during which he or she was the Engagement Leader for four or more years, the individual must serve a cooling-off period of five consecutive years before he or she can return to the Sustainability Assurance Engagement (see paragraph R5540.17 of the Code).

14. As the individual has served on the Sustainability Assurance Engagement for a total of seven cumulative years in a combination of roles during which he or she was the EQR for four or more years, the individual must serve a cooling-off period of three consecutive years before he or she can return to the Sustainability Assurance Engagement (see paragraph R5540.18 of the Code).

15. The individual has served on the Sustainability Assurance Engagement for a total of seven cumulative years, but has not served as the Engagement Leader or the EQR for at least four of those seven years. Accordingly, the individual must serve a cooling-off period of two consecutive years before he or she can return to the engagement (see paragraph R5540.20 of the Code).

[19] Firms and Sustainability Assurance Practitioners should refer to the requirement in ASQM 2 *Engagement Quality Reviews* for Sustainability Assurance Practitioners to undertake a two-year cooling-off period between the time they finish being an Engagement Leader for a Sustainability Assurance Client and then assuming the role of Engagement Quality Reviewer for the same Sustainability Assurance Client.

16. The individual has served on the Sustainability Assurance Engagement for a total of seven cumulative years in a combination of Engagement Leader and EQR roles during which he or she was the Engagement Leader for three years, the individual must serve a cooling-off period of five consecutive years before he or she can return to the Sustainability Engagement (see paragraph R5540.19 (a) of the Code).

17. As the individual has served on the Sustainability Assurance Engagement for a total of seven cumulative years in a combination of Key Sustainability Assurance Leader roles, with more than four years in Engagement Leader and EQR roles but was the Engagement Leader for less than three years, the individual must serve a cooling-off period of three consecutive years before he or she can return to the Sustainability Assurance Engagement (see paragraph R5540.19 (b) of the Code).

18. As the individual has served on the Sustainability Assurance Engagement and the Audit Engagement for a total of seven cumulative years in a combination of roles during which he or she was the Engagement Leader or Engagement Partner for four or more years, the individual must serve a cooling-off period of five consecutive years before he or she can return to the Sustainability Assurance Engagement or the Audit Engagement (see paragraphs R540.17 and R5540.17 of the Code).

Table 8: Effect of the combination of roles on cooling-off periods for PIEs that are listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities

Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Cooling-off period
KSAL*	KSAL*	KSAL*	EL	EL	EL	EL	5 years (Note 19)
KAP**	KSAL*	KSAL*	EQR	EQR	EQR	EQR	3 years (Note 20)
EL	EL	EL	KAP**	KAP**	KAP**	KAP**	2 years (Note 21)
EQR	EQR	EQR	EQR	EL			3 years (Note 22)
EQR	EQR	EQR	EQR	EQR			3 years (Note 23)
EL	EL	KSAL*	KSAL*	KSAL*	EL	EL	5 years (Note 19)
KSAL*	KSAL*	KSAL*	KSAL*	EL	EL	EL	2 years (Note 21)
EL	EL	EL	EL	EP			5 years (Note 24)

* KSAL = an individual who was neither the Engagement Leader (EL) nor the Engagement Quality Reviewer (EQR).

** KAP = an individual who was neither the Engagement Partner (EP) nor the Engagement Quality Reviewer (EQR).

Notes

19. As the individual has served on the Sustainability Assurance Engagement for a total of seven cumulative years in a combination of roles during which he or she was the Engagement Leader for four or more years, the individual must serve a cooling-off period of five consecutive years before he or she can return to the Sustainability Assurance Engagement (see paragraph R5540.17 of the Code).

20. As the individual has served on the Sustainability Assurance Engagement for a total of seven cumulative years in a combination of roles during which he or she was the EQR for four or more years, the individual must serve a cooling-off period of three consecutive years before he or she can return to the Sustainability Assurance Engagement (see paragraph R5540.18 of the Code).

21. The individual has served on the Sustainability Assurance Engagement for a total of seven cumulative years in a combination of roles during which he or she was the Engagement Leader for three years and an other Key Audit Partner for four years. Accordingly, the individual must serve a cooling-off period of two consecutive years before he or she can return to the engagement (see paragraph R5540.20 of the Code).
22. The individual has served on the Sustainability Assurance Engagement for a total of five consecutive years in a combination of Engagement Leader and EQR roles during which he or she was the EQR for four consecutive years. Unless granted an extension by the relevant regulator, the individual must serve a cooling-off period of three consecutive years before he or she can return to the Sustainability Assurance Engagement (see paragraph R5540.19 (b) of the Code).
23. The individual has served on the Sustainability Assurance Engagement for a total of five years as an EQR. Unless granted an extension by the relevant regulator, the individual is not able to perform the Engagement Leader or EQR role until he or she has cooled off from the engagement for three consecutive years (see paragraph R5540.18 of the Code).
24. The individual has served on the Sustainability Assurance Engagement and the Audit Engagement for a total of five consecutive years in a combination of Engagement Leader and Engagement Partner roles. Unless granted an extension by the relevant regulator, the individual must serve a cooling-off period of five consecutive years before he or she can return to the Sustainability Assurance Engagement or the Audit Engagement (see paragraphs R540.17 and R5540.17 of the Code).

Combination of roles across Audit and Sustainability Assurance Engagements

Q30. Individual W has served as the Engagement Partner for the audit of the financial statements of a Sustainability Assurance Client for three years. The Client is a PIE that is not a Listed or APRA regulated entity. Individual W was then appointed to perform the Engagement Quality Review for the Sustainability Assurance Engagement for this Client for four years. How long is the cooling-off period for Individual W?

To determine the appropriate cooling-off period for Individual W, it is necessary to consider W's role in the context of both the Audit and the Sustainability Assurance Engagement performed for the same client.

The individual has served on the Audit Engagement and the Sustainability Assurance Engagement for the same Sustainability Assurance Client for a total of seven cumulative years. Over these years, the individual held a combination of Engagement Partner and Engagement Quality Reviewer roles, during which he or she was the Engagement Partner for three years. Therefore, the individual must serve a cooling-off period of five consecutive years before he or she can return to either the Audit Engagement or the Sustainability Assurance Engagement of the Sustainability Assurance Client (see paragraph R5540.19(a) of the Code).

G. Other specific circumstances

Implications of Involvement in a Half-Year Review

~~Q20.~~Q31. **A partner signs a half-year review opinion in relation to a client that is a PIE, then another partner signs the opinion for the audit. Does the partner's service as Engagement Partner for the half-year Review Engagement constitute a year for the purposes of applying the rotation requirements?**

Yes. The partner for the Review Engagement is also considered to have served one year for the purposes of applying the rotation provisions even if he or she was not the Engagement Partner for the audit of the Financial Statements.

Implications of a Need to Re-audit a Prior Period

~~Q21.~~Q32. **A Firm accepts a new PIE Audit Client that had previously been audited by another Firm. In the course of auditing the current period's Financial Statements, it was determined that the newly engaged Firm should re-audit the prior two periods for comparative purposes only (with no updated audit reports to be issued). For the purposes of the partner rotation provisions of the Code, does this engagement constitute one year or three years of service by the audit partner?**

As the audits are undertaken concurrently, this constitutes one year of service for the purposes of determining when the individuals would need to rotate. The familiarity threat would not be different than if the Engagement Partner had performed only the first-year audit of the entity as a new client.

Implications of Auditing Multiple Periods in one Calendar Year

~~Q22.~~Q33. **A Firm accepts a new PIE Audit Client that is a ~~L~~listed ~~Entity~~company. The newly engaged Firm is required to audit three successive financial years within the first calendar year of their appointment. For the purposes of the partner rotation provisions, does this engagement constitute one year or three years of service by the audit partner?**

In Australia there are requirements in the *Corporation Act 2001* that specify audit partner rotation requirements for ~~Listed Entities~~listed companies, ~~and~~ listed registered schemes or registrable superannuation entities (s324DA). These requirements are specifically linked to the financial year of the audited body. This position is clarified in ASIC's *Regulatory Guide 187: Auditor Rotation*.

Based on the requirements of the *Corporations Act 2001*, the engagement would constitute three years for the ~~purposes~~purpose of determining when the individuals would need to rotate.

Audits of Financial Statements for Periods Other than 12 Months

~~Q23.~~Q34. **A firm audits an eighteen-month period for a PIE due to a change in the entity's financial year-end. Does the Engagement Partner's service constitute one year for the purposes of partner rotation?**

Yes, it would be considered as one year.

~~Q24.~~Q35. Due to a change in accounting period, a firm audits two sets of financial statements for a PIE, one covering a six-month period and the other the subsequent twelve-month period. Would the engagement partner's service constitute one or two years for the purposes of partner rotation?

This depends on whether the PIE is a listed company, listed registered scheme or registrable superannuation entity,~~Listed~~ or APRA regulated entity or not.

In Australia there are requirements in the *Corporation Act 2001* that specify audit partner rotation requirements for ~~Listed Entities~~listed companies, ~~and~~ listed registered schemes or registrable superannuation entities (s324DA). These requirements are specifically linked to the financial year of the audited body. This position is clarified in ASIC's *Regulatory Guide 187: Auditor Rotation*. Based on the requirements of the *Corporations Act 2001*, the engagement would constitute two years for the ~~purposes~~purpose of determining when the individuals would need to rotate.

If the PIE is not a ~~L~~listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity, it depends on the timing of the execution of the audits. If the Audit Engagements are carried out concurrently, the two engagements would constitute one year of service. The familiarity threat would not be different than if the engagement partner had served on the audit of the combined 18-month period as one engagement. If, however, the two Audit Engagements are not carried out concurrently, they would be considered as two years of service.

Manager Becoming a Key Audit Partner

~~Q25.~~Q36. A manager served on the Audit Engagement Team for a PIE Audit Client for five years before being promoted to partner. How many years may he or she serve on the engagement as a Key Audit Partner for that Audit Client?

The rotation requirements in the Code apply to time spent as a Key Audit Partner. In principle, the individual may serve seven years[20] as a Key Audit Partner. However, the general provisions of the Code indicate that in evaluating the threat created by long association, the overall length of an individual's association with the client, how long the individual has been on the Engagement Team and the roles that he or she has played should be taken into account (see paragraphs 540.~~34~~ A3, ~~and~~ R540.~~10~~12 and 540.12 A1 of the Code). A Firm may decide that it is appropriate to rotate an individual off the Audit Team before the end of the seven-year period or to serve a period off the engagement before re-joining the Audit Engagement Team as a Key Audit Partner.

Entities Becoming Public Interest Entities

~~Q26.~~Q37. How do the revised long association provisions apply to audits of entities that become Public Interest Entities?

Paragraph R540.~~8~~10 of the Code permits an Audit Partner who has already served an Audit Client for a period of six or more cumulative years at the time of the entity becoming a PIE (for example, through an Initial Public Offering) to serve a further two years with the concurrence of Those Charged with Governance of the entity.

However, the requirements of the *Corporations Act 2001*[21] mean that any years served as the Engagement Partner or the EQ~~C~~R ~~Partner~~ on the audit of this entity before the listing is included in determining the maximum five-year time-on period allowed for ~~l~~Listed companies, listed registered schemes or registrable superannuation e~~E~~ntities. Therefore, a partner who has served five years or more as the Engagement Partner or EQ~~C~~R ~~Partner~~ on the audit of a private company

[20] If the PIE entity is a listed company, listed registered scheme, registrable superannuation entity~~Listed Entity~~ or APRA regulated entity the maximum time-on period for the Engagement Partner or EQ~~C~~R ~~Partner~~ may only be five years, unless the relevant regulator grants an extension to the time-on period.

[21] Refer to s324DA of the *Corporations Act 2001* which has more restrictive Audit Partner rotation requirements for listed companies, listed registered schemes and registrable superannuation entities~~Listed Entities~~ in Australia. The *Corporations Act 2001* restricts the number of years that an Engagement Partner can serve an Audit Client that becomes a listed company, listed registered scheme or registrable superannuation entity ~~Listed Entity~~.

prior to its listing is not permitted to act in a similar role once the entity becomes a ~~Listed~~ Publicly Traded Entity.

Note that the time-on period for an Engagement Partner of a ~~L~~listed company, listed registered scheme or registrable superannuation ~~E~~entity may be extended by the Audit Client or a regulator in accordance with the provisions of s342A, ~~and~~ s324DA and s324DAA of the *Corporations Act 2001*. However, as this extension is not automatically applied and requires specific consent, it has not been applied to the facts in this question.

Additional Restrictions on Activities during the Cooling-off Period

~~Q27.~~Q38. The 30 June 2026~~17~~ financial year audit will be the seventh year an individual has served as a Key Audit Partner on the audit of a PIE that is not a ~~L~~listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity. The individual will then commence~~s~~ a cooling-off period starting with the 30 June 2027~~18~~ audit. How should the provision regarding ~~additional~~ restrictions on activities during the cooling-off period be applied?

During the cooling-off period, the ~~The new provisions on the scope of activities apply to all Key Audit Partners from the effective date. Accordingly, if a~~ Key Audit Partner ~~has completed his or her seventh cumulative year of service with the 2017 financial year audit and commenced a cooling-off period with the 2018 financial year audit, he or she would~~is ~~be~~ required to comply with the restrictions on activities as set out in paragraph ~~290.149 of the extant Code for the financial year 2018 audit and paragraph~~ R540.~~20~~23 of the Code~~. for the 2019 financial year audit and thereafter.~~ These restrictions are designed to reduce familiarity and self-interest threats by ensuring the former Key Audit Partner does not influence the Audit Engagement or Sustainability Assurance Engagement of the Client, or maintain close relationships with senior management or Those Charged with Governance.

~~Additional restrictions would apply in 2019. For e~~Examples of activities that the individual would not be permitted to undertake during the cooling-off period include, but are not limited to:

- ~~, during 2019 the individual would not be permitted to~~ leading or coordinating~~e~~ the Firm's Professional Services to the Audit Client – this change would need managing in terms of a Firm's resource planning.
- being a member of, or providing technical advice to, the Engagement Team for the Audit Engagement or Sustainability Assurance Engagement.
- performing an Engagement Quality Review for either the Audit Engagement or Sustainability Assurance Engagement.
- Performing a National Greenhouse and Energy Reporting (NGERs) assurance engagement which is not within the scope of the Independence Standards in Part 5 of the Code as this would involve continued interaction with senior management or Those Charged with Governance of the Client.

~~Q28.~~Q39. An individual has served five cumulative years as a ~~Key Audit~~ Engagement Partner on the audit of a PIE that is a ~~Listed Publicly Traded Entity~~listed company and has entered a cooling-off period as required by the Code. The Firm subsequently determines that the individual will not return to the Audit Engagement at the end of the cooling-off period. Would the individual be permitted to move into a role in which he or she provides non-assurance services to the entity which would involve significant contact with management during the cooling-off period?

No. Under paragraph R540.~~20~~23(d), the individual would be prohibited from undertaking any role or activity, including the provision of non-assurance services, which would result in the individual:

(a) Having significant or frequent interaction with senior management or Those Charged with Governance; or

(b) Exerting direct influence on the outcome of the Audit Engagement.

Whilst the cooling-off requirement serves to facilitate a 'fresh pair of eyes', the prohibition in R540.~~20~~23 also serves to allow the Audit Engagement Team to conduct the audit without any influence from the former ~~Key Audit~~ Engagement Partner. Accordingly, even if there is no intention for the former ~~Key Audit~~ Engagement Partner to return to the audit, the Code would not permit the individual to provide such non-assurance services to the entity during the cooling-off period.

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H. Determination of Cooling-off Period

Listed companies, listed registered schemes, registrable superannuation Eentities and APRA regulated entities ~~(including transitional relief)~~

30 June year end

~~**Q29. The Engagement Partner for the audit of a PIE that is a Listed or APRA regulated entity served for five cumulative years in that role with the completion of the 30 June 2017 financial year audit. How long should the individual cool-off?**~~

~~The cooling-off period commences for the financial year beginning 1 July 2017. Under the original provisions, a cooling-off period of two consecutive years is required (i.e. for 2018 and 2019). The Engagement Partner will complete the cooling-off period required under the original provisions before the revised provisions come into effect for the next audit of the Financial Statements of the client beginning on or after 1 January 2019. The individual could come back to the Audit Engagement in any Key Audit Partner role for the 2020 audit.~~

~~**Q30. The Engagement Partner for the audit of a PIE that is a Listed or APRA regulated entity served for five cumulative years in that role with the completion of the 30 June 2018 audit. How long should the individual cool-off?**~~

~~The cooling-off period commences for the financial year beginning 1 July 2018. The length of the cooling-off period must meet the requirements of the revised provisions as the Engagement Partner will not be able to complete a two-year cooling-off period required by the original provisions before the revised provisions come into effect.~~

~~The Engagement Partner will need to cool-off for three consecutive years. The individual will not be able to be a Key Audit Partner on the audit of this entity until the 30 June 2022 audit.~~

~~**Q31. The Engagement Partner for the audit of a PIE that is a Listed or APRA regulated entity served for five cumulative years in that role with the completion of the 30 June 2023 audit. How long should the individual cool-off?**~~

~~The cooling-off period commences for the financial year beginning 1 July 2023. The Engagement Partner has commenced the cooling-off period prior to the end of the transition period for the substitution of a shorter cooling-off period established by law and regulation, i.e. effective for audits of financial statements for periods beginning prior to 31 December 2023. Therefore, the Engagement Partner will need to cool-off for three consecutive years. The individual will not be able to be a Key Audit Partner on the audit of this entity until the 30 June 2027 audit.~~

~~Q32.~~Q40. **The Engagement Partner for the audit of a PIE that is a ~~L~~listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity served for five cumulative years in that role with the completion of the 30 June 2046 audit. How long should the individual cool-off?**

The cooling-off period commences for the financial year beginning 1 July 2046. ~~The substitution of a shorter cooling-off period established by law and regulation will no longer be able to be applied as it was only effective for audits of financial statements for periods beginning prior to 31 December 2023. Therefore,~~T ~~t~~he Engagement Partner will need to cool-off for five consecutive years. The individual will not be able to be a Key Audit Partner on the audit of this entity until the 30 June 2030 audit.

31 December year end

~~**Q33. The Engagement Partner for the audit of a PIE that is a Listed or APRA regulated entity served for five cumulative years in that role with the completion of the 31 December 2016 financial year audit. How long should the individual cool-off?**~~

~~The cooling-off period commences for the financial year beginning 1 January 2017. Under the original provisions, a cooling-off period of two consecutive years is required (i.e. for 2017 and 2018). The Engagement Partner will complete the cooling-off period required under the original provisions before the revised provisions come into effect for the next audit of the Financial Statements of the client beginning on or after 1 January 2019. The individual could come back to the Audit Engagement in any Key Audit Partner role for the 2019 audit.~~

~~**Q34. The Engagement Partner for the audit of a PIE that is a Listed or APRA regulated entity served for five cumulative years in that role with the completion of the 31 December 2017 financial year audit. How long should the individual cool-off?**~~

~~The cooling-off period commences for the financial year beginning 1 January 2018. The length of the cooling-off period must meet the revised requirements as the Engagement Partner will not complete the cooling-off period required under the original provisions before the revised provisions came into effect.~~

~~The Engagement Partner needs to complete a cooling-off period of three consecutive years (i.e. 2018 - 2020) in accordance with the new provisions. The individual could come back to the Audit Engagement in any Key Audit Partner role for the 2021 audit.~~

~~**Q35. The Engagement Partner for the audit of a PIE that is a Listed or APRA regulated entity served for five cumulative years in that role with the completion of the 31 December 2022 audit. How long should the individual cool-off?**~~

~~The cooling-off period commences for the financial year beginning 1 January 2023. The Engagement Partner has commenced the cooling-off period prior to the end of the transition period for the substitution of a shorter cooling-off period established by law and regulation, i.e., effective for audits of financial statements for periods beginning prior to 31 December 2023. Therefore, the Engagement Partner will need to cool-off for three consecutive years. The individual will not be able to be a Key Audit Partner on the audit of this entity until the 31 December 2026 audit.~~

~~Q36.~~Q41. **The Engagement Partner for the audit of a PIE that is a ~~L~~listed company, registered scheme, registrable superannuation entity or APRA regulated entity served for five cumulative years in that role with the completion of the 31 December 2026~~3 audit. How long should the individual cool-off?**

The cooling-off period commences for the financial year beginning 1 January 2027~~2~~4. ~~The substitution of a shorter cooling-off period established by law and regulation will no longer be able to be applied as it was only effective for audits of financial statements for periods beginning prior to 31 December 2023. Therefore, t~~The Engagement Partner will need to cool-off for five consecutive years. The individual will not be able to be a Key Audit Partner on the audit of this entity until the 31 December 2032~~29~~ audit.

PIEs other than ~~L~~listed companies, listed registered schemes, registrable superannuation ~~E~~entities and APRA regulated entities

30 June year end

~~**Q37. The Engagement Partner for the audit of a PIE that is not a Listed or APRA regulated entity served for seven cumulative years in that role with the completion of the audit of the financial period ending 30 June 2017. How long should the Engagement Partner cool-off?**~~

~~The cooling-off period commences for the financial period beginning 1 July 2017. Under the original provisions, a cooling-off period of two consecutive years is required (i.e. for 2018 and 2019). The Engagement Partner will complete the cooling-off period required under the original provisions before the revised provisions come into effect for the next audit of the Financial Statements of the client beginning on or after 1 January 2019. The individual could come back to the engagement in any Key Audit Partner role for a new seven-year term with the audit for the financial period ending 30 June 2020.~~

~~Q38.~~Q42. **The Engagement Partner for the audit of a PIE that is not a ~~L~~listed company, listed registered scheme, registrable superannuation entity or APRA regulated entity served for seven cumulative years in that role with the completion of the 30 June 2026~~18~~ financial year audit. How long should the individual cool-off?**

The cooling-off period commences for the financial period beginning 1 July 2026~~18~~. ~~The length of the cooling-off period must meet the revised requirements as the Engagement Partner will not be able to complete the cooling-off period required under the original provisions before the revised provisions came into effect.~~ The Engagement Partner needs to complete a cooling-off period of five consecutive years. The individual could come back to the engagement in any Key Audit Partner role for a new seven-year term with the 2032~~24~~ audit.

31 December year end

~~**Q39. The Engagement Partner for the audit of a PIE that is not a Listed or APRA regulated entity served for seven cumulative years in that role with the completion of the audit of the financial period ending 31 December 2016. The individual subsequently did not participate in the 2017 and 2018 audits. Would that individual be able to come back as Engagement Partner for the 2019 audit for a new seven-year term?**~~

~~Yes. The cooling-off period commences for the financial period beginning 1 January 2017. Under the original provisions, a cooling-off period of two consecutive years is required (i.e. for 2017 and 2018). The Engagement Partner will complete the cooling-off period required under the original provisions before the revised provisions come into effect for the next audit of the Financial Statements of the client beginning on or after 1 January 2019. The individual could begin a new seven-year term beginning with the audit of the financial period ending 31 December 2019.~~

~~Q40.~~Q43. **The Engagement Partner for the audit of a PIE that is not a listed company, listed registered scheme, registrable superannuation entity~~Listed~~ or APRA regulated entity served for seven cumulative years in that role with the completion of the 31 December 2026~~18~~ financial year audit. How long should the individual cool-off?**

The cooling-off period commences for the financial period beginning 1 January 2027~~19~~. ~~The length of the cooling-off period must meet the revised requirements as the Engagement Partner will not complete the cooling-off period required under the original provisions before the revised provisions came into effect.~~ The Engagement Partner needs to complete a cooling-off period of five consecutive years. The individual could come back to the engagement in any Key Audit Partner role for a new seven-year term with the 2032~~24~~ audit.

Breaks in service

Q41. The Engagement Partner for the audit of a PIE that is not a Listed or APRA regulated entity served for five years in that role with the completion of the 30 June 2018 financial year audit. The individual subsequently did not participate in the 2019 and 2020 audits. Would that individual be able to come back as Engagement Partner for the 2021 audit for a new seven-year term (having cooled off for the 2019 and 2020 audits)?

No, the Engagement Partner would not be able to come back for a new seven-year term. As the revised provisions are effective for audits of Financial Statements for periods beginning on or after 1 January 2019, the revised cooling-off provisions in the Code apply. Accordingly, if the Engagement Partner comes off the engagement before the full permitted seven-year time-on period is served, under the revised provisions the full five-year cooling-off period applies in accordance with paragraphs R540.6 and R540.6 A1 of the Code before the individual may come back to the engagement in any Key Audit Partner role for a new seven-year time-on period.

In this case, the individual would therefore be able to serve as Engagement Partner for an additional two years (i.e., for the 2021 and 2022 financial year audits) before reaching the cumulative seven-year time-on period. He or she would then need to cool-off for five consecutive years starting from the 2023 financial year audit.

Alternatively, the individual could remain off the engagement for the 2021, 2022 and 2023 financial year audits, reaching the five consecutive years cooling-off period applicable to Engagement Partners under the new provisions, and then come back to the 2024 audit in any Key Audit Partner role for a new seven-year time-on period.

The tables below illustrate the two options, where "X" represents a year in which the individual was not a Key Audit Partner on the audit.

Option 1

FY 2018 (Yr 5)	FY 2019	FY 2020	FY 2021 (Yr 6)	FY 2022 (Yr 7)	FY 2023	FY 2024	FY 2025	FY 2026	FY 2027	FY 2028 (Yr 1)
EP	X	X	EP	EP	X	X	X	X	X	KAP*

* KAP = Key Audit Partner

Option 2

FY 2018 (Yr 5)	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024 (Yr 1)	FY 2025 (Yr 2)	FY 2026 (Yr 3)	FY 2027 (Yr 4)	FY 2028 (Yr 5)
EP	X	X	X	X	X	KAP*	KAP*	KAP*	KAP*	KAP*

* KAP = Key Audit Partner

Appendix A – Flowchart: Determination of type of entity

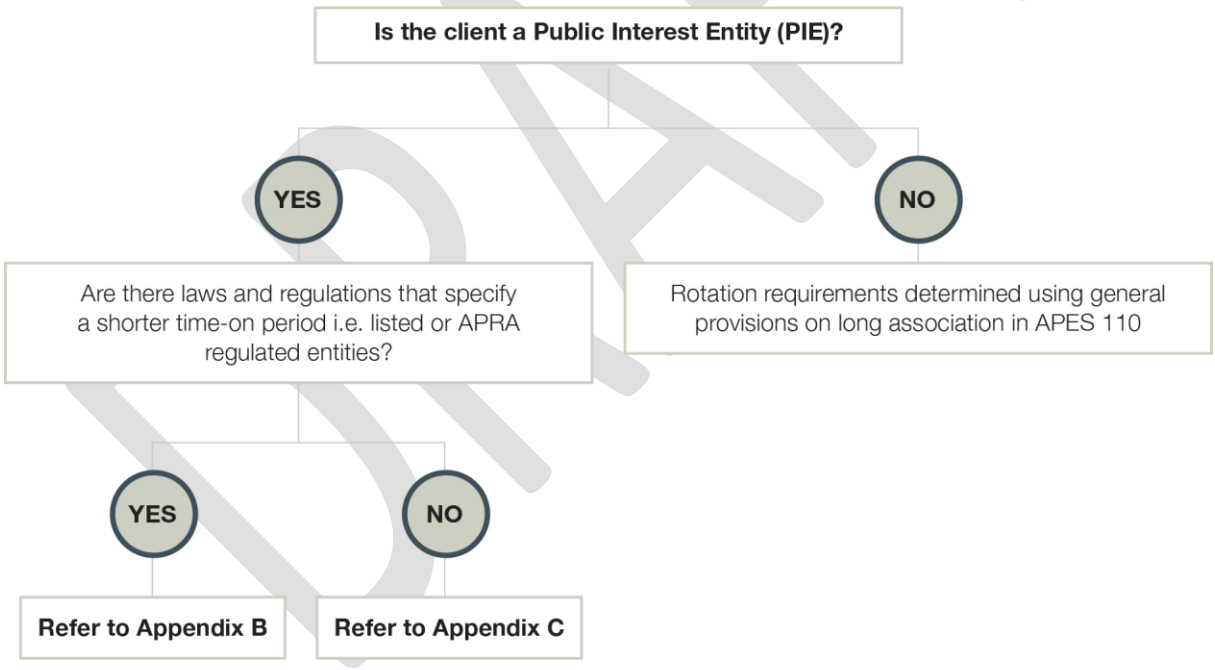
Introduction to Appendices A to ~~D~~C

Appendices A to C~~D~~ set out a flowchart of the ~~original and revised~~ audit partner rotation requirements. The flowchart maps out key factors to consider such as:

- *The type of entity being audited (Appendix A);*
- *The impact of ~~a shorter cooling-off period~~rotation requirements specified in laws and regulations (Appendix B);*
- *~~The impact when there are no laws and regulations that specify a shorter cooling-off period (Appendix D);~~ and*
- *The effect of acting in a combination of Key Audit Partner roles (Appendix B~~C~~ and Appendix ~~D~~C).*

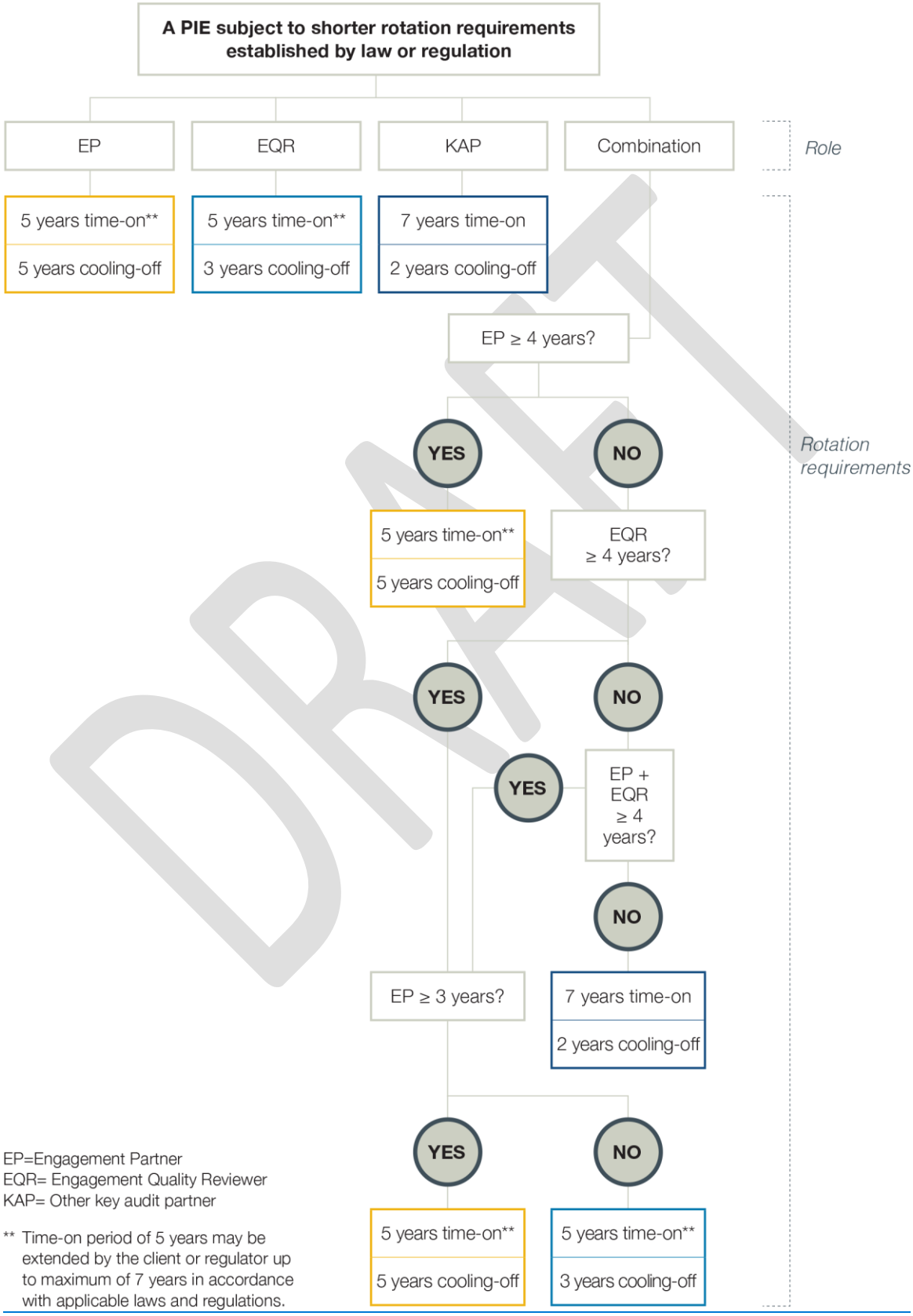
The flowchart can help individuals determine the applicable rotation requirements. Appendix D~~E~~ sets out further details on the combinations that may occur in practice and the impact on the audit partner rotation requirements.

Flowchart



Note: Text in diagrams to be updated

Appendix B – Flowchart: A Public Interest Entity (PIE) subject to ~~a cooling-off period~~rotation requirements established by ~~a~~ law or regulation [Note: text in diagram to be updated]



EP=Engagement Partner
EQR= Engagement Quality Reviewer
KAP= Other key audit partner

** Time-on period of 5 years may be extended by the client or regulator up to maximum of 7 years in accordance with applicable laws and regulations.

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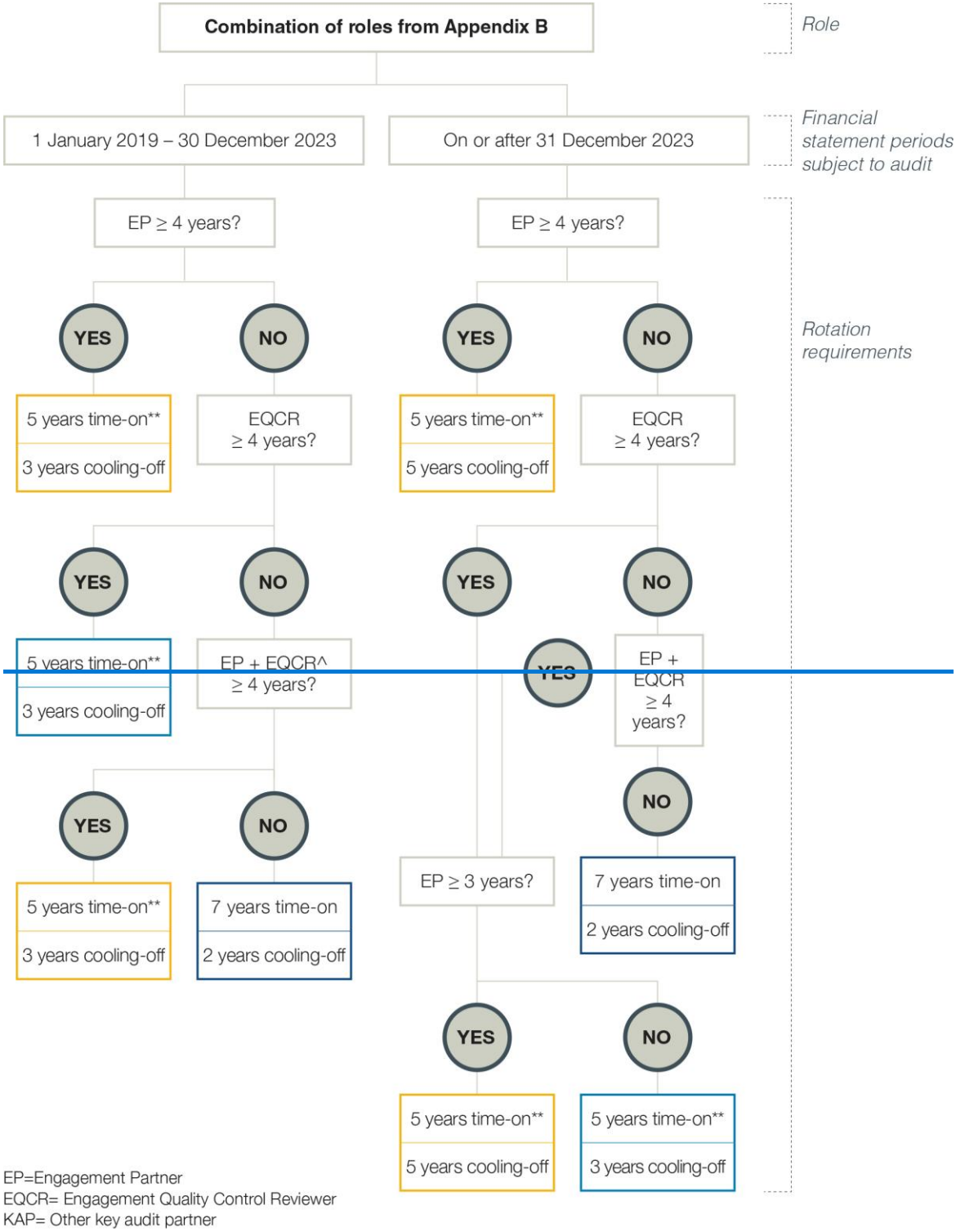
~~Appendix C – Flowchart: Combination of Audit Partner Roles (continued from Appendix B)~~

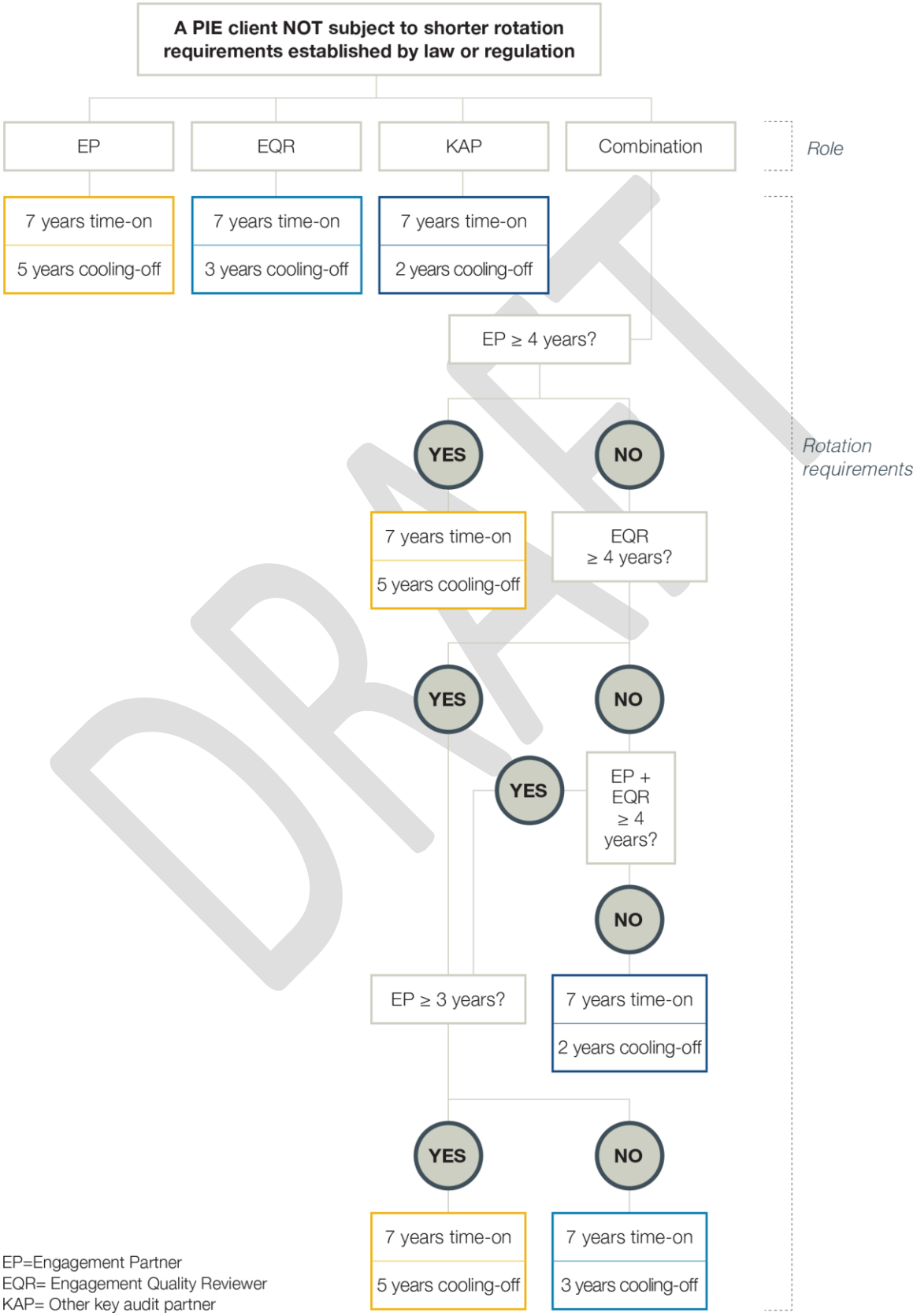


EP=Engagement Partner
EQCR= Engagement Quality Control Reviewer
KAP= Other key audit partner

** Time-on period of 5 years may be extended by the client or regulator up to maximum of 7 years in accordance with applicable laws and regulations.

^ During the transition period, the substitution of the 3-year cooling-off period results in the same outcome for all combination of EP/EQCR roles of 4 or more years.

Appendix CD – Flowchart: A Public Interest Entity (PIE) not subject to a cooling-off periodrotation requirements established by law or regulation [Note text in diagram to be updated]



Appendix DE: Application of Provisions Regarding Service in a Combination of Roles

Information on the combination of roles and the impact on audit partner and sustainability assurance leader rotation requirements areis set out in Section FQuestion 19. The tables below provide further details on the combinations that may occur in practice and the related impact on the auditor partner rotation requirements. The tables do not factor in the impact of the exemptions provided in the Code at paragraphs R540.10, R540.11, R5540.10, R5540.10a and R5540.11.

Table A: Combination of roles for PIEs that are not Llisted companies, listed registered schemes, registrable superannuation entities or APRA regulated entities

Number of Years During Time-on Period				Cooling-off (Years)	The Code Paragraph Reference
Engagement Partner and/or Engagement Leader	Engagement QualityC Reviewer Partner	Other Key Audit Partner	Other Key Sustainability Assurance Leader		
7	–	–	–	5	R540.131 &R5540.13
6	1	–	–	5	R540.174 & R5540.17
6	–	1	–	5	R540.174 &R5540.17
6	–	–	1	5	R540.17 & R5540.17
5	2	–	–	5	R540.174 & R5540.17
5	1	1	–	5	R540.174 & R5540.17
5	1	–	1	5	R540.17 & R5540.17
5	–	2	–	5	R540.174 & R5540.17
5	–	1	1	5	R540.17 & R5540.17
5	–	–	2	5	R540.17 & R5540.17
4	3	–	–	5	R540.174 & R5540.17
4	2	1	–	5	R540.174 & R5540.17
4	2	–	1	5	R540.17 & R5540.17
4	1	2	–	5	R540.174 & R5540.17
4	1	1	1	5	R540.17 & R5540.17
4	–	3	-	5	R540.174 & R5540.17
4	–	2	1	5	R540.17 & R5540.17
4	–	1	2	5	R540.17 & R5540.17
4	–	–	3	5	R540.17 & R5540.17
3	4	–	–	5	R540.196(a) & R5540.19 (a)

Number of Years During Time-on Period				Cooling-off (Years)	The Code Paragraph Reference
Engagement Partner and/or Engagement Leader	Engagement Quality~~C~~ Reviewer ~~Partner~~	Other Key Audit Partner	Other Key Sustainability Assurance Leader		
3	3	1	–	5	R540.1~~9~~6(a) & R5540.19 (a)
3	3	–	1	5	R540.19(a) & R5540.19(a)
3	2	2	–	5	R540.1~~9~~6(a) & R5540.19(a)
3	2	1	1	5	R540.19(a) & R5540.19(a)
3	2	–	1	5	R540.19(a) & R5540.19(a)
3	1	3	–	5	R540.1~~9~~6(a) & R5540.19(a)
3	–	4		2	R540.~~17~~20 & R5540.20
3	–	3	1	2	R540.20 & R5540.20
3	–	2	2	2	R540.20 & R5540.20
3	–	1	3	2	R540.20 & R5540.20
3	–	–	4	2	R540.20 & R5540.20
2	5	–	–	3	R540.1~~9~~6(b) & R5540.19(b)
2	4	1	–	3	R540.1~~9~~6(b) & R5540.19(b)
2	4	–	1	3	R540.19(b) & R5540.19(b)
2	3	2	–	3	R540.1~~9~~6(b) & R5540.19(b)
2	3	1	1	3	R540.19(b) & R5540.19(b)
2	3	–	2	3	R540.19(b) & R5540.19(b)
2	2	3	–	3	R540.1~~9~~6(b) & R5540.19(b)
2	2	2	1	3	R540.19(b) & R5540.19(b)
2	2	1	2	3	R540.19(b) & R5540.19(b)

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Number of Years During Time-on Period				Cooling-off (Years)	The Code Paragraph Reference
Engagement Partner and/or Engagement Leader	Engagement Quality~~C~~ Reviewer ~~Partner~~	Other Key Audit Partner	Other Key Sustainability Assurance Leader		
2	2	–	3	3	R540.19(b) & R5540.19(b)
2	1	4	–	2	R540.20~~17~~ & R5540.20
2	1	3	1	2	R540.20 & R5540.20
2	1	2	2	2	R540.20 & R5540.20
2	1	1	3	2	R540.20 & R5540.20
2	1	–	4	2	R540.20 & R5540.20
2	–	5	–	2	R540.20~~17~~ & R5540.20
2	–	4	1	2	R540.20 & R5540.20
2	–	3	2	2	R540.20 & R5540.20
2	–	2	3	2	R540.20 & R5540.20
2	–	1	4	2	R540.20 & R5540.20
2	–	–	5	2	R540.20 & R5540.20
1	6	–	–	3	R540.1~~85~~ & R5540.18
1	5	1	–	3	R540.1~~85~~ & R5540.18
1	5	–	1	3	R540.18 & R5540.18
1	4	2	–	3	R540.1~~85~~ & R5540.18
1	4	1	1	3	R540.18 & R5540.18
1	4	–	2	3	R540.18 & R5540.18
1	3	3	–	3	R540.1~~96~~(b) & R5540.19(b)
1	3	2	1	3	R540.19(b) & R5540.19(b)
1	3	1	2	3	R540.19(b) & R5540.19(b)
1	3	–	3	3	R540.19(b) & R5540.19(b)
1	2	4	–	2	R540.20~~17~~ & R5540.20
1	2	3	1	2	R540.20 & R5540.20
1	2	2	2	2	R540.20 & R5540.20
1	2	1	3	2	R540.20 & R5540.20

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Number of Years During Time-on Period				Cooling-off (Years)	The Code Paragraph Reference
Engagement Partner and/or Engagement Leader	Engagement Quality~~C~~ Reviewer ~~Partner~~	Other Key Audit Partner	Other Key Sustainability Assurance Leader		
1	2	–	4	2	R540.20 & R5540.20
1	1	5	–	2	R540.20~~17~~ & R5540.20
1	1	4	1	2	R540.20 & R5540.20
1	1	3	2	2	R540.20 & R5540.20
1	1	2	3	2	R540.20 & R5540.20
1	1	1	4	2	R540.20 & R5540.20
1	1	–	5	2	R540.20 & R5540.20
1	–	6	–	2	R540.20~~17~~ & R5540.20
1	–	5	1	2	R540.20 & R5540.20
1	–	4	2	2	R540.20 & R5540.20
1	–	3	3	2	R540.20 & R5540.20
1	–	2	4	2	R540.20 & R5540.20
1	–	1	5	2	R540.20 & R5540.20
1	–	–	6	2	R540.20 & R5540.20
–	7	-	–	3	R540.1~~4~~2 & R5540.14
–	6	1	–	3	R540.1~~8~~5 & R5540.18
–	6	–	1	3	R540.18 & R5540.18
–	5	2	–	3	R540.1~~8~~5 & R5540.18
–	5	1	1	3	R540.18 & R5540.18
–	5	–	2	3	R540.18 & R5540.18
–	4	3	–	3	R540.1~~8~~5 & R5540.18
–	4	2	1	3	R540.18 & R5540.18
–	4	1	2	3	R540.18 & R5540.18
–	4	–	3	3	R540.18 & R5540.18
–	3	4	–	2	R540.20~~17~~ & R5540.20
–	3	3	1	2	R540.20 & R5540.20
–	3	2	2	2	R540.20 & R5540.20
–	3	1	3	2	R540.20 & R5540.20
–	3	–	4	2	R540.20 & R5540.20

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Number of Years During Time-on Period				Cooling-off (Years)	The Code Paragraph Reference
Engagement Partner and/or Engagement Leader	Engagement Quality~~C~~ Reviewer ~~Partner~~	Other Key Audit Partner	Other Key Sustainability Assurance Leader		
–	2	5	–	2	R540.20~~17~~ & R5540.20
–	2	4	1	2	R540.20 & R5540.20
–	2	3	2	2	R540.20 & R5540.20
–	2	2	3	2	R540.20 & R5540.20
–	2	1	4	2	R540.20 & R5540.20
–	2	–	5	2	R540.20 & R5540.20
–	1	6	–	2	R540.20~~17~~ & R5540.20
–	1	5	1	2	R540.20 & R5540.20
–	1	4	2	2	R540.20 & R5540.20
–	1	3	3	2	R540.20 & R5540.20
–	1	2	4	2	R540.20 & R5540.20
–	1	1	5	2	R540.20 & R5540.20
–	1	–	6	2	R540.20 & R5540.20
–	–	7	–	2	R540.15~~3~~ & R5540.15
–	–	6	1	2	R540.15 & R5540.15
–	–	5	2	2	R540.15 & R5540.15
–	–	4	3	2	R540.15 & R5540.15
–	–	3	4	2	R540.15 & R5540.15
–	–	2	5	2	R540.15 & R5540.15
–	–	1	6	2	R540.15 & R5540.15
–	–	–	7	2	R540.15 & R5540.15

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Table B: Combination of roles for PIEs that are ~~I~~listed companies, listed registered schemes, registrable superannuation entities or APRA regulated entities.

Number of Years During Time-on Period[22]				Cooling-off (Years)	The Code Paragraph Reference
Engagement Partner and/or Engagement Leader	Engagement Quality C~~R~~eviewer ~~Partner~~	Other Key Audit Partner	Other Key Sustainability Assurance Leader		
5	–	–		~~3~~/5[23]	R540.131~~, R540.19~~ & R5540.13~~AUST R540.19.1~~
5	–	1	–	~~3~~/5[13]	R540.174~~, R540.19~~ & ~~AUST R540.19.1~~R5540.17
5	–	–	1	5	R540.17 & R5540.17
5	–	2	–	~~3~~/5[13]	R540.174 & R5540.17~~, R540.19 & AUST R540.19.1~~
5	–	1	1	5	R540.17 & R5540.17
5	–	–	2	5	R540.17 & R5540.17
4	1	–	–	~~3~~/5[13]	R540.174 & R5540.17~~, R540.19 & AUST R540.19.1~~
4	1	1	–	~~3~~/5[13]	R540.174 & R5540.17~~, R540.19 & AUST R540.19.1~~
4	1	–	1	5	R540.17 & R5540.17
4	1	2	–	~~3~~/5[13]	R540.174 & R5540.17~~, R540.19 & AUST R540.19.1~~
4	1	1	1	5	R540.17 & R5540.17
4	1	–	2	5	R540.17 & R5540.17
4	–	3	–	~~3~~/5[13]	R540.174 & R5540.17~~, R540.19 & AUST R540.19.1~~
4	–	2	1	5	R540.17 & R5540.17
4	–	1	2	5	R540.17 & R5540.17
4	–	–	3	5	R540.17 & R5540.17

[22] This assumes that there are no extensions granted on the Engagement Partner's or Engagement Leader's time-on period in instances when the individual has served the maximum of 5 years in this role.

[23] ~~Cooling-off period of three years (for audits of Financial Statements during the transition period and five years (for audits of Financial Statements beginning on or after 31 December 2023).~~

Number of Years During Time-on Period[22]				Cooling-off (Years)	The Code Paragraph Reference
Engagement Partner and/or Engagement Leader	Engagement Quality CReviewer Partner	Other Key Audit Partner	Other Key Sustainability Assurance Leader		
3	2	–	–	3/5[13]	R540.196(a), R540.19 & AUST R540.19.1R5540.19(a)
3	2	2	–	3/5[13]	R540.196(a), R540.19 & AUST R540.19.1R5540.19(a)
3	2	1	1	5	R540.19(a) & R5540.19(a)
3	2	–	2	5	R540.19(a) & R5540.19(a)
3	2	1	–	3/5[13]	R540.196(a), R540.19 & AUST R540.19.1R5540.19(a)
3	2	–	1	5	R540.19(a) & R5540.19(a)
3	1	3	–	3/5[13]	R540.196(a), R540.19 & AUST R540.19.1R5540.19(a)
3	1	2	1	5	R540.19(a) & R5540.19(a)
3	1	1	2	5	R540.19(a) & R5540.19(a)
3	1	–	3	5	R540.19(a) & R5540.19(a)
3	–	4	–	2	R540.1720 & R5540.20
3	–	3	1	2	R540.20 & R5540.20
3	–	2	2	2	R540.20 & R5540.20
3	–	1	3	2	R540.20 & R5540.20
3	–	–	4	2	R540.20 & R5540.20
2	3	–	–	3	R540.196(b) & R5540.19(b)
2	3	1	–	3	R540.196(b) & R5540.19(b)
2	3	2	–	3	R540.196(b) & R5540.19(b)

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Number of Years During Time-on Period[22]				Cooling-off (Years)	The Code Paragraph Reference
Engagement Partner and/or Engagement Leader	Engagement Quality Reviewer Partner	Other Key Audit Partner	Other Key Sustainability Assurance Leader		
2	3	1	1	3	R540.19(b) & R5540.19(b)
2	3	–	2	3	R540.19(b) & R5540.19(b)
2	2	1	–	3	R540.196(b) & R5540.19(b)
2	2	–	1	3	R540.19(b) & R5540.19(b)
2	2	2	–	3	R540.196(b) & R5540.19(b)
2	2	1	1	3	R540.19(b) & R5540.19(b)
2	2	–	2	3	R540.19(b) & R5540.19(b)
2	2	3	–	3	R540.196(b) & R5540.19(b)
2	2	2	1	3	R540.19(b) & R5540.19(b)
2	2	1	2	3	R540.19(b) & R5540.19(b)
2	2	–	3	3	R540.19(b) & R5540.19(b)
2	1	4	–	2	R540.1720 & R5540.20
2	1	3	1	2	R540.20 & R5540.20
2	1	2	2	2	R540.20 & R5540.20
2	1	1	3	2	R540.20 & R5540.20
2	1	–	4	2	R540.20 & R5540.20
2	–	5	–	2	R540.1720 & R5540.20
2	–	4	1	2	R540.20 & R5540.20
2	–	3	2	2	R540.20 & R5540.20
2	–	2	3	2	R540.20 & R5540.20
2	–	1	4	2	R540.20 & R5540.20
2	–	–	5	2	R540.20 & R5540.20

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Number of Years During Time-on Period[22]				Cooling-off (Years)	The Code Paragraph Reference
Engagement Partner and/or Engagement Leader	Engagement Quality ~~C~~Reviewer ~~Partner~~	Other Key Audit Partner	Other Key Sustainability Assurance Leader		
1	4	–	–	3	R540.1~~5~~8 & R5540.18
1	4	1	–	3	R540.1~~5~~8 & R5540.18
1	4	–	1	3	R540.18 & R5540.18
1	4	2	–	3	R540.1~~5~~8 & R5540.18
1	4	1	1	3	R540.18 & R5540.18
1	4	–	2	3	R540.18 & R5540.18
1	3	3	–	3	R540.1~~9~~6(b) & R5540.19(b)
1	3	2	1	3	R540.19(b) & R5540.19(b)
1	3	1	2	3	R540.19(b) & R5540.19(b)
1	3	–	3	3	R540.19(b) & R5540.19(b)
1	2	4	–	2	R540.~~17~~20 & R5540.20
1	2	3	1	2	R540.20 & R5540.20
1	2	2	2	2	R540.20 & R5540.20
1	2	1	3	2	R540.20 & R5540.20
1	2	–	4	2	R540.20 & R5540.20
1	1	5	–	2	R540.~~17~~20 & R5540.20
1	1	4	1	2	R540.20 & R5540.20
1	1	3	2	2	R540.20 & R5540.20
1	1	2	3	2	R540.20 & R5540.20
1	1	1	4	2	R540.20 & R5540.20
1	1	–	5	2	R540.20 & R5540.20
1	–	6	–	2	R540.~~17~~20 & R5540.20
1	–	5	1	2	R540.20 & R5540.20
1	–	4	2	2	R540.20 & R5540.20
1	–	3	3	2	R540.20 & R5540.20
1	–	2	4	2	R540.20 & R5540.20
1	–	1	5	2	R540.20 & R5540.20

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Number of Years During Time-on Period[22]				Cooling-off (Years)	The Code Paragraph Reference
Engagement Partner and/or Engagement Leader	Engagement Quality Reviewer Partner	Other Key Audit Partner	Other Key Sustainability Assurance Leader		
1	–	–	6	2	R540.20 & R5540.20
–	5	–	–	3	R540.158 & R5540.18
–	5	1	–	3	R540.158 & R5540.18
–	5	–	1	3	R540.18 & R5540.18
–	5	2	–	3	R540.158 & R5540.18
–	5	1	1	3	R540.18 & R5540.18
–	5	–	2	3	R540.18 & R5540.18
–	4	3	–	3	R540.158 & R5540.18
–	4	2	1	3	R540.18 & R5540.18
–	4	1	2	3	R540.18 & R5540.18
–	4	–	3	3	R540.18 & R5540.18
–	3	4	–	2	R540.1720 & R5540.20
–	3	3	1	2	R540.20 & R5540.20
–	3	2	2	2	R540.20 &R5540.20
–	3	3	1	2	R540.20 &R5540.20
–	3	–	4	3	R540.20 & R5540.20
–	2	5	–	2	R540. 1720 & R5540.20
–	2	4	1	2	R540.20 & R5540.20
–	2	3	2	2	R540.20 & R5540.20
–	2	2	3	2	R540.20 & R5540.20
–	2	1	4	2	R540.20 & R5540.20
–	2	–	5	2	R540.20 & R5540.20
–	1	6	–	2	R540.1720 & R5540.20
–	1	5	1	2	R540.20 & R5540.20
–	1	4	2	2	R540.20 & R5540.20
–	1	3	3	2	R540.20 & R5540.20
–	1	2	4	2	R540.20 & R5540.20
–	1	1	5	2	R540.20 & R5540.20
–	1	–	6	2	R540.20 & R5540.20

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Number of Years During Time-on Period[22]				Cooling-off (Years)	The Code Paragraph Reference
Engagement Partner and/or Engagement Leader	Engagement Quality CReviewer Partner	Other Key Audit Partner	Other Key Sustainability Assurance Leader		
–	–	7	–	2	R540.135 & R5540.15
–	–	–	7	2	R540.15 & R5540.15

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