



Transparency Report 2023

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Foreword from the Chief Executive

Nigel Bostock
Chief Executive



Leading an agenda for change and driving a culture of quality

I outlined in our 2022 report that our agenda for the year ahead would bring transformational change to our business. I am pleased that we have made significant progress and investment over the last year as we continue our journey and shape our firm and audit practice for the future.

- ✔ Set up our System of Quality Management (SoQM). We are now focused on ensuring we have effective and ongoing systems for monitoring, remediation, and evaluation for continuous improvement.
- ✔ Continued our engagement with the Financial Reporting Council, receiving our first Audit Supervision Letter in August 2022 and focusing on improvements and remedial actions as part of our improvement agenda.
- ✔ Embarked on a significant governance review for the firm to re-position Crowe for the future needs of our clients, people and market.
- ✔ Registered as a PIE audit firm and 10 partners as PIE registered auditors.
- ✔ Appointed the firm's first Independent Non-Executives, set up our Public Interest Committee and our Audit and Risk Committee.
- ✔ Invested in our audit platform, technology tools, technical resources, people, audit teams, and in learning and development.
- ✔ Evolved our Transitional Audit Board to our Audit Executive.
- ✔ Continued to play an influential role as a member of our global network with key input on several initiatives including ISQM 1.

We see these developments as necessary and significant steps for Crowe as we evolve and mature as a firm. We are not complacent and there is always more to do, with continuous investment to support our audit business and wider firm.

Embracing the changes in our market

The challenges and opportunities we and our market face, can be summarised into three areas.

Quality



We are realistic about where we are and where we want to be. Our audit profession continues to be under significant regulatory scrutiny and as a Tier 2 firm we recognise the need for continuous improvement in audit quality. Our focus is to positively engage with our regulators and continually learn and improve what we do.

People



We care for our people, their wellbeing, and their careers with Crowe. In a capacity constrained market, the retention and recruitment of talent is critical to our strategy. We aim to offer a rewarding people experience in a culture that aligns with our values.

Technology



We are accelerating our use of data analytics, data science and client solutions across the business in our delivery of services to our clients. We have implemented the next generation of our audit platform to address necessary changes to our audit methodology, new auditing standards, and to implement audit quality improvement measures.



Quality management

During the year we completed our implementation of ISQM (UK) 1 and our SoQM. While significant time and effort was invested in the implementation phase last year, this was the first step in the journey. Our SoQM is now the central component of our processes to drive our agenda for continuous improvement in audit quality across the business.

As we horizon scan or matters arise, we evaluate what this means for our system of quality management, objectives, response to risks and the effectiveness of our processes and policies. We are embedding a monitoring and remediation process leading, ultimately, to our annual evaluation to determine the success of our SoQM objectives.

Our strategic focus and delivering a culture for audit quality

Our goals and objectives, how they are set, executed and evaluated, will be focused on the positive achievement and/or contribution to one of more of the following components.



Culture starts with setting the tone at the top around quality, the behaviours we expect across the firm, the values we aspire to and how we embed this culture across the firm.

Our values – we care, we share, we invest, we grow – underpin our focus on delivering excellent quality services to our clients and looking after and developing our people.

Our purpose is to work collaboratively to deliver high quality work, excellent client service and act in the public interest, while growing the firm to be profitable, resilient and sustainable in an environment that delivers a rewarding people experience. See Appendix 1 for details about the firm including our financials.

Culture and values

At Crowe, we see our focus on quality as a key foundation and necessity to our success; benefiting not only the firm but our clients, our people and the wider public interest. Our next steps to further develop and formalise our 'culture for audit quality' are outlined below.

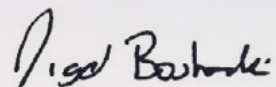
- Clearly defining and communicating **what this means** in terms of our purpose, ambition, values and behaviours that will underpin our culture for audit quality.
- Evaluating and actioning **what we need to do** to ensure we embed and live these across the firm whereby our:
 - leaders consistently **set the tone** and be the role models for quality
 - governance **holds us to account** for our commitment to quality and the progress being made
 - reward and recognition frameworks are **aligned** to quality
 - people engagement supports wellbeing and encourages listening, learning and development to **drive** quality
 - working environment is supportive, collaborative, team focused and **enables** a culture of continual improvement in quality and encourages people to speak up for what is right
 - multi-channel communications give **consistent and regular messaging** around quality, mindset, behaviours and promotion of good practice across the firm.
- Ensuring we have the appropriate measures to **assess and monitor** our progress in improving our culture.

It is my role as Chief Executive to ensure that appropriate policies and procedures are in place, that all work carried out by the firm, including audit assignments, is conducted to a satisfactory standard and that the firm complies with its regulatory responsibilities. I have considered the internal quality control processes that the firm has in place in respect of audit work and I am satisfied that they are appropriate and effective.

Looking forward

Our agenda over the next 12 months is to continue the momentum we have built to drive change across our business. Initiatives around audit quality, culture, people, governance, risk management, ISQM (UK) 1, Audit Firm Governance Code, technology, equality, diversity and inclusion and sustainability remain a focus.

As a leading firm that plays a significant role in acting in the public interest, there is also a need for us all to continue to promote our profession as an important, fulfilling and rewarding career.



Nigel Bostock, Chief Executive
for and on behalf of Crowe U.K. LLP

31 July 2023

How Crowe operates

Governance and leadership

Crowe U.K. LLP is a limited liability partnership owned and controlled by its members, which comprise senior equity and equity partners. The voting rights sit, principally, with the senior equity partners and the firm ensures that sufficient senior equity partners have the audit qualification to comply with the Audit Regulations.




Our partners elect members of a Supervisory Board and that board selects the Chief Executive. The Chief Executive appoints a national Executive team which comprises the London Office Managing Partner, Regional Office Managing Partner and Finance Partner. The Chief Executive may co-opt additional members to the national Executive team. Office Managing Partners are also appointed by the Chief Executive, who are responsible for leading the business in their offices.

The Audit Executive is a sub-committee of the Executive. It is chaired by a member of the Executive and includes the firm's Head of Audit.

During the year ended 31 March 2023 we prepared changes to our governance structure to allow the firm to adopt the Financial Reporting Council's (FRC's) Audit Firm Governance Code (AFGC) with effect from 1 April 2023.

From that date we have two Independent Non-Executives (INEs) who, together with the Chair of the Supervisory Board, form our Public Interest Committee (PIC).

The **Public Interest Committee's** objectives include promoting audit quality, ensuring the firm takes account of the public interest in its decision-making and that the firm is safeguarding the sustainability and resilience of the audit practice and the firm as a whole.

	Steve Maslin Chair, Independent Non-Executive
	Gary Kildare Independent Non-Executive
	Matthew Stallabross Chair, Supervisory Board

From 1 April 2023, in line with the requirements of the AFGC, we have also formed an Audit and Risk Committee, which includes the members of the Supervisory Board and the two INEs.

The **Supervisory Board** provides guidance to the Chief Executive and the Executive team on matters that impact the interests of the firm and its partners¹.



Matthew Stallabrass
Chair

Elected by
All senior equity partners

Term of office
Three years

7/7

Meetings attended



Rob Warne

Elected by
London senior equity partners

Term of office
Three years

6/7

Meetings attended



Jeremy Cooper*

Elected by
Regional partners

Term of office
Three years

3/3

Meetings attended



Helen Drew

Elected by
Regional senior equity partners

Term of office
Three years

5/5

Meetings attended

* Jeremy replaced Helen upon her retirement on 31 January 2023. His first meeting was 26 January 2023.

The **Executive team** is responsible for the policies, strategic and operational direction and the overall management of our firm.



Nigel Bostock
Chief Executive

46/46

Meetings attended



Peter Varley
London Office Managing Partner

40/46

Meetings attended



Mark Anderson
Regional Office Managing Partner

39/46

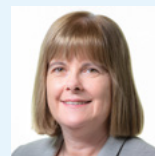
Meetings attended



Jaki Mitchell
Finance Partner

34/46

Meetings attended



Tina Allison
Audit Executive Chair

42/46

Meetings attended

All members are appointed by the Chief Executive, with the exception of the Chief Executive who is selected by the Supervisory Board.

The **Audit Executive**² challenges and provides oversight to the strategic direction and operational activities of the firm's audit practice.



Tina Allison
Chair, Executive member

12/12

Meetings attended



Nigel Bostock
Executive member

12/12

Meetings attended



Mark Anderson
Executive member

11/12

Meetings attended



Steve Gale
Head of Audit

12/12

Meetings attended



Nick Jones³
Partner, Corporate Audit

1/1

Meetings attended**

¹ The Supervisory Board meets formally with the Executive on a quarterly basis and ad hoc as the need arises. In addition, it meets informally with the Chief Executive on a regular basis.

² Formerly known as the Transitional Audit Board until February 2023.

³ Nick Jones, an audit partner from the London Corporate team joined the Audit Executive in March 2023.

Audit Executive

As part of our ongoing governance review, the Transitional Audit Board became the Audit Executive.



Monitor



Challenge



Oversee

Its purpose is to monitor, challenge and provide oversight to the strategic direction and operational activities of the firm's audit practice, to meet the firm's needs and ensure the firm's public interest obligations can be properly discharged to audit clients and other key stakeholders.

The Audit Executive continues to adapt and evolve its agenda and priorities, which include:



Quality and risk, including achievement of agreed quality improvement plans



Audit compliance and regulation



Resources and capacity



Competency and training



Performance and audit quality indicators.

The Chair of the Audit Executive reports regularly to the Executive, Supervisory Board and Public Interest Committee. The Chair also provides updates in our full partner meetings, which are held at least twice each year.

How our partners share profits

Partners are remunerated solely out of the profits of the firm.

Each partner receives an initial allocation that is paid monthly through the year. The initial allocation will reflect matters such as seniority, responsibility, contribution and performance.

The remaining profit is split into pools, which represent a return on their investment in the firm, an element to reward their performance with the final element being shared according to the number of equity points held.

Performance allocations are determined by a remuneration committee and reflect the results of partner appraisals and other metrics.

No element of the partner or employee remuneration is related to the selling of non-audit services to audit clients.

For all partners, where there are quality failures, the Chief Executive together with the Executive and Supervisory Board determine whether a fine should be levied on a partner. A quality failure may occur as a result of an adverse regulatory finding, a complaint or claim by a client, or a file being given the lowest grade in an external or internal quality review inspection.

Crowe Global

We are the UK member firm of Crowe Global, which is the eighth largest accounting network in the world. Our Chief Executive sits on the Board of Crowe Global and chairs its Audit and Risk Committee. As a firm, we participate actively in network activities.

Steve Gale, our Head of Audit, sits on the Global Accounting and Audit Committee, Peter Varley, Head of Corporate Finance, chairs the Global Corporate Advisors' Committee and Laurence Field, International Liaison Partner, sits on the Global Marketing Standards Committee and the EMEA Tax Committee.

Further details about Crowe Global, including details of its constitution and management, can be found in Appendix 6.

Our audit practice

Steve Gale
Head of Audit



The firm's audit business represents around 42% of the firm's revenue and is centred on the following key markets: listed companies (including those listed on the main market of the London Stock Exchange and AIM), privately held companies and limited liability partnerships, social purpose and non profit organisations and pension funds.

Audit has a huge part to play in providing confidence and trust to investors, employees, customers and clients, suppliers, regulators, and a host of other stakeholders. We recognise the value of audit and are committed to ensuring that our teams recognise the public interest element of what they do.

Our audit approach is built on a thorough knowledge of the environment in which the entity operates and understanding the risks that each of those entities might be facing. One of the ways we do this is to ensure we have senior people involved in industry and sector groups, including those responsible for developing accounting and auditing guidance (see Appendix 2).

In addition to audit of financial statements, the corporate reporting environment continues to evolve with increasing focus on non-financial measures. This has been evidenced over recent years with gender pay reporting, payment practices reporting, energy and carbon reporting and the introduction for certain entities to report on how they apply the principles of the Taskforce for Climate-related Financial Disclosures (TCFD). As a result, we have invested in strengthening our internal sustainability and environmental, social and governance (ESG) capabilities to be able to support our clients and audit teams as they continue to adapt to this changing environment.

With a greater focus on social purpose and ESG factors, many organisations are proactively communicating what they are doing. The FRC expects auditors to actively consider climate risks in the planning of their audit work and we have made progress during the year in implementing these steps, with further embedding into our audit protocols expected in the coming year. As auditors, we continue to have a role to play in ensuring that organisations' overall ESG disclosures are consistent with what we observe they are doing and is fair and balanced. This goes to the heart of ensuring that readers of annual reports and financial statements can have confidence in what they read.



Our markets

Corporate business

We act for many types of corporate businesses, including:

-  Listed businesses.
-  Private equity backed organisations.
-  Subsidiaries of groups established overseas.
-  Professional services firms operating as LLPs.
-  Companies owned by small groups of shareholders.

At 31 March 2023 we were ranked as the fourth largest auditor of AIM listed companies by number of audits and, together with audits of companies who are listed on the London Stock Exchange and other markets, we audit over 100 listed companies.

Our aim is for all our audits to be challenging and robust, carried out with a knowledge and understanding that means boards and management will benefit from the challenge we bring, and be able to act on advice that is delivered.

A list of our PIE audits, together with other major audits including companies listed on AIM plus large non profits and pensions funds, is included in Appendix 3.

For many of the private and unlisted companies and entities we act for, we provide, where we are not ethically prohibited, a range of services outside the statutory audit.

Audit plays a vital role in providing trust and confidence within the economy and that is important to the SME sector as well as the capital markets. Investors, lenders, creditors and other stakeholders, including employees, need to be able to rely on the financial information reported by companies and we recognise that need in our audits.

Social purpose and non profit organisations

The people in our social purpose and non profits team are passionate about working with these organisations.

The entities we audit include:

- ✔ Charities.
- ✔ International Non Governmental Organisations (INGOs).
- ✔ Social housing providers.
- ✔ Membership bodies.
- ✔ Independent schools.
- ✔ Academies.
- ✔ Trade unions.

We have been ranked as the leading auditor to charities (based on the number of audits) in the Charity Finance Audit Survey for 14 consecutive years and act for non profit organisations of all sizes and types. Crowe is the leading firm of auditors to the

independent schools' sector and we also advise many academies.

Over the last three years, we have increased our work with Registered Social Housing Providers and Local Authorities' Arm's Length Management Organisations. We are actively involved with the wider sector through our close involvement with leading sector bodies and regulators.

Social purpose organisations are facing the ongoing challenge of income generation amid rising costs and increasing demand. Our continued focus is to support our clients and to deliver a quality audit based on a deep understanding of the sector.

We work with boards and management to help them to develop their risk management processes, evaluate their impact, consider their ESG agenda, carry out board effectiveness and governance reviews as well as provide the usual tax services.

Pension funds

We provide statutory audit services to Trustees of a wide range and large number of schemes including defined benefit schemes, defined contribution schemes, master trusts and other consolidators; many with billions of pounds worth of assets under management.

Our approach is understanding the specific dynamics of each scheme and ensuring that our audit work is focused on the risks identified and providing the appropriate assurance to the Trustees. Through our place on

bodies such as the Pensions Research Accounting Group (PRAG), which is responsible for the publication of the Pensions SORP, we ensure that we bring deep knowledge and experience which is appreciated by the Trustees and administrators that we deal with and which they have come to expect.

The introduction of the Pensions Regulator's General Code of Practice in 2023 presents a further opportunity to use our insight and experience for the benefit of the Trustees through our own research and provision of assurance services to our clients.

Our regulatory environment

Our audit registration is provided by the Institute of Chartered Accountants in England and Wales (ICAEW) and details of our audit registration can be found on the UK Audit Register at www.auditregister.org.uk.

As we audit Public Interest Entities (PIEs), we applied under the FRC's transitional provisions to be a PIE Auditor under the PIE Auditor Registration Regulations that came into force on 5 December 2022. Details of these regulations can be found on the FRC website and the [PIE Audit Register](#).

We are in Tier 2 of the FRC's Supervision regime that applies to firms that are PIE Auditors.

Some jurisdictions outside of the UK require auditors to be registered with them if they conduct certain types of audit work. At 31 March 2023 we held registrations in the Crown Dependencies, USA and Luxembourg. Since that date, we have re-registered in Canada and applied to withdraw our registration with the Public Company Accounting Oversight Board in the USA.

FRC supervision

We have regular engagement with the FRC on both a formal and informal basis. In August 2022, we received our first annual Supervisor's letter. The letter set out the FRC's overall assessment of the firm and highlighted those matters assessed by our Supervisor as the most important to address to safeguard and/or improve audit quality and the firm's resilience. These included our plan to ensure that our System of Quality Management (SoQM) under ISQM (UK) ¹⁴ was in place by the required date of 15 December 2022, our plans for embedding robust Root Cause Analysis (RCA) and the need to ensure that we completed the comprehensive action plan agreed with the Audit Quality Review team of the FRC at the conclusion of their last inspection visit at the start of 2022.

While the FRC was encouraged by certain initiatives we had introduced and the added investment in our central teams, they wish to see further progress. They have required us to increase the amount of internal quality monitoring that we undertake, with the results of our internal file reviews reported to the FRC on a six-monthly basis. There is also a requirement for continued investment in our central functions and resources.

We participate actively in the initiatives that the FRC runs as part of its mission to improve the quality of audits in Tier 2 and Tier 3 firms and increase competition in the audit market. This includes participating in informal roundtable events and, as they develop, will include contributing to more formal initiatives such as the Audit Sandbox and Audit Scalebox, details of which can be found on the FRC's website.

¹⁴International Standard on Quality Management (UK) 1: Quality Management For Firms That Perform Audits Or Reviews Of Financial Statements, Or Other Assurance Or Related Services Engagements.

Quality management

Our approach to quality management

Firmwide risk assessment process

Our Chief Risk Officer was appointed in March 2022 with a mandate to ensure the firm's risk management processes are robust and that we can report to our stakeholders reliably. Working alongside the Chief Executive and leadership teams, the priorities are to deliver a capable and action-centred enterprise risk framework, which can be effectively validated and assured, to record and systematise the firm's control, approval and consultation mechanisms, ensuring they deliver appropriate reporting and audit trails.

The focus throughout 2022 was to establish our SoQM in accordance with the requirements of ISQM (UK) 1 and ensuring this was in place by the standard's effective date of 15 December 2022.

Under ISQM (UK) 1, our Chief Executive has ultimate responsibility for our system of quality management and our Head of Audit has operational responsibility.

Quality objectives and risk assessment

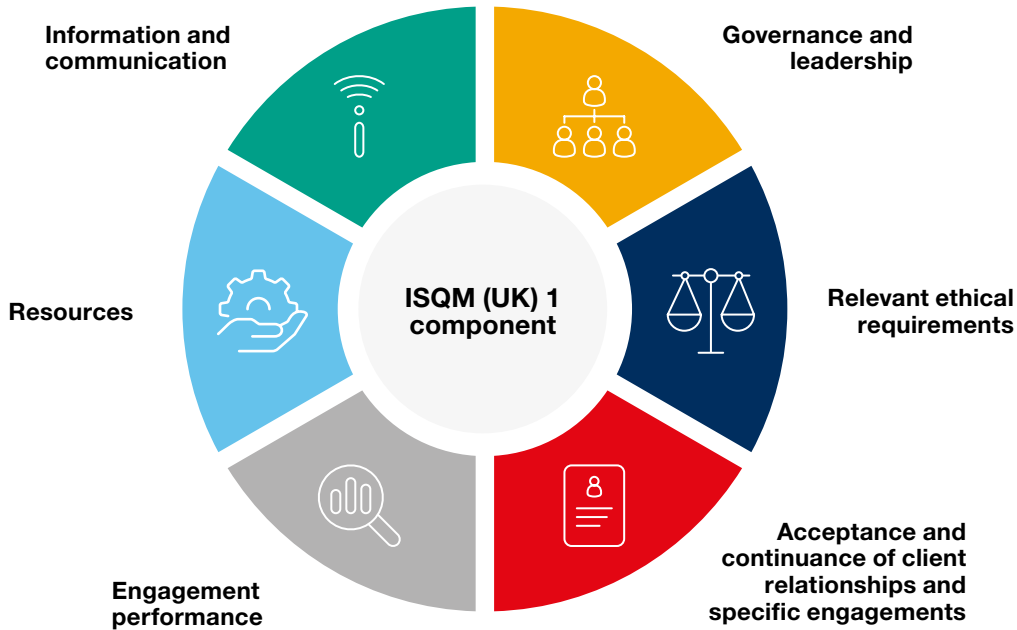
ISQM (UK) 1 requires a firmwide risk assessment process which will:

- identify and establish quality objectives, some of which are required by ISQM (UK) 1
- identify and assess the risk that those quality objectives will not be met
- design and implement responses to address those quality risks.

With the oversight of the Chief Executive, the Head of Audit and our Chief Risk Officer, we identified our quality objectives and then performed a thorough risk assessment. We have recorded our objectives, risk assessment and responses to those risks using a commercially available software platform.

Each risk identified was scored on a scale of 0-5 on probability and impact, where 5 means 'very likely' on probability and 'severe' on impact. In the first instance this was assessed on a 'gross risk' basis, i.e. without considering the policies, activities, actions and controls we have in place that we consider mitigate these risks (our responses). We then identified and documented those responses and assessed the degree to which we believe they mitigated the initial risk assessment to arrive at an assessment of residual risks. Where ISQM (UK) 1 requires specific responses, we have ensured that these are in place.

ISQM (UK) 1 identifies six areas where audit firms need to establish quality objectives and through this Transparency Report, we provide insight into how we approach these areas and how we believe we will achieve our quality objectives.



The final element of the SoQM is the need for the firm to undertake appropriate monitoring activities and to identify whether there are findings from those activities and other sources (for example external quality reviews) that indicate there may be deficiencies in the SoQM. We will complete our first evaluation of the SoQM no later than 15 December 2023, in line with the requirements of the standard.

We have recently established an SoQM Leadership Group who will regularly review the monitoring activities and consider remedial action that is needed if deficiencies are identified.

The SoQM leadership group will report through to the Audit Executive, Executive and Chief Executive with regular updates to both the Supervisory Board and Public Interest Committee.

SoQM Leadership Group	Members
Steve Gale	Head of Audit
Christine Dobson	Quality Assurance Partner
Ian Weekes	Ethics Partner
Gwyn Griffiths	Chief Risk Officer
Andrew Gambier	Director, Audit Quality

Ethics and independence

We are committed to acting with the highest standards of integrity and in accordance with the ICAEW's Code of Ethics and the FRC's Ethical Standard. Our policies are set out in an Ethics Manual and matters concerning ethics are covered within our internal training programmes.

All queries, notifications and judgements relating to ethics and independence are required to be logged through an ethics application and database. The Ethics Partner, with the assistance of a director in the National Audit Support team, reviews all entries on the database and will form and communicate any necessary judgements and responses.

As required by the Ethical Standard, the Ethics Partner reports to the FRC every six months on any matters that have been identified as a breach of the Ethical Standard or our own policies.

We have policies and processes to ensure that the firm complies with the requirements of legislation and regulations around the length of engagement as statutory auditor of PIEs, and to ensure appropriate rotation of audit partners and senior members of the audit team. The rotation of audit partners and Engagement Quality Control Review (EQCR) partners on PIEs, Other Entities of Public Interest (OEPs) and listed companies is monitored by the Head of Audit.

Details of our rotation policies and other ways that we ensure independence can be found in Appendix 4.

Acceptance and continuance

We recognise the importance of appropriate acceptance and continuance processes throughout the firm. Due consideration is given to both client take-on and continuance across our audit engagements. We are mindful that the firm's commercial and other strategic priorities do not compromise client acceptance and continuance decisions.

Certain engagements that meet high risk, public interest, fee and or other key characteristics are subject to our formal acceptance committee process which involves at least one member of the Executive. In addition, all our people undertake annual anti-money laundering training.

To meet the future needs of the business, we are planning further investment in our client acceptance processes including a new platform.

How we do our audits

Audit engagement partners

At 31 March 2023 we had 46 Responsible Individuals (RIs) of which two were not partners, with a total of around 600 people involved in delivering audit services.

The firm is a PIE auditor under the PIE Auditor Registration Regulations and 10 of our Responsible Individuals are registered as PIE RIs.

Where new RIs are proposed, either through an external hire or internal promotion, a proposal form is submitted to the Head of Audit. Candidates will have an interview with the firm's Senior Development Panel and a technical interview with a senior member of the National Audit Support team plus an experienced audit partner. Once feedback from both processes is received, the Head of Audit will make a recommendation to the Audit Executive as to whether an application for RI status should be made.

All RIs receive an annual Audit Partner Quality Indicator (APQI) report for discussion in their annual appraisal meeting. Prior to issue, the APQI reports are reviewed by the RI Review Panel, which allocates a quality grade to each audit partner. The RI Review panel is chaired by the Head of Audit and the other members are the Quality Assurance Partner, the Ethics Partner, Head of London Corporates, Head of Social Purpose and Non Profits and Head of Pension Funds. The Head of Audit provides a summary report to the Audit Executive and issues the APQI report to the audit partner and their appraiser.

The APQI reports are compiled by the Quality Assurance Partner and include details of the results of any internal or external quality reviews undertaken in the year, the partner's record of completing required training and any other matters that impact audit quality such as complaints, breaches of ethical standards or adverse regulatory findings.

Our audit teams

Our audit teams operate from our offices in London, Cheltenham, Maidstone, Manchester, Oldbury, Reading and Tunbridge Wells and are organised into seven management groups: London Corporate Audit, London Non Profits, London Pensions, Kent, Thames Valley, Midlands and South West, and Manchester.

Each office/unit manages and reviews the portfolios of audits held by partners and managers. We use a software tool that is employed across all offices/units to manage and plan the people resources needed for audit assignments of those below manager level.

We run accreditation programmes for the audits of listed companies, charities and pension funds. Audit partners and senior audit team members acting on those audits must have the appropriate accreditation. These sector groups operate on a national basis and run across the offices/units.

Engagement Quality Control Reviews (EQCR)

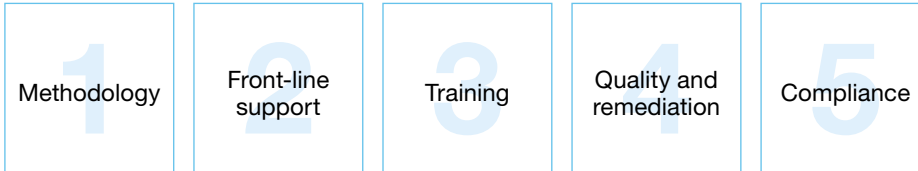
The EQCR regime is a core element of our approach to ensure that audits are performed to the appropriate standard. An EQCR partner is appointed when required by auditing standards, the FRC's Ethical Standard and our own policies. The Ethics Partner may also require an EQCR partner to be appointed as a safeguard to an ethical threat and an audit engagement partner may additionally request an EQCR partner be appointed based on their own risk assessment for the audit.

EQCR partners are appointed by the Head of Audit or, where he is the engagement partner or otherwise conflicted, the Ethics Partner or Deputy Ethics Partner. When appointing an EQCR, the Head of Audit will consider their experience, any specialist knowledge that is required, and whether they have sufficient time for the role. Our audit software includes work programmes covering the responsibilities and work to be undertaken by the EQCR partner and we have policies and procedures in the event there is a difference of opinion between the audit engagement partner and the EQCR partner.



National Audit Support

The National Audit Support team is our central team that supports the audit practice. Its activities come under five elements.



As part of our drive to improve audit quality we continue to invest in and build this team, which has seen significant growth over the last four years and further recruitment is planned. Over the last year we have developed our focus on the five elements with senior members of the team allocated to lead in their specific areas.

Methodology

Our audit methodology is developed internally and delivered using a commercially sourced software platform, which is supported by our National Client Solutions team.

In May 2022, in recognition of the requirements of auditing standards and the increased emphasis on improving audit quality, we updated our audit methodology and released a new audit platform that we have named 'Crystal'. Crystal is mandatory for audits for periods ending 31 December 2022 and includes updates designed to improve risk assessments based on our knowledge of the entity, including better documentation. It also provides a system for recording and following up on points identified during the audit, and a system of dashboards that allow audit teams to track the progress of the audit.

Where enhancements are identified through our review processes or through other means such as our close scrutiny of regulatory matters, supplemental materials and training are provided.

Supporting materials and guidance are provided through the National Audit Support team site within our intranet and are communicated to audit personnel on a timely basis. The teams in specialist areas such as listed companies, non profits and pension funds work with National Audit Support to develop additional, sector specific guidance as required.

Audit files are maintained in a secure cloud environment, enabling efficient and effective working for audit teams, whatever their location.

We continue to examine how new technologies can be utilised in audit work and our National Audit Support team works with our Client Solutions team to develop tools for use by our audit teams.

Our audit work programmes include compulsory elements dedicated to ethical requirements to ensure that these areas are considered at set stages on all audit engagements.

The firm's policy for the assembly of final engagement files on a timely basis after signing the audit report is shorter than that required by auditing standards.

Front-line support

Our front-line support function has three elements.

- 1 Helpdesk for formal and informal consultations.
- 2 In-Flight Technical Support.
- 3 Assistance for audit teams when dealing with enquiries from external inspections or investigations.

During the year, we introduced a new consultation workflow to ensure we capture and record the more formal consultations that are required and provide evidence for audit files.

In-Flight Technical Support (IFTS) was introduced during the year to provide support to audit partners and their teams on certain of our higher risk audit assignments. Initially, the scope of IFTS was centred around the audits of companies listed on the premium segment of the London Stock Exchange and other listed companies meeting certain criteria. IFTS is designed to ensure that there has been adequate consideration and documentation in areas of the audit where key judgements are likely to be required, including ensuring that there has been adequate challenge of management and exercise of professional scepticism.

Training

The training for our audit teams falls under two programmes: Evolve (for qualified personnel up to and including the partners) and Engage (for those in training). The National Audit Support team develops learning programmes designed to ensure that all audit personnel have the appropriate skills and competencies that they need to do their job. The training programme is designed to ensure that audit personnel are aware of upcoming changes to standards, legislation and regulation, changes and enhancements to methodology and lessons to be learned from audit quality reviews.

We continue to develop different types of training designed to provide a variety of means by which audit teams can learn. Aside from the formal courses, teams have access to shorter 'drop-in' sessions which can be run in a physical or virtual environment. We are also planning our first national audit conference which will be held at the start of January 2024.

The training team works with People Development to ensure that courses are available through the MyDevelopment platform and to monitor the attendance at courses, conducting the appropriate follow-up. The team is also working to enhance how training is delivered to ensure that it can include elements of evaluation so that learning objectives are met.

As our experience and understanding of RCA develops, we will seek to learn from good quality outcomes and to push our analysis into even more deep-rooted areas of the firm.

Quality and remediation

This function deals with matters arising from quality reviews including carrying out RCA, thematic reviews and ensuring that action plans formed in response to findings are actioned and completed appropriately.

During the year, the firm engaged with a specialist provider to carry out some RCA projects, deliver training and to provide us with a software solution that we have adopted for our ongoing RCA programme. The depth of RCA activities will vary depending on the finding from a desktop exercise through to full workshop-based exercise, which may be facilitated by an external specialist. Recommendations arising from RCA projects are reported to the Audit Executive.

Our initial RCA reviews have sought to understand the root causes in audit files that have been graded 3 or 4 in internal or external file reviews. Issues that have been identified and are being remediated have led to methodology enhancements, software changes and targeted training.

Compliance

The compliance function assists the Head of Audit in fulfilling their responsibilities under Audit Regulations, the FRC PIE Audit Registration Regulations and the requirements of other regulators.

Resources

Our people

Our people are key to the quality of our work. We recognise the need to ensure that not only are our people adequately trained but that we promote an appropriate culture, where the quality of work is paramount and there is an environment where they feel empowered to speak up.

Philosophy

Our philosophy remains unchanged: we remain committed to giving our people access to rich, fulfilling careers and the opportunity to work with talented, diverse professionals to learn, grow and progress.

From early careers through to partner, we ensure that our people are technically competent and demonstrate sound knowledge, the ability to exercise judgement, professional scepticism, sound business ethics and effective management and leadership.

Recruitment, resourcing and retention

Our innovative, flexible and yet personal approach to recruitment, plays a big part in providing an enjoyable and engaging recruitment and onboarding experience. While retaining the talent we have is a priority, we have also continued to use additional resourcing strategies by utilising individuals and teams overseas through third-party providers. We have ensured that we continue to bring on board individuals who come from a diverse talent pool and have skills, behaviours and attributes that are in line with our competency requirements to meet our commitment to quality in all our service lines.

Talent management is conducted largely through a formal annual appraisal process, which reviews performance, achievements and considers areas for ongoing professional and personal development. We encourage our managers and people leaders to provide regular feedback, praise and recognition to their people and teams throughout the year; providing timely and relevant guidance to make more immediate improvements and adjustments.



Our competency framework sets out the technical skills as well as knowledge and behaviours required from individuals operating at different levels within the firm. While quality is identified as a key competency for those working in audit, it is also a requirement that members of the audit practice have clear objectives that relate to audit quality.

As part of their annual appraisal process, all audit partners⁵ receive an APQI report, which is sent to their appraiser for discussion in their appraisal meeting.

Those who are appraising non-audit partners are also made aware of any issues that have impacted on audit quality, such as ethics and independence.

Our apprentices and trainees receive regular feedback and reviews – in line with ICAEW training guidance – to ensure that they meet the requirements of both the ICAEW training review process as well as the apprenticeship programme.

All professionally qualified people are required to assess their continuing professional development (CPD) annually. They reflect on their role and identify the learning and development they need to complete, to ensure they remain competent to carry out that role. The ICAEW is introducing a new CPD framework as well as developing a competency framework for individuals involved in audit work and we will be developing our policies to apply that framework by its effective date of 1 November 2023.

⁵This report is also produced for Responsible Individuals who are not partners.

Learning and development

We remain committed to ensuring that our people receive the training and development that they need to effectively perform their roles and continue their personal and professional development.

We have adopted new technology and techniques to support the delivery of learning and development activities within our established development pathways. These include online learning and webinars, apprenticeship programmes, technical update courses, skills workshops and management and leadership development programmes.

We launched our new learning management system, MyDevelopment, in autumn 2022 to support a more flexible approach; providing learning and development opportunities to all our people that will help them grow, progress and flourish. Everyone has access to their own personal learning dashboard where they can identify courses they need or wish to attend and can keep a record of other learning activity that they undertake. MyDevelopment also improves visibility on course attendance and provides a more robust management system.

Equality, diversity and inclusion

We encourage celebration and promotion of the diversity in our teams and the benefits that this brings us as a firm, individuals and the quality of work we deliver. Our Equality, Diversity and Inclusion (ED&I) initiative has continued to develop and thrive in the year resulting in a culture where everyone has the opportunity to succeed, creating an environment where our people feel that they can bring their whole self to work.

Our national ED&I Steering Group receives input from each of our network groups – made up of more than 200 champions and allies. There is a clear operating framework and firmwide objectives, with a focus on the future. We continue to make progress with a wider diversity agenda, including disability, neuro-diversity, wellbeing, social mobility and the link to our overarching ESG approach. Our leadership team is actively engaged in supporting, championing and leading local and firmwide activities and projects because the firm recognises the positive role it plays for our people and our business.



Wellbeing, and the sense of belonging, continues to be of paramount importance. We have continued to share regular updates and news from around the firm through our weekly firmwide newsletter 'We are Crowe', to help our people feel informed and connected. Our National People team continues to work with the firm's benefits providers and other third parties to continually enhance the support already provided through programmes and platforms focused on mental, physical and financial wellness, as well as a range of other needs.

Our fourth YouCount survey was conducted in May 2022. Details of this appeared in our 2022 Transparency Report and is reproduced in Appendix 5. The next YouCount survey is planned for later this year.

Recognition

Our annual 'Pinnacle Awards' are a great opportunity to recognise, celebrate and showcase the contribution of our people with awards recognising leadership, client service, outstanding achievement and living our values.

We hold a gala dinner and awards ceremony but also live-stream this event to all our people for maximum engagement and to allow everyone in the firm to celebrate the success of their colleagues.



Technology and innovation

We have continued to invest in technology and innovation and during the year we appointed our first Chief Innovation Officer who is responsible for implementing the firm's strategy on technology.

Their role also includes ensuring that we are aware of emerging technologies both from the viewpoint of how our approach needs to respond to them but also how we can use them in our work, for example robotic process automation and artificial intelligence.

There is a range of technology tools that can be deployed in our audits by our core teams, which are provided by our National Client Solutions team. The CaseWare Support team, which is responsible for the maintenance and delivery of our audit platform, sits within National Client Solutions.

The National Client Solutions team works closely with National Audit Support to ensure a collaborative approach. Over the course of the last year, there have been ongoing initiatives around automating evidence gathering, data extraction and ingestion, analytics and open banking. There is a dedicated hub on our intranet to document what's available and share knowledge with teams including training resources for specific tools.

Potential new technology tools are subject to an established process of 'Define, Select, Test, Approve' before being released to the business. This process ensures technology is acquired to fill specified needs and is tested and approved to meet the specifications required.

An enablement team then supports the audit business in implementation change management to ensure it fits the methodology and competency framework appropriately.

We take data security and privacy seriously. As part of our ongoing efforts, we continue our re-certification in Cyber Essentials Plus and ISO 27001 for the Technology function, demonstrating our dedication to best practices and meeting internationally recognised standards. Reviews and enhancements of our security readiness take place regularly, based on evolving threats and industry best practices. We have external audits in respect of our ISO 27001 accreditation and ISO certification and provide ongoing training to everyone in the firm to foster a culture of security awareness.

We are collaborating with Birmingham City University on a Knowledge Transfer Partnership partially funded by Innovate UK. This will give our people the opportunity to learn from academics at the university and the graduate has the opportunity to apply their knowledge in a professional working environment. Our project is designed to increase the use of data analytics tools across audit, assist with selection of appropriate tools for specific audits and enable governance and oversight of the use of technology tools across the audit portfolio.

Managing enterprise risk

Managing Risk


In addition to the implementation of ISQM (UK) 1 during the year, we continue to invest in our wider enterprise risk management.

We appointed a Chief Risk Officer in March 2022 and following the appointment of our Independent Non-Executives on 1 April 2023, we have also established our Public Interest Committee and Audit and Risk Committee (ARC).

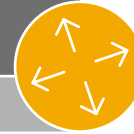
In April 2023, the Chief Risk Officer spent time with the Executive and Supervisory Board to refresh the firm’s Enterprise Risk Framework, focusing initially on the strategic risks facing the organisation. Initiation of a new enterprise-wide risk management platform commenced in July 2023 to support an action-driven response to enterprise risks, which will improve responses to risk and transparent reporting to the Executive, Supervisory Board and Audit and Risk Committee.

The following section provides a summary response to the risks that have been identified. Throughout this Transparency Report we have set out in more detail how the firm responds to some of these risks, in particular those related to audit quality.

Our most significant enterprise risks

Audit Quality 	
Risk	Response
<p>Failure to achieve appropriate levels of audit quality.</p>	<p>We have implemented ISQM (UK) 1 and established our SoQM – a significant step as the firm seeks to make further improvements to audit quality. We see this as a continual process as we evolve, with the need to reevaluate, reassess and revise as appropriate. We are undertaking our monitoring and remediation processes and will undertake our annual evaluation later in the year.</p> <p>The firm develops action plans to respond to points raised in quality assurance reviews, whether by internal or by external parties, including the FRC and in respect of their Annual Supervision letter from the FRC. Fulfilling those action plans is of key importance in ensuring that identified deficiencies are remediated on a timely basis to ensure that improvements in audit quality are achieved. Progress on the action plans is monitored by the Audit Executive.</p>

Regulatory and legislative change



Risk	Response
<p>Failure to adapt the structure, operation and governance of the firm in response to regulatory/legislative change or commercial need.</p>	<p>In response to the growth of the firm in recent years, the scale and nature of the clients we are now working with, and the evolving challenges that these bring, the firm is reviewing its governance arrangements and management structures. We have appointed INEs as part of our adoption of the AFGC and established our SoQM in line with the requirements of ISQM (UK) 1.</p>

People and talent



Risk	Response
<p>Being unable to recruit and retain the right talent to deliver our strategy, including wellbeing strategies, people management and ED&I.</p>	<p>The talent agenda is at the top of the firm's risk register. The firm's Chief People Officer is an equity partner, recognising the importance of this key role.</p> <p>The Chief People Officer is accountable to the Executive and success measures include recruitment and retention targets, as well as quality standards for training and development.</p>

Environmental, social and governance



Risk	Response
<p>Failure to respond to evolving ESG risks</p>	<p>We are continuing to develop our ESG strategy and are committed to ensuring that we fulfil our obligations in respect of the environment, the communities that we work in, diversity, social mobility, sustainability and governance.</p> <p>In July 2023, the Science Based Targets initiative (SBTi) approved our near-term science-based emissions reduction target.</p>

Profitable growth, resilience and financial sustainability



Risk	Response
<p>Failure to define and execute a strategy that is supported by an appropriately resourced operational plan, structure and resilient business model.</p>	<p>The firm continues to evolve strategic thinking around quality, digital transformation, rewarding people experience, delivering change and leadership. At the same time, we ensure the firm remains profitable, cash generative and financially resilient. Our recent growth has been achieved through continual investment in resources combined with actions to better align our resources with our current and planned workloads. Work continues to develop our risk framework to ensure we remain strong and resilient.</p>

Technological relevance



Risk	Response
<p>The risk of reduced relevance of current product offerings and solutions due to new or advanced technology underpinning new business models and cost structures, under-investment in new and advanced technology or inadequate response to non-traditional disruption.</p>	<p>The Executive has a regular strategy session with business leaders to identify business development opportunities using technological solutions.</p> <p>The firm appointed a Chief Innovation Officer during the year, whose role is to seek out new solutions to existing business services and processes. The use of technology will enable practitioners to:</p> <ul style="list-style-type: none"> • access an improved knowledge base • allow better advice and higher quality work • make decision making more dynamic.

Cybersecurity and data protection



Risk	Response
<p>Firewall breach or successful phishing attack leading to a ransomware attack, denial of services, theft of client data and financial cost.</p>	<p>The firm operates an information security management system (ISMS), designed to meet the requirements of ISO 27001, a key part of which is cyber and data security.</p> <p>We have a comprehensive range of preventive measures to minimise the possibility of successful attack, including physical and technological security, and training and regular awareness checks for our people.</p>

Monitoring and remediation

Internal quality monitoring

We have an extensive internal quality assurance review programme to monitor the quality of the audit work we perform.

Our internal Quality Assurance Reviews (QARs) are led by the Quality Assurance Partner and run by the National Quality Assurance Director.

The firm's Quality Assurance Review process also considers certain firmwide procedures. During the year, we reviewed a sample of files for compliance with the firm's ethics requirements and also performed a limited review of training course attendance and processes for appraisal and promotion. RCA was performed in the year on the firm's processes for tracking ethical compliance, and a number of improvements are being introduced as a result.

Our quality assurance reviewers are experienced auditors and, where audits are in a specialised sector, are required to have the appropriate skills and experience to carry out the review.

Where necessary, we continue to use additional resource from outside of the firm to perform some of the reviews where we consider they have the required specialist skills and knowledge.

Our policy is that we monitor the audit work undertaken by all audit RIs at least every other year. We also review an appropriate proportion of our higher risk audits annually, which may mean that some RIs are reviewed every year and, in some cases, on more than one audit file. New RIs (whether internally appointed or experienced hires) are selected in both of their first two years and any RI who was given an unsatisfactory audit quality grade by the RI Review Panel based on their APQI report (which includes anyone who had a file graded 4 in the previous round) is also selected.

In agreement with the FRC in 2022, we increased the number of file reviews by 25%. We also agreed to provide the FRC with six-monthly reports on the results of our file reviews. The first report covered six months ending 31 December 2022.

File reviews are carried out using a bespoke programme and are graded using a scoring system designed to mirror, as far as possible, the system used by the external regulators.

We have set a number of key performance indicators (KPIs) based on the grades achieved. These KPIs are unchanged from the previous period.

The results of the individual file reviews are discussed with the partner and manager responsible for the work, who are required to respond in writing to the matters arising.

Where the audit file reviewed has also been subject to an EQCR, the review also considers the quality and adequacy of the work conducted by the EQCR partner. If the overall file grade is unsatisfactory, the reviewer will consider whether the EQCR should have identified the issues that led to the file score. If they do, they will note an 'EQCR improvement point' and this will be fed back to the relevant partner and noted on their APQI.

The Quality Assurance team meets with the Head of Audit and the National Audit Support team on a regular basis, to ensure that any significant matters are raised on a timely basis and to enable action to be taken promptly, such as amendments to guidance or methodology or inclusion in training modules and material.

At the conclusion of the reviews, the Quality Assurance Partner produces a formal report setting out the results of the reviews and the key findings. That report includes actions to address the issues raised by the QAR.

In previous years, the annual QAR report has been distributed to all partners and RIs by the Chief Executive and an abridged version of the report distributed to all audit personnel. Given the change in timing of the QAR process, a consolidated report covering reviews conducted in the 12 months ended 30 June 2023 will be prepared and distributed thereafter.

Internal monitoring results

The firm now conducts the review of internal file reviews in six-month periods where it previously had an annual cycle based on a year ending 31 March. The 2022/2023 results in the table below are the aggregate of the reviews in the six months ended 31 December 2022 and 30 June 2023.

Key Performance Indicator	2022/2023	2021/2022	2020/2021	2019/2020
Proportion of files scoring 1 or 2 should be at least 75%	80%	66%	58%	50%
KPI achieved?	Yes	No	No	No
There should be an increase in the proportion of files scoring 1 or 2	14%	8%	8%	(19)%
KPI achieved?	Yes	Yes	Yes	No
There should be no files graded as 4	3	2	1	2
KPI achieved?	No	No	No	No

The increase in the number of files graded 1 and 2 is encouraging and means that we have met our KPI in the period of having at least 75% of the files graded as a 1 or 2. While we are encouraged by these findings, we are not complacent. It is disappointing, and unacceptable, that there has been an increase in the number of files that have been graded 4. We have already carried out RCA on one of the files and developed solutions designed to help prevent matters identified from recurring. RCA on one of the other two files has already commenced.

Crowe Global quality review

As a member of Crowe Global, we are subject to a quality review every three years and the last inspection was concluded in 2022.

The scope of the quality review included understanding the results and response to external monitoring and internal monitoring, testing of the operation of the firm's system of quality control, and the review of completed audit engagements. Matters arising from the review of individual engagements were discussed with the relevant engagement partner and, at the conclusion of the review, a report was sent to the Head of Audit with a summary of findings from file reviews and other observations relating to the system of quality control and audit quality. The overall results of the review were satisfactory and no significant issues arose.

External inspections

External monitoring is carried out primarily by the FRC and the ICAEW.

The Audit Quality Review team (AQR) of the FRC carries out a firmwide inspection every three years. This includes a review of firmwide processes and an inspection of audit files within its scope. Interim file inspection may also take place between full inspection visits and the results of those are incorporated into the final firmwide report.

The last firmwide inspection, covering the period from June 2021 to February 2022, was finalised in May 2023. Details of that inspection were included in our 2022 Transparency Report. Through the year, we have continued to progress the actions from the plan that was agreed with the FRC as part of the finalisation of that report.

One interim file inspection was started in the period covered by this Transparency Report.

In December 2022, the FRC published their first report on inspection findings in the Tier 2 and Tier 3 firms. The information in that report is aggregated and anonymised as there is a statutory confidentiality requirement which applies to individual inspection reports. Given the small number of PIE audits, and consequently the small number of file inspections that the AQR carries out at Crowe, we do not publish the detail of individual file inspection results as

that would risk identifying how the FRC had assessed the audits of specific entities.

The Quality Assurance Department (QAD) of the ICAEW has completed their 2022 inspection and provided us with their report.

QAD inspections cover a cross-section of the firm's non-PIE audit clients, weighted towards those of greater public interest and specific areas of risk. The files reviewed in 2022 included two audits involving construction contracts, following up on matters identified at the 2020 inspection.

The results of our 2022 inspection were disappointing when compared to previous visits and the average results identified by the ICAEW. The timing of the audits inspected by the QAD was before some of the actions and initiatives agreed with the AQR could be instigated but the QAD report also highlighted certain other areas where we need to make improvements.

Details of the results from the QAD report are set out below.

RCAs have been conducted for files graded 3 and 4. Additionally, we have committed to providing guidance and support to teams conducting audits with long-term construction contracts, including undertaking a 'hot review' of the work in that area on the relatively small number of audits we have that include long-term construction contracts.

Grade	2022 ⁶	2020
1 and 2 Good	5	7
3 Improvement required	3	2
4 Significant improvements required	1	0
Total	9	9

⁶The scope of the file reviews in the two visits is not directly comparable as three of the reviews in 2022 were focused in nature in terms of a particular area of the file (2020 one file review).

In October 2021, the FRC announced that it was conducting an investigation into one of the firm's audits under the Audit Enforcement Procedure. This investigation remains ongoing.

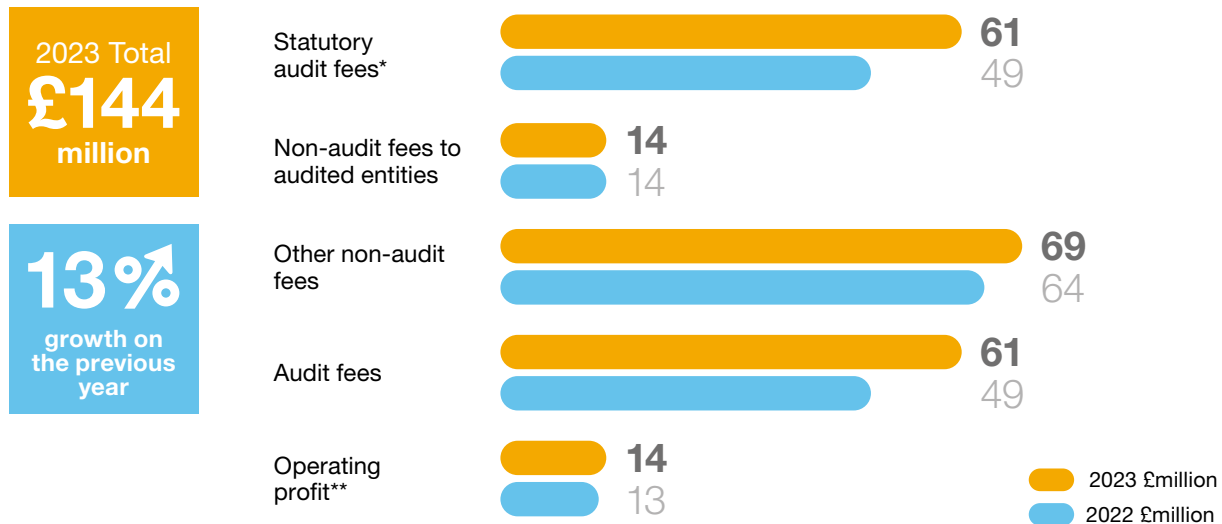
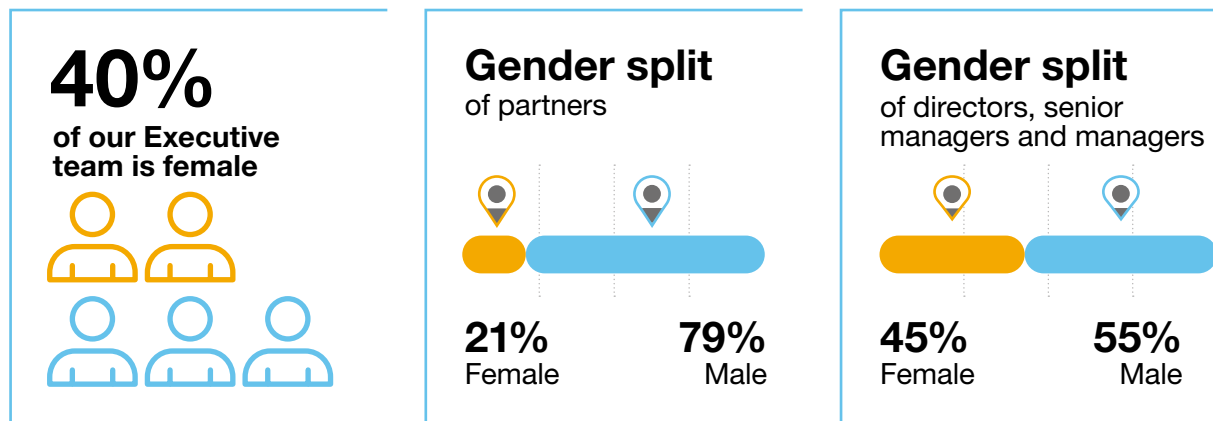
At the time of writing, we have two audit matters subject to constructive engagement with the FRC. There are four audit matters with other regulators.

There have been no matters in the year ended 31 March 2023 which resulted in an adverse finding under the ICAEW's disciplinary processes. Details of past findings against the firm can be found on the [ICAEW's public disciplinary database](#).

Appendices

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Appendix 1: Facts about Crowe in the UK and figures as at 31 March 2023



* Statutory audit fees include £1.5 million (2022: £1.1 million) from the audit of PIEs and entities within PIE groups.

** Operating profit is calculated after charging direct employee costs and allocating other overheads (such as space costs, IT and general practice costs). In 2023 the basis of allocation of other overheads to service lines was reviewed and amended. The operating profit for 2022 relating to audit fees disclosed above has been restated on this amended basis.

Appendix 2: Involvement in committees and working groups

Crowe takes an active role in developing best practice and quality within the accountancy profession. This is demonstrated by the involvement of our partners in committees and working groups, some of whom are outlined below.



Shona Harvie
Partner, Pension Funds

Positions held:
Chair, Pensions Research Accountants Group (PRAG)
Member, PRAG SORP working party
Member, PRAG/Investment Association working party



Naziar Hashemi
Partner and Head of Social Purpose and Non Profits

Position held:
Member, ICAEW Audit Insights Group on the Not for Profit Sector
Vice Chair, ICAEW Charities Committee



Michael Jayson
Partner, Audit

Position held:
Member, ICAEW National Technical Advisory Committee



Ryan Ketteringham
Partner, Corporate Audit

Position held:
Member, LLP SORP Steering Group



Andrew Penketh
Partner and Head of Pension Funds

Positions held:
Chair, joint ICAEW/Pensions Regulator Master Trust Assurance Framework working party
Member of ICAEW Pensions Sub Committee



Julia Poulter
Head of Social Housing

Position held:
Technical Advisor to the Housing SORP working party

Appendix 3: Major audits

The table below lists the entities we audit which were PIEs or otherwise listed on a recognised exchange, together with major non profits and pension schemes, where we carried out audit work in the year ended 31 March 2023.

4basebio Plc	Citius Resources Plc*
4Global Plc	City's Cash
AA Pension Scheme	Civil Aviation Authority Pension Scheme
AB Dynamics plc	Cleantech Building Material plc
Achieving for Children	Cleantech Lithium Plc
Action For Children	Columbus Midco Limited
Adept Technology Group plc	Compass Group Pension Plan
Age UK	Contango Holdings Plc*
Airea Plc	Coral Products Plc
Alkemy Capital Investments Plc*	Curzon Energy Plc*
Alphabet Bidco Ltd (Phoenix Datacom Group Limited)	Destiny Pharma Plc
Altitude Group Plc	Dillistone Group Plc
Angus Energy Plc	Dimensions (UK) ltd
Aquila Services Group plc*	Disasters Emergency Committee
Archbishops' Council	Dogs Trust
Asiamet Resources Limited	DP Poland Plc
Atome Energy Plc	DXS International Plc
Aviva Master Trust	East Imperial Plc*
Axa Uk Group Pension Scheme	Echo Energy Plc
BAA Pension Scheme	Elixirr International Plc
Bank of England Pension Fund	Ensco 1322 Limited
Barkby Group PLC	E-Therapeutics plc
Begbies Traynor Group Plc	Facilities by ADF Plc
Big Technologies plc	Ferro-Alloy Resources Limited
Birmingham Children's Trust	First Tin Plc*
BiVictrix Therapeutics Plc	Gama Aviation plc
Blencowe Resources Plc*	General Medical Council
Bloomsbury Publishing Plc*	GenFinance II plc*
Bowen Fintech plc*	Glenstone Property Plc
Bricklane London REIT Plc	Grand Fortune Highgrade Limited
Bricklane Residential REIT Plc	GXO Logistics Pension Scheme
Byotrol Plc	Harmsworth Pension Scheme
Campus Living Villages (Bond Issuer) UK Plc	Hawkwing Plc*
Campus Living Villages (Goldsmiths) Issuer Plc	Haydale Graphene Industries Plc
Centaur Media Plc*	HeiQ Plc*
CentralNIC Group plc	Herefordshire Capital Plc*
Chamberlin plc	Hornby Plc
Change, Grow, Live	Howden Joinery Pension Plan
Chapel Down Group PLC	Hydrogen Future Industries Plc
CHARM Finance plc*	Induction Healthcare Group Plc
Church of England Funded Pensions Scheme	Insig AI plc
Church of England Pensions Board	IPPF

Ironveld Plc
 Jarvis Securities plc
 Jubilee Metals Group plc
 Katoro Gold Plc
 Kendrick Resources Plc*
 Lafarge UK Pension Plan
 Libertine Holdings Plc
 Likewise Group Plc
 Lunglife AI Inc
 LV= Employee Pension Plan
 M Winkworth Plc
 Made Tech Group Plc
 Mars Associates Retirement Plan
 Mast Energy Developments Plc*
 Master And Fellows Of University College Oxford*
 Medcaw Investments Plc*
 Medicash Health Benefits Limited*
 Mercer Master Trust
 Methodist Homes Housing Association Ltd
 Mining, Minerals & Metals Plc*
 Mitchells & Butlers Pension Plan
 Molecular Energies Plc (former President Energy Plc)
 National Audit Office
 National World Plc*
 Northamptonshire Children's Trust
 Notting Hill Genesis (inc Gen Finance II plc)*
 NSPCC
 Oncimmune Holdings Plc
 Oxfam GB
 Panther Securities Plc
 Pearson Pension Plan
 Pelatro Plc
 Pennpetro Energy Plc*
 Phoenix Copper Limited
 PHSC Plc
 PipeHawk plc
 Plexus Holdings plc
 Polarean Imaging Plc
 PSA Group UK Pension Plan
 Public Policy Holding Company, Inc.
 Royal College of Nursing
 Royal Horticultural Society

Royal Mencap Society
 Royal Society for the Protection of Birds (RSPB)
 Saffron Housing Finance plc*
 Samarkand Group Plc
 SDX Energy Plc
 Seena Plc
 Shaw Trust Limited (The)
 Sheffield City Trust
 Sightsavers International
 Silver Bullet Data Services Group plc
 Silverwood Brands Plc
 Sivota Plc*
 Skillcast Group Plc
 Smiths Industries Pension Scheme
 Sound Energy PLC
 Sunrise Resources Plc
 Supply@ME Capital Plc*
 Tavistock Investments Plc
 Tertiary Minerals Plc
 The Alumasc Group Plc
 TMT Acquisition Plc*
 Trellus Health Plc
 Trufin plc
 Turning Point
 UNICEF - UK
 Unison
 Upland Resources Limited
 Vast Resources Plc
 Verditek Plc
 Verici Dx Plc
 Water Intelligence plc
 Wausau Insurance Company*
 Weird Fish Clothing Limited
 Xerox Final Salary Scheme
 Xpediator Plc
 Zytronic Plc

* Entities that are Public Interest Entities within the meaning of the Statutory Auditors and Third Country Auditors Regulations 2016.

Appendix 4: Independence policies

Maintaining independence

We do not permit any of our partners or employees to hold financial interests in audit clients unless expressly permitted by the Ethics Partner based upon the specific circumstances. For non-audit clients, our policy is that no members of the engagement team should hold a financial interest in clients of the firm but, where this does occur, perhaps because of historical family Trusts, there are safeguards in place to ensure that objectivity is not compromised.

A list of prohibited investments is maintained and published on our intranet, which identifies all listed companies that we act for and whether they are audit clients. We also notify Crowe Global of our PIE clients and they also maintain a prohibited investment list that is available to everyone.

Partners and employees (including members of offshore delivery centres) complete a statement of independence and confidentiality, which incorporates a 'fit and proper' form, on joining and, thereafter, on an annual basis. Any declarations on those forms that may indicate an issue regarding independence are reviewed and, where appropriate, suitable action is taken. The forms for partners are reviewed by the Head of Audit.

Conflict and independence checks are carried out on new and prospective clients according to independence requirements and the nature of the risk. If appropriate, for example for PIEs and multinational clients, these will extend to firms in the Crowe Global network. Additionally, where we use subcontractors for audit purposes, we carry out appropriate checks on independence and competence.

Partners are also required to notify the compliance team of all instances where they hold directorships or similar offices outside of the firm's normal business.

Rotation policies

The table below sets out the maximum time that an audit engagement partner and other senior individuals associated with an audit may undertake that role, whether through the requirement of the FRC's Ethical Standard or our own policies.

Role	PIE	OEPI	Listed	Other ⁷
Engagement partner	5 years ⁸	10 years	5 years	10 years
Key audit partner	5 years	10 years	5 years	10 years
EQCR	7 years	7 years	7 years	7 years
Other key partners	7 years	10 years	7 years	10 years
Senior people	7 years	10 years	7 years	10 years

Where an individual has held the engagement partner, key audit partner or EQCR roles for a PIE, Other Entity of Public Interest (OEPI) or listed entity, we impose a 'cooling off' period in which they have no further involvement with the client for five years following completion of their term. Other key partners and senior people must have no further involvement with the client for two years following completion of their term.

We introduced a new policy in the autumn of 2022 limiting the maximum period that an audit engagement partner can act in that role to 10 years. There are some transitional provisions and the Ethics Partner will continue, until the new policy is fully implemented, to consider whether any safeguards should be put in place to mitigate the long association threat. If no satisfactory safeguards are available, the Ethics Partner will require that there is a change to the audit team. Safeguards

that are available include as a minimum, the instigation of a second partner review or appointment of an EQCR.

The rotation of audit engagement partners and EQCR partners on PIEs, OEPIs and listed companies is monitored by the Head of Audit.

Networks and associations

As well as being members of Crowe Global, whose members are 'network firms' within the meaning of the FRC's Ethical Standard, we are the founding member of Accelerate, an association of independent accountancy practices providing business support, including technical and training resources, to its members. Accelerate is not a network within the meaning of the Ethical Standard.

⁷The Policy applies for audits of years ending on or after 31 March 2023, with transitional provisions.

⁸'Years' is taken as number of audit opinions; sign-off of historical financial information of a public interest assurance engagement is treated as one audit opinion in this respect. The periods referred to above include periods working for previous firms.

Appendix 5: YouCount survey

In May 2022 we conducted our fourth YouCount survey. Details of this appeared in our 2022 Transparency Report and have been reproduced below. We have taken a number of actions since the 2022 survey results and our next all people survey is planned during the current financial year.

Crowe YouCount 2022 % of respondents agreeing (‘Strongly agree’ or ‘Agree’)	All Crowe			Audit		
	Agree	Neutral	Disagree	Agree	Neutral	Disagree
I believe that the firm conducts its business activities with honesty and integrity	95%	4%	1%	94%	5%	1%
I have received the training I need to perform the job I'm doing	79%	15%	6%	79%	14%	7%
The firm provides the resources necessary for me to work effectively	81%	11%	8%	78%	11%	11%
I have sufficient time, support and training to carry out my work to the highest quality	60%	20%	20%	45%	23%	32%
I have access to the training/development I need to develop my career in the firm	68%	24%	8%	72%	22%	6%
I am clear on the career pathway for my area of the business and about what is expected of me in my role	68%	22%	10%	71%	20%	9%

Appendix 6: Crowe Global

Legal and constitutional structure

Crowe Global is an international network of independently owned and managed accounting and advisory firms that are licensed to use the 'Crowe' brand in connection with the provision of accounting, auditing, tax, advisory and other professional services to their clients. It is commercially organised under the laws of Switzerland as a Verein (Association), owned by its member firms. It operates through a wholly owned subsidiary incorporated under the laws of the State of New York in the USA where it is headquartered.

Crowe Global is a 'network' as defined under the Code of Ethics of the International Ethics Standards Board for Accountants (IESBA) and by virtue of its membership of the Forum of Firms. It is a non-practising entity and does not provide professional services in its own right.

The Crowe Global Transparency Report for the year ended 31 December 2022 presents the network's commitment to global standards.

This is available from the [Crowe Global website \(www.crowe.com/global\)](http://www.crowe.com/global).

A list of network firms that provide audit services and their countries can be found at the end of this appendix.

The revenue from audit services provided by network audit firms was USD \$1.81 billion in the year to 31 December 2022.

Leadership, governance and management

The Board of Directors (Board) is responsible for the governance of Crowe Global and is charged with overseeing the activities of the network, including setting strategy and policy. With the exception of the Chief Executive Officer, the Board is made up of individuals representing or elected by member firms in Crowe Global. Crowe UK takes an active role in shaping the future of the network and our Chief Executive sits on the Global Board and chairs the Audit and Risk Committee.

The Management Committee operates according to the responsibilities and authority that is delegated to it by the Board and oversees the daily management of the network's operations. It consists of the Chief Executive Officer, Chief Operating Officer, Regional Executives, the International Accounting and Audit Director and International Tax Director, and the Global Marketing Director.

The network's members and activities are co-ordinated in three geographies: Europe, Middle East and Africa (EMEA), the Americas and Asia Pacific.

Network committees are chaired by partners in member firms. Partners and employees in the UK take an active part in these committees as well as participating in training and other events, both as attendees and presenters.

The last 12 months has seen a move back towards in-person meetings and the first Global Conference since 2019 was held in Rome in October 2022.

Crowe Global audit firms

The following firms within the Crowe Global network provide statutory audit services.

Country	Firm	Region
Afghanistan	Crowe Horwath - Afghanistan	Asia Pacific
Albania	Crowe AL SHPK	EMEA
Algeria	Cabinet D'Audit Hamza et Associes	EMEA
Andorra	Alfa Capital Assessors I Auditors SL	EMEA
Angola	Crowe Angola - Auditores e Consultores, S.A.	EMEA
Argentina	Canepa, Kopec y Asociados	Americas
Armenia	Crowe & Asatryans LLC	EMEA
Australia	Crowe Horwath (Australasia) Pty. Ltd.	Asia Pacific
Austria	Crowe SOT	EMEA
Azerbaijan	Crowe Baltic Caspian Audit LLC	EMEA
Azerbaijan	ABAK-Az Crowe Ltd.	EMEA
Bahamas	Crowe Bahamas	Americas
Bahrain	Crowe BH	EMEA
Bangladesh	Ahmed Mashuque and Co.	Asia Pacific
Barbados	Crowe BDS SRL	Americas
Belgium	Callens, Pirenne & Co.	EMEA
Belize	Crowe Belize LLP	Americas
Bolivia	Crowe Horwath Bolivia SRL	Americas
Botswana	Crowe Goel & Associates	EMEA
Brazil	Crowe Consult Consultoria Empresarial	Americas
Brazil	Crowe Macro Auditoria e Consultoria Ltda.	Americas
Brazil	Consult Auditores e Consultores Associados	Americas
British Virgin Islands	Crowe (BVI) Limited	Americas
Bulgaria	Crowe Bulgaria Audit EOOD	EMEA
Cambodia	Crowe (KH) Co. Ltd.	Asia Pacific
Cameroon	Okalla Ahanda & Associes	EMEA
Canada	Crowe BGK LLP	Americas
Canada	Crowe MacKay LLP	Americas
Canada	Crowe Soberman LLP	Americas
Cayman Island	Crowe Horwath Cayman Limited	Americas
Chile	Crowe Auditores Consultores Ltda.	Americas
China	Crowe China Certified Public Accountants	Asia Pacific
Colombia	Crowe Co S.A.S.	Americas
Costa Rica	Crowe Horwath CR, S.A.	Americas
Cote d'Ivoire	Uniconseil	EMEA
Croatia	Crowe Hrvatska	EMEA
Curacao	ACC & Partners B.V.	Americas
Cyprus	Crowe Cyprus Limited	EMEA
Czech Republic	Crowe Advartis Audit s.r.o.	EMEA
Denmark	Crowe Statsautoriseret Revisionsinteressentskab	EMEA
Dominican Republic	Sotero Peralta & Asociados	Americas
Ecuador	Romero y Asociados Cia. Ltda.	Americas
Egypt	Crowe Dr A.M. Hegazy & Co	EMEA
El Salvador	Integrity Auditing Group, Ltda. de C.V.	Americas

Country	Firm	Region
Estonia	CDNW Group Ltd	EMEA
Finland	Maura Audit Oy	EMEA
France	Avvens Management	EMEA
France	Becouze & Associes	EMEA
France	Cifralex	EMEA
France	Cogefis Associes	EMEA
France	Crowe Reunion	EMEA
France	Dauge Fideliance	EMEA
France	Dupouy & Associes	EMEA
France	Fideliance	EMEA
France	Fiduroc	EMEA
France	Groupe Ficorec	EMEA
France	Crowe HAF	EMEA
France	RSA	EMEA
France	SAS Groupe Rocard	EMEA
France	Sogec	EMEA
French Polynesia	Horwat Tahiti	Asia Pacific
Georgia	Crowe GE LLC	EMEA
Germany	Dr. Kleeberg and Partners GmbH	EMEA
Germany	Möhrle Happ Luther Wirtschaftsprüfungsgesellschaft mbH	EMEA
Germany	HSA Horwath GmbH Wirtschaftsprüfungsgesellschaft	EMEA
Germany	RWT Crowe GmbH Wirtschaftsprüfungsgesellschaft Steuerberatungsgesellschaft	EMEA
Germany	BPG Beratungs- und Prüfungsgesellschaft mbH Wirtschaftsprüfungsgesellschaft Steuerberatungsgesellschaft	EMEA
Ghana	Veritas Associates	EMEA
Greece	Crowe SOL	EMEA
Guatemala	Vertice Financiero S.A.	Americas
Honduras	Horwath Central America, S. de R.L. de C.V.	Americas
Hong Kong	Crowe (HK) CPA Ltd.	Asia Pacific
Hungary	Crowe FST Consulting Kft	EMEA
India	V.P. Thacker & Co	Asia Pacific
India	JC Bhalla & CO.	Asia Pacific
Indonesia	Kosasih Nurdiyaman Mulyadi Tjahjo & Rekan	Asia Pacific
Iraq	Crowe Professional Auditors LV	EMEA
Ireland	Crowe Ireland	EMEA
Isle of Man	Crowe Isle of Man LLC	EMEA
Israel	Ovadia Pick Krieheli And Co.	EMEA
Italy	Crowe AS SpA	EMEA
Japan	Crowe Toyo & Co.	Asia Pacific
Jordan	Ibrahim Yaseen & Partners Co. – Professional Auditors	EMEA
Jordan	Al-Tillawi, Al-Khateeb Company & Partner Co.	EMEA
Kazakhstan	Crowe Kazakhstan	EMEA

Country	Firm	Region
Kenya	Crowe Erastus & Co.	EMEA
Kenya	Crowe COR LLP	EMEA
Kuwait	Cowe Al Muhanna & Co.	EMEA
Latvia	Crowe DNW SIA	EMEA
Lebanon	Crowe Professional Auditors LV	EMEA
Liberia	Crowe Liberia LLC	EMEA
Liechtenstein	Crowe Treuhand AG	EMEA
Lithuania	UAB Crowe LT	EMEA
Luxembourg	C-CLERC S.A.	EMEA
Malawi	Crowe J&W	EMEA
Malaysia	Crowe Malaysia	Asia Pacific
Maldives	Crowe Maldives LLP	Asia Pacific
Mali	Inter Africaine d'Audit et d'Expertise (IAE-SARL)	EMEA
Malta	Horwath Malta	EMEA
Mauritius	Crowe Horwath ATA	EMEA
Mexico	Gossler SC	Americas
Montenegro	Crowe MNE	EMEA
Morocco	Horwath Maroc Audit	EMEA
Mozambique	Crowe Horwath Mozambique Limitada	EMEA
Nepal	B. K. Agrawal & Co.	Asia Pacific
Netherlands	Crowe Foederer B.V.	EMEA
Netherlands	Crowe Peak B.V.	EMEA
New Zealand	Crowe Australasia	EMEA
Nigeria	Crowe Dafinone	EMEA
Norway	Vidi Revisjon AS	EMEA
Norway	Crowe Partner Revisjon AS	EMEA
Oman	Crowe Mak Ghazali LLC	EMEA
Pakistan	Crowe Hussain Chaudhury And Co.	Asia Pacific
Panama	Crowe Panama Sociedad Civil	Americas
Paraguay	J.C. Descalzo & Asociados	Americas
Peru	Roncal, D'Angelo y Asociados S. Civil De R.L.	Americas
Philippines	Ramon F. Garcia & Company CPAs	Asia Pacific
Poland	Poland Audit Services Sp. z o.o.	EMEA
Portugal	Horwath & Asociados, SROC, Lda.	EMEA
Puerto Rico	Crowe PR PSC	Americas
Qatar	Adib Al Chaa & Co Chartered Accountants	EMEA
Romania	Finexpert - Boscolo Consulting SRL	EMEA
Saint Vincent and Grenadines	Crowe SVG Ltd.	Americas
Saudi Arabia	Al-Azem & Al-Sudairy Certified Public Accountants	EMEA
Senegal	Max Consulting Group (MCG)	EMEA
Serbia	Crowe RS doo	EMEA
Sierra Leone	Crowe Decker & Partners	EMEA
Singapore	Crowe Horwath First Trust LLP	Asia Pacific
Slovakia	Crowe Advartis Assurance s.r.o.	EMEA
South Africa	Crowe HZK	EMEA
South Africa	Crowe JHB	EMEA

Country	Firm	Region
South Africa	Crowe Winelands (Pty) Ltd.	EMEA
South Korea	Hanul LLC	Asia Pacific
Spain	Crowe Auditores España S.L.P	EMEA
Sri Lanka	Gajma and Co.	Asia Pacific
Suriname	Crowe Burgos Accountants N.V.	Americas
Sweden	Sydrevisjoner Vast AB	EMEA
Sweden	Kindberg Revision AB	EMEA
Sweden	Sydrevisjoner Aktiebolag	EMEA
Sweden	Crowe Osborne AB	EMEA
Sweden	Crowe Västerås AB	EMEA
Sweden	Nyström & Partners Revision KB	EMEA
Sweden	Crowe Tonnerviks Revision AB	EMEA
Sweden	Tonnerviks Horwath Revision Skane AB	EMEA
Switzerland	Alfa Treuhand- und Revisions AG	EMEA
Switzerland	Crowe Curator Tax AG	EMEA
Switzerland	Crowe Curator Audit AG	EMEA
Switzerland	S&A Tax and Audit SA	EMEA
Syria	Crowe Professional Auditors LV	EMEA
Taiwan	Crowe (TW) CPAs	Asia Pacific
Tajikistan	Crowe ACG	EMEA
Tanzania	Crowe Tanzania	EMEA
Thailand	ANS Audit Company Limited (to change to Crowe ANS)	Asia Pacific
Togo	Crowe TG Icaaf Sarl	EMEA
Tunisia	Cabinet Zahaf et Associates	EMEA
Tunisia	Horwath ACF	EMEA
Turkey	Kavram Baımsız Denetim ve Danıřmanlık A. .	EMEA
Turkey	Crowe Horwath Olgu Bagimsiz Denetim ve YMM A.S.	EMEA
Turkey	Mert 1 YMM ve Bagimsiz Denetim A.S.	EMEA
Turkey	Crowe HSY AB	EMEA
Uganda	Crowe AIA	EMEA
Ukraine	Inter-Audit Crowe LLC	EMEA
Ukraine	AC Crowe Ukraine	EMEA
Ukraine	Crowe Audit & Accounting Ukraine LLC	EMEA
United Arab Emirates	Crowe Mak	EMEA
United Kingdom	Crowe U.K. LLP	EMEA
United States	Crowe LLP	Americas
United States	TRUSTA, An Accountancy Corporation	Americas
Uruguay	Stavros Moyal y Asociados SRL	Americas
Uzbekistan	Crowe TAC	EMEA
Venezuela	SC Marquez Perdomo & Asociados	Americas
Vietnam	Crowe Vietnam Co., Ltd.	Asia Pacific
Yemen	Crowe AHFAD	EMEA
Zimbabwe	Crowe Zimbabwe	EMEA

Network facts and figures



40,000+
people



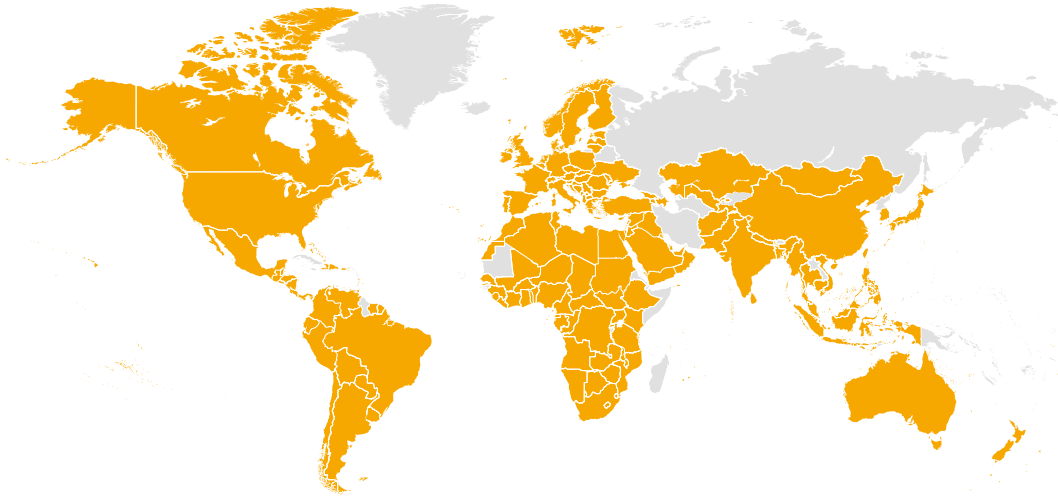
150
countries



4.9 billion
USD global revenues*

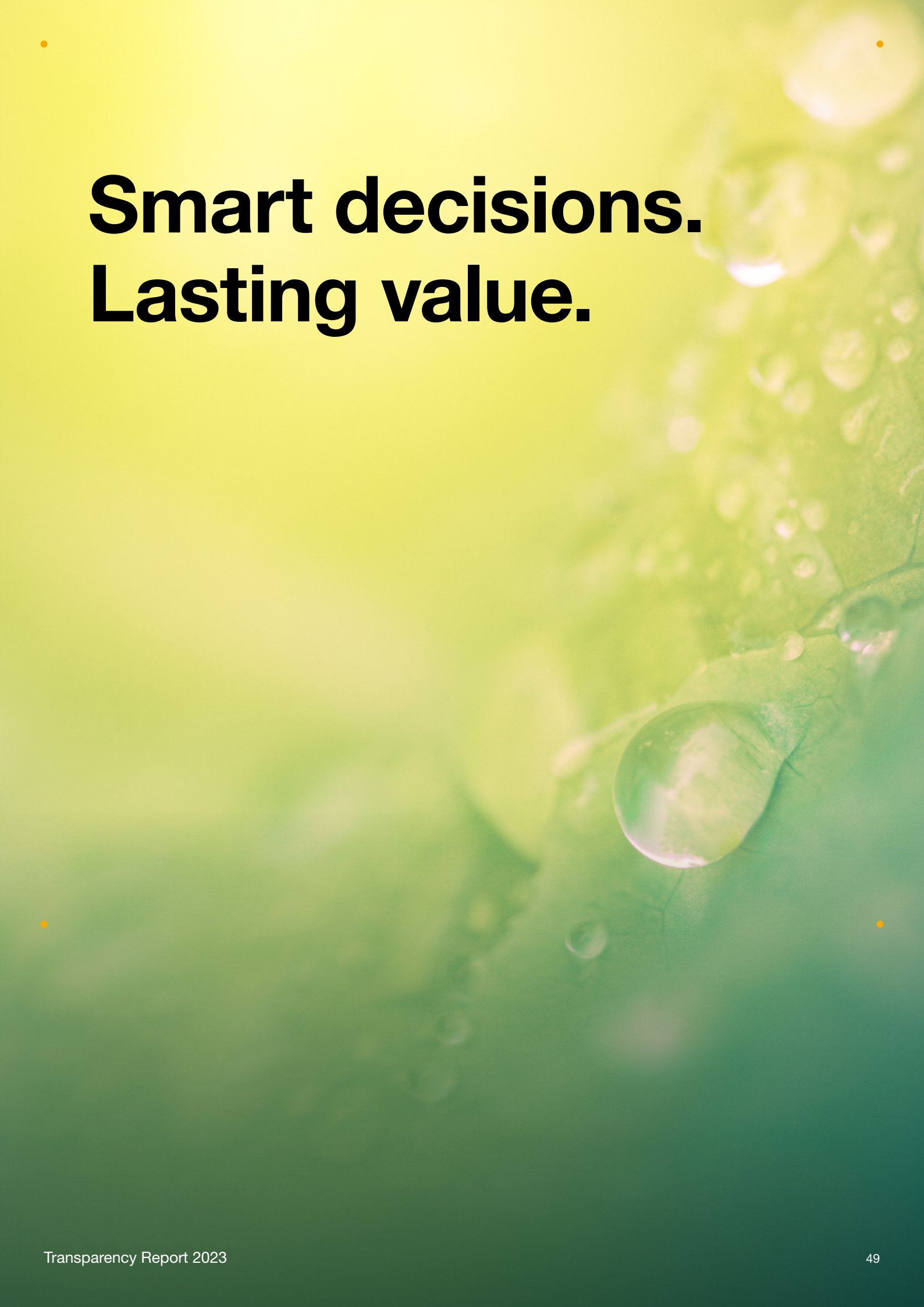


790+
offices



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*Source: IAB World survey 2022, using 2022 fee data



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Start the conversation

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About Us

Crowe UK is a leading audit, tax, advisory and risk firm with a national presence to complement our international reach. We are an independent member of Crowe Global, one of the top 10 accounting networks in the world. With exceptional knowledge of the business environment, our professionals share one commitment, to deliver excellence.

We are trusted by thousands of clients for our specialist advice, our ability to make smart decisions and our readiness to provide lasting value. Our broad technical expertise and deep market knowledge means we are well placed to offer insight and pragmatic advice to businesses of all sizes, professional practices, social purpose and non profit organisations, pension funds and private clients.

We work with our clients to build something valuable, substantial and enduring. Our aim is to become trusted advisors to all the organisations and individuals with whom we work. Close working relationships are at the heart of our effective service delivery.

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