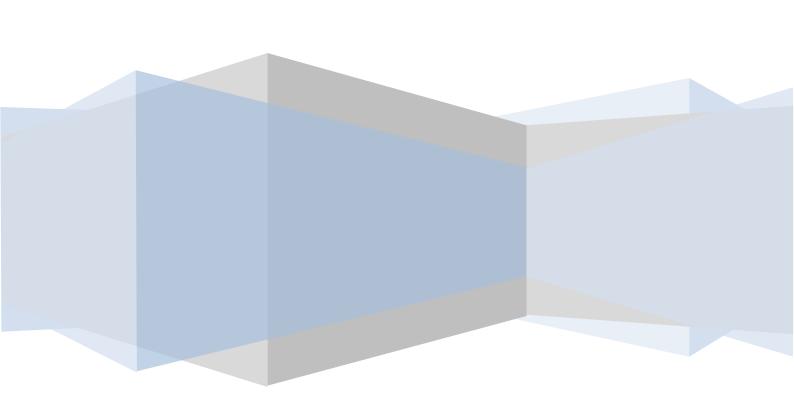


Audit Quality Assurance Annual Report 2011

February 2012

Department of Accounting Standards



Prepared By

CAPITAL MARKETS BOARD OF TURKEY DEPARTMENT OF ACCOUNTING STANDARDS

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Capital Markets Board of Turkey;

The Capital Markets Board of Turkey (the CMB/the Board) has been established for carrying out the tasks and exercising the authorities granted with the Capital Market Law (CML) and the related legislation, to maintain secure, transparent, efficient, fair, and competitive capital markets, and to protect rights and interests of investors. The CMB is a statutory public legal entity with administrative and financial autonomy, and exercises its authorities independently under its own responsibility.

The CMB is related with the Minister assigned by the Prime Minister.

The mission of the CMB is to regulate and supervise the capital markets for the secure, fair, transparent and efficient functioning of the capital markets within the framework of objectivity and accountability, conducting supervision and making clear and comprehensible approach that is in conformity with international norms and developments which meets varying market needs. The vision of the CMB is to be a leading dynamic and respected institution in national and international arena.

Regarding independent audit activities and audit firms in capital markets, the Board; has responsibility and authority to

- 1. specify the corporations and institutions subjected to the CML, whose financial reports are prepared according to Turkish Accounting Standards and the regulations of the CMB, which should be audited,
- 2. regulate additional conditions for audit firms, to conduct audit in capital markets, which are authorized by Public Oversight Accounting and Auditing Standards Authority of Turkey and authorize these firms,
- 3. engage in quality assurance reviews to the audit firms which are authorized to perform do auditing in capital markets,
- 4. cooperate with other institutions.

The Board conduct those responsibilities and authorities by the Department of Accounting.

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1. Content of the Report

In accordance with the article 22/e of the Capital Markets Law and related auditing regulations of the Board, annually quality assurance reviews in the presence of audit firms are implemented by the Accounting Standards Department of the Board to detect whether the operations of the audit firms are consistent with the regulations related to the auditing standards which had been put into effect by the Board.

At the 30th article of the European Union's Eighth Directive related to auditing, It is stated that the overall results of the quality assurance system shall be published annually.

In this content, it needs to arise making disclosure regarding the quality assurance reviews which have been implemented by the Board.

A Total of 12 quality assurance reviews in the presence of audit firms were implemented in the year 2011 and all of these quality assurance reviews were settled by the Board.

The statistics related to mentioned quality assurance reviews which have been implemented by the Board in this period is shown in the following table:

Table: The Sta	Table: The Statistics Related To Audit Reviews In The Year 2011							
The year	Withdrawal of Approvals	Administrativ e Fine	Legal Notice	Ongoing Reviews	The Number of Audit Reviews			
2011	-	3	9	-	12			

2. Main Findings

In respect of the results of the quality assurance reviews implemented by the Board, main findings related to the audit firms and auditors is summarized substantially in the following text.

2.1. Establishment Requirements

It has been determined that 1 audit firm didn't provide the one of the establishment requirements prescribed by the 30th article of the Second Section of "Communique About Auditing Standards in the Capital Markets" (Communique). The subject of this contradiction was stated as "lack of enough space and technical equipment".

2.2. Documentation In Audit Works

In conclusion of the audit reviews, at 10 of these 12 audit firms, significant deficiencies have been determined in documentation of audit works. General deficiencies determined in documentation of audit works are set out below.

- Lack of enough Information regarding the content and time of the performed auditing procedures, by whom these work and checks were performed and results of these procedures,
- In the works performed, lack of evidence of audit in the working documents regarding that any account items of the financial statements was checked,
- Lack of documentation of plan and programme of audit,

- Lack of documentation of evaluations made by auditor to understand the industry, economic and legal environment which the company operates,
- Lack of documentation of works made by auditor to understand the accounting and internal control systems of the company,
- Lack of documentation of statements regarding sampling techniques used by the auditor,
- Lack of documentation of statements regarding auditing techniques used by the auditor,
- Lack of content and quality of the working papers,
- Lack of documentation of works related to risk assesments and materiality level,
- Lack of documentation of strategy of audit,
- Lack of documentation of evaluations and works made in contemplation of professional septicism related to frauds and unlawfulnesses determined during audit,
- Lack of taken confirmation letter from the company administration concerning interception of frauds and unlawfulnesses in arranging financial statements,
- Lack of documentation of work related to quality control of audit.

2.3. Obtaining Appropriate And Sufficient Audit Evidence

At 10 of these 12 audit firms, failure is detected in obtaining sufficient, confidential and appropriate audit evidence that provides reasonable assurance. In many audit works, it can not be detected that information presented by the entity was confirmed by using the audit evidences. General deficiencies in obtaining appropriate and sufficient audit evidence which were detected during audit reviews are set out below:

- Auditor's absence at the cash count,
- Auditor's absence at the physical inventory count and failure in the valuation of inventory,
- Relying on documents obtaining from the company itself without taking sufficient confirmations about trade receivables and trade payables,
- Mot making tests related to the impairment losses of receivables
- Taking insufficient confirmation from the banks,
- Not checking the correctness of depreciation calculations relying on the calculations of the company.
- Not checking the correctness of the calculations of the company for the provision for severance pay,
- Undetailed information and documentation for affiliated party transactions,
- Lack of the techniques of inspection, data gathering, affirmation and analytical procedures in evaluating the financial information,
- Not making tests performed on the results of the expert's work in outsourcing services,
- Not arranging working papers for the mesurement of the impairment loses in tangible and intangible assets.

2.4. Risk Assesments and Audit Materiality Level

In conclusion of the audit reviews, at 8 of these 12 audit firms, any work could not be detected about defining the audit materiality level which determine the content and timing of the audit procedures that need to be applied during audit work and evaluating the risk of significant error relavant to the information, documentation and declaration presented by the company.

2.5. Overall Audit Plan and Programme

In conclusion of the audit reviews, at 7 of these 12 audit firms, main deficiencies detected about overall audit plan and programme are set out below:

- Not having separate audit plans and programmes for all kinds of companies which cover the all of the Board's financial reporting standards,
- Not updating the existing audit plan and programmes,
- Not defining the structure of the audit techniques, content and timing in audit plan going to be used in audit work.

2.6. Analytical Procedures

In conclusion of audit reviews, at 5 of these 12 audit firms, it was detected that any analytical procedures which need to be performed during the planning of the audit work so as to detect the potential risks of the audit works were not applied. The main deficiencies detected during audit reviews are set out below:

- Not defining the hyphotesis and modellings,
- Lack of evaluation related to the industry, economic and legal environment which the company operates
- Lack of analytical tests for understanding the industry risk of the company,
- Lack of analytical tests by using analysis techniques to understand the financial situation of the company

2.7. Evaluation of the Internal Control System

In conclusion of audit reviews, at 6 of these 12 audit firms, it was not detected any documentation using in understanding the accounting and internal control systems of the companies.

2.8. Affiliated Party Transactions

In conclusion of audit reviews, at 3 of these 12 audit firms, some deficiencies were detected in identifying affiliated party transactions and presenting the sufficient audit evidence related to these transactions. Main deficiencies detected about affiliated party transactions are set out below:

- Not performing the required audit techniques to expose the extraordinary transactions or transactions with extraordinary prices,
- Arranging an audit letter despite the fact that sufficient audit evidence for affiliated party transactions was not obtained in audit work.

2.9. Checking the Accuracy of the Fair Value Estimations

In conclusion of audit reviews, at 2 of these 12 audit firms, some errors were detected in fair value estimations in the financial statements which need to be arranged in accordance with IFRS and also it was detected that the accuracy of the fair value estimations were not checked inspite of these errors.

2.10. Professional Training

In conclusion of audit reviews, in 5 of these 12 audit firms, it was detected that professional training for auditors to enable improving themselves and gaining professional competence for auditing was not efficient together with lack of on-the -job training.

2.11. Liabilities of Notification to the Board

In conclusion of audit reviews, it was detected that 2 of these 12 audit firms did not send or sent with a delay any documents as hard copy and soft copy and any information which have to be sent in accordance with the liabilities of notification of the audit firms to the Board.

2.12. Audit Contracts

In conclusion of audit reviews, some deficiencies and contradictions were detected in 2 audit firms' audit contracts which had to be arranged in accordance with auditing standards as required by the Board. Main deficiencies and contradictions detected in audit contracts are set out below:

- Lack of minimum requirements determined in the Communique,
- Difference between auditors determined in audit contracts and auditors performing the audit works.

2.13. The Other Issues

The other issues detected in audit reviews are set out below:

- Not taking into account the titles of auditors in determining the audit team, competence and task.
- Performing the audit work without surveillance and coordination of the partner,
- Not performing the peer reviews on audit works,
- To make calculations by using the same discount and interest rates in all audit works.

3. General Evaluation

Consequently, in most cases, the documentation did not provide evidence that the audit was planned and performed in accordance with auditing standards. It was not possible to test the assumptions in arranging the financial statements because of the lack of qualification and content of the working papers. Because of the absence of audit works for understanding the internal control systems, risks, audit materiality level and fulfilling analytical procedures and audit plans and programmes etc., reasonable assurance in some audit works could not be provided.

In conclusion of these audit reviews, some sanctions were applied to the auditors and audit firms by the Board as administrative fine and legal notification.

CAPITAL MARKETS BOARD OF TURKEY ESKİŞEHİR YOLU 8. KM NO:156 06530 ANKARA-TURKEY

Tel: +90 (312) 292 90 90 Faks: +90 (312) 292 90 00 http://www.cmb.gov.tr/