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COVID-19に関連する決算・監査上の留意事項(例)

新型コロナウイルス感染症の拡大により、企業の事業活動において工場の一時閉 鎖や従業員の在宅勤務の開始など、様々な影響が生じている。

これらは2020年3月末に決算期を迎えるタイ国内日系企業の決算スケジュール、および監査スケジュールにも影響を与えることが想定され、特に以下のような項目につき、留意が必要と考えられる。

なお、以下に記載する事項は、現時点で一般的に留意すべきと考えられる事項を例示列挙したものであり、今後の状況変化により追加して留意すべき事項が生じる可能性がある。

(1)企業への往査制限に伴う決算・監査スケジュールの延長 企業への往査制限や在宅勤務に伴い決算や監査の進捗に遅延が発生する場合、 今後の決算・監査スケジュールを再検討して監査報告書の提出日を見直す必要性 を検討することが想定される。

(2)電子媒体等の情報の信頼性の確認

企業への往査が制限されると、企業が監査に必要な証憑を複写又は PDF等の電子 媒体に変更したものを監査証拠として監査人に提出する、あるいは企業のデータベ 一スからダウンロードした情報を監査人が利用することが想定される。このような場 合には、情報の信頼性を確認するため、監査人が電子媒体に変換された文書の作 成と管理に関する内部統制について評価・検討する、あるいは必要に応じて企業へ の往査が可能になったタイミングで原本確認を行うなど、追加の手続を実施する可 能性がある。

(3)残高確認状の発送・回収遅延に伴う追加手続

新型コロナウイルスの感染症拡大防止対策の影響により、事業が停止している、又は業務が遅滞していることによって、海外に所在する金融機関や企業から確認状に対する回答が得られない場合が想定される。この場合、監査人は、相手先の状況を踏まえ、確認状回収の可否や代替的な手続の可否について追加の検討を要することになると考えられる。

(4)資産の評価減・引当金の追加検討

新型コロナウイルス感染症に起因する事業活動の縮小や停止、将来キャッシュ・フローの悪化、将来の課税所得の見積りの下振れの可能性等の影響により、企業が保有する資産の評価減や減損要否、あるいは引当金の設定について、より一層の検討が必要となる可能性がある。この場合、決算日現在において新型コロナウイルス感染症に起因してどのような影響がどの程度生じているかを見積もり、その程度を勘案して、当事業年度の会計処理に反映させるかどうかを検討する必要があると考えられる。

(5)継続企業の前提

財務諸表は、事業の停止や清算、またはその他の合理的な理由がない限り、企業 等が将来にわたって存続することを前提(継続企業の前提)として作成されており、 経営者は期末日後に生じた事象も加味して、継続企業の前提が適切かどうかの評 価を実施する必要がある。

新型コロナウイルス感染症に起因する大幅な赤字や資金繰り悪化などで、この前提が崩れかねない場合には、経営者は継続企業の前提のもと財務諸表を作成することの適切性を検討するとともに、財務諸表への注記要否を慎重に検討しなければならない可能性がある。また、その判断に当たり、監査人から将来キャッシュフロー予測や、親会社がタイ子会社の事業継続を保証するサポートレターなど、追加の資料を求められる可能性がある。

(6)再編計画

資金調達の困難等に直面している企業では、一部事業の売却や閉鎖、一時的・永久的な事業規模の縮小、あるいはリストラ計画の検討ないし実施をしている場合がある。その場合、以下のような項目に留意が必要と考えられる。

- ・具体的な再編計画を有しており、かつ当該計画の実施を開始する、もしくは主な 内容を公表することにより、再編の実施を周囲に合理的に期待させている場合、再 編に要するコストを引当金として計上しなければならない可能性がある。
- ・事業のいずれかの部分が現在の状態で即時売却可能であり、その売却が1年以内に完了する可能性が非常に高い場合、売却処分予定の資産及び負債は、売却予定資産負債として分類・評価される可能性がある。

(7)契約違反

新型コロナウイルス感染症による不安定な取引状況やキャッシュ・フローの不足は、企業が財務制限条項に違反するリスクを高める可能性がある。その場合、企業は財務制限条項への抵触が、関連する融資及びその他の負債の返済時期にどのように影響するか、また、報告日における負債の分類にどのように影響するかを考慮する必要がある。

では、財務計では、 でに期末日以前に財務制限条項への抵触が発生し、期末日から12か月以内に返済を請求する権利が貸主に与えられた場合、期末日以前に締結された契約で報告日から12か月を超えて支払を延期する権利が企業に与えられていない限り、当該負債は企業の財務諸表において流動負債として分類されるべきであると考えられる。一方、期末日以降に生じた抵触は開示後発事象となり、その影響が重要である場合には、財務諸表において開示されるべきであると考えられる。なお、報告日以降に財務制限状況への抵触が発生した場合、企業が継続企業として存続できるかどうかについて、不確実性が大きく高まる可能性がある。

(8)後発事象

新型コロナウイルス感染症の拡大自体は3月決算の会社にとって後発事象には該当しないが、当該ウイルスの拡大を契機として、4月以降に工場の閉鎖や人員削減、その他重要な意思決定を行う場合、また得意先の倒産など重要な事象が生じた場合には、その意思決定や事象が後発事象に該当するか、また該当する場合には後発事象として財務諸表に与える影響を慎重に判断する必要がある。また、監査人からは、客観的事実に基づく合理的な説明を求められることが想定される。

上記は、いずれも企業のビジネスや監査スケジュールに重要な影響を与える可能性があるものであり、上記に該当する可能性のある企業は、早期に担当の監査法人・会計士と協議をすることが望まれる。

Impact of COVID-19 on Accounting and Audit Considerations

The expansion of the new coronavirus infection has had various impacts, such as temporary shutdown of factories and starting of employees working from home as company's business activities.

They will make an impact on financial closing and audit timeline of Japanese companies in Thailand for the year ending March 31, 2020, and in particular, it is necessary to pay attention to the following matters in accounting and audit. The following matters are considered to be generally noted at this moment, so there is a possibility to be considered additionally due to the change of circumstances in near future.

(1) Extension of financial closing and audit timeline due to restrictions on auditor's fieldwork

In case of a delay is expected in financial closing and audit timeline due to restrictions on auditor's fieldwork or working from home, the company should re-arrange their timeline and the due date of audit report.

- (2) Check the reliability of information such as electronic media If auditor's fieldwork to the company is restricted, it is assumed that the company will copy or scan original documents to submit them to auditors as audit evidences, or that the auditor will utilize the information that the company has downloaded from its own data. In such cases, in order to verify the reliability of those electronic information, additional audit procedures may be performed; evaluating and examining internal controls related to composing and managing of documents converted into electronic media, or reviewing such original documents when it is possible to visit the company if necessary.
- (3) Additional audit procedures relating to a delay in sending and collecting confirmation letters

Due to the impact of infectious diseases of the new coronavirus, it is assumed that financial institutions and companies located overseas may not be able to provide an answer to confirmation letters since their suspension of business or their delayed operations. In this case, it is considered that auditors will perform additional audit procedures on whether to collect the confirmation letters or whether an alternative audit procedure is required based on the situation of the companies.

(4) Additional consideration on valuation of assets and provision Due to the reduction or suspension of business activities, deterioration of future cash flow and the possibility of a decline in future taxable income estimates caused by the new coronavirus infection, the valuation of assets and setting provision may be needed. In such cases, it is necessary to estimate how much impact the new coronavirus infection has brought to the company at the year-end and consider if the company should reflect such impacts on their financial statements of the current fiscal year.

(5) Going concern

Financial statements are prepared on a going concern basis unless management intends either to liquidate the entity or to cease trading, or has no realistic alternative but to do so. The assessment as to whether the going concern basis is appropriate takes into account events after the end of the reporting period.

If this fundamental is likely to collapse due to a significant deficit or fund shortage due to the new coronavirus infection, it will be necessary for management to consider the appropriateness of preparing financial statements on a going concern basis. When management is aware of material uncertainties that cast a significant doubt on the entity's ability to continue as a going concern, the entity should disclose those material uncertainties in the financial statements. In addition, in determining whether or not to note it, auditors may request additional evidences, such as future cash flow forecasts and a support letter that guarantee going concern of the company provided by its parent company.

(6) Restructuring plans

In a difficult economic environment and facing difficulties in obtaining

financing, an entity may be considering or implementing restructuring plans such as the sale or closure of part of its businesses or the downsizing (temporarily or permanently) of operations. Plans such as these may require consideration of a number of issues, including whether:

- The entity has a detailed formal plan for the restructuring and has raised a
 valid expectation in those affected that it will carry out the restructuring by
 starting to implement that plan or announcing its main features to those
 affected by it. If and only if both of these criteria are met should a
 restructuring provision be recognized; and
- If any part of the business is available for immediate sale in its present condition and completion of such a sale within one year is highly probable, the assets and liabilities to be disposed of are classified and assessed as held for sale.

(7) Breach of covenants

Unstable trading conditions and shortages of cash flows in the affected regions may increase the risk that entities breach financial covenants. Entities should consider how the breach of a loan covenant would affect the timing of repayment of the related loan and other liabilities and how it affects the classification of the related liabilities at the reporting date.

If a breach occurs on or before the end of the reporting date and the breach provides the lender with the right to demand repayment within 12 months of the reporting date, the liability should be classified as current in the entity's financial statements in the absence of any agreements made prior to the reporting date that give the entity a right to defer payment beyond 12 months after the reporting date.

In contrast, a breach of loan covenants after the reporting date is a non-adjusting event that should be disclosed in the financial statements if the information is material. A breach after the reporting date could also affect the entity's ability to continue as a going concern.

(8) Subsequent events

Although the expansion of the new coronavirus infection itself is not applicable to subsequent events for the companies for the year ending March 31, 2020, it is necessary to judge if they are applicable to subsequent events or not and their impact on the financial statements when companies decided to close their factories, layoff, made other important decisions or notified bankruptcy of a customer after April, 2020. Moreover, auditors may request reasonable evidences for them based on objective facts.

All of the above are likely to have a significant impact on the company's business and audit timeline. Companies who are applicable to the above should consult with their auditors and accountants at an early stage.













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