



TRANSPARENCY REPORT

2021



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INTRODUCTION

The overall business focus of VCA remains our auditing and accounting business. Although we provide a much wider range of services than just audit and accounting, we are very much dedicated to our foundation. We ensure that our core values of integrity, professionalism and quality imbue all our services. We also appreciate the need to demonstrate such commitment to our many stakeholders and our Transparency Report forms an important part of that communication.

This report is designed to provide an overview of who we are, our values and the policies and procedures we have in place to ensure the maintenance of audit quality, including compliance with auditing and ethical standards.

Maintaining- and being perceived to maintain- the highest of standards of audit quality and independence together with providing a high-quality professional service to clients, is of paramount importance, not just to the firm, but to the profession a whole.

The transparency report describes policies and procedures which were effective as at 31 December 2021.



Michael Curmi
Managing Partner



Vincent Curmi
Founder Partner

26th April 2022

FOREWORD FROM THE MANAGING PARTNER

At VCA we continue to aim to do things a little differently; to excel technically and to give our clients a personalized professional service. We are committed to continually provide a professional service always and this is what has earned our respect with our clients and their stake holders, lending institutions and the financial industry at large.

One of our constant priorities is attracting and investing in high calibre and hard-working people while giving them the opportunity to share in the success of the set up. We are strong believers in continuing professional education, and we endeavour to maintain an excellent level of technical know how by giving our staff the opportunity to further their studies and specialize further in our core services.

Ultimately, quality is at the heart of our business as it underpins our very reputation. VCA operates in an industry where quality, ethics and independence have always been the foundation of its practitioner's credibility. As the world around us has changed, with freer movement of capital, more complex corporate structures and new forms of ownership, transparency and quality control expectations have also increased in both the world of business and society at large.

Similar to FY2020, FY2021 was also a challenging year with the long COVID effect from March 2020. We continued to implement safety measures by encouraging staff to work remotely and if necessary to come to work on a rotational basis. Working at clients was only allowed if the clients followed similar protocols. To adapt to these changing times, we continued to invest in additional technology in order to continue our engagements remotely.

In FY 2021, our clients were again impacted by the continued spreading of COVID-19 especially those in the hospitality industry. Measures taken to contain the spread of the virus, including travel bans, quarantines, social distancing, and closures of non-essential services have triggered significant disruptions to many of our clients. The situation is rapidly improving but uncertainties still exist. Our people are at the heart of our business and supporting their wellbeing remains a priority through challenging times. This also means assessing the appropriate level of workloads as well initiatives that drive efficiencies through technology.

The turnover of the firm for FY2021 has significantly improved when compared to FY2020, mainly due to arrears in completed work carried forward from FY2020 and take on of additional clients that were also serviced in FY2021.

We encourage all our stakeholders – including clients and their investors, audit committee members and regulators – to continue to engage with us on our strategy as well as any of the matters covered in this report.

If you would like to discuss any aspect of this report or have any questions or feedback, I would very much welcome your comments



Michael Curmi
Managing Partner

26th April 2022

LEGAL STRUCTURE AND OWNERSHIP

Founded in 1969, VCA is one of Malta's independent accountancy practices, which delivers audit, tax, and advisory services to varied customer environments ranging from public-interest entities to Maltese family-run businesses.

VCA, Certified Public Accountants is a civil partnership as registered with the Accountancy Board, Malta (Registration Number: AB/26/84/46).

The partners of the practice during 2021 were:

- Vincent Curmi – Founder Partner
- Michael Curmi- Managing Partner and Compliance principal
- Carol Cassar Torreggiani -Accounting and international client services
- Alice Losco - Audit Partner

All the partners of VCA are Certified Public Accountants and have practicing certificates in Auditing issued by the Accountancy Board.

Other than VCA, the following entities are considered to be related to the practice: -

- CAF Consultancy Limited

CAF Consultancy Limited is the company that is responsible for Accounting, Payroll services and back office services

We conduct all our business from 1 office in Ta' Xbiex, Malta. Further details of our service offerings can be found on our website at the following link:

www.vca.com.mt

LEADERSHIP

We believe that the tone at the top of any organisation drives the culture of that firm. We believe that a commitment to quality is the most important of these priorities. We recognise that if we do not provide a quality service then, the success of each one of the other strategic priorities would be jeopardised. The Partners of the Firm took several important initiatives in the last year to further promote the quality agenda within our practice. These initiatives include: -

Regular partner meetings to align the strategic orientation of the firm with the present changes in the economic environment.

Operational responsibility for the system of quality control within VCA has been delegated to the Compliance Partner, Michael Curmi.

Appointment of external quality control reviewer, as recognized by the Malta Institute of Accountants to carry out reviews and provide technical advise as necessary.

These measures make it clear that at engagement level risk management and quality control is at the heart of all partners of the audit practice.

INDEPENDENCE

To ensure independence, our partners and the people assigned to each engagement must be free from prohibited financial interests in and prohibited relationships with our audit clients, their management, directors, and significant owners. The firm's policies and procedures are designed to ensure that independence requirements are adhered to. These include:

Leadership commitment to quality

The firm recognises that quality and commitment to ethical standards is essential to its work and the firm's leadership is committed to a quality-oriented internal culture in which we perform work that complies with professional standards and regulatory and legal requirements, and issue reports that are appropriate in the circumstances. The policies and procedures are designed to assist the firm's leadership in developing and maintaining a culture of quality in the firm and ensuring that commercial considerations do not override the firm's commitment to quality in all its engagements. The ultimate responsibility for the firm's ethics and system of quality control rests with the Managing Partner.

Audit partner and senior personnel rotation

Audit engagement partners cease their participation in the statutory audit of a public interest entity after having served seven consecutive years in an engagement role with respect to the audit of that public interest entity. They do not participate again in the statutory audit of that audited entity before that required cooling- off period has been completed.

Other than audit engagement partners, in assigning the most senior personnel to audit engagements of public interest entities, attention is paid to ensure that a gradual rotation mechanism on the basis of individuals rather than of the entire engagement team is implemented.

Annual confirmations

Each year, members and staff at VCA sign a written confirmation to identify any potential threats to independence and to evaluate whether one complied with the fundamental principles as identified in the Accountancy Profession Act. All personnel are required to confirm that they do not hold any financial interests in any of the firm's clients which are prohibited by the firm's policies and standards. They are also required to confirm that they do not have any relationships, nor entered into any transactions, with the firm's audit clients that are prohibited by the firm's ethical policies. These confirmations are made upon joining the firm and thereafter on an annual basis.

Provision of other non-audit services

We have policies and procedures to restrict the scope of services that can be provided to audit clients. These require consideration by the audit engagement partner of the threats arising from the provision of non-audit services and the safeguards available to address those threats, thus preventing the provision of non-permitted services to audit clients.

Monitoring

Professionals are responsible for making appropriate enquiries to ensure that they do not have any personal financial interests which are prohibited. As part of its annual internal quality control process the firm inspects for compliance with the firm's independence policies and procedures and staff annually sign independence confirmations.

OUR PEOPLE

One of the key drivers of quality is ensuring that we have the right engagement leaders and staff members assigned to an engagement. Our people management system encompasses the following core areas:

- Recruitment
- Staff development and training
- Engagement assignment
- Performance evaluation and compensation

The Firm has a professional team that is made up of experienced staff as well as young bright, dynamic and motivated Certified Chartered Accountants and Bachelor of Arts (Hons) graduates. The Firm's policy is to attract and invest in high calibre and hard-working employees with the opportunity to share in the success of the set up.

Recruitment

The firm has a comprehensive recruitment procedure and references are always obtained for new staff. The firm conducts an annual assessment of all staff employed on audits. This is carried out by completion of questionnaires and skill assessments. The firm considers training a part of the skills assessment review and the appointment process and decide on appropriate training programmes based on this.

Staff development and training

Our policies require all professionals to maintain their technical competence and to comply with applicable regulatory and professional development requirements. About continuous learning, we provide opportunities to help our professionals meet their continuing professional development requirements as well as their own personal development goals.

Continuing education is the key to maintaining the highest of standards and this is done by:

Organising structured in house training courses which are mandatory and

Staff and partners are continually updating themselves by attending Malta institute of Accountants and other professional bodies structured CPE courses.

Also, all audit warrant holders are required by VCA to undertake training, in particular, according to Directive Number 1 issued in terms of the Accountancy Profession Act (Cap. 281) and of the Accountancy Profession Regulations 2009, whereby all warrant holders must spend at least twenty-five (25) hours per calendar year on structured CPE Activities.

Engagement assignment

The firm's policy is to ensure an Engagement Partner is assigned to each job and their name and role is communicated to the client. The Engagement Partner must have the necessary skills and competence and time to undertake the role. The firm's policy is to ensure appropriately competent individuals are assigned to each job so that each job can be performed to the necessary standard. People are assigned to engagements based on several factors including their skill set, relevant professional and industry experience, and the nature of the assignment or engagement.

Performance Evaluation

All qualified staff undergo annual goal-setting and performance evaluations conducted by partners who are familiar with the individuals' performance. Everyone is evaluated on his or her attainment of agreed-upon goals, demonstration of skills/ behaviours, and adherence to our values.

OUR CLIENTS

Whenever a potential client approaches VCA, a proposal containing an understanding of the nature and scope of the service, description of the practice's responsibilities, description of the company's responsibilities, description of the report and fees are sent to the client shortly following the preliminary meeting.

At the commencement of each new audit engagement, VCA decides and evaluates whether the practice should accept the engagement. The procedures for acceptance and continuance of clients and engagements provide the firm with reasonable assurance that it will only undertake or continue relationships and engagements where it:

- a) has considered the integrity of the client and does not have information that would lead it to conclude that the client lacks integrity.
- b) is competent to perform the engagement and has the capabilities, time and resources to do so; and
- c) can comply with ethical requirements.

Depending on the overall risk assessment made, additional safeguards might be introduced into our audit procedures to help mitigate any identified risk factors. These rigorous client acceptance and continuance policies are vitally important to our firm's ability to provide high-quality professional services.

OUR QUALITY CONTROL PROCEDURES

The audit firm applies the internal quality control system established by VCA. The system includes policies and procedures addressing quality control systems within the audit firm, ethical requirements, client and engagement acceptance and continuance, human resources, engagement performance and monitoring. VCA's ISQC 1 Manual of Policies and Procedures Manual can be accessed online by each professional, on the Firm's internal network.

The firm is committed to following the requirements of ISQC 1 and of promoting a culture of quality throughout its organisation. We confirm our policy is:

- to ensure quality in all assignments that we perform;
- to ensure commercial considerations never override the quality of performance;
- to ensure sufficient resources are devoted to the development, documentation and support of the firm's quality control policies and procedures; and
- to ensure all audit work is controlled and signed off by the partners.

The firm's policy is that our system of quality control procedures will be subject to a robust review on an annual basis. This review will be conducted by the signing partners and will include a sample of file reviews. All deficiencies arising from this review and any associated file reviews will be acted upon and any corrective action to the system made.

QUALITY CONTROL REVIEWS

Like most companies with quality review programmes, we identify areas for continuous improvement and disseminate our findings to our staff through written communications, internal training tools, and periodic partner, manager, and staff meetings. These areas are also emphasised in subsequent inspection programmes to gauge the extent of continuous improvement.

The firm is subject to reviews by the Quality Assurance Unit, set up within the Accountancy Board, which forms part of the Ministry of Finance, the Economy and Investment. The most recent review by the Quality Assurance Unit was carried out in 2020.

The firm also has its own internal quality control monitoring programme whereby reviews of completed audit engagements are carried out to ensure compliance with professional standards, technical considerations and independence and ethical issues amongst others.

No issues have been raised through this continual quality control review programme that we believe have a material impact on the conduct of our statutory audit business.

We also have robust procedures in place for handling complaints received from clients relating to the quality of our work. The firm's policies and procedures are designed to provide it with reasonable assurance that it deals appropriately with complaints and allegations that the work performed by the firm failed to comply with professional standards, and regulatory and legal requirements, and allegations of non-compliance with the firm's system of quality control. All formal complaints are investigated under the authority of a partner.

AUDITS OF PUBLIC INTEREST ENTITIES

VCA issued statutory audit reports during the year ending 31 December 2021, for the following entities that fell within the definition of Public Interest Entities

Eden Finance p.l.c (C-26843) – 31 December 2020 date of audit report 27 April 2021

SP Finance p.l.c (C-89462) – 31 December 2020, date of audit report 30 April 2021

The Accountancy Profession Act Cap 281 defines public interest entities as those:

- a) whose transferable securities are admitted to trading on a regulated market of any EU member state.
- b) credit institutions.
- c) insurance undertakings; and
- d) any other entities as may be prescribed by the Accountancy Board.

The Accountancy Board may from time-to-time designate other entities as Public Interest Entities.

FINANCIAL INFORMATION

VCA is committed to promoting a culture of quality throughout its organisation. Our goal has never been to become the largest accountancy practice but to be big where it matters – on giving a personalised professional service.

Personnel

During the year ending 31 December 2021, the average number of personnel employed by VCA amounted to 13 (in full time equivalents).

Revenue

The numbers below represent revenues for the year ended 31 December 2021 segmented by category as required by Article 18(k) of the Accountancy Profession Act (Cap. 281).

Service	Revenue (€)
Statutory audit (PIEs or PIE subsidiaries)	20,950
Statutory audit (non-PIEs or non-PIE subsidiaries)	550,654
Non-audit services (audited clients)	193,917
Non-audit services (other entities)	203,728
Total	969,249

PARTNER REMUNERATION

The partners do not have any predetermined level of remuneration. They are entitled to their share of the firm's total profits which are allocated according to the partners' respective equity interest.

None of the partners are remunerated based on fees generated by a particular service or group of services, or by a particular client or group of clients.