



# Perth and Kinross Council

**Interim management report and audit status summary**

**Year ending 31 March 2021**

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For Perth and Kinross Council Audit Committee on 30 June 2021

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<b>About this report</b>	

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We have not verified the reliability or accuracy of any information obtained in the course of our work, other than in the limited circumstances set out in the scoping and purpose section of this report.

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# Introduction

## Purpose of document

In line with our audit strategy document, we have completed an interim audit. Key activities performed included the testing of a selection of system controls, holding discussions with management to update our understanding of the Council's activities and our assessment of the key risks and audit focus areas.

This report provides the Audit Committee with an update on:

- Clarification of significant risks (page four)
- The results of the control testing (pages five to nine).
- Best Value and wider scope (page 10).
- Action plan (page 11)
- Prior year follow up (pages 12 to 15)

Our progress is highlighted on pages six and eight where some sample testing remains in progress from our February and June interim testing, aligned with management's annual planned valuation process.

Significant risks in relation to the audit of the financial statements which are unchanged except as highlighted, from our audit strategy document, dated 31 March 2021, and are:

- fraud risk from management override of controls;
- fraud risk from income and expenditure recognition (see page four);
- valuation of property and investment property; and
- retirement benefit obligations.

The other focus area identified was:

- capital expenditure.

## Acknowledgements and context

We recognise that 2020-21 has posed extreme challenges for all aspects of the Council and its staff. The significant shift in operations to home working and additional pressures on services and staff have impacted on some aspects of the control environment and ability to progress audit recommendation. In this context, we would like to take this opportunity to thank officers and Members for their continuing help and cooperation throughout our audit work and focus on its importance. While some aspects of our control testing are outstanding, we have not identified any new significant risks as a result of our procedures or decline in the overall control environment which remains generally strong.

# Clarification of significant risks

## Significant risks

As part of our ongoing audit, we re-consider our risk assessments as a result of wider sector knowledge, regulatory findings, internal and external reviews and KPMG internal updates. As part of a response to additional knowledge, we clarify the significant risk relating to fraud over expenditure.

Our other three significant risks remain unchanged from our audit strategy presented on 31 March 2021.

### Significant audit risk

#### The risk

Fraud risk from income recognition and expenditure

#### Why

We continue to rebut the risk of improper recognition of expenditure in respect of payroll costs (including pension adjustments), financing and investment expenditure, or depreciation. These costs are routine in nature and not at risk of manipulation. We also consider that regular expenditure throughout the year is generally routine, and low value but high volume of transactions, and the risk of material misstatement is sufficiently low given the segregations of duties that exist, and the regularly budget reporting and scrutiny carried out.

Practice Note 10 suggests that the risk of fraud over expenditure may in some cases outweigh the risk of fraud over income recognition, and we consider there does remain a risk. Our assessed risk is relates to cut off, whereby expenditure is recognised in the wrong financial year in order to meet budgets and targets, and is an inherent risk at any local authority.

Our assessment and approach in respect of income is unchanged.

#### Planned response

We will focus on cut off testing during the period of focus, through sample testing thresholds of transactions in order to mitigate any residual risk.

# Control Framework

## System Controls

In accordance with ISA 330 *The auditor's response to assessed risks*, we designed and performed tests of controls to obtain sufficient appropriate audit evidence as to the operating effectiveness of relevant controls over the main financial systems. Interim audit testing took place during February 2020. Overall we concluded that the control environment is effective.

Test	Description	Results
<b>Bank reconciliations</b> (response to fraud risk)	<p>Bank reconciliations are prepared monthly by a member of the income team and reviewed by a more senior officer.</p> <p>We tested a sample of two months for each of the eight bank accounts to verify they had been completed and reviewed on a timely basis. A further test of control will be completed in respect of the year end reconciliations.</p>	<p>The November reconciliation for the Revenue Account was not completed within a month of the period end, being completed in January. No items were identified that impacted on the results of the reconciliation, and although not completed in line with internal expectations, we did consider the control to have operated effectively.</p> <p><b>Satisfactory</b></p> <p>Bank reconciliations are a key anti-fraud control and should be fully reconciled on a regular basis. Therefore, it is recommended that management ensures the timely reconciliation of all bank accounts.</p> <p><b>Recommendation one</b></p>
<b>Capital budget monitoring</b>	<p>Management and elected members monitor capital expenditure on all projects throughout the year. Performance of all large projects and any smaller projects nearing their approved spend will be considered by the Strategic Investments Board ("SIB") and then by the Strategic Policy and Resource committee ("SP&amp;R") via the budget monitoring reports in September, November, January and April. Approval is required for any overspends or adjustments against original budgets.</p> <p>We considered the January 2021 report to conclude whether a sufficient level of detail was presented to and considered by the committees and that a level of precision is used to determine which variances require further analysis and discussion.</p>	<p>Our testing concluded that budget monitoring arrangements over capital expenditure are designed and implemented effectively.</p> <p><b>Satisfactory</b></p>

# Control Framework (continued)

## System Controls (continued)

Test	Description	Results
<b>Revenue budget monitoring</b> (response to fraud risk)	<p>The Council has a robust revenue budget setting process, with involvement of key members of staff across the Council. Performance against revenue budget is monitored on a regular basis and formally reported to Council via budget monitoring reports in September, November, January and April.</p> <p>The format of these reports has changed during 2020-21 while the Council responds to the Covid-19 pandemic. Reporting has focused on the impact of Covid-19 on the Council's five strategic objectives. We considered whether reporting included the sufficient level of precision and analysis.</p>	<p>Our testing concluded that budget monitoring arrangements over the revenue budget are designed and implemented effectively.</p> <p><b>Satisfactory</b></p> <p>As a result of Covid-19, revenue and capital budget monitoring remains increasingly important, both in the short and medium term. We will consider revisions to the budget and future budgets as part of the year-end audit.</p>
<b>Review of cost of services expenditure</b>	<p>The Council has a well-defined process covering the payment of services provided. We considered and tested management's review and authorisation of payments to an individual supplier that exceed £75,000 as required by Council policy. A sample of 40 payments were tested.</p>	<p>As a result of Covid-19, the control did not operate as planned during the period April to June 2020. The mitigating control identified was the approval of purchase invoices on receipt.</p> <p>Our testing of the 40 payments indicated that there is adequate segregation of duties between those entering data, and those authorising the payment.</p> <p><b>Satisfactory</b></p>
<b>Authorisation over procurement contracts</b>	<p>The Council has defined processes for the awarding of contracts, with written procedures to be followed for each contract type and value.</p> <p>Procurement testing of a sample of 15 contracts awarded in the year, split between those which required completion of a quotation and those which required to be tendered was undertaken. Our approach was designed to test whether correct procurement route had been followed based on value and reviewed the evidence of the tender evaluation process.</p>	<p>One item remains outstanding at the time of preparation related to one procurement contract.</p> <p><b>TBC</b></p>

# Control Framework (continued)

## System Controls (continued)

Test	Description	Results
<b>BACS authorisation</b>	<p>BACS payment runs must be approved by an authorised member of the finance team.</p> <p>We tested a sample of 25 BACS payments to verify they had been authorised.</p> <p>Management enhanced controls in 2019-20 in respect of BACS payments following fraud identified at another local authority. Any amendments to the BACS payment file automatically generate an email to a number of senior members of Finance to allow for scrutiny and challenge. A central record is kept of any changes, and finance officers do not consider that this control can be reasonably strengthened any further.</p> <p>While the control environment has been strengthened, we consider that a weakness remains in respect of the ability of a small number of senior staff to modify the BACS payment file and override the detection control which has been implemented.</p>	<p>All sample items were correctly signed and authorised by the appropriate officer.</p> <p><b>Satisfactory</b></p> <p>In our previous audit, we made a recommendation over this control, and management indicated that there was acceptance over any residual risk as a very small number of individuals could override the controls in place. We continue to recommend that the detective control is redesigned to mitigate the risk that it is subject to management override by the privileged system users it is designed to monitor.</p> <p><b>Refer recommendation two, Interim report 2019-20</b></p>
<b>Housing rents system</b>	<p>We tested a sample of two months' reconciliations between the housing rents system (Northgate) and the general ledger (Integra) to determine whether officers completed this reconciliation on a timely basis and any reconciling items were followed up and investigated.</p>	<p>Both reconciliations have been performed on a timely basis and any reconciling items were followed up and investigated.</p> <p><b>Satisfactory</b></p>

# Control Framework (continued)

## System Controls (continued)

Test	Description	Results
<b>Council Tax and Non-Domestic Rates</b>	<p>For Non-Domestic Rates reliefs and exemptions, we selected 25 applications from account holders to test whether applications had been reviewed by an appropriate officer within the Local Taxes team and appropriate evidence of entitlement obtained.</p> <p>For each of Non-Domestic Rates and Council Tax, we tested a sample of five reconciliations of the Council's valuation roll against the valuation roll provided by the Tayside Valuation Joint Board and other valuation lists respectively.</p>	<p>In respect of our sample of 25 relating to non-domestic rates reliefs we are awaiting supporting documentation for some of the items selected for testing earlier in the year. We will provide an update in our annual audit report in September 2021, including any changes in approach that may be required.</p> <p>Our testing concluded that Council Tax and Non-Domestic Rates reconciliations over are designed and implemented effectively.</p> <p><b>TBC</b></p>
<b>Review of valuations (response to significant risk)</b>	<p>We will review management's assessment of impairment indicators and assess for completeness.</p> <p>We walked through with the valuations team to consider whether the review process was robust.</p>	<p>We will report our findings over the operating effectiveness of this control in our annual audit report once management completes its annual review of both movements in valuations from 1 April 20 to 31 March 21, and the review of assets not revalued in year in line with the year end timetable.</p> <p>For in year property valuations, we are satisfied with the design and implementation of the control in place.</p> <p><b>TBC</b></p>
<b>Authorisation of payroll, and service establishment approval</b>	<p>A sample of two months control sheets were tested, which record that the stages of the payroll process have been completed, before authorising the payroll and completing the BACS runs. This includes a key control over any exceptions or variances in net pay.</p> <p>A sample of two months' BACS runs were reviewed to test the payment schedule reconciled to appropriate reports and appropriately authorised.</p> <p>The annual service establishment report was reviewed to determine whether it had been reviewed by each service to confirm all employees are still actively employed by the Council.</p>	<p>Those controls sheets tested recorded key stages of the pay run and had been marked as completed, with the pay run being marked as ready for processing. The sample of exception reports tested were marked as reviewed and investigated.</p> <p>Both BACS runs subject to testing had been reconciled and authorised by an authorised signatory in advance of the pay run.</p> <p>Our testing indicated that all four services had completed and signed the service establishment report as expected.</p> <p><b>Satisfactory</b></p>



# Control Framework (continued)

## System Controls (continued)

Test	Description	Results
<b>Transfer of pensionable data, and management review of assumptions</b> (response to significant risk)	<p>We furthered our understanding of the process management undertake to transfer data to Tayside Pension Fund ("the fund"), and its assessment of the actuarial assumptions.</p> <p>We tested the annual management review of pension assumptions.</p> <p>These controls were tested in response to the significant risk over retirement benefit obligations.</p>	<p>We discussed and walked through the process undertaken by Management during the March 2021 payroll and pension processes. We were satisfied that the following controls are designed and implemented appropriately:</p> <ul style="list-style-type: none"> <li>– transfer of new starts, leavers, and other changes to employee data to the fund; and</li> <li>– authorisation of the payment of pension contributions to the fund.</li> </ul> <p><b>Satisfactory</b></p> <p>Following our recommendation in the 2019-20 audit in respect of assumption review, management introduced a high level review of the assumptions recommended by the fund's actuary, and adopted in respect of the Council's participation in the fund. This review is intended to identify any significant differences between the assumptions adopted which are specific to the Council against the publicly available market data, in order to allow appropriate challenge by management should the need arise. In order to gain expert advice management engage an actuary through the pension fund to provide these assumptions which management may or may not chose to adopt.</p> <p>While the control environment has been strengthened as a result of the introduction of this control, we consider that in order for us to rely on it, it would need to be informed by an additional independent experienced actuary.</p> <p><b>Recommendation two</b></p> <p>Our planned approach is unchanged in respect of the above.</p>

# Wider Scope and Best Value

The Code of Audit Practice sets out four audit dimensions which, alongside Best Value, set a common framework for all audit work conducted for the Accounts Commission. These areas are: governance and transparency, financial management, financial sustainability and value for money. During our interim audit we considered these areas and will conclude our assessment in our Annual Audit Report. We provide an update below of work carried out so far on Best Value.

Test	Audit update
Best Value	<p>2020-21 represents year five of the Best Value plan for the Council during which we shall complete a follow up of the Best Value Assurance Report ("BVAR") recommendations and will the equalities topic as part of our phased consideration over the term of appointment. We also consider that there are wider scope risks in respect of demand pressures, the transformation programme and EU withdrawal.</p> <p>We began our best value work over equalities with management in February 2021, and progress is ongoing. We continue to expect presentation of our findings and conclusions in September 2021.</p> <p>We will engage with management over their response to demand pressures, transformation programmes and EU Withdrawal at year end, noting that the impact of EU Withdrawal will be considered as part of equalities.</p>

# Action Plan

The action plan summaries specific recommendations arising from our work, together with related risks and management's responses.

## Priority rating for recommendations

Grade one (significant) observations are those relating to business issues, high level or other important internal controls. These are significant matters relating to factors critical to the success of the Council or systems under consideration. The weaknesses may therefore give rise to loss or error.

Grade two (material) observations are those on less important control systems, one-off items subsequently corrected, improvements to the efficiency and effectiveness of controls and items which may be significant in the future. The weakness is not necessarily great, but the risk of error would be significantly reduced if it were rectified.

Grade three (minor) observations are those recommendations to improve the efficiency and effectiveness of controls and recommendations which would assist us as auditors. The weakness does not appear to affect the availability of the control to meet their objectives in any significant way. These are less significant observations than grades one or two, but we still consider they merit attention.

Finding and risk	Recommendation	Original actions
<b>1. (Grade three) Bank Reconciliations</b>		
The November reconciliation for the Revenue Account was not completed within a month of the period end, being completed in January. No items were identified that impacted on the results of the reconciliation.	It is a key anti-fraud control for bank balances to be fully reconciled on a regular basis. It is recommended that management ensures the timely reconciliation of all bank accounts.	<p><b>Management response:</b></p> <p>Agreed - one reconciliation was not complete within one month of the period end, due to significant workloads. The Team involved in completing the reconciliations were also responsible for processing thousands of additional payments to businesses, individuals and families during 2020/21. Management recognise the importance of ensuring reconciliations are completed timeously, but not to the detriment of ensuring that financial support payments required in 2021/22 are prioritised, and will remind key colleagues of this.</p> <p><b>Implementation date:</b> 31 August 2021</p> <p><b>Responsible officer:</b> Chief Accountant</p>

# Action Plan (continued)

Finding and risk	Recommendation	Original actions
<b>2. (Grade three) Management Review of Pension Assumptions</b>		
<p>Testing of the Management review of Pension assumptions identified that while the control environment has strengthened, it does not meet the high bar required to enable KPMG to rely upon it.</p> <p>Auditing standards require auditors to identify a management control where there is a significant risk. In the case of the defined benefit pension liability significant risk, we have not been able to identify a management control which is carried out to an acceptable level of expertise as required by the auditing standards.</p> <p>Due to the specialist nature of pension assumptions, we consider that the officer carrying out the review does not have the necessary specific expertise to fully review and challenge the assumptions and estimates that the Actuary suggested for the Defined Benefit Obligations.</p>	<p>We recommend that should management wish to meet this requirement, that they will need to carry out a predictive review of the methodology and assumptions that are being proposed to calculate the net liability of the defined benefit pension scheme held by the Council.</p> <p>This would require the services of an additional independent actuary.</p> <p>This control point does not impact upon our planned audit approach and is a common audit finding across our portfolio.</p>	<p><b>Management response:</b></p> <p>Tayside Pension Fund engages independent actuaries to undertake an annual review of the Fund. The Council places reliance on the professional, independent judgement of the actuaries to ensure that the assumptions remain reasonable. The Council will not be incurring additional cost to review the work of the independent actuary. The Council will, however, continue to undertake an inhouse review of the pension assumptions to ensure that they are reasonable.</p> <p><b>Implementation date:</b> n/a</p> <p><b>Responsible officer:</b> n/a</p>

# Prior year follow up

The action plan summaries specific recommendations arising from our work, together with related risks and management's responses.

## Priority rating for recommendations

Grade one (significant) observations are those relating to business issues, high level or other important internal controls. These are significant matters relating to factors critical to the success of the Council or systems under consideration. The weaknesses may therefore give rise to loss or error.

Grade two (material) observations are those on less important control systems, one-off items subsequently corrected, improvements to the efficiency and effectiveness of controls and items which may be significant in the future. The weakness is not necessarily great, but the risk of error would be significantly reduced if it were rectified.

Grade three (minor) observations are those recommendations to improve the efficiency and effectiveness of controls and recommendations which would assist us as auditors. The weakness does not appear to affect the availability of the control to meet their objectives in any significant way. These are less significant observations than grades one or two, but we still consider they merit attention.

Finding, risk and recommendation	Original actions	Progress
<b>1. (Grade three) Bank Reconciliations</b>		
<p>The December 2019 reconciliations were not completed within one month of the period end. This meant that one reconciling item was not identified or corrected until both December and January bank reconciliations were completed mid-February.</p> <p><b>Recommendation:</b> It is a key anti-fraud control for bank balances to be fully reconciled on a regular basis. It is recommended that management ensures the timely reconciliation of all bank accounts.</p>	<p><b>Management response:</b> n/a</p> <p><b>Implementation date:</b> n/a</p> <p><b>Responsible officer:</b> n/a</p>	<p>Management have completed bank reconciliations on a more timely basis, noting that one account reconciliation was delayed due to workload in November 2020 that has resulted in the continued recommendation going forward.</p>

# Prior year follow up (continued)

Finding, risk and recommendation	Original actions	Progress
<b>2. (Grade two) BACS payment process</b>		
<p>As part of our audit, we remain alert to the susceptibility of fraud within the audit entity, using our existing knowledge from other entities and sectors.</p> <p>Management enhanced controls in respect of BACS payments following fraud identified at another local authority. While the control environment has been strengthened, we consider that a weakness remains in respect of the ability of a small number of senior staff to modify the BACS payment file and override the detection control which has been implemented.</p> <p>We note that our sample testing on page six in respect of BACS payment authorisation process did not identify any errors, and management have not identified any errors in relation to this weakness.</p> <p><b>Recommendation:</b> It is recommended that the detective control is redesigned to mitigate the risk that it is subject to management override by the privileged system users it is designed to monitor.</p>	<p><b>Management response:</b> The Council has implemented a number of controls in this area. Any amendments to the BACS payment file automatically generate an email to a number of senior members of Finance to allow for scrutiny and challenge. A central record is kept of any changes. Finance officers do not consider that this control can be reasonably strengthened any further.</p> <p><b>Implementation date:</b> n/a</p> <p><b>Responsible officer:</b> n/a</p>	<p>We will continue to plan and undertake our audit approach factoring in management's assessment.</p>
<b>3. (Grade three) Housing rents system</b>		
<p>We tested a sample of two months' reconciliations between the housing rents system (Northgate) and the general ledger (Integra). There was no documented review of these reconciliations by an authorised senior member of staff.</p> <p><b>Recommendation:</b> We recommend that the reconciliations are reviewed by an authorised senior member of staff, and that this review is appropriately documented.</p>	<p><b>Management response:</b> The monthly reconciliation will be reviewed and authorised by the Finance &amp; Governance Manager and copies will be held on file.</p> <p><b>Implementation date:</b> April 2020</p> <p><b>Responsible officer:</b> Finance &amp; Governance Manager</p>	<p>Implemented</p>

# Prior year follow up (continued)

Finding, risk and recommendation	Original actions	Progress
<p><b>4. (Grade three) Non-Domestic Rates</b></p> <p>We have tested the design and implementation of the controls around Non-Domestic Rates. In two cases there was no clear segregation of duties in terms of staff recording and authorising Non-Domestic Rates relief applications.</p> <p><b>Recommendation:</b> We recommend that management implements a process to ensure segregation of duties when completing and authorizing Non-Domestic Rates relief applications.</p> <p>In respect of management's response, we understand that detective controls are in place, we will consider their design and implementation as part of our year-end audit and will report on our findings in our Annual Audit Report. We do not plan to test the operating effectiveness to the extent we are not relying on IT based system controls.</p>	<p><b>Management response:</b> The Local Taxes Management Team does not consider that there is a need for a clear segregation between accepting and processing information as it views this as one single customer interaction. They view the ability to make amendments, including those made at the point of contact, by an experienced member of staff to be beneficial in terms of customer service, and in achieving Best Value through effective use of staff resources rather than the recommended two-tiered approach.</p> <p>There is a very minor risk that staff could enter invalid information into the system, but this applies whether there is the existence of an application form or not.</p> <p>Furthermore, they strongly consider that satisfactory arrangements are in place through login control, system permissions, audit trails, accuracy checking and review processes to identify and mitigate any potential such actions occurring.</p> <p>Therefore, the Local Taxes Management Team are comfortable with existing processes and are accepting of any minor risks that current arrangements may bring.</p> <p><b>Implementation date:</b> n/a</p> <p><b>Responsible officer:</b> n/a</p>	<p>We will continue to plan and undertake our audit approach factoring in management's assessment and are aware that there is continued shift towards online processing by individuals without staff intervention.</p>

# Prior year follow up (continued)

Finding, risk and recommendation	Original actions	Progress
<b>5. (Grade two) Council Tax and Non-Domestic Rates</b>		
<p>In respect of both Non-Domestic Rates and Council Tax, we were unable to verify a formal approach in respect of how the Council considered reliefs spanning multiple years.</p> <p><b>Recommendation:</b> For best practice, it is recommended that the Council undertakes its formal process to consider these reliefs and discounts that span multiple years.</p>	<p><b>Management response:</b> The Council recognises the need to regularly review discounts and exemptions awards that cross multiple financial years.</p> <p>To do this, each year a review timetable is created detailing the awards that we intend to review in the coming year.</p> <p>For Financial Year 2019/20, although such a timetable was created the reviews were not carried out as originally scheduled due to other work priorities.</p> <p>It is anticipated that a full review programme will be carried out during Financial Year 2020/21, although this may be impacted by Covid-19. The Local Taxes management team are content with this situation and will, as far as possible manage the risks of any delay in carrying out reviews.</p> <p><b>Implementation date:</b> 31 March 2021</p> <p><b>Responsible officer:</b> Principal Officer (Local Taxes)</p>	<p>We understand that due to the specific and understandable pressures affecting 2020-21 this has not been able to be progressed.</p>





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