2023 Inspection Ernst & Young AS

(Headquartered in Oslo, Norway)

April 28, 2025

PCAOB RELEASE NO. 104-2025-069

PCAOB
PUBLIC COMPANY ACCOUNTING OVERSIGHT BOARD

TABLE OF CONTENTS

2023 INSPECTION

In the 2023 inspection of Ernst & Young AS, the Public Company Accounting Oversight Board (PCAOB) assessed the firm's compliance with laws, rules, and professional standards applicable to the audits of public companies. Our inspection was conducted in cooperation with the Financial Supervisory Authority of Norway.

We selected for review three audits of issuers with fiscal years ending in 2022. For each issuer audit selected, we reviewed a portion of the audit. We also evaluated elements of the firm's system of quality control.

2023 Inspection Approach

In selecting issuer audits for review, we use a risk-based method of selection. We make selections based on (1) our internal evaluation of audits we believe have a heightened risk of material misstatement, including those with challenging audit areas, and (2) other risk-based characteristics, including issuer and firm considerations. In certain situations, we may select all of the firm's issuer audits for review.

When we review an audit, we do not review every aspect of the audit. Rather, we generally focus our attention on audit areas we believe to be of greater complexity, areas of greater significance or with a heightened risk of material misstatement to the issuer's financial statements, and areas of recurring deficiencies. We may also select some audit areas for review in a manner designed to incorporate unpredictability.

Our selection of audits for review does not necessarily constitute a representative sample of the firm's total population of issuer audits. Additionally, our inspection findings are specific to the particular portions of the issuer audits reviewed. They are not an assessment of all of the firm's audit work or of all of the audit procedures performed for the audits reviewed.

View the details on the scope of our inspections and our inspections procedures.

OVERVIEW OF THE 2023 INSPECTION

The following information provides an overview of our 2023 inspection. We use a risk-based method to select audits for review and to identify areas on which we focus our review. Because our inspection process evolves over time, it can, and often does, focus on a different mix of audits and audit areas from inspection to inspection and firm to firm. Further, a firm's business, the applicable auditing standards, or other factors can change from the time of one inspection to the next. As a result of these variations, we caution that our inspection results are not necessarily comparable over time or among firms.

Firm Data and Audits Selected for Review

	2023
Firm data	
Total issuer audit clients in which the firm was the principal auditor	4
Total issuer audits in which the firm was not the principal auditor	9
Total engagement partners on issuer audit work[1]	10
Audits reviewed	
Total audits reviewed[2]	3
Audits in which the firm was the principal auditor	2
Audits in which the firm was not the principal auditor	1
Integrated audits of financial statements and internal control over financial reporting (ICFR)	3
Audits with Part I.A deficiencies	2
Percentage of audits with Part I.A deficiencies	67%

If we include a deficiency in Part I.A of our report, it does not necessarily mean that the firm has not addressed the deficiency. In many cases, the firm has performed remedial actions after the deficiency was identified. Depending on the circumstances, remedial actions may include performing additional

[1] The number of engagement partners on issuer audit work represents the total number of firm personnel (not necessarily limited to personnel with an ownership interest) who had primary responsibility for an issuer audit (as defined in AS 1201, *Supervision of the Audit Engagement*) or for the firm's role in an issuer audit during the twelve-month period preceding the outset of the inspection.

[2] The population from which audits are selected for review includes both audits for which the firm was the principal auditor and those where the firm was not the principal auditor but played a role in the audit.

audit procedures, informing management of the issuer of the need for changes to the financial statements or reporting on ICFR, or taking steps to prevent reliance on prior audit reports.

Our inspection may include a review, on a sample basis, of the adequacy of a firm's remedial actions, either with respect to previously identified deficiencies or deficiencies identified during the current inspection. If a firm does not take appropriate actions to address deficiencies, we may criticize its system of quality control or pursue a disciplinary action.

If we include a deficiency in our report — other than those deficiencies for audits with incorrect opinions on the financial statements and/or ICFR — it does not necessarily mean that the issuer's financial statements are materially misstated or that undisclosed material weaknesses in ICFR exist. It is often not possible for us to reach a conclusion on those points based on our inspection procedures and related findings because, for example, we have only the information that the auditor retained and the issuer's public disclosures. We do not have direct access to the issuer's management, underlying books and records, and other information.

Audit Areas Most Frequently Reviewed

This table reflects the audit areas we have selected most frequently for review in the 2023 inspection. For the issuer audits selected for review, we selected these areas because they were generally significant to the issuer's financial statements, may have included complex issues for auditors, and/or involved complex judgments in (1) estimating and auditing the reported value of related accounts and disclosures and (2) implementing and auditing the related controls.

2023	
Audit area	**Audits reviewed**
Revenue and related accounts	3
Long-lived assets	2
Cash and cash equivalents	1
Deposit liabilities	1

PART I: INSPECTION OBSERVATIONS

Part I.A of our report discusses deficiencies, if any, that were of such significance that we believe the firm, (1) at the time it issued its audit report(s), had not obtained sufficient appropriate audit evidence to support its opinion(s) on the issuer's financial statements and/or ICFR or (2) in audit(s) in which it was not the principal auditor, had not obtained sufficient appropriate audit evidence to fulfill the objectives of its role in the audit.

Part I.B discusses certain deficiencies, if any, that relate to instances of non-compliance with PCAOB standards or rules other than those where the firm had not obtained sufficient appropriate audit evidence to support its opinion(s) or fulfill the objectives of its role in the audit(s). This section does not discuss instances of potential non-compliance with SEC rules or instances of non-compliance with PCAOB rules related to maintaining independence.

Part I.C discusses instances of potential non-compliance with SEC rules or instances of non-compliance with PCAOB rules, if any, related to maintaining independence.

Consistent with the Sarbanes-Oxley Act ("Act"), it is the Board's assessment that nothing in Part I of this report deals with a criticism of, or potential defect in, the firm's quality control system. We discuss any such criticisms or potential defects in Part II. Further, you should not infer from any Part I deficiency, or combination of deficiencies, that we identified a quality control finding in Part II. Section 104(g)(2) of the Act restricts us from publicly disclosing Part II deficiencies unless the firm does not address the criticisms or potential defects to the Board's satisfaction no later than 12 months after the issuance of this report.

Classification of Audits with Part I.A Deficiencies

Within Part I.A of this report, we classify each issuer audit in one of the categories discussed below based on the Part I.A deficiency or deficiencies identified in our review.

The purpose of this classification system is to group and present issuer audits by the number of Part I.A deficiencies we identified within the audit as well as to highlight audits with an incorrect opinion on the financial statements and/or ICFR.

Audits with an Incorrect Opinion on the Financial Statements and/or ICFR

This classification includes instances where a deficiency was identified in connection with our inspection and, as a result, an issuer's financial statements were determined to be materially misstated, and the issuer restated its financial statements. It also includes instances where a deficiency was identified in connection with our inspection and, as a result, an issuer's ICFR was determined to be ineffective, or there were additional material weaknesses that the firm did not identify, and the firm withdrew its opinion, or revised its report, on ICFR.

This classification does not include instances where, unrelated to our review, an issuer restated its financial statements and/or an issuer's ICFR was determined to be ineffective. We include any deficiencies identified in connection with our reviews of these audits in the audits with multiple deficiencies or audits with a single deficiency classification below.

Audits with Multiple Deficiencies

This classification includes instances where multiple deficiencies were identified that related to a combination of one or more financial statement accounts, disclosures, and/or important controls in an ICFR audit.

Audits with a Single Deficiency

This classification includes instances where a single deficiency was identified that related to a financial statement account or disclosure or to an important control in an ICFR audit.

PART I.A: AUDITS WITH UNSUPPORTED OPINIONS

This section of our report discusses the deficiencies identified, by specific issuer audit reviewed, in the audit work (1) supporting the firm's opinion(s) on the issuer's financial statements and/or ICFR and (2) in audit(s) in which it was not the principal auditor, to fulfill the objectives of its role in the audit.

We identify each issuer by a letter (e.g., Issuer A) and industry sector. Each deficiency could relate to several auditing standards, but we reference the PCAOB standard that most directly relates to the requirement with which the firm did not comply.

We present issuer audits below within their respective deficiency classifications (as discussed previously). Within the classifications, we generally present the audits based on our assessment as to the relative significance of the identified deficiencies, taking into account the significance of the financial statement accounts and/or disclosures affected, and/or the nature or extent of the deficiencies.

Audits with an Incorrect Opinion on the Financial Statements and/or ICFR

None

Audits with Multiple Deficiencies

Issuer A – Energy

Type of audit and related areas affected

In our review, we identified deficiencies in the financial statement and ICFR audits related to **Revenue**, **Accounts Receivable**, and **Long-Lived Assets**. The firm's internal inspection program had inspected this audit and reviewed the **Long-Lived Assets** area but did not identify certain of the deficiencies below related to this area.

Description of the deficiencies identified

With respect to **Revenue**:

The firm's substantive procedures to test certain revenue included testing a sample of transactions. The sample size the firm used to perform these substantive procedures was too small to provide sufficient appropriate audit evidence because the firm did not take into account the relevant factors in determining its sample size, including the relationship of the samples to the relevant audit objective and the characteristics of the population. (AS 2315.16, .19, .23, and .23A)

With respect to **Accounts Receivable**:

The firm sent positive confirmation requests via email to a sample of customers as part of its substantive testing of accounts receivable, and the email address for each customer was provided by the issuer. The firm received the responses for all but one of the confirmation requests sent via email. The firm did not consider performing procedures to address the risks associated with electronic responses, such as verifying the source of the confirmation responses. (AS 2310.29)

With respect to **Long-Lived Assets**, for which the firm identified a significant risk:

The issuer utilized internal specialists (company's employed specialists), including reserve engineers, to estimate its proved and expected oil and gas reserves ("reserve estimates"). Proved reserves were used in the calculation of depreciation, depletion, and amortization of production plants and oil and gas assets, and expected reserve estimates were used in the impairment analyses of production plants and oil and gas assets including assets under development. The issuer also engaged an external specialist (company's engaged specialist) to evaluate its proved reserve estimates.

The firm selected for testing certain controls over the reserve estimates that consisted of the issuer's (1) review of changes to the expected future production volumes ("production profile"), (2) review of key assumptions within the remaining expected production profile estimates, (3) assessment of deviations between the expected reserve estimates the company's employed specialists developed and the expected reserve estimates the company's engaged specialist developed, (4) review of changes in proved developed and undeveloped reserves, (5) review of the proved reserve estimates volumetric inputs in the standardized measure of value, and (6) review of the final proved reserve estimates. The following deficiencies were identified:

- The firm did not identify and test any controls over the accuracy and completeness of certain non-financial data the issuer produced and/or the evaluation of the relevance and reliability of certain non-financial data from external sources that was (1) used in developing the reserves production profiles and/or standardized measure of value, (2) used in the operation of certain of the above controls, and (3) provided to the company's engaged specialist to evaluate the issuer's reserve estimates. (AS 2201.39)

- The firm did not identify and test any controls over the reasonableness of the methods and assumptions the company's employed specialists used to develop the reserve estimates. (AS 2201.39)

- The firm did not evaluate the specific review procedures that the control owners performed to evaluate the accuracy and completeness of the underlying non-financial data used in developing the reserves production profiles and/or standardized measure of value used in the operation of certain of the above controls. (AS 2201.42 and .44)

The firm's approach for substantively testing the reserve estimates was to test the issuer's process. The firm did not perform sufficient procedures to test the reserve estimates because the firm did not:

- Perform procedures to test, or test any controls over, the accuracy and completeness of certain non-financial data the issuer prepared and the company's employed specialists used to develop the reserve estimates; (AS 1105.A8a)

- Evaluate the relevance and reliability of external non-financial data the company's employed specialists used to develop the reserve estimates; (AS 1105.A8a)

- Evaluate the reasonableness of the significant assumptions developed by the issuer and the company's employed specialists that were used by the company's employed specialists to develop the reserve estimates; (AS 1105.A8b; AS 2501.16) and

- Evaluate whether the methods the company's employed specialists used to develop the reserve estimates were appropriate under the circumstances, taking into account the requirements of the applicable financial reporting framework. (AS 1105.A8c)

Issuer B – Financials

Type of audit and related areas affected

In our review of an audit in which the firm played a role but was not the principal auditor, we identified deficiencies in connection with the firm's role in the financial statement and ICFR audits related to **Receivables** and **Deposit Liabilities**. This was the firm's initial audit of this issuer. The firm's internal inspection program had inspected this audit and reviewed these areas but did not identify certain of the deficiencies below.

Description of the deficiencies identified

With respect to **Receivables**:

Among other procedures, the principal auditor instructed the firm to (1) compare the contract terms of receivables acquired during the year to the contract summary to ensure that it provided a complete and accurate reflection of the contract details and (2) test the accuracy of key customer data in the component's customer collections system. The firm did not perform these substantive procedures, as instructed by the principal auditor. (AS 2301.08)

With respect to **Deposit Liabilities**:

The firm selected for testing certain controls over deposit liabilities that consisted of the issuer's reconciliation and review of deposit payment requests. The firm did not evaluate the specific review procedures that the control owners performed to ensure that deposits were not refunded incorrectly or fraudulently in the approval of withdrawal requests and to ensure the accuracy of the interest-bearing deposits account reconciliations. (AS 2201.42 and .44)

The firm's substantive procedures to test the existence and completeness of deposit liabilities included sending positive confirmation requests to a sample of customers to confirm the deposits that they made through an interim date. The firm communicated to the principal auditor that it had also examined support for customer account statements and proof of deposits in the accounting system. The following deficiencies were identified:

- The firm did not perform any substantive procedures to test withdrawal activity during the year. (AS 2301.08)
- The firm did not perform any procedures to extend its conclusions regarding the existence and completeness of deposit liabilities from the interim date in which the audit procedures were performed to year-end. (AS 2301.45)
- The firm did not perform procedures to test, or test any controls over, the completeness of the report from which it selected its samples for testing, beyond reviewing the parameters used to generate the report. (AS 1105.10)
- The firm did not examine the support for customer statements and proof of deposits in the accounting system, as it had communicated to the principal auditor. (AS 2301.08)
- The sample size the firm used in its substantive procedures to test deposit liabilities was too small to provide sufficient appropriate audit evidence because these procedures were designed based on a level of control reliance that was not supported due to the deficiencies in the firm's control testing discussed above. (AS 2301.16, .18, and .37; AS 2315.19, .23, and .23A)

Audits with a Single Deficiency

None

PART I.B: OTHER INSTANCES OF NON-COMPLIANCE WITH PCAOB STANDARDS OR RULES

This section of our report discusses certain deficiencies that relate to instances of non-compliance with PCAOB standards or rules other than those where the firm had not obtained sufficient appropriate audit evidence to support its opinion(s) or fulfill the objectives of its role in the audit(s). This section does not discuss instances of potential non-compliance with SEC rules or instances of non-compliance with PCAOB rules related to maintaining independence.

When we review an audit, we do not review every aspect of the audit. As a result, the area below was not necessarily reviewed on every audit. In some cases, we assess the firm's compliance with specific

PCAOB standards or rules on other audits that were not reviewed and include any instances of non-compliance below.

We identified the following deficiency:

In one of two audits reviewed, the firm, when testing journal entries for evidence of possible material misstatement due to fraud, did not have an appropriate rationale for limiting its testing of entries it identified as having certain fraud risk characteristics to certain entries. In this instance, the firm was non-compliant with AS 2401, *Consideration of Fraud in a Financial Statement Audit*.

PART I.C: INDEPENDENCE

This section of our report discusses instances of potential non-compliance with SEC rules or instances of non-compliance with PCAOB rules related to maintaining independence. An instance of potential non-compliance with SEC rules or an instance of non-compliance with PCAOB rules does not necessarily mean that the Board has concluded the firm was not objective and impartial throughout the audit and professional engagement period. Although this section includes instances of potential non-compliance that the firm brought to our attention, there may be other instances of non-compliance with SEC or PCAOB rules related to independence that were not identified through our procedures or the firm's monitoring activities.

PCAOB-Identified

We did not identify any instances of potential non-compliance with SEC rules or instances of non-compliance with PCAOB rules related to maintaining independence.

Firm-Identified

During the inspection, the firm brought to our attention that it had identified, through its independence monitoring activities, four instances across two issuers,[3] in which the firm or its personnel appeared to have impaired the firm's independence because it may not have complied with Rule 2-01(c) of Regulation S-X related to maintaining independence.

While we have not evaluated the underlying reasons for the instances of potential non-compliance, the number, large or small, of firm-identified instances of potential non-compliance may be reflective of the size of the firm, including any associated firms; the design and effectiveness of the firm's independence monitoring activities; and the size and/or complexity of the issuers it audits, including the number of affiliates of those issuers. Therefore, we caution against making any comparison of these firm-identified instances of potential non-compliance across firms.

The instances of potential non-compliance related to financial relationships and a business relationship:

[3] The firm-identified instances of potential non-compliance do not necessarily relate to the issuer audits that we selected for review.

- The firm reported three instances of potential non-compliance with Rule 2-01(c)(1) of Regulation S-X regarding financial relationships, which occurred at the firm or involved its personnel. These instances related to investments in an audit client where a partner, or the spouse of a partner, in the same office as the engagement partner for an issuer had a financial relationship with that issuer. Of these three instances, two instances related to investments in broad-based funds.

- The firm reported one instance of potential non-compliance with Rule 2-01(c)(3) of Regulation S-X regarding a business relationship with a company that is a subsidiary of an issuer of an associated entity of the firm.

The firm has reported to us that it has evaluated the instances of potential non-compliance for issuer audit clients in which the firm was the principal auditor and determined in all instances that its objectivity and impartiality were not impaired. The firm also reported to us that it has communicated all of these instances to the issuer's audit committee in accordance with PCAOB Rule 3526. In addition, the firm reported to us that it has communicated the remaining instance of potential non-compliance to the principal auditor and that the principal auditor determined that its objectivity and impartiality were not impaired.

PART II: OBSERVATIONS RELATED TO QUALITY CONTROL

Part II of our report discusses criticisms of, and potential defects in, the firm's system of quality control.

We include deficiencies in Part II if an analysis of the inspection results, including the results of the reviews of individual audits, indicates that the firm's system of quality control does not provide reasonable assurance that firm personnel will comply with applicable professional standards and requirements. Generally, the report's description of quality control criticisms is based on observations from our inspection procedures.

This report does not reflect changes or improvements to the firm's system of quality control that the firm may have made subsequent to the period covered by our inspection. The Board does consider such changes or improvements in assessing whether the firm has satisfactorily addressed the quality control criticisms or defects no later than 12 months after the issuance of this report.

When we issue our reports, we do not make public criticisms of, and potential defects in, the firm's system of quality control, to the extent any are identified. If a firm does not address to the Board's satisfaction any criticism of, or potential defect in, the firm's system of quality control within 12 months after the issuance of our report, we will make public any such deficiency.

APPENDIX A: FIRM'S RESPONSE TO THE DRAFT INSPECTION REPORT

Pursuant to Section 104(f) of the Act, 15 U.S.C. § 7214(f), and PCAOB Rule 4007(a), the firm provided a written response to a draft of this report. Pursuant to Section 104(f) of the Act and PCAOB Rule 4007(b), the firm's response, excluding any portion granted confidential treatment, is attached hereto and made part of this final inspection report.

The Board does not make public any of a firm's comments that address a nonpublic portion of the report unless a firm specifically requests otherwise. In some cases, the result may be that none of a firm's response is made publicly available.

In addition, pursuant to Section 104(f) of the Act, 15 U.S.C. § 7214(f), and PCAOB Rule 4007(b), if a firm requests, and the Board grants, confidential treatment for any of the firm's comments on a draft report, the Board does not include those comments in the final report. The Board routinely grants confidential treatment, if requested, for any portion of a firm's response that addresses any point in the draft that the Board omits from, or any inaccurate statement in the draft that the Board corrects in, the final report.

Statsautoriserte revisorer
Ernst & Young AS

Stortorvet 7, NO-0155 Oslo
Postboks 1156 Sentrum, NO-0107 Oslo

Foretaksregisteret: NO 976 389 387 MVA
Tlf: +47 24 00 24 00

www.ey.com/no
Medlemmer av Den norske revisorforening

Ms. Christine Gunia
Director, Division of Registration and Inspections
Public Company Accounting Oversight Board
1666 K Street, NW
Washington, DC 20006-2803

March 27, 2025

Response to the Draft Report on the 2023 Inspection of Ernst & Young AS (Headquartered in Oslo, Norway)

Dear Ms. Gunia,

We are pleased to provide our response to the draft inspection report (the Report) from the Public Company Accounting Oversight Board (the Board or PCAOB) pertaining to the 2023 inspection of Ernst & Young AS (Headquartered in Oslo, Norway).

Our overriding objective is to make certain that all aspects of our auditing and quality control processes are of the highest quality for the continued benefit of the capital markets in which the public participates and on which they rely. The PCAOB's inspection process assists us in achieving that objective.

We respect the PCAOB's inspection process and understand that judgments are involved in performing audits, as well as in subsequent inspections of those audits. We have thoroughly evaluated all matters described in Part I, *Inspection Observations,* and have taken actions, where appropriate, in accordance with PCAOB standards and our policies. These actions did not change our audit conclusion, nor did the actions affect our reports to the principal auditor with respect to our role in the audit. We have reviewed the remainder of the Report and have no further comments.

We appreciate the opportunity to provide our response to the Report and look forward to continuing to work with the PCAOB on matters of interest to our U.S. SEC issuer auditing practice.

Respectfully submitted,
Ernst & Young AS

Einar Hersvik
Professional Practice Director