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# 2024 Inspection PwC Contadores y Auditores SAS

(Headquartered in Bogota, Colombia)

November 20, 2025

THIS IS A PUBLIC VERSION OF A PCAOB INSPECTION REPORT

PORTIONS OF THE COMPLETE REPORT ARE OMITTED FROM THIS  
DOCUMENT IN ORDER TO COMPLY WITH SECTIONS 104(g)(2) AND  
105(b)(5)(A) OF THE SARBANES-OXLEY ACT OF 2002

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# 2024 INSPECTION

In the 2024 inspection of PwC Contadores y Auditores SAS, 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.

We selected for review three audits of issuers with fiscal years ending in 2023. For each issuer audit selected, we reviewed a portion of the audit. We also evaluated elements of the firm's system of quality control.

## 2024 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 2024 INSPECTION

The following information provides an overview of our 2024 inspection, which was our first inspection of this firm. 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

2024	
<b>Firm data</b>	
<b>Total issuer audit clients in which the firm was the principal auditor</b>	2
<b>Total issuer audits in which the firm was not the principal auditor</b>	8
<b>Total engagement partners on issuer audit work<sup>1</sup></b>	6
<b>Audits reviewed</b>	
<b>Total audits reviewed<sup>2</sup></b>	3
<b>Audits in which the firm was the principal auditor</b>	2
<b>Audits in which the firm was not the principal auditor</b>	1
<b>Integrated audits of financial statements and internal control over financial reporting (ICFR)</b>	3
<b>Audits with Part I.A deficiencies</b>	1
<b>Percentage of audits with Part I.A deficiencies</b>	33%

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.

<sup>1</sup> 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.

<sup>2</sup> 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.

was identified. Depending on the circumstances, remedial actions may include performing additional 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 2024 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.

2024	
Audit area	Audits reviewed
Revenue and related accounts	2
Cash and cash equivalents	2
Long-lived assets	2
Significant estimates	1
Financial instruments	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 supporting the firm's opinion(s) on the issuer's financial statements and/or ICFR.

We identify each issuer by a letter (e.g., Issuer A). 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

#### Type of audit and related areas affected

In our review, we identified deficiencies in the financial statement and ICFR audits related to a **Significant Estimate** and **Financial Instruments**.

## Description of the deficiencies identified

With respect to a **Significant Estimate**, for which the firm identified a significant risk:

The significant estimate consisted of multiple components that were valued by the issuer using various inputs, assumptions, models, and methodologies. With respect to the components of the significant estimate, the following deficiencies were identified:

- The firm selected for testing a control that consisted of management's review and approval of certain models used by the issuer to estimate the valuation for the collective components. The firm did not (1) identify and test any controls over the accuracy and completeness of certain information used in the performance of the control (AS 2201.39), (2) evaluate the specific review procedures that the control owners performed to evaluate the reasonableness of the models (AS 2201.42 and .44), and (3) perform any procedures to test, or test any controls over, the completeness of the population of models from which it made its selections to test this control. (AS 1105.10)
- The firm did not identify and test any controls over certain other models used by the issuer to estimate the valuation for the collective components. (AS 2201.39)
- The firm selected for testing other controls that consisted of the issuer's (1) review and validation of the methodologies used to develop certain assumptions used by the issuer to estimate the valuation for the collective components and (2) review and approval of the resulting assumptions. The firm did not evaluate the review procedures that the control owners performed, including the procedures to identify items for follow-up and the procedures to determine whether those items were appropriately resolved. (AS 2201.42 and .44)
- The firm did not identify and test any controls over the determination of certain assumptions used by the issuer to estimate the valuations for certain components. (AS 2201.39)
- The firm selected for testing another control that consisted of the issuer's review of certain other assumptions used by the issuer to estimate the valuations for the components. The firm did not evaluate the specific review procedures that the control owners performed to evaluate the reasonableness of the assumptions. (AS 2201.42 and .44)
- The firm did not identify and test any control over the determination of an input used by the issuer to estimate the valuation for another component. (AS 2201.39)
- The firm selected for testing another control that consisted of the issuer's review of another input used by the issuer to estimate the valuation for the component. The firm did not (1) identify and test any controls over the accuracy and completeness of certain data used in the operation of the control (AS 2201.39) and (2) evaluate the specific review procedures that the control owners performed to evaluate the reasonableness of the input. (AS 2201.42 and .44)
- The firm selected for testing another control that consisted of the issuer's review of an element of the component, including the reasonableness of the assumptions and methodology used to estimate the valuation for the element. The firm did not evaluate the specific review procedures

that the control owner performed to evaluate the reasonableness of the assumptions and methodology used to estimate the valuation for the element. (AS 2201.42 and .44)

- The sample sizes the firm used in its substantive procedures to test the reasonableness of certain assumptions used by the issuer to estimate the valuation for a component were 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 certain of the deficiencies in the firm's control testing discussed above. (AS 2301.16, .18, and .37; AS 2315.19, .23, and .23A)
- The firm's approach for testing the valuation for the component was to limit its substantive testing to certain balances over a specified threshold. The firm did not perform any procedures to substantively test the balances below the threshold. (AS 2315.24)
- The firm did not perform sufficient procedures to evaluate the reasonableness of certain assumptions used by the issuer to estimate the valuation for the component because it did not evaluate certain exceptions identified while testing the assumptions. (AS 2301.08 and .11; AS 2810.03)
- The firm did not perform procedures to evaluate whether the issuer's presentation and disclosure and valuation for a component was in conformity with the relevant financial reporting framework. (AS 2301.08)

With respect to **Financial Instruments**:

The firm did not perform any substantive procedures to test the completeness of certain financial instruments. (AS 2301.08)

## 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 areas below were 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.

The deficiencies below are presented in numerical order based on the PCAOB standard or rule with which the firm did not comply. We identified the following deficiencies:

- In one of two audits reviewed, the firm did not make a required communication to the audit committee related to the name, location, and planned responsibilities of an other accounting firm that performed audit procedures in the audit. In this instance, the firm was non-compliant with AS 1301, *Communications with Audit Committees*.
- In one of two audits reviewed, the firm did not inform the audit committee that it had communicated to management, in writing, all control deficiencies identified during the audit. In this instance, the firm was non-compliant with AS 2201, *An Audit of Internal Control Over Financial Reporting That Is Integrated with An Audit of Financial Statements*.
- In one of two audits reviewed, the firm's audit report did not include the city and country from which the auditor's report was issued. In this instance, the firm was non-compliant with AS 3101, *The Auditor's Report on an Audit of Financial Statements When the Auditor Expresses an Unqualified Opinion*.

## PART I.C: INDEPENDENCE

In the 2024 inspection, we did not identify, and the firm did not bring to our attention, any instances of potential non-compliance with SEC rules or instances of non-compliance with PCAOB rules related to maintaining independence. Although this section does not include any instances of potential non-compliance that we identified or the firm brought to our attention, there may be 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.

While the firm did not bring to our attention any 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 the number of 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 firm-identified instances of potential non-compliance across firms.

## 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.



Bogotá, Colombia. October 20, 2025

Ms. Christine Gunia  
Director  
Division of Registration and Inspections  
Public Company Accounting Oversight Board  
1666 K Street, N.W.  
Washington, D.C. 20006  
United States of America

**Re: Public Response to Draft Report on 2024 Inspection of PwC Contadores y Auditores SAS**

Dear Ms. Gunia:

We are pleased to provide our public response to the Public Company Accounting Oversight Board's ("PCAOB" or the "Board") Draft Report on the Board's 2024 Inspection of our Firm's 2023 audits (the "Report").

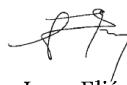
We continue to support the PCAOB's mission and value the insights provided by the PCAOB's inspection process. We also appreciate the professionalism of the PCAOB inspection team. The Firm's leadership and its partners maintain a strong commitment to audit quality, and we will continue to make investments to enhance audit quality.

We appreciate the opportunity to formally respond to the Report and look forward to continuing our dialogue with the PCAOB with respect to the mutual objective of enhancing audit quality. We would be pleased to discuss any aspect of our response or any further questions you may have.

Sincerely yours,

  
Carlos Mario Lafaurie S.

Country Senior Partner



Jorge Eliécer Moreno U.  
Territory Assurance Leader

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