

# The Corporation of the Town of Halton Hills

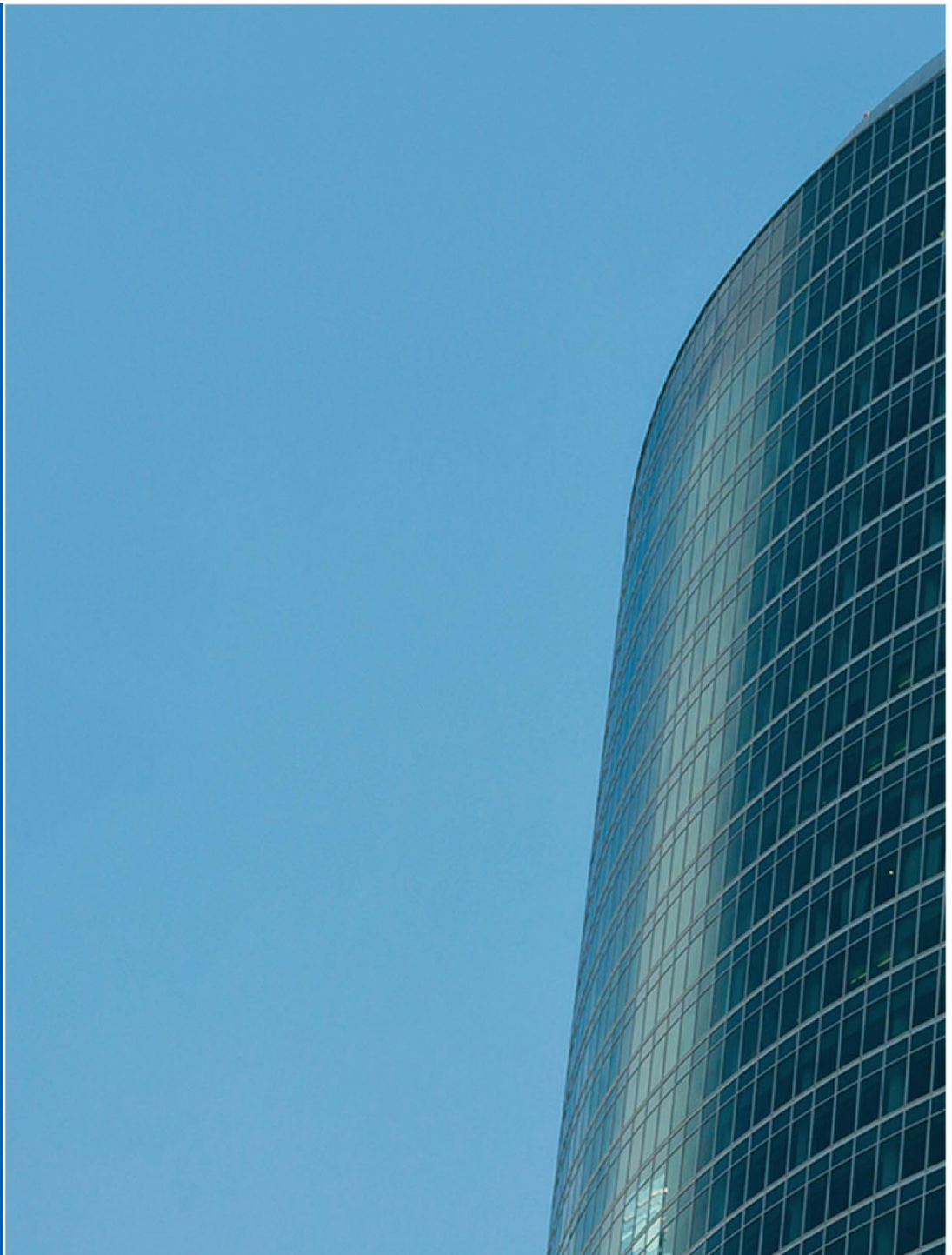
Audit Findings Report  
for the year ended  
December 31, 2021

*KPMG LLP*

Licensed Public Accountants

Prepared August 15, 2022 for  
presentation September 6, 2022

[kpmg.ca/audit](https://kpmg.ca/audit)



# Table of contents

<b>How do we deliver audit quality?</b>	<b>3</b>
<b>Executive summary</b>	<b>4</b>
<b>Group audit – summary of scope</b>	<b>5</b>
<b>Audit risks and results</b>	<b>6</b>
<b>Significant accounting policies and practices</b>	<b>11</b>
<b>Financial statement presentation and disclosure</b>	<b>12</b>
<b>Uncorrected differences and corrected adjustments</b>	<b>13</b>
<b>Control deficiencies</b>	<b>14</b>
<b>Appendices</b>	<b>15</b>

# KPMG contacts

The contacts at KPMG in connection with this report are:



Carlos Alvarez

**Lead Audit Engagement Partner**

Tel: 905-523-2238

carlosalvarez@kpmg.ca



Heather Doerksen

**Audit Senior Manager**

Tel: 905-687-3283

hdoerksen@kpmg.ca

## Our refreshed Values

### What we believe



Integrity

We do what is right.



Excellence

We never stop learning  
and improving.



Courage

We think and act boldly.



Together

We respect each other  
and draw strength from  
our differences.



For Better

We do what matters.



# How do we deliver audit quality?

**Quality** essentially means doing the right thing and remains our highest priority. Our **Global Quality Framework** outlines how we deliver quality and how every partner and staff member contributes to its delivery.

**‘Perform quality engagements’** sits at the core along with our commitment to continually monitor and remediate to fulfil on our quality drivers.

Our **quality value drivers** are the cornerstones to our approach underpinned by the **supporting drivers** and give clear direction to encourage the right behaviours in delivering audit quality.

We define **‘audit quality’** as being the outcome when:

- audits are **executed consistently**, in line with the requirements and intent of **applicable professional standards** within a strong **system of quality controls**; and
- all of our related activities are undertaken in an environment of the utmost level of **objectivity, independence, ethics, and integrity**.



**Doing the right thing. Always.**

# Executive summary

## Purpose of this report<sup>1</sup>

The purpose of this Audit Findings Report is to assist you, as a member of the Committee and Council, in your review of the results of our audit of the consolidated financial statements as at and for the period ended December 31, 2021. This Audit Findings Report builds on the Audit Plan we presented to the Committee.

### Changes from the audit plan

In response to the cyber incident incurred, we amended our audit plan previously presented to you to include the involvement of the KPMG Cyber Risk Management group to support the audit. See page 10.

### Finalizing the audit

As of the date of this report, we have completed the audit of the consolidated financial statements, with the exception of certain remaining procedures, which include amongst others:

- Receipt of five outstanding legal letters
- Receipt of the signed management representation letter
- Completing our discussions with the Committee
- Obtaining evidence of the Council's approval of the financial statements

We will update the Committee, and not solely the Chair, on significant matters, if any, arising from the completion of the audit, including the completion of the above procedures. Our auditors' report will be dated upon the completion of any remaining procedures.

### Uncorrected differences

Please see appendix two for one uncorrected audit difference proposed related to a reclassification between financial assets.

### Control deficiencies

We did not identify any control deficiencies that we determined to be significant deficiencies in internal control over financial reporting.

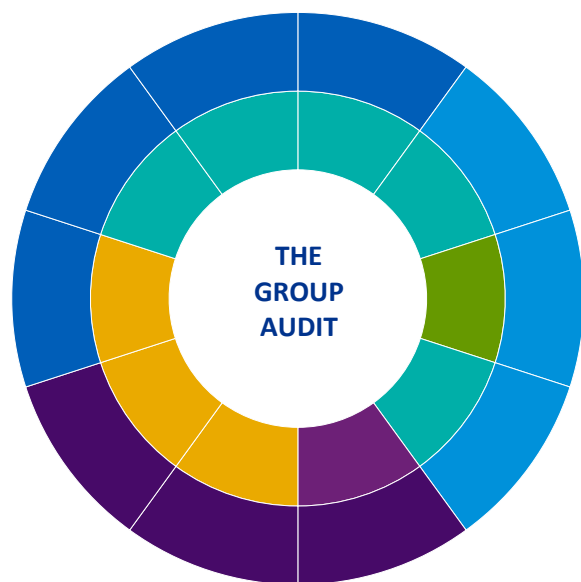
### Independence

We are independent with respect to the Town, within the meaning of the relevant rules and related interpretations prescribed by the relevant professional bodies in Canada and any other standards or applicable legislation or regulation.

---

<sup>1</sup> This Audit Findings Report is intended solely for the information and use of Management, the Committee, and Council and should not be used for any other purpose or any other party. KPMG shall have no responsibility or liability for loss or damages or claims, if any, to or by any third party as this Audit Findings Report has not been prepared for, and is not intended for, and should not be used by, any third party or for any other purpose.

# Group audit – summary of scope



Entity	Significant Component?	Standalone Audit?	New for FY21?
Corporation of the Town of Halton Hills	Yes	Yes	No
Halton Hills Community Energy Corporation	Yes	Yes	No
Halton Hills Public Library	No	Yes	No
Acton BIA	No	Yes	No
Georgetown BIA	No	Yes	No

**Note:** consistent with our audit approach in the prior period, the non-significant components noted above were subject to full-scope standalone audits. These are completed due to the reporting needs of management and the users of the financial statements, rather than requirements based on significance to the group audit of the Town.

We note that there were no changes in the expected scope communicated to you in our Audit Plan.

# Audit risks and results

We highlight our significant findings in respect of **significant financial reporting risks** as identified in our discussion with you in the Audit Plan, as well as any additional significant financial reporting risks identified.

Significant financial reporting risk	New or changed?	Estimate?
1. Fraud risk from revenue recognition	No	No
2. Fraud risk from management override of controls		

## Our response

- We rebutted the fraud risk related to revenue recognition. We continued to perform substantive testing over revenue and deferred revenues as in prior years.
- To respond the risk of management override of controls our procedures included the following:
  1. Testing high risk journal entries and other adjustments. Data and analytics tools were used to perform work over journal entries
  2. Performing a retrospective review of accounting estimates
  3. Evaluation the business rationale for significant unusual transactions

## Significant findings

- We did not identify any issues or concerns regarding revenue recognition and management override of controls.

# Audit risks and results

We highlight our significant findings in respect of **areas of focus** as identified in our discussion with you in the Audit Plan, as well as any additional areas of focus identified.

Area of focus	New or changed?	Estimate?
1. Tangible capital assets	No	No
2. Government grants, including related deferrals		

## Our response

- Our response to tangible capital assets and government grants included the following procedures:
  1. Completing substantive procedures over additions and disposals of tangible capital assets
  2. Verifying the Town correctly capitalized the additions from work in progress to capital assets and appropriately recognized developer contributed assets
  3. Completed substantive procedures over government grants received including assessing for any potential eligibility criteria that meets the definition of a liability in order to determine appropriate revenue recognition
  4. Substantively tested the revenue recognition of related deferrals as at December 31, 2021

## Significant findings

No significant audit findings to report.



# Audit risks and results

Area of focus	New or changed?	Estimate?
Operating expenditures	No	No

## Our response

- Our response included the following procedures:
  1. Performing substantive procedures to address the risk of cut-off and ensuring completeness of material transactions reported as at year end
  2. Performing substantive analytical procedures including trend analysis in the operating expenditures both in comparison to the budget and prior year.
  3. Substantively testing a sample of expenses by vouching to supporting documentation.

## Significant findings

No significant audit findings to report.

# Audit risks and results

Area of focus	New or changed?	Estimate?
---------------	-----------------	-----------

- |                                   |    |                     |
|-----------------------------------|----|---------------------|
| 1. Contaminated sites liabilities | No | Yes-not significant |
| 2. Employee benefit obligation    |    |                     |

## Our response

1. Our response to the contaminated sites liabilities included the following procedures:
  - a) Reviewing management's process for identifying potential sites and reviewed management's listing of contaminated sites and the analysis against the prescribed criteria to determine if a liability should be recorded.
  - b) Gaining an understanding and assessing the reasonability of the remediation estimates for contaminated sites deemed to be relevant to this standard and performed a recalculation of the present value of the determined liability.
  - c) Obtaining an understanding of management's methodology for estimating contaminated site liabilities and ensuring that the approach used to quantify the potential liabilities is reasonable.
  - d) We have concluded that management's approach to identifying, evaluation and determining the liability in accordance with the PSAB standard is appropriate and that the liability recorded in the current year is reasonable.
2. The Town provides certain employee benefits which will require funding in future periods. These benefits include long term disability, benefits under the Workplace Safety Insurance Board ("WSIB") Act and extended health and dental benefits for early retirees. The liability for these future benefits has been determined by actuarial valuation.
  - Our response to the employee benefit obligation included the following procedures:
    - a) Obtaining a copy of the most recent actuarial valuation completed in 2018, and subsequent updates in 2019, 2020 and 2021. As is required, a full valuation is currently in progress as of December 31, 2021.
    - b) Assessing management's assumptions for reasonableness and ensured disclosures in the financial statements were complete and accurate.
    - c) Assessing the actuary's qualifications.
    - d) We determined that the work of management's expert and management's assumptions were reasonable and could be utilized as audit evidence to support our assessment of the employee benefits obligation.

## Significant findings

No significant audit findings to report.

# Audit risks and results

Area of focus	New or changed?	Estimate?
Cyber incident	Yes	No
<b>Our response</b>		
<p>During March 2022, the Town was subject to a cyber-attack which impacted the IT systems responsible for financial management and reporting. As part of our audit, we are required to involve KPMG specialists to evaluate whether there are audit implications to the current period audit (2021) or future periods (2022, the year in which the attack occurred).</p> <p>We engaged Cyber Risk Management specialists who performed a detailed analysis of the Town's third-party incident report including follow up questions with the Town Treasurer. Based on the review of the report and inquiries with management, we are satisfied that the 2021 financial data was satisfactorily verified and the attack did not have a financial statement impact.</p>		
<b>Significant findings</b>		
<p>No significant audit findings to report.</p>		

# Significant accounting policies and practices

---



## Initial selections

---

There were no new selections made during fiscal 2021 to profile.

---



## Changes

---

There have been no changes to significant accounting policies and practices and the impact on the financial statements.

---



## Future Implementation

---

There are a number of new standards becoming effective over the next two to three years. As discussed previously, Asset Retirement Obligations is effective for fiscal 2023 and will require significant investment of time from management to ensure adoption is appropriate and complete. We are available to assist management in navigating the challenges of the implementation.

The evidence to support the adoption of the standard will come from many sources and require inputs from departments across the Town. As an example, the property acquired in 2017 contains an underground storage tank that will require work in the future to retire and therefore an associated accounting impact under this new standard.

Refer to Appendix 2 for additional information on the new standards that will become effective, and Appendix 7 for detailed guidance on the Asset Retirement Obligation standard.

---

# Financial statement presentation and disclosure

Misstatements, including omissions, if any, related to financial statement presentation and disclosure items are in the management representation letter.

We also highlight the following:

---

## Form, arrangement, and content of the financial statements

The financial statements are, in all material respects, in accordance with the applicable financial accounting framework. The disclosures in the notes to the financial statements are adequate. We have provided feedback and suggested changes in the financial statement presentation and disclosure and are satisfied with the action taken by management.

---

## Significant qualitative aspects of financial statement presentation and disclosure

There are no concerns at this time regarding significant qualitative aspects of financial statement presentation and disclosure.

---

# Uncorrected differences and corrected adjustments

Differences and adjustments include disclosure and presentation differences and adjustments.

Professional standards require that we request of management and the audit committee that all identified differences be corrected. We have already made this request of management.

## Uncorrected differences

The management representation letter includes the Summary of Uncorrected Audit Misstatements, which discloses the impact of all uncorrected differences considered to be other than clearly trivial.

Based on both qualitative and quantitative considerations, management have decided not to correct certain differences and represented to us that the differences —individually and in the aggregate—are, in their judgment, not material to the financial statements. This management representation is included in the management representation letter.

We concur with management's representation that the differences are not material to the financial statements. Accordingly, the differences have no effect on our auditors' report.

## Corrected adjustments

We did not identify any adjustments that were communicated to management and subsequently corrected in the financial statements.

# Control deficiencies

## Consideration of internal control over financial reporting

A significant deficiency in internal control over financial reporting is a deficiency, or combination of deficiencies, in internal control that, in the auditor's professional judgment, is of sufficient importance to merit the attention of those charged with governance.

In planning and performing our audit, we considered ICFR relevant to the Entity's preparation of the financial statements in order to design audit procedures that are appropriate in the circumstances for the purpose of expressing an opinion on the financial statements, but not for the purpose of expressing an opinion on ICFR.

Our understanding of internal control over financial reporting was for the limited purpose described above and was not designed to identify all control deficiencies that might be significant deficiencies. The matters being reported are limited to those deficiencies that we have identified during the audit that we have concluded are of sufficient importance to merit being reported to those charged with governance.

Our awareness of control deficiencies varies with each audit and is influenced by the nature, timing, and extent of audit procedures performed, as well as other factors. Had we performed more extensive procedures on internal control over financial reporting, we might have identified more significant deficiencies to be reported or concluded that some of the reported significant deficiencies need not, in fact, have been reported.

We did not identify control deficiencies determined to be significant deficiencies in internal control.

# Appendices

## Content

**Appendix 1: Other Required communications**

**Appendix 2: Current Developments**

**Appendix 3: Management Representation Letter**

**Appendix 4: Technology in the Audit**

**Appendix 5: Audit and Assurance Insights**

**Appendix 6: Asset retirement obligations**

**Appendix 7: Environment Social and Governance (ESG)**





# Appendix 1: Other required communications

<b>Report</b>	<b>Engagement terms</b>
The conclusion of our audit is set out in our draft auditors' report attached to the draft financial statements.	A copy of the engagement letter and any subsequent amendments has been provided to management.
<b>Reports to the audit committee</b>	<b>Representations of management</b>
We have provided our audit planning report to you on December 3, 2021.	In accordance with professional standards, Management have been provided with a copy of the representation letter for the audit of the financial statements. This letter is to be signed by management and may be made available to you upon request.
<b>Audit Quality in Canada</b>	<b>Control deficiencies</b>
<p>The reports available through the following links were published by the Canadian Public Accountability Board to inform audit committees and other stakeholders about the results of quality inspections conducted over the past year:</p> <ul style="list-style-type: none"><li>• <a href="#">CPAB Audit Quality Insights Report: 2021 Interim Inspections Results</a></li><li>• <a href="#">CPAB Audit Quality Insights Report: 2020 Interim Inspection Results</a></li></ul> <p>Visit our <a href="#">Audit Quality Resources page</a> for more information including access to our <a href="#">Transparency report</a></p>	Other control deficiencies, identified during the audit, that do not rise to the level of a significant deficiency have been, communicated to management as required.
<b>Matters pertaining to independence</b>	
We confirm that we are independent as auditors and that we have not provided any services to the Town which would infringe on our independence.	

# Appendix 2: Current Developments

## Public Sector Accounting Standards

Standard	Summary and implications
Impact of COVID-19	<ul style="list-style-type: none"> <li>In response to the impact of COVID-19 on public sector entities, PSAB has approved deferral of all upcoming accounting standards by one year and will issue non-authoritative guidance on the effects of COVID-19. The dates noted below reflect the new revised dates.</li> </ul>
Asset Retirement Obligations	<ul style="list-style-type: none"> <li>The new standard is effective for fiscal years beginning on or after April 1, 2022. The effective date was deferred by one year due to COVID-19. This would be applicable to the Town's fiscal year starting on January 1, 2023.</li> <li>The new standard addresses the recognition, measurement, presentation and disclosure of legal obligations associated with retirement of tangible capital assets in productive use. Retirement costs will be recognized as an integral cost of owning and operating tangible capital assets. PSAB currently contains no specific guidance in this area.</li> <li>The ARO standard will require the public sector entity to record a liability related to future costs of any legal obligations to be incurred upon retirement of any controlled tangible capital assets ("TCA"). The amount of the initial liability will be added to the historical cost of the asset and amortized over its useful life.</li> <li>As a result of the new standard, the public sector entity will have to: <ul style="list-style-type: none"> <li>Consider how the additional liability will impact net debt, as a new liability will be recognized with no corresponding increase in a financial asset;</li> <li>Carefully review legal agreements, senior government directives and legislation in relation to all controlled TCA to determine if any legal obligations exist with respect to asset retirements;</li> <li>Begin considering the potential effects on the organization as soon as possible to coordinate with resources outside the finance department to identify AROs and obtain information to estimate the value of potential AROs to avoid unexpected issues.</li> </ul> </li> </ul>
Revenue	<ul style="list-style-type: none"> <li>The new standard is effective for fiscal years beginning on or after April 1, 2023. The effective date was deferred by one year due to COVID-19. This would be applicable to the Town's fiscal year starting on January 1, 2024.</li> <li>The new standard establishes a single framework to categorize revenues to enhance the consistency of revenue recognition and its measurement.</li> <li>The standard notes that in the case of revenues arising from an exchange transaction, a public sector entity must ensure the recognition of revenue aligns with the satisfaction of related performance obligations.</li> <li>The standard notes that unilateral revenues arise when no performance obligations are present, and recognition occurs when there is authority to record the revenue and an event has happened that gives the public sector entity the right to the revenue.</li> </ul>

Standard	Summary and implications
Financial Instruments and Foreign Currency Translation	<ul style="list-style-type: none"> <li>— The accounting standards, PS3450 <i>Financial Instruments</i>, PS2601 <i>Foreign Currency Translation</i>, PS1201 <i>Financial Statement Presentation</i> and PS3041 <i>Portfolio Investments</i> are effective for fiscal years commencing on or after April 1, 2022. The effective date was deferred by one year due to COVID-19. This would be applicable to the Town's fiscal year starting on January 1, 2023.</li> <li>— Equity instruments quoted in an active market and free-standing derivatives are to be carried at fair value. All other financial instruments, including bonds, can be carried at cost or fair value depending on the public sector entity's choice and this choice must be made on initial recognition of the financial instrument and is irrevocable.</li> <li>— Hedge accounting is not permitted.</li> <li>— A new statement, the Statement of Remeasurement Gains and Losses, will be included in the financial statements. Unrealized gains and losses incurred on fair value accounted financial instruments will be presented in this statement. Realized gains and losses will continue to be presented in the statement of operations.</li> <li>— In July 2020, PSAB approved federal government narrow-scope amendments to PS3450 <i>Financial Instruments</i> which will be included in the Handbook in the fall of 2020. Based on stakeholder feedback, PSAB is considering other narrow-scope amendments related to the presentation and foreign currency requirements in PS3450 <i>Financial Instruments</i>. The exposure drafts were released in summer 2020 with a 90-day comment period.</li> </ul>
Employee Future Benefit Obligations	<ul style="list-style-type: none"> <li>— PSAB has initiated a review of sections PS3250 <i>Retirement Benefits</i> and PS3255 <i>Post-Employment Benefits, Compensated Absences and Termination Benefits</i>. In July 2020, PSAB approved a revised project plan.</li> <li>— PSAB intends to use principles from International Public Sector Accounting Standard 39 <i>Employee Benefits</i> as a starting point to develop the Canadian standard.</li> <li>— Given the complexity of issues involved and potential implications of any changes that may arise from the review of the existing guidance, PSAB will implement a multi-release strategy for the new standards. The first standard will provide foundational guidance. Subsequent standards will provide additional guidance on current and emerging issues.</li> </ul>

Standard	Summary and implications
Public Private Partnerships ("P3")	<ul style="list-style-type: none"> <li>— PSAB has proposed new requirements for the recognition, measurement and classification of infrastructure procured through a public private partnership. PSAB is in the process of reviewing feedback provided by stakeholders on the exposure draft.</li> <li>— The exposure draft proposes that recognition of infrastructure by the public sector entity would occur when it controls the purpose and use of the infrastructure, when it controls access and the price, if any, charged for use, and it controls any significant interest accumulated in the infrastructure when the P3 ends.</li> <li>— The exposure draft proposes that the public sector entity recognize a liability when it needs to pay cash or non-cash consideration to the private sector partner for the infrastructure.</li> <li>— The infrastructure would be valued at cost, which represents fair value at the date of recognition with a liability of the same amount if one exists. Cost would be measured in reference to the public private partnership process and agreement, or by discounting the expected cash flows by a discount rate that reflects the time value of money and risks specific to the project.</li> <li>— The final standard was approved in December 2020 with an issuance date of April 1, 2021 and an effective date of April 1, 2023 or the Town's year ending December 31, 2024.</li> </ul>
Concepts Underlying Financial Performance	<ul style="list-style-type: none"> <li>— PSAB is in the process of reviewing the conceptual framework that provides the core concepts and objectives underlying Canadian public sector accounting standards.</li> <li>— PSAB has released four exposure drafts for the proposed conceptual framework and proposed revised reporting model, and their related consequential amendments. Comments on the exposure drafts are due in May 2021.</li> <li>— PSAB is proposing a revised, ten-chapter conceptual framework intended to replace PS 1000 <i>Financial Statement Concepts</i> and PS 1100 <i>Financial Statement Objectives</i>. The revised conceptual framework would be defined and elaborate on the characteristics of public sector entities and their financial reporting objectives. Additional information would be provided about financial statement objectives, qualitative characteristics and elements. General recognition and measurement criteria, and presentation concepts would be introduced.</li> <li>— In addition, PSAB is proposing: <ul style="list-style-type: none"> <li>• Relocation of the net debt indicator to its own statement and the statement of net financial assets/liabilities, with the calculation of net debt refined to ensure its original meaning is retained.</li> <li>• Separating liabilities into financial liabilities and non-financial liabilities.</li> <li>• Restructuring the statement of financial position to present non-financial assets before liabilities.</li> <li>• Changes to common terminology used in the financial statements, including re-naming accumulated surplus (deficit) to net assets (liabilities).</li> <li>• Removal of the statement of remeasurement gains (losses) with the information instead included on a new statement called the statement of changes in net assets (liabilities). This new statement would present the changes in each component of net assets (liabilities), including a new component called "accumulated other".</li> <li>• A new provision whereby an entity can use an amended budget in certain circumstances.</li> <li>• Inclusion of disclosures related to risks and uncertainties that could affect the entity's financial position.</li> </ul> </li> </ul>

Standard	Summary and implications
International Strategy	<ul style="list-style-type: none"> <li>PSAB has reviewed all proposed options for its international strategy, and in accordance with its due process, approved the option to adapt International Public Sector Accounting Standards when developing future standards. PSAB noted that the decision will apply to all projects beginning on or after April 1, 2021.</li> <li>An exposure draft to modify the GAAP hierarchy was issued and public comments were accepted up to February 15, 2021.</li> </ul>
Purchased Intangibles	<ul style="list-style-type: none"> <li>In October 2019, PSAB approved a proposal to allow public sector entities to recognize intangibles purchased through an exchange transaction. Practitioners are expected to use the definition of an asset, the general recognition criteria and the GAAP hierarchy to account for purchased intangibles.</li> <li>PSAB has approved Public Sector Guideline 8 which allows recognition of intangibles purchased through an exchange transaction. Narrow-scope amendments were made to Section PS 1000 Financial statement concepts to remove prohibition on recognition of intangibles purchased through exchange transactions and PS 1201 Financial statement presentation to remove the requirement to disclose that purchased intangibles are not recognized.</li> <li>The effective date is April 1, 2023 (Town's year ending December 31, 2024) with early adoption permitted. Application may be retroactive or prospective.</li> </ul>

## Appendix 3: Management representation letter

KPMG LLP  
Commerce Place  
21 King Street West, Suite 700  
Hamilton ON L8P 4W7  
Canada

September 6, 2022

We are writing at your request to confirm our understanding that your audit was for the purpose of expressing an opinion on the consolidated financial statements (hereinafter referred to as “financial statements”) of The Corporation of the Town of Halton Hills (“the Entity”) as at and for the period ended December 31, 2021.

*General:*

We confirm that the representations we make in this letter are in accordance with the definitions as set out in [Attachment I](#) to this letter.

We also confirm that, to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

*Responsibilities:*

- 1) We have fulfilled our responsibilities, as set out in the terms of the engagement letter dated December 21, 2020, including for:
  - a) the preparation and fair presentation of the financial statements and believe that these financial statements have been prepared and present fairly in accordance with the relevant financial reporting framework.
  - b) providing you with all information of which we are aware that is relevant to the preparation of the financial statements (“relevant information”), such as financial records, documentation and other matters, including:
    - the names of all related parties and information regarding all relationships and transactions with related parties;
    - the complete minutes of meetings, or summaries of actions of recent meetings for which minutes have not yet been prepared, of shareholders, board of directors and committees of the board of directors that may affect the financial statements. All significant actions are included in such summaries.
  - c) providing you with unrestricted access to such relevant information.
  - d) providing you with complete responses to all enquiries made by you during the engagement.

- e) providing you with additional information that you may request from us for the purpose of the engagement.
- f) providing you with unrestricted access to persons within the Entity from whom you determined it necessary to obtain audit evidence.
- g) such internal control as we determined is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error. We also acknowledge and understand that we are responsible for the design, implementation and maintenance of internal control to prevent and detect fraud.
- h) ensuring that all transactions have been recorded in the accounting records and are reflected in the financial statements.
- i) ensuring that internal auditors providing direct assistance to you, if any, were instructed to follow your instructions and that we, and others within the entity, did not intervene in the work the internal auditors performed for you.

*Internal control over financial reporting:*

- 2) We have communicated to you all deficiencies in the design and implementation or maintenance of internal control over financial reporting of which we are aware.

*Fraud & non-compliance with laws and regulations:*

- 3) We have disclosed to you:
  - a) the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
  - b) all information in relation to fraud or suspected fraud that we are aware of that involves:
    - management;
    - employees who have significant roles in internal control over financial reporting; or
    - otherswhere such fraud or suspected fraud could have a material effect on the financial statements.
  - c) all information in relation to allegations of fraud, or suspected fraud, affecting the financial statements, communicated by employees, former employees, analysts, regulators, or others.
  - d) all known instances of non-compliance or suspected non-compliance with laws and regulations, including all aspects of contractual agreements, whose effects should be considered when preparing financial statements.
  - e) all known actual or possible litigation and claims whose effects should be considered when preparing the financial statements.



*Subsequent events:*

- 4) All events subsequent to the date of the financial statements and for which the relevant financial reporting framework requires adjustment or disclosure in the financial statements have been adjusted or disclosed.

*Related parties:*

- 5) We have disclosed to you the identity of the Entity's related parties.
- 6) We have disclosed to you all the related party relationships and transactions/balances of which we are aware.
- 7) All related party relationships and transactions/balances have been appropriately accounted for and disclosed in accordance with the relevant financial reporting framework.

*Estimates:*

- 8) The methods, the data and the significant assumptions used in making accounting estimates, and their related disclosures are appropriate to achieve recognition, measurement or disclosure that is reasonable in the context of the applicable financial reporting framework.

*Going concern:*

- 9) We have provided you with all information relevant to the use of the going concern assumption in the financial statements.
- 10) We confirm that we are not aware of material uncertainties related to events or conditions that may cast significant doubt upon the Entity's ability to continue as a going concern.

*Comparative information:*

- 11) In respect of the restatement made in the comparative information for deferred revenue and accumulated surplus related to the change in accounting policy around development charges, we reaffirm that the written representations we previously provided to you, in respect of the prior period financial statements presented as comparative information, remain appropriate.

*Misstatements:*

- 12) The effects of the uncorrected misstatements described in [Attachment II](#) are immaterial, both individually and in the aggregate, to the financial statements as a whole.

*Non-SEC registrants or non-reporting issuers:*

- 13) We confirm that the Entity is not a Canadian reporting issuer (as defined under any applicable Canadian securities act) and is not a United States Securities and Exchange Commission ("SEC") Issuer (as defined by the Sarbanes-Oxley Act of 2002).
- 14) We also confirm that the financial statements of the Entity will not be included in the group financial statements of a Canadian reporting issuer audited by KPMG or an SEC Issuer audited by any member of the KPMG organization.

*Approval of financial statements:*

- 15) Moya Jane Leighton, Treasurer, has the recognized authority to take, and has taken, responsibility for the financial statements.

Yours very truly,

---

Moya Jane Leighton, Treasurer

cc: KPMG LLP

## ***Attachment I – Definitions***

### ***Materiality***

Certain representations in this letter are described as being limited to matters that are material.

Information is material if omitting, misstating or obscuring it could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

Judgments about materiality are made in light of surrounding circumstances, and are affected by perception of the needs of, or the characteristics of, the users of the financial statements and, the size or nature of a misstatement, or a combination of both while also considering the entity's own circumstances.

Information is obscured if it is communicated in a way that would have a similar effect for users of financial statements to omitting or misstating that information. The following are examples of circumstances that may result in material information being obscured:

- a) information regarding a material item, transaction or other event is disclosed in the financial statements but the language used is vague or unclear;
- b) information regarding a material item, transaction or other event is scattered throughout the financial statements;
- c) dissimilar items, transactions or other events are inappropriately aggregated;
- d) similar items, transactions or other events are inappropriately disaggregated; and
- e) the understandability of the financial statements is reduced as a result of material information being hidden by immaterial information to the extent that a primary user is unable to determine what information is material.]

### ***Fraud & error***

Fraudulent financial reporting involves intentional misstatements including omissions of amounts or disclosures in financial statements to deceive financial statement users.

Misappropriation of assets involves the theft of an entity's assets. It is often accompanied by false or misleading records or documents in order to conceal the fact that the assets are missing or have been pledged without proper authorization.

An error is an unintentional misstatement in financial statements, including the omission of an amount or a disclosure.

## Attachment II – Summary of Audit Misstatements Schedule(s)

The Corporation of the Town of Halton Hills  
Summary of Uncorrected Audit Misstatements  
December 31, 2021

Correcting Entry Required at Current Period End						Income Statement Effect - Debit(Credit)			Balance Sheet Effect - Debit (Credit)			
ID	Description of misstatement	Type of misstatement	Accounts	Debit	(Credit)	Income effect of correcting the balance sheet in prior period (carryforward from prior period)	Income effect of correcting the current period balance sheet	Income effect according to Rollover (Income Statement) method	Accumulated Surplus	Financial Assets	Nonfinancial assets	
				A		B	C=A (Only Income Statement accounts)	C-B				
USAD1	Reclassification from AR to Cash for voided cheque.	Factual	AR		(106,222)					(106,222)		
			Cash	106,222						106,222		
				Total		-	-	-	-	-	-	-

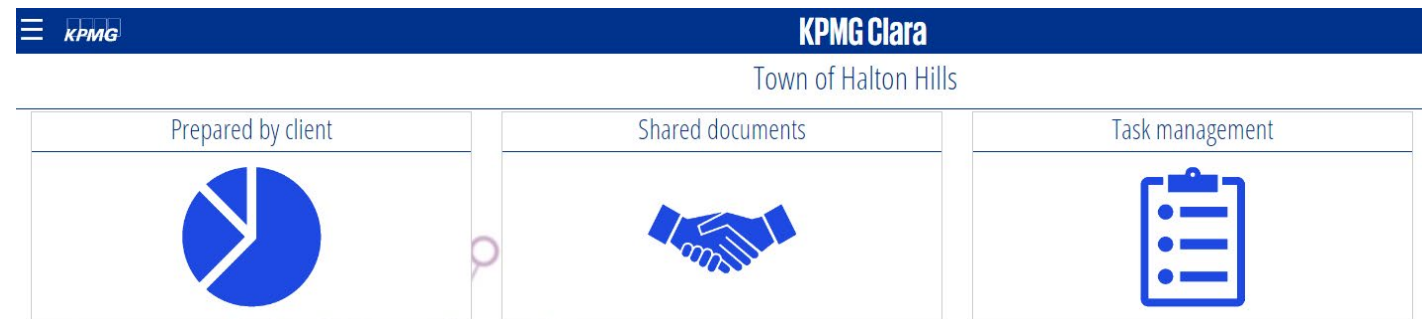
# Appendix 4: Technology in the audit

As previously communicated in our Audit Planning Report, we have utilized technology to enhance the quality and effectiveness of the audit.

Technology	Areas of the audit where Advance Technology routines were used
<b>Journal Entry Analysis</b>	<p>Utilized KPMG application software (IDEA) to evaluate the completeness of the journal entry population through a roll-forward of all accounts</p> <p>Utilized computer-assisted audit techniques (CAATs) to analyze journal entries and apply certain criteria to identify potential high-risk journal entries for further testing such as entries that adjust the cash accounts while impacting a revenue or expense account or entries that move costs between funded programs</p>

## KPMG Clara for Clients (“KCFC”)

We utilized our collaboration platform to handle our requests and securely obtain the information needed for the audit.



# Appendix 5: Audit and assurance insights

Our latest thinking on the issues that matter most to audit committees, Boards and Management.

Featured insight	Summary	Reference
<b>Accelerate 2022</b>	The key issues driving the audit committee agenda in 2022	<a href="#">Learn more</a>
<b>Audit Committee Guide – Canadian Edition</b>	A practical guide providing insight into current challenges and leading practices shaping audit committee effectiveness in Canada	<a href="#">Learn more</a>
<b>Unleashing the positive in net zero</b>	Real solutions for a sustainable and responsible future	<a href="#">Learn more</a>
<b>KPMG Audit &amp; Assurance Insights</b>	Curated research and insights for audit committees and boards.	<a href="#">Learn more</a>
<b>Board Leadership Centre</b>	Leading insights to help board members maximize boardroom opportunities.	<a href="#">Learn more</a>
<b>KPMG Climate Change Financial Reporting Resource Centre</b>	Our climate change resource centre provides insights to help you identify the potential financial statement impacts to your business.	<a href="#">Learn more</a>
<b>The business implications of coronavirus (COVID 19)</b>	Resources to help you understand your exposure to COVID-19, and more importantly, position your business to be resilient in the face of this and the next global threat.	<a href="#">Learn more</a>
<b>Momentum</b>	A quarterly Canadian newsletter which provides a snapshot of KPMG's latest thought leadership, audit and assurance insights and information on upcoming and past audit events – keeping management and board members abreast on current issues and emerging challenges within audit.	<a href="#">Sign-up now</a>
<b>Current Developments</b>	Series of quarterly publications for Canadian businesses including Spotlight on IFRS, Canadian Securities & Auditing Matters and US Outlook reports.	<a href="#">Learn more</a>
<b>KPMG Learning Academy</b>	Technical accounting and finance courses designed to arm you with leading-edge skills needed in today's disruptive environment.	<a href="#">Learn more</a>

# Appendix 6: Asset retirement obligations

## Implications

### Financial reporting implications

A liability for asset retirement costs will be recorded with a corresponding increase in the cost of tangible capital assets in productive use, resulting in a decrease (increase) to the net financial assets (net debt) reported in the Statement of Financial Position.

Asset retirement obligations associated with tangible capital assets that are not recognized or no longer in productive use are expensed.

Additional non-cash expenses for the amortization of tangible capital assets and accretion will be recognized annually.

The total cost of legally required retirement activities will be recognized earlier in a tangible capital asset's life. There is no change to the total cost recorded over an asset's life.

A rigorous process needs to be established to support updates to the ARO measurement on an annual basis post-initial implementation.

### Asset management implications

The asset retirement date used to determine the asset retirement liability needs to be consistent with the useful life of the related tangible capital asset. As a result, public sector entities need to assess whether the useful lives of tangible capital assets continue to be accurate and consistent with asset management plans.

Many public sector entities are using the implementation of PS 3280 as an opportunity to develop or refine their asset management plans.

### Funding implications

PS 3280 does not provide guidance on how the asset retirement liability should be funded. Many public sector entities currently fund retirement costs as they are incurred at the end of the asset's life. Public sector entities will need to assess whether this practice remains appropriate or if funding will be obtained over the life of the asset.

### Budget implications

In addition to budgeting for costs associated with the initial implementation of PS 3280, public sector entities will need to consider if the non-cash accretion expense and additional amortization expense will be included in the annual budget.

Public sector entities operating under balanced budget legislation or similar guidelines will need to obtain guidance from the provincial government to determine the impact of PS 3280 on current requirements.

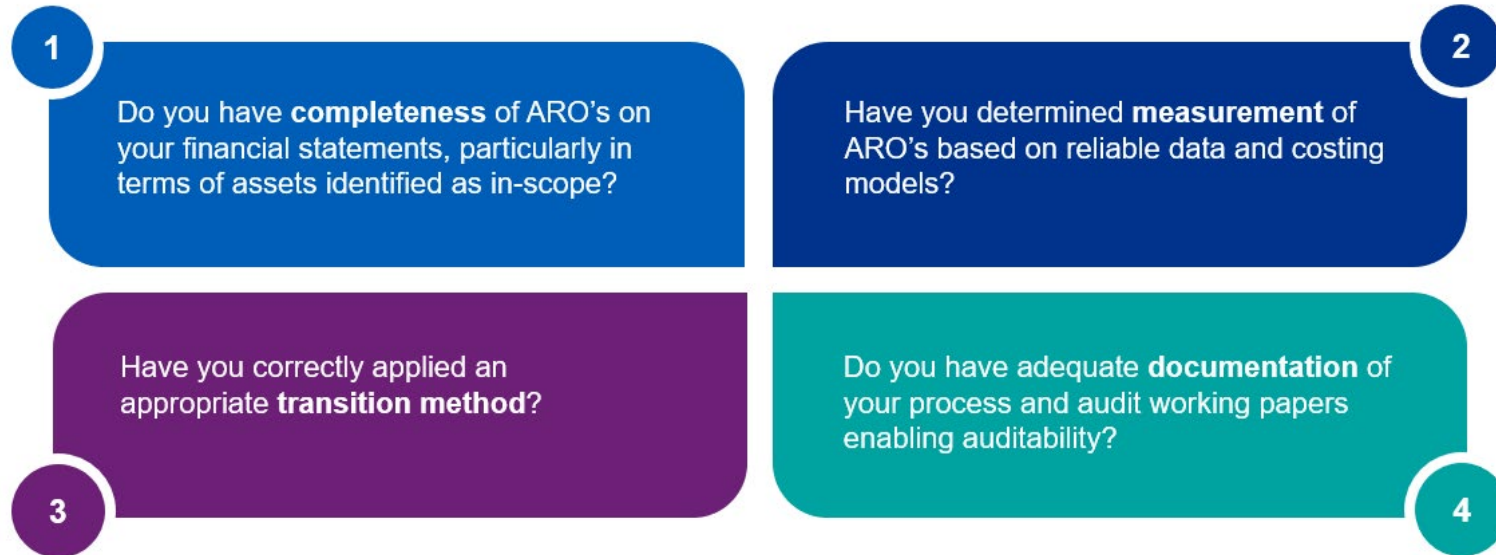
### Capital planning implications

PS 3280 requires legal obligations associated with the retirement of tangible capital assets to be recorded when the assets are acquired, constructed or developed. As a result, the cost of legally required retirement activities will need to be considered at the inception of a capital project to determine the financial viability and impact of the project.

KPMG is available to help public sector entities analyze the implications of PS 3280 and determine how to mitigate resulting risks.

# Appendix 6: Asset retirement obligations (continued)

## Key audit risks





# Appendix 6: Asset retirement obligations (continued)

## Implementation project

### Project planning

- ❑ Project team is cross-functional and includes Finance and non-Finance personnel.
- ❑ Sufficient personnel resources are available for the implementation project.
- ❑ Where required, external experts have been engaged.
- ❑ The project plan identifies who is responsible for each project task.
- ❑ Project timelines are reasonable.
- ❑ Auditor involvement has been scheduled at each significant project milestone.
- ❑ Asset retirement obligations policy has been drafted.
- ❑ Funding is available for PS 3280 implementation costs.
- ❑ Recurring project updates are provided to the Audit Committee or other governance body to engage them in the implementation process.

### Scoping

- ❑ The tangible capital assets listing reconciles to the audited financial statements.
- ❑ Agreements (e.g. leases, statutory rights of way, etc.) have been reviewed for potential legal obligations.
- ❑ Productive and non-productive assets have been included in the scoping analysis.
- ❑ Assets with similar characteristics and risks have been grouped together in the scoping analysis.
- ❑ All relevant legal acts, regulations, guidelines, etc. have been identified.
- ❑ Relevant internal stakeholders have been interviewed to obtain information about potential retirement obligations.

### Measurement

- ❑ Cost information is relevant and reliable.
- ❑ Only costs directly attributable to legally required retirement activities have been included in the liability.
- ❑ If applicable, the discount rate is consistent with the risks and timelines inherent in the cash flows.
- ❑ If discounting is applied, it is based on reliable information to inform the timing of future cash flows.
- ❑ Asset retirement obligations have been linked to specific tangible capital assets.
- ❑ The useful life of the tangible capital asset remain appropriate and are consistent with estimated asset retirement date.
- ❑ The transition method selected is appropriate based on the measurement information available.
- ❑ Calculations are mathematically accurate.

### Financial reporting

- ❑ Financial statements have been mocked up to include asset retirement obligations.
- ❑ Note disclosures, including significant accounting policies, have been drafted.
- ❑ Documentation prepared during the project has been reviewed to ensure it is accurate and complete.
- ❑ Plans have been implemented for the annual post-implementation review and update of the asset retirement obligation liability.

# Appendix 6: Asset retirement obligations (continued)

## Implementation milestones

PHASE #1:	
Step #1	Development of a PS3280 compliant policy. Include a definition for in-scope assets, productive and non-productive assets, and document known sources of legal obligations (such as regulations and contracts) as well as key roles and responsibilities for retirement obligation identification, measurement and reporting.
Step #2	Identification of TCA/sites inventory. Develop an inventory of potential in-scope assets or sites based on existing TCA listings, and inventories used for PS3260 contaminated sites. Reconcile the listing of TCA items to the audited financial statements. Assess in-scope assets against PS3280 recognition criteria.
Milestone - Audit team review of PS3280 policy, asset listings and in-scope assets during Fall 2022.	
PHASE #2:	
Step #3	Measure the estimated liability. Assess available information, and consider the need for additional environmental assessment of any sites. Document key assumptions and variables, and selection of transition method. Determine if discounting will be applied for any assets. Consider impacts on useful life assumptions for in-scope assets. Document measurement methodology and range of estimate for in-scope assets.
Milestone - Audit team review of measurement methodology and range of estimates in Fall 2022.	
Step #4	Reporting. Prepare a library of documentation and assumptions supporting each retirement obligation for audit purposes, and comprehensive documentation of the process followed for implementation. Prepare template financial statements and related note disclosure for 2023 year end.
Milestone - Audit team review of working papers and template financial statements in Winter/Spring 2023.	

# Appendix 7: Environment Social and Governance (ESG)

When thinking about ESG, the following are the two key considerations:

## Financial Reporting Impacts

- How a Organization reflects the impacts of climate-related matters in the financial statements will depend on its specific facts and circumstances, including the nature and extent of those impacts on the Organization.
- IFRS Standards do not refer explicitly to climate-related risks or climate-related matters, but they implicitly require relevant disclosures in the financial statements when climate-related matters considered in preparing the financial statements are material.
- Organizations are required to consider materiality carefully in deciding what information to provide as information may be material even though there is no current-period financial impact.



Accounting impacts from ESG-related risks and opportunities on key areas of judgement and estimates that may be relevant will vary by industry.

## Sustainability Reporting

- ESG-related information is frequently disclosed outside of traditional financial statements whether in be in separate sustainability reports but also could be within the MD&A and/or AIF
- Such information can be in the form of key metrics as identified by management or specific qualitative information around key risks and opportunities



Common voluntary disclosure frameworks used are Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB) by industry, and the Taskforce on Climate-Related Financial Disclosures (TCFD).

# Appendix 7: Environment Social and Governance (continued)

## How might climate-related risks impact the financial statements?

The audit committee's deep understanding of internal control and financial reporting puts it in a good position to challenge management to develop systems and processes for ESG risk and opportunity identification, to create resilient strategies to manage these risks, to develop metrics, processes and controls around data collection and ESG reporting.

The following are ten questions as a starting point to assess the impact on financial statements.



10 questions to start  
impact assessment  
of climate-related  
risks to the financial  
statements

- 01 Has your Organization made a net-zero commitment?
- 02 Does your Organization have polluting assets?
- 03 Is your Organization exposed to carbon-related regulation?
- 04 What about your inventory and production costs?
- 05 Does your Organization take part in an emissions scheme?
- 06 Does your Organization borrow funds?
- 07 Is your Organization a provider of finance?
- 08 What about your staff benefits?
- 09 What about your cash flow forecasts?
- 10 What about your disclosures?

# Appendix 7: Environment Social and Governance (continued)

## The Importance of ESG



### Public Commitment

Increased public commitments to global initiatives and announcements relating to climate change, nature, sustainable development goals, impact and social issues.



### Access to capital

Investors, lenders and underwriters increasingly factor in ESG considerations when making investment decisions, offer sustainability-linked products and require sustainability-related information from customers and clients.



### Regulatory developments

ESG-related compliance costs and disclosure requirements continue to evolve, as securities commissions, prudential supervisors, stock exchanges and governments tighten the rules.



### Reporting standards

Measurement and reporting of ESG-related information is maturing rapidly, as investor-centric disclosure standards are making headway (e.g. ISSB, TCFD, SASB).



### Societal pressure

Stakeholders increasingly scrutinize companies' ESG performance and transparency affecting project approval, brand acceptance and consumer demand.



### Climate change

Widespread recognition that climate change is a material financial risk – measuring and managing climate risks (and opportunities) is maturing and considered critical to financial risk management.



### Enhanced risk management and investment returns

ESG integration has become an investment norm. 75% of institutional investors now consider ESG factors to be "material" to their investment analysis.



### Workforce of the future

ESG has become a key factor in attracting and retaining top talent, as employees are seeking purpose from their work.



