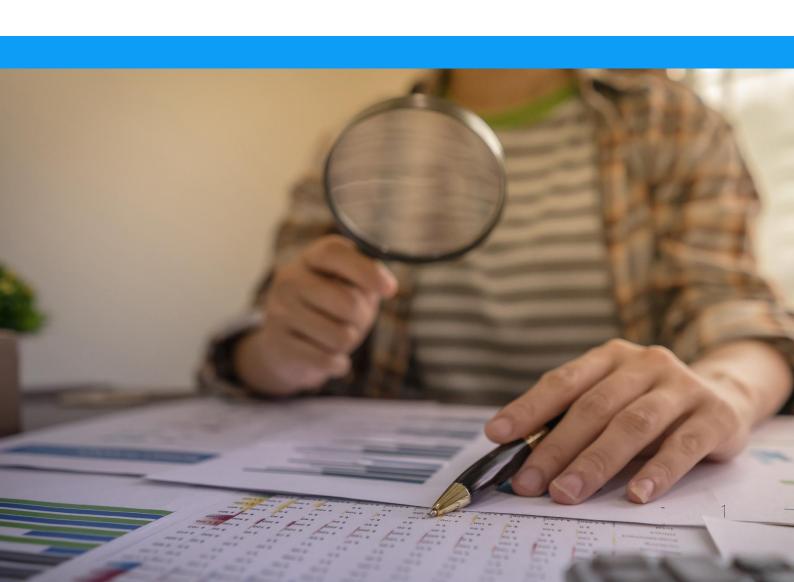


# Internal Financial Control in Audit for Indian Companies:

A Digitized Perspective



# Introduction



Internal Financial Control (IFC) is indispensable in maintaining the integrity of financial reporting, operational efficiency, and regulatory compliance within an organization.

The Companies Act, 2013, under Section 143(3)(i), mandates statutory auditors to assess the adequacy and effectiveness of a company's IFC framework. According to Standards on Auditing (SA) 315, "Identifying and Assessing the Risks of Material Misstatement Through Understanding the Entity and its Environment" internal control is defined as "a process designed, implemented, and maintained by those charged with governance, management, and other personnel to provide reasonable assurance regarding the achievement of an entity's objectives in financial reporting reliability, operational effectiveness, and regulatory compliance." SA also defines internal financial controls over financial reporting as "a process designed by, or under the supervision of, the company's principal executive and principal financial officers, or persons performing similar functions, and effected by the company's board of directors, management, and other personnel, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles".

The scope of IFC extends beyond financial reporting to include operational and compliance controls, covering aspects such as risk assessment, fraud prevention, and IT governance. It encompasses the policies, procedures, and mechanisms necessary to safeguard an organization's financial integrity while ensuring efficiency and adherence to regulations.

# Criteria for Applicability of IFC:

- As per the Companies Act, all listed companies and specified classes of unlisted and private companies are required to establish IFC.
- MCA, through its notification dated 13th June 2017 (G.S.R. 583(E)) provided exemption from Applicability of ICFR to following companies:
  - 1. One-person Company (OPC); or
  - 2. A Small Company; or
  - 3. A Private Limited company which has turnover less than Rs. 50 Crores as per latest audited financial statement or which has aggregate borrowings from banks or financial institutions or anybody corporate at any point of time during the financial year less than Rs. 25 Crores.

Additionally, the exemption from the applicability of IFC can be availed only if the aforementioned companies have not defaulted in filing their financial statements under Section 137 or annual returns under Section 92 of the Companies Act, 2013, with the Registrar.

# Key Components of IFC:

#### **Control Environment**

The foundation of IFC, including governance structures, corporate culture, and ethical values.

#### **Risk Assessment**

Identifying and evaluating risks affecting financial reporting and operations.

#### **Control Activities**

Policies and procedures ensuring the execution of management directives.

#### Information and Communication

Efficient reporting channels for control execution and monitoring.

## **Monitoring Activities**

Ongoing assessments and corrective measures to maintain control effectiveness.

While traditional IFCs primarily focused on fraud prevention and ensuring procedural discipline, today's business environment, driven by rapid digitization, demands a more nuanced approach. The digital revolution, while unlocking new efficiencies through automation, has simultaneously exposed organizations to sophisticated threats such as cyberattacks, data breaches, and system vulnerabilities. Against this backdrop, this article explores the relevance of IFC from a contemporary perspective, emphasizing how technology must be harnessed to safeguard financial operations in the face of emerging risks.

# **Foundations of Internal Financial Control**

At its core, IFC refers to the policies, procedures, and governance mechanisms instituted to:

## 1. Ensure Operational Efficiency

Streamline business processes for optimized performance.

## 2. Enhance Financial Reporting Integrity

Deliver accurate, reliable financial statements.

# 3. Ensure Compliance with Regulatory Requirements

Adhere to legal mandates, including those outlined in the Companies Act, 2013.

These controls serve as the foundation for safeguarding an organization's assets, preventing misstatements in financial reports, and maintaining accountability. A comprehensive audit process ensures these controls are rigorously evaluated, and any deficiencies promptly addressed.

# **The Effect of Digital Transformation on IFCs**

As Indian companies embrace digitization, they gain operational efficiencies but also face new challenges. Automation has transformed financial processes like payroll, procurement, and reconciliations, reducing manual reliance. However, this shift brings emerging risks, necessitating a fresh approach to financial controls.

Further, automation offers enhanced speed and precision in financial reporting. Yet, system failures or control lapses within automated processes can lead to material misstatements or unauthorized transactions. Without robust controls governing system updates and process changes, organizations risk compromising data integrity.

**Testing of IT General Controls (ITGC):** By performing test of ITGCs, it supports the reliability of system-dependent controls, including access security, change management, and backup procedures.

# **Strategic Components of Robust IFCs in the Digital Age**

A forward-thinking IFC framework must address emerging risks while leveraging technology for operational efficiency. The following elements are critical to establishing resilient internal controls:

# 1. IT-Driven Financial Controls

With technology underpinning modern financial processes, IT-dependent controls are integral to safeguarding financial reporting:

- Access Control: Implement role-based access protocols to ensure only authorized personnel can access critical financial systems.
- Change Management Systems: Establish strict protocols to monitor and approve any modifications to financial systems.
- IT General Controls (ITGC): Regularly assess network security, backup systems, and IT governance practices to mitigate potential risks.

Auditors must validate the integrity and effectiveness of these IT controls as part of their broader financial audit responsibilities.

## 2. Governance Frameworks and Risk Management Alignment

To effectively manage risks, companies must align their IFC frameworks with globally recognized governance standards, such as **COSO** and **COBIT**. These frameworks provide structured guidance for managing financial and IT risks holistically.

The **Segregation of Duties (SoD)** is another vital element, ensuring that no single individual can control multiple aspects of financial transactions. This mitigates the risk of fraud and promotes accountability.

## 3. Continuous Monitoring Through Data Analytics

Incorporating advanced analytics tools allows organizations to monitor financial activities in real-time. Continuous monitoring enables early detection of anomalies, such as unauthorized transactions or unusual patterns, allowing management to take proactive measures before risks materialize.

# Mitigating Cybersecurity Risks: A Critical Imperative for IFC

Cybersecurity threats must be addressed within the broader framework of internal financial controls. Failure to adequately mitigate these risks can have far-reaching consequences.

## 1. Strengthening Access Control and Identity Management

Multi-factor authentication (MFA) and role-based access control (RBAC) are critical for preventing unauthorized access. These measures ensure that employees only have access to information necessary for their roles, minimizing insider threats.

## 2. Implementing Comprehensive Audit Trails

Maintaining detailed audit trails for financial transactions promotes accountability and ensures transparency. In the event of discrepancies or breaches, these records provide critical evidence for investigations and audits.

## 3. Establishing Incident Response Frameworks

Companies must develop robust incident response plans to manage cybersecurity incidents effectively. These frameworks should outline procedures for isolating affected systems, notifying stakeholders, and restoring operations swiftly to minimize disruptions.

# **Dynamic IFCs: The Need for Continuous Testing and Adaptability**

Financial controls must be continuously evaluated and refined to remain effective in a rapidly changing business environment.

# 1. Regular Control Testing and Process Walkthroughs

Periodic walkthroughs and control tests are essential to validate the effectiveness of internal controls. These assessments should cover both the design and operational aspects of controls, ensuring they remain robust and responsive to evolving risks.

#### 2. Adapting to Regulatory Changes

Regulatory changes necessitate updates to financial control frameworks. Organizations must proactively monitor regulatory developments and align their internal controls with new requirements to ensure seamless compliance.

## 3. Leveraging AI for Real-Time Risk Monitoring

Artificial intelligence (AI) and machine learning algorithms are increasingly employed to monitor financial activities in real-time. These technologies can identify suspicious activities, flag discrepancies, and generate alerts for potential risks, thereby enhancing the organization's ability to respond promptly to emerging threats.

# The Evolving Role of Auditors in Ensuring Effective IFCs

Auditors play a pivotal role in the governance ecosystem by offering independent assessments of a Company's IFC framework. In the digital age, auditors must:

#### Assess IT Controls:

Evaluate the reliability and effectiveness of IT-dependent financial controls.

#### Apply Advanced Analytical Tools:

Leverage data analytics to detect control deficiencies and fraud.

#### Provide Independent Assurance:

Offer objective insights into control effectiveness and recommend areas for improvement.

The adoption of technology in audit processes has enhanced the ability of auditors to analyse vast datasets and uncover hidden risks, improving audit precision and quality.

# **Conclusion: Preparing for the Future with Dynamic IFCs**

In an increasingly interconnected and digitized world, internal financial controls are no longer confined to traditional compliance objectives. Today's IFC frameworks must be dynamic, agile, and integrated with advanced technology to address emerging risks effectively.

Indian companies that proactively invest in robust, technology-driven financial controls will be better positioned to navigate complex regulatory landscapes, manage operational risks, and achieve sustainable growth. Management and auditors should ensure that there is continuous improvement and innovation to ensure resilience in the face of evolving threats.

A well-executed IFC strategy, aligned with governance frameworks and fortified by technology, is essential for maintaining stakeholder trust and sustaining long-term success in the digital era.



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