# **Report for Information**

# PricewaterhouseCoopers LLP Audit Results - 2017

Date: June 12, 2018

**To:** TTC Insurance Company Limited Audit Committee

From: Chief Executive Officer

# Summary

Each year, the Audit Committee receives the attached report from TTC Insurance Company Limited's external auditor, expressing their opinion on the financial statement for the company. It should be noted that no issues of concern have been identified.

# **Financial Summary**

This report has no financial impact.

# **Equity/Accessibility Matters**

There are no accessibility or equity issues associated with this report.

# **Decision History**

On February 10, 2010, the City's Audit Committee approved the appointment of PricewaterhouseCoopers LLP for the provision of external audit services for the City and its agencies, boards and commissions.

http://app.toronto.ca/tmmis/viewAgendaltemHistory.do?item=2010.AU15.3

On June 15, 2017, the Audit Committee appointed PricewaterhouseCoopers LLP to perform the 2017 financial year-end audit of TTCICL.

# **Issue Background**

In accordance with Section 102 of the Insurance Act (Ontario), a statement of the condition of affairs of the Company shall be accompanied by a report of an auditor prepared in the manner required by the Superintendent.

### **Comments**

PricewaterhouseCoopers LLP has audited TTC Insurance Company Limited's financial statements for the year ended December 31, 2017. The independent auditor's report is a statutory reporting requirement and forms part of the annual submission to the Financial Services Commission of Ontario.

### Contact

Brian Leck, Director, TTC Insurance Company Limited 416-393-3860 Brian.Leck@ttc.ca

# Signature

Richard J. Leary Chief Executive Officer (Acting)

### **Attachments**

Attachment 1 - PricewaterhouseCoopers LLP, Independent Auditor's Report

# TTC Insurance Company Limited

2017 year-end report to the management

Prepared as of February 19, 2018





February 19, 2018

Mr. Brian Leck General Counsel/Head of Legal TTC Insurance Company Limited Toronto Transit Commission 1900 Yonge Street Toronto, ON M4S 1Z2

Dear Mr. Leck:

We have substantially completed our audit of the financial statements and accompanying notes and Return (collectively the financial statements) of TTC Insurance Company Limited (the Company) prepared in accordance with Public Sector Accounting Standards (PSAS) for the year ended December 31, 2017. We propose to issue an unqualified report on those financial statements, subject to satisfactory resolution of the outstanding items outlined on page 1. Our draft auditor's reports are included as Appendix A.

We prepared the accompanying report to assist you in your review of the financial statements. It includes an update on the status of our work, as well as a discussion on the significant accounting and financial reporting matters dealt with during the audit process.

We would like to express our sincere thanks to the management and staff who have assisted us in carrying out our work, and we look forward to our meeting on February 20, 2018. If you have any questions or concerns please do not hesitate to contact me.

Yours very truly,

Akif Siddiqui Partner

c.c.: Angelet Lim, Accounting Supervisor

# Communications to management

Key matters for discussion	Comments		
Status of the audit	We have substantially completed our audit of the financial statements (the financial statements) of the Company.  Significant outstanding items at time of mailing include the following:  receipt of and completion of our work over P&C - 1;  completion and review of our final audit documentation;  receipt and review of the final Appointed Actuary's report;  receipt of the signed management representation letter, draft is attached as Appendix B of this report;  review and approval of financial statements; and  completion of subsequent events procedures up to the release of our auditor's reports.		
Status of other reporting	We will provide an update on the above items at the meeting.		
Specified procedures report to the appointed actuary  Significant accounting, audit	All procedures have been performed and no exceptions were noted.  The report will be issued concurrently with the auditor's report on the financial statements of the Company.  Iting and reporting matters discussed with management.		
Valuation of insurance liabilities	Insurance liabilities are subject to a significant amount of subjectivity and uncertainty. The key audit risks are appropriateness of reserves and reasonableness of methodologies and assumptions used by management and the appointed actuary.  Management has the following processes and controls in place to address this risk:  • valuation is performed by an external Appointed Actuary who is a member of the Chartered Institute of Actuaries;  • reconciliations are performed between the data used in the valuation and the information from the underlying financial systems; and  • review and approval of actuarial liabilities by senior management.  We performed the following audit procedures to gain comfort over the insurance liabilities balance:  • tested claim files on a sample basis to assess the accuracy and completeness of data used in the reserve calculations;  • reviewed reconciliations of data to underlying systems;  • reconciled the amounts recorded by the Company to those reported by the Appointed Actuary;  • independently projected 90% of the total estimate of reserves and compared the estimates to those of the Company; and  • reviewed methodologies and assumptions for the remaining balance.		

Key matters for discussion	Comments						
	In comparing discounted actuarial liabilities recorded by management to the estimate projected by our actuaries we noted the discounted actuarial liabilities were different as follows:						
		Appointed Actuary (000's)	PwC (000's)	Surplus/ (Deficiency) (%)			
	2017	141,416	146,412	(3.4)			
	2016	174,546	169,991	2.7			
	2015	182,212	167,429	8.8			
.1	Based on the procedures above, we have concluded that management's valuation of provision for unpaid claims and adjustment expenses fall we reasonable range of our estimate.  We have assessed the standard audit risk of material misstatement due						
Management override of controls	fraud or error involving management override of controls.  Management has the following processes and controls in place to address this risk:						
	<ul> <li>segregation of duties exist between staff responsible for accounting records and senior management;</li> <li>management performs a detailed review of manual journal entries; and</li> <li>oversight by those charged with governance.</li> </ul>						
	In response to this risk the following auditing procedures were performed:						
	<ul> <li>Updated our understanding of the internal controls designed to prevent and detect fraud, specifically surrounding journal entries and the financial reporting processes;</li> </ul>						
	<ul> <li>Reviewed accounting estimates for biases that could result in material misstatement due to fraud, including retrospective review of significant prior year estimates;</li> </ul>						
	<ul> <li>Performed tests of details on all significant financial statement line items; and</li> <li>Included an element of unpredictability in our audit procedures.</li> </ul>						
	• Included an element of unpredictability in our audit procedures.						
	Based on the work performed to date of this report, there are no significant matters to report.						

Other communications				
Related party transactions	Given the nature of the organization, related party transactions have a pervasive impact on the financial statements.  We have performed the following audit procedures for related party transactions:  Reviewed agreements between the Company and its related parties: City of Toronto, the Toronto Transit Commission (TTC), and Toronto Coach Terminal Inc. (TCTI); Confirmed the related party receivable and payable balances with the affiliated entities; and Examined the most recent financial statements of TTC to assess its solvency and the collectability of the receivable balance.			
	We have not been aware of any significant change in the underlying agreements or transactions.			
Summary of adjusted and unadjusted misstatements	As a result of our audit, we have not noted any unadjusted or adjusted items.			
Fraud and illegal acts	No fraud involving senior management, or employees with a significant role in internal control that would cause a material misstatement of the financial statements and no illegal acts came to our attention as a result of our audit procedures.  We wish to reconfirm that those charged with governance are not aware of any known, suspected or alleged incidents of fraud or illegal acts not previously discussed with us.			
Management representation letter	A copy of the draft management representation letter is included in Appendix B. The representations included are standard in nature, except for the representation on indemnity and guarantees between related parties.			
Independence	We are not aware of any relationships between the Company or its management and PricewaterhouseCoopers LLP that may reasonably be thought to bear on our independence.			
Internal controls recommendations	The purpose of our audit was so that we could express an opinion on the financial statements. The audit included consideration of internal control relevant to the preparation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of internal control.  No significant deficiency nor material weakness were identified during our			
Subsequent events	audit.  No subsequent events which would impact the financial statements other than			
	those disclosed have come to our attention.  We would like to reconfirm that the management is not aware of any other subsequent events that might affect the financial statements.			

PwC Publications	We present summary of our proactive approach on auditing of IFRS 17 transition. Please refer to Appendix C.
	Please feel free to contact your engagement team to discuss the content or connect with our subject matter expert.

The matters raised in this and other reports that will flow from the audit are only those that have come to our attention arising from or relevant to our audit that we believe need to be brought to your attention. They are not a comprehensive record of all the matters arising and, in particular, we cannot be held responsible for reporting all risks in your business or all internal control weaknesses. Comments and conclusions should only be taken in context of the financial statements as a whole, as we do not mean to express an opinion on any individual item or accounting estimate. This report has been prepared solely for your use. It was not prepared for, and is not intended for, any other purpose. No other person or entity shall place any reliance upon the accuracy or completeness of statements made herein. PwC does not assume responsibility to any third party, and, in no event, shall PwC have any liability for damages, costs or losses suffered by reason of any reliance upon the contents of this report by any person or entity other than you.

# Appendix A: Draft auditor's reports



February 22, 2018

### **Independent Auditor's Report**

# To the Superintendent of Financial Services Commission of Ontario

We have audited the accompanying financial statements of TTC Insurance Company Limited (the Company) which comprise the balance sheet included on pages 20.10 and 20.20, the statements of income, comprehensive income (loss), and accumulated other comprehensive income (loss), changes in equity and cash flows, and the related notes, which comprise a summary of significant accounting policies and other explanatory information, on pages 20.30 through 20.60.

Management's responsibility for the financial statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with Public Sector Accounting Standards, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with Canadian generally accepted auditing standards. Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

**Opinion** 

In our opinion, the financial statements present fairly, in all material respects, the financial position of the Company as at December 31, 2017 and its financial performance and cash flows for the year then ended, in accordance with Public Sector Accounting Standards.



### Other matter

We have not audited, reviewed or otherwise attempted to verify the accuracy or completeness of the statement of reserves on page 20.45 and the schedules or exhibits referenced on pages 20.10 through 20.60 of the Company's financial statements.

Chartered Professional Accountants, Licensed Public Accountants





February 22, 2018

### **Independent Auditor's Report**

# To the Board of Directors and Shareholder of TTC Insurance Company Limited

We have audited the accompanying financial statements of TTC Insurance Company Limited, which comprise the statement of financial position as at December 31, 2017 and the statements of operations and accumulated surplus and cash flows for the year then ended, and the related notes, which comprise a summary of significant accounting policies and other explanatory information.

## Management's responsibility for the financial statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with Canadian public sector accounting standards, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with Canadian generally accepted auditing standards. Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

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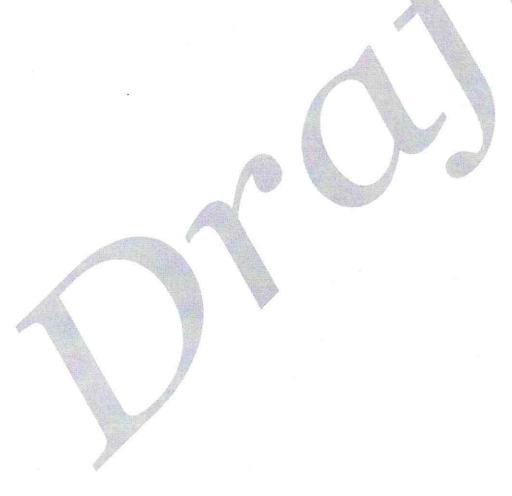
We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

**Opinion** 



In our opinion, the financial statements present fairly, in all material respects, the financial position of TTC Insurance Company Limited as at December 31, 2017 and the results of operations, its and cash flow for the year then ended in accordance with Canadian public sector accounting standards.

**Chartered Professional Accountants Licensed Public Accountants** 



# Appendix B: Draft management representation letter

February 22, 2018

PricewaterhouseCoopers LLP PwC Tower 18 York Street, Suite 2600 Toronto, Ontario M5J 0B2

We are providing this letter in connection with your audit of the financial statements and the Annual Return P&C 1 (collectively – the financial statements) of Toronto Transit Commission Insurance Company Limited (TTCICL) as at December 31, 2017 and for the year then ended for the purpose of expressing an opinion as to whether such financial statements present fairly, in all material respects, TTCICL's financial position, results of operations and cash flows in accordance with Canadian public sector accounting standards.

Management's responsibilities

We have fulfilled our responsibilities, as set out in the terms of the audit engagement letter dated November 30, 2015 (subsequently confirmed on October 13, 2017). In particular, we confirm to you that:

 We are responsible for the preparation and fair presentation of the financial statements in accordance with Canadian public sector accounting standards;

We are responsible for designing, implementing and maintaining an effective system of internal
control over financial reporting to enable the preparation and fair presentation of the financial
statements that are free from material misstatement, whether due to fraud or error. In this
regard, we are responsible for establishing policies and procedures that pertain to the
maintenance of accounting systems and records, the authorization of receipts and disbursements,
the safeguarding of assets and for reporting financial information;

We have provided you with all relevant information and access, as agreed in the terms of the audit

engagement; and

 All transactions have been recorded in the accounting records and are reflected in the financial statements.

We confirm the following representations:

Preparation of financial statements

The financial statements include all disclosures necessary for fair presentation in accordance with Canadian public sector accounting standards and disclosures otherwise required to be included therein by the laws and regulations to which TTCICL is subject.

We have appropriately reconciled our books and records (e.g. general ledger accounts) underlying the financial statements to their related supporting information (e.g. sub ledger or third party data). All related reconciling items considered to be material were identified and included on the reconciliations and were appropriately adjusted in the financial statements. There were no material unreconciled differences or material general ledger suspense account items that should have been adjusted or reclassified to another account balance. There were no material general ledger suspense account items written off to a balance sheet account, which should have been written off to an operations account and vice versa. All inter-governmental unit accounts have been eliminated or appropriately measured and considered for disclosure in the financial statements.

Accounting policies

We confirm that we have reviewed TTCICL's accounting policies and, having regard to the possible alternative policies, our selection and application of accounting policies and estimation techniques used for the preparation and presentation of the financial statements is appropriate in TTCICL's particular circumstances to present fairly in all material respects its financial position, results of operations and cash flows in accordance

# with Canadian public sector accounting standards. Internal controls over financial reporting

We have designed disclosure controls and procedures to ensure material information relating to TTCICL is made known to us by others.

We have designed internal control over financial reporting to provide reasonable assurance regarding the reliability of financial reporting and the preparation of the financial statements for external purposes in accordance with Canadian public sector accounting standards.

We have not identified any deficiency in the design or operation of disclosure controls and procedures and internal control over financial reporting identified as part of our assessment as at December 31, 2017.

#### **Minutes**

All matters requiring disclosure to or approval of the Board of Directors or the shareholders have been brought before them at appropriate meetings and are reflected in the minutes.

**Completeness of transactions** 

All contractual arrangements entered into by TTCICL with third parties have been properly reflected in the accounting records or/and, where material (or potentially material) to the financial statements, have been disclosed to you. We have complied with all aspects of contractual agreements that could have a material effect on the financial statements in the event of non-compliance. There are no side agreements or other arrangements (either written or oral) undisclosed to you.

#### Fraud

We have disclosed to you:

- The results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud;
- All information in relation to fraud or suspected fraud of which we are aware affecting TTCICL
  involving management, employees who have significant roles in internal control or others where
  the fraud could have a material effect on the financial statements; and
- All information in relation to any allegations of fraud, or suspected fraud, affecting TTCICL's financial statements, communicated by employees, former employees, analysts, regulators or others.

#### Disclosure of information

We have provided you with:

- Access to all information of which we are aware that is relevant to the preparation of the financial statements, such as records, documentation and other matters including:
  - · Contracts and related data;
  - Information regarding significant transactions and arrangements that are outside the normal course of business;
  - Minutes of the meetings of shareholders, management, directors and committees of directors.
     The most recent meetings held were the Directors', Shareholders and Conduct Review and
     Audit Committee meetings, which were all held on June 15, 2017;
- · Additional information that you have requested from TTCICL for the purpose of the audit; and
- Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.

We have no knowledge of any allegations of fraud or suspected fraud affecting TTCICL received in communications from employees, former employees, analysts, regulators, short sellers, or others.

We have disclosed to you all aspects of laws, regulations and contractual agreements that may affect the financial statements, including actual or suspected non-compliance with laws and regulations whose effects should be considered when preparing financial statements.

We are not aware of any illegal or possibly illegal acts committed by TTCICL's directors, officers or employees acting on TTCICL's behalf.

#### Accounting estimates and fair value measurements

Significant assumptions used by TTCICL in making accounting estimates, including fair value accounting estimates, are reasonable.

For recorded or disclosed amounts in the financial statements that incorporate fair value measurements, we confirm that:

- The measurement methods are appropriate and consistently applied;
- The significant assumptions used in determining fair value measurements represent our best estimates, are reasonable and have been consistently applied;
- No subsequent event requires adjustment to the accounting estimates and disclosures included in the financial statements; and
- The significant assumptions used in determining fair value measurements are consistent with TTCICL's planned courses of action. We have no plans or intentions that have not been disclosed to you, which may materially affect the recorded or disclosed fair values of assets or liabilities.

Significant estimates and measurement uncertainties known to management that are required to be disclosed in accordance with CPA Canada Public Sector Accounting Handbook Section PS 2130, Measurement Uncertainty, have been appropriately disclosed.

### Related parties

Given that we have not early adopted PSAS 2200 Related Party Disclosures, we confirm that we have disclosed to you the identity of TTCICL's related parties as defined by Canadian Auditing Standards (CAS) 550, Related Parties, and all the related party relationships and transactions. In accordance with CAS 550, for government controlled entities, only those entities that TTCICL engaged in transactions with during the year have been defined as related parties.

The identity of, relationship, balances and transactions with related parties have been properly recorded and adequately disclosed in the financial statements.

The list of related parties attached to this letter as Appendix A accurately and completely describes TTCICL's related parties.

#### **Indemnity and Guarantees**

The Toronto Transit Commission makes all claims payments on behalf of TTCICL through the terms of an indemnity agreement. We confirm that as at the date of this letter, the Toronto Transit Commission continues to completely and fully indemnify and hold harmless TTCICL against and from any and all losses, costs and expenses of TTCICL as stated in the signed Indemnity Agreement dated February 25, 1994.

The City of Toronto, through execution of the Guarantee Agreement dated July 13, 1994, guarantees all liabilities of TTCICL in the event that the Toronto Transit Commission is unable to meet these obligations as required by the indemnity agreement noted above. We confirm that as of the date of this letter, we are not aware of any termination notice in respect of the guarantee from the City of Toronto.

#### Going concern

We have no plans or intentions that may materially alter the carrying value or classification of assets and liabilities reflected in the financial statements (e.g. to dispose of the business or to cease operations).

#### Assets and liabilities

We have satisfactory title or control over all assets. There are no liens or encumbrances on TTCICL's assets and assets pledged as collateral.

We have recorded or disclosed, as appropriate, all liabilities, in accordance with Canadian public sector accounting standards. All liabilities and contingencies, including those associated with guarantees, whether written or oral, under which TTCICL is contingently liable in accordance with the CPA Canada Public Sector Accounting Handbook Section PS 3300, Contingent Liabilities, have been disclosed to you and are appropriately reflected in the financial statements.

Litigation and claims

All known actual or possible litigation and claims, which existed at the statement of financial position date or exist now, have been disclosed to you and accounted for and disclosed in accordance with Canadian public sector accounting standards, whether or not they have been discussed with legal counsel.

Misstatements detected during the audit

Certain representations in this letter are described as being limited to those matters that are material. Items are also considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would have been changed or influenced by the omission or misstatement.

We confirm that the financial statements are free of material misstatements, including omissions.

We confirm there are no uncorrected misstatements in the financial statements.

There are no adjusted misstatements identified during your audit.

#### Events after balance sheet date

We have identified all events that occurred between the statement of financial position date and the date of this letter that may require adjustment of, or disclosure in, the financial statements, and have effected such adjustment or disclosure.

#### Cash and banks

The books and records properly reflect and record all transactions affecting cash funds, bank accounts and bank indebtedness of TTCICL.

All cash balances are under the control of TTCICL, free from assignment or other charges, and unrestricted as to use, except as disclosed to you.

The amount shown for cash on hand or in bank accounts excludes trust or other amounts, which are not the property of TTCICL.

All cash and bank accounts and all other properties and assets of TTCICL are included in the financial statements as at December 31, 2017.

### Accounts receivable

All amounts receivable by TICICL were recorded in the books and records and are considered to be fully collectible.

Use of a specialist

We assume responsibility for the findings of specialists in evaluating the case reserves and incurred but not reported (IBNR) and have adequately considered the qualifications of the specialists in determining the amounts and disclosures used in the financial statements and underlying accounting records. We did not give or cause any instructions to be given to specialists with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had an impact on the independence or objectivity of the specialists.

#### Approval of financial statements

management.			
Yours truly,			
The TTC Insurance Company Limited			
Brian Leck, Head Legal/General Counsel			
Mark Cosgrove, Secretary	а		

We have the authority to attest that the financial statements have been reviewed and accepted by

# Appendix A - List of related parties

# **Related Entities:**

- City of Toronto
- Toronto Transit Commission Toronto Coach Terminal Inc.
- TTC Sick Benefit Association

# Appendix C: Auditing IFRS 17 transition - our proactive approach

# Auditing IFRS 17 transition - our proactive approach

Move forward with confidence throughout implementation

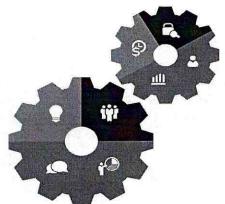
# Why start now?

With 3 years leading up to transition, we need to align our audit effort when action plans are being developed and decisions are being made.

IFRS 17 implementation programs include a number of important decisions, action plans, and work-streams - many of which are interdependent. Our approach is to work with management throughout the implementation years to give confidence that the outcome will be compliant with the requirements, with flexibility to change direction along the way if needed. It minimises the chances of last-minute surprises later on, and supports a high quality implementation.

# Our approach means that...

- · Potential issues are identified and resolved early on
- · Pressure on teams is reduced later on
- · There can be confidence in project progress and output
- You benefit from our industry insights, and your progress and approach can be benchmarked against peers



### What will we do?

The type and amount of work required to complete an audit will increase with IFRS 17, particularly in the years of transition.

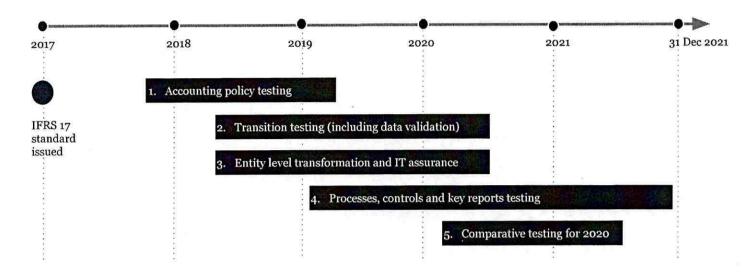
We will consider the key milestones in (insert entity name) project plan and arrange our work around them. This provides the project and management team with timely feedback and the Board with an independent view on key judgements and decisions along the way.

Our up-front auditing activities include detailed considerations relating to the following workstreams in management's project plan:

- Accounting policy decisions
- 2 Transition
- 3 Entity level transformation assurance and IT considerations
- Processes, controls and key reports
- Comparative reporting for 2020



# Auditing IFRS 17 transition - our proactive approach



The timeline above illustrates how work can be phased over the period from 2018 to 2021. Actual timing will of course depend on management's implementation project plan - we will align our work alongside and around management's key milestones, decision points and action plans. Our work will generally fall into five workstreams, explained below:



**Accounting policy testing -** IFRS 17 requires a new, more complex accounting model and significant judgement in establishing accounting policy choices. Many of these accounting policy choices are inter-related and need to be concluded on before management can make confident decisions - for example regarding model design or IT solutions.



→ Audit Response - We are required to review accounting policy decisions and the judgements management will make during implementation. By testing and validating management's conclusions, we can give timely feedback on management's approach, giving confidence to move forward without revisiting all the steps along the way at the end of the process.



**Transition testing -** The impact arising from restating the opening balance sheet for transition to IFRS 17 is likely to be material and of significant interest to a number of key stakeholders. The transition approach presents entities with a number of alternative valuation methods in arriving at the opening Contractual Service Margin (CSM) position depending on accounting policy choices. These are critical decisions which will require data gathering and validation, as well as determining the transitional adjustment calculations.



→ Audit Response - In addition to validating management's transition approach, we are required to perform audit procedures (at defined levels of materiality) over the transition calculations and data inputs.



# Auditing IFRS 17 transition - our proactive approach

- Entity level transformation assurance and IT testing The IFRS 17 program will be highly complex, requiring the delivery of pragmatic solutions in a coordinated manner, utilizing strong governance and risk management disciplines. With this, IT and data architectures will need to deliver accurate, timely and well controlled data for reporting and management decision making.
  - Audit Response As auditors, on any large project, we are required to develop an audit approach to address the company's business, technology, data, third-party risk management, and governance transformation. Through a concurrent and real-time approach focused on a hybrid combination of control and substantive based testing, our approach can provide the required comfort for audit sign-off purposes while also providing insights and feedback to management.
- **Processes, controls and key reports -** Management will need to design and implement appropriate processes and controls to address new and re-defined financial reporting risks, which includes reliance on new key reports.
  - → Audit Response In early stages, it is best practice for auditors to review and provide observations on planned changes to the control environment to adapt to the new IFRS 17 environment. This will minimize the risk of process issues or control design deficiencies arising after implementation. Closer to transition, our audit approach will be primarily control based, increasing the importance of management implementing and maintaining a strong control environment.
- Comparative testing for 2020 IFRS 17 requires disclosure of comparative figures meaning that management needs to be ready to prepare IFRS 17 results and disclosures in 2020.
  - → Audit Response For 2020 we will be required to fully audit results under IFRS 17 as they will be presented as the comparative figures in 2021.

For more information on the impact of IFRS 17 and our services please see our website (<a href="https://www.pwc.com/ca/en/industries/insurance/ifrs17.html">https://www.pwc.com/ca/en/industries/insurance/ifrs17.html</a>) or speak with your engagement leader.

