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### Introduction

#### UI Background

- This survey was completed by KPMG clients or other US company representatives based on their experience in managing SOX 404 programs for their company
- The respondents were professionals with a detailed understanding of their company's internal controls over financial reporting program

#### U2 Demographics

- The experiences of 146 participants, from companies of various sizes and industries, are represented in the survey responses
- Detailed demographics have been presented within a separate section of the survey report

#### 03 Results

- The results were derived from a web-based survey conducted from Apr'25-Jun'25
- The data presented has been categorized by industry and/or company size, as deemed insightful
- Results and figures are reported for the 2024 fiscal year end

## 04

## Other considerations

- Readers should consider multiple benchmarks (e.g., mean, median) for comparison and should draw their own conclusions regarding an individual company's SOX 404 program relative to their appropriate peer group
- Some question sums may not 100% due to rounding or multiple selections
- The total number (N) may vary across questions due to logic or excluded options

## Key industries covered



TMT – Technology, media and telecom



ENRC – Energy, natural resources and chemicals



IM – Industrial manufacturing



FS – Financial services



C&R – Consumer and retail

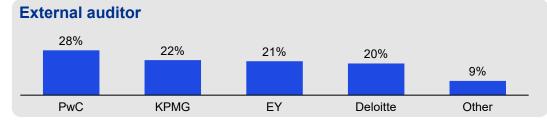


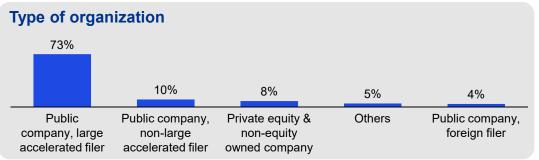
HCLS – Healthcare and life sciences

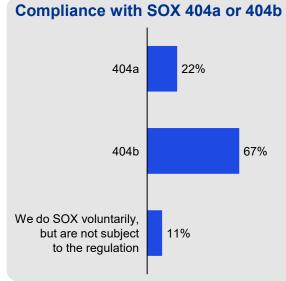




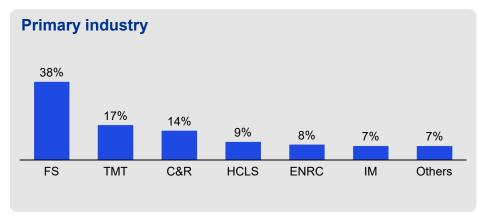
## Respondents overview

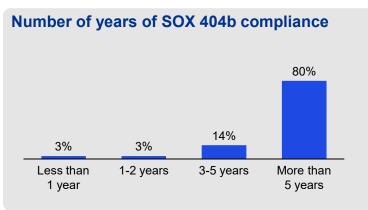


















## **Key takeaways**



## Increase in budget and level of effort

- 45% of organizations reported an increase in their SOX program costs compared to the previous year. FY24 average cost was \$2.3 M with average hours of 15,581
- Over the past two years, the average number of systems in scope more than doubled, which is a key driver in cost and budget increases
- Only 28% of organizations are using offshore resources, despite 42% noting a strategy of reducing the cost of compliance



#### Increase in number of inscope systems, but no increase in percentage of automated controls

- Even though the average number of in-scope systems rose from 17 in FY22 to 40 in FY24, automated controls only accounted for 17% in FY24, declining from 21% in FY22
- This suggests a potential opportunity for further leveraging technology to drive process efficiency and making the overall control environment more robust



# External auditors have a narrower focus; reliance related fee savings remain unclear

- Over half (56%) of organizations noted their external auditors had fewer inscope controls than they did
- Although organizations adjusted their testing approach by using external auditor templates and modifying sample sizes, 90% of organizations cannot quantify fee savings from auditor reliance



## Decrease in satisfaction with current tools and technologies

- There was a notable dip in organizations' satisfaction with their current SOX program technology, dropping from 92% of respondents identifying as satisfied in FY22 to 58% identifying as satisfied in FY24
- The decrease in satisfaction highlights significant opportunity to enhance SOX technology capabilities and user experience





## **Key observations: Program budget**

#### Year-over-year cost

- 45% of organizations reported an increase in the year-overyear cost of their SOX program, Notably, the HCLS sector had the highest percentage (69%) of respondents reporting this trend
- Organizations indicated that the increase in cost was driven by an increased number of controls and inflationary impacts of resources

#### **Budget**

- The SOX program's average budget was reported as \$2.3 M, with an average time effort of 15,581 hours
- Both the average cost budget and the average time spent have increased over the past two years

#### **Average hours spent**

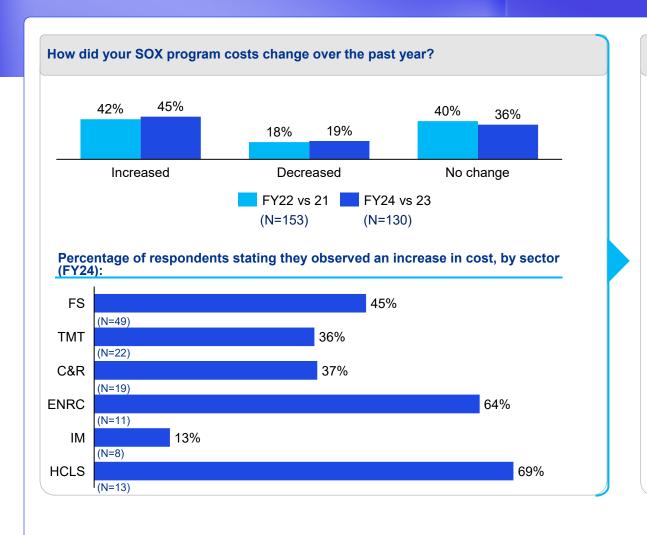
- Average testing hours per control for ToE (Test of effectiveness) increased to 16 hours, compared to 12 hours in FY22
- FS sector organizations spent highest average hours to test transactional controls (30 hours)

#### **Outsourcing**

- 58% indicated that outsourced providers accounted for more than 20% of their SOX program efforts
- Only 28% of respondents reported that their organizations used offshore resources (lower cost location) for SOX testing



## 45% of respondents noted higher SOX program costs in FY24



What were your main drivers of the change in SOX program costs? (N=83) (Question is directed to only those respondents who selected their program costs had "increased" or "decreased")

#### Drivers for the increase in SOX program costs (FY24)

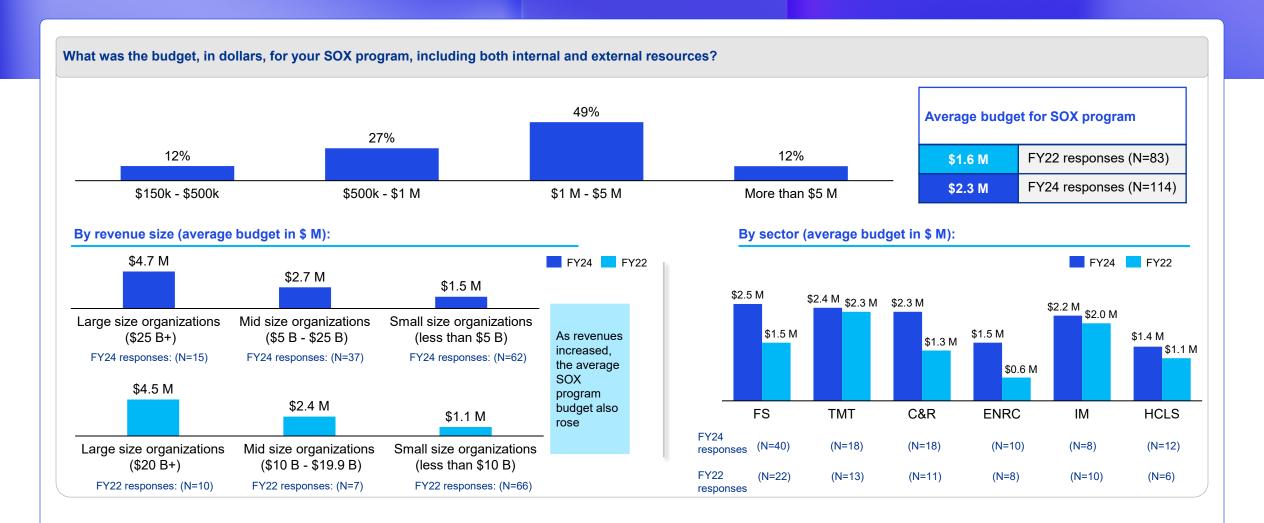
- Evolving PCAOB requirements, increasing efforts needed to satisfy external auditor needs
- Increase in controls driven by business changes such as acquisitions, IT transformations, and business growth
- · Inflation impacts on both internal personnel costs and co-source provider fees

#### Drivers for the decrease in SOX program costs (FY24)

- · Hiring of resources at lower salaries
- · Improvement in business efficiencies
- Control optimization
- · Implementation of automated tools

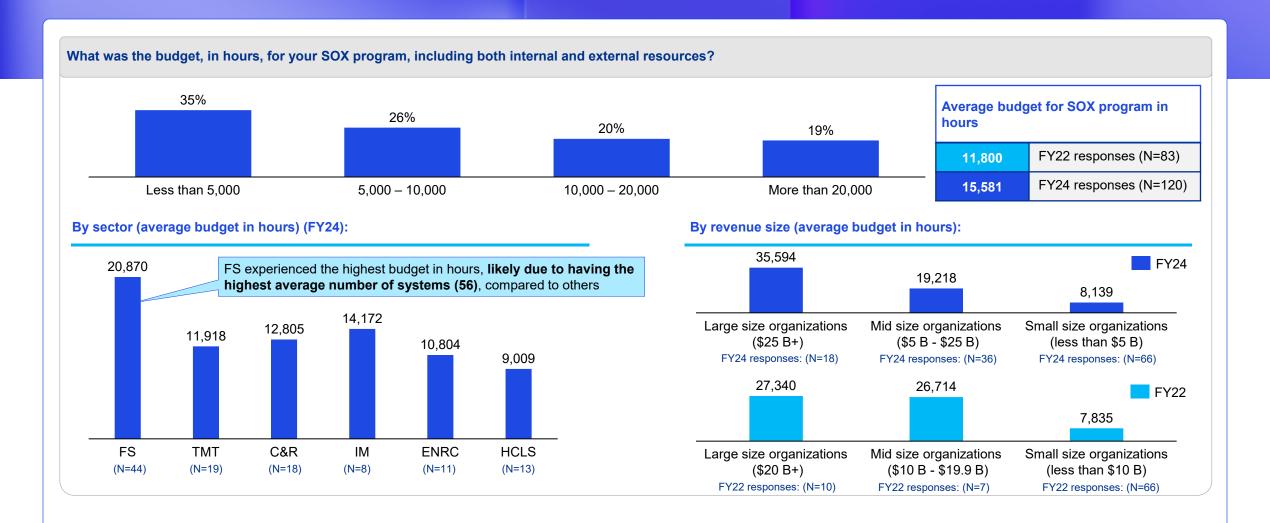


## Average budget for SOX programs of \$2.3 M



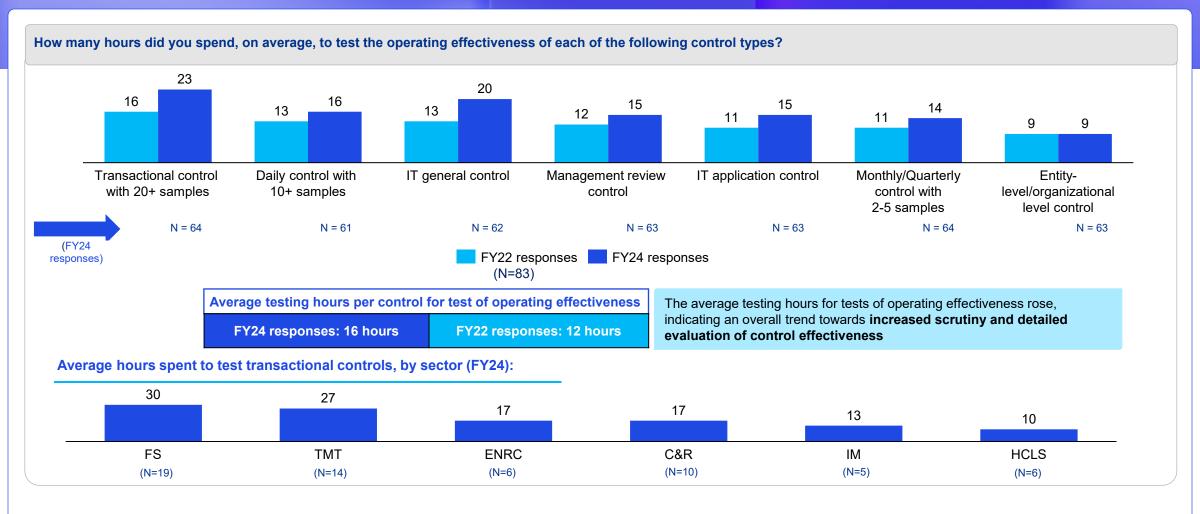


### The average hours spent on SOX in FS dwarfs other sectors





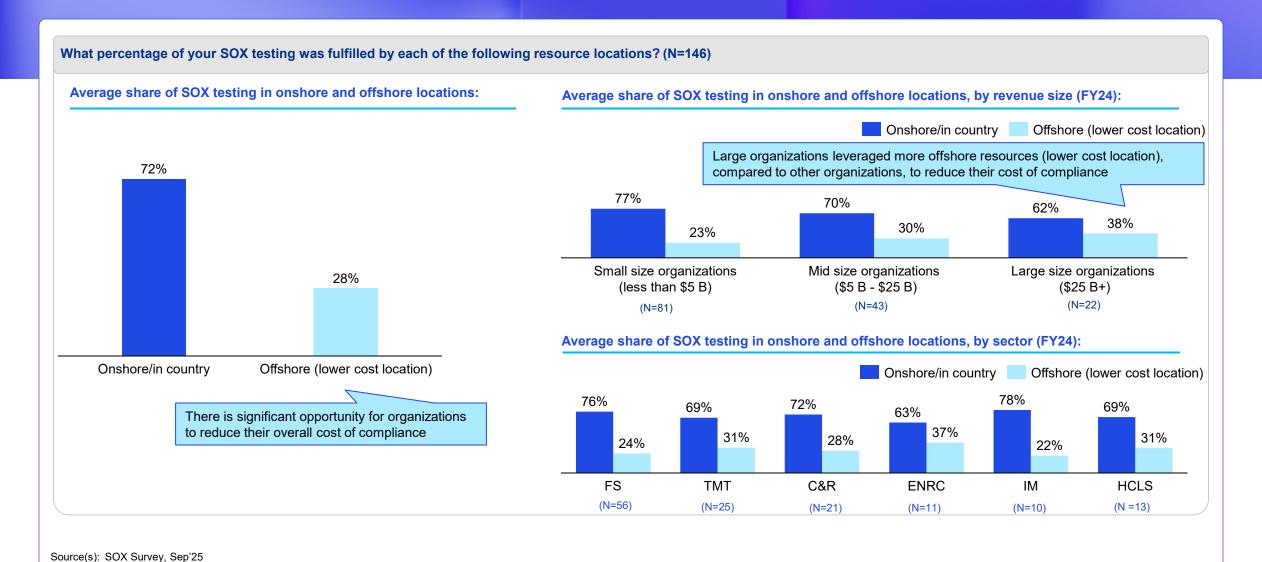
## Average testing hours per control increased from 12 hours in FY22 to 16 hours in FY24, with transactional and IT general controls requiring the most time to test





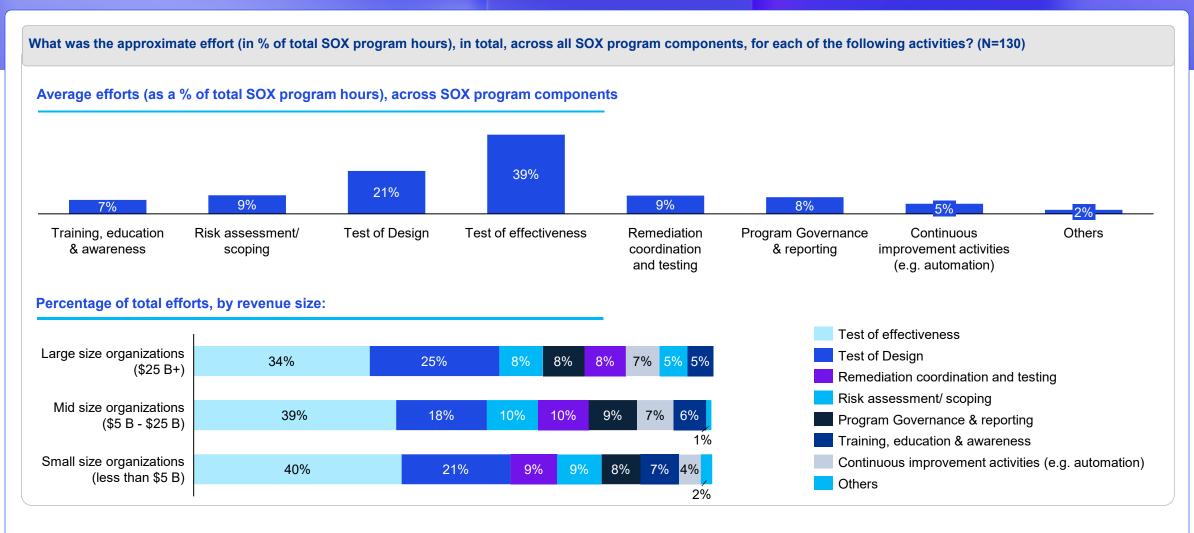


## Organizations relied on onshore resources for 72% of SOX testing



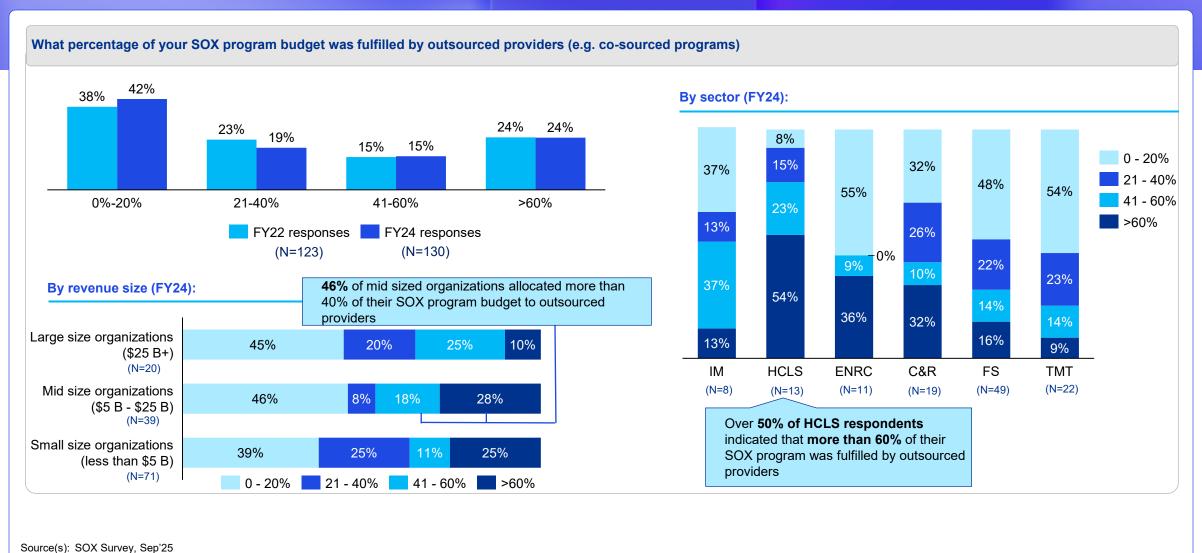


## 39% of total SOX program hours were dedicated to testing effectiveness, representing the single largest allocation of time across all SOX program components

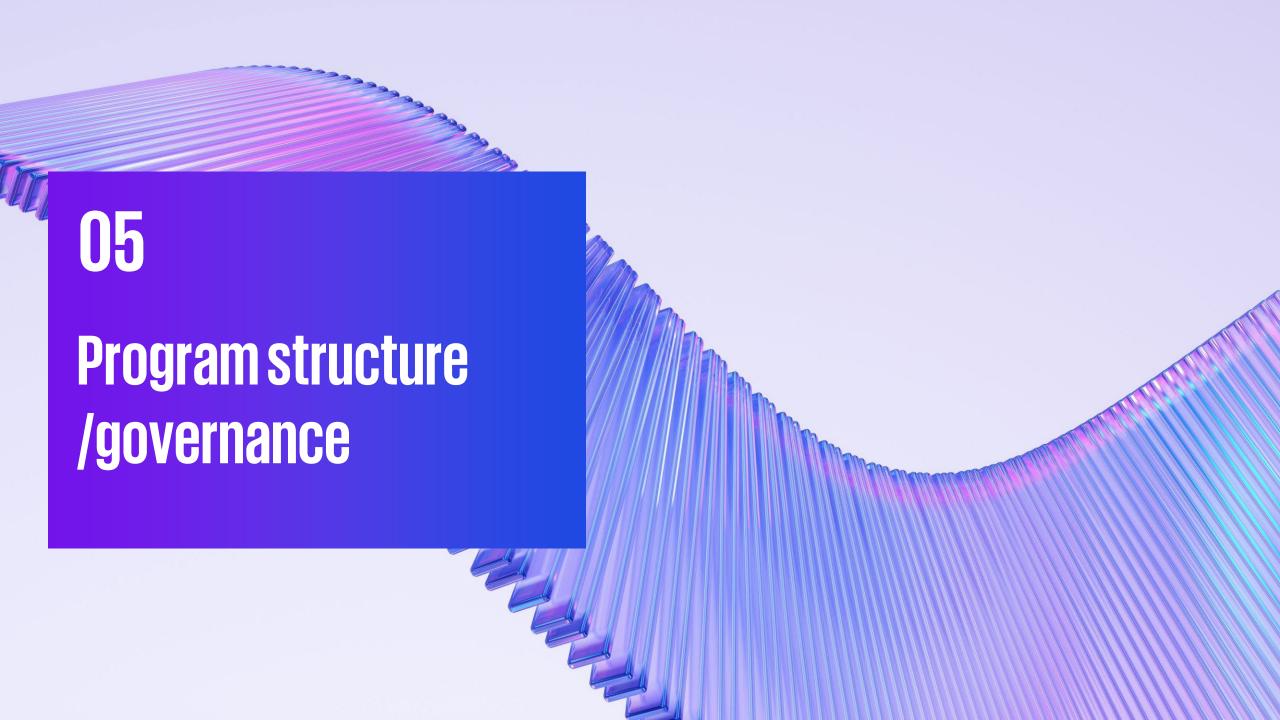




# 58% indicated that outsourced providers accounted for more than 20% of their SOX program budget, indicating continued support for outsourcing







## **Key observations: Program structure / governance**

#### **Level of maturity**

 The majority of respondents (68%) reported their SOX programs in the maturing stage, up from 47% two years before. This trend was consistent across organizations from all sectors and revenue size

#### **Objectives**

 About half (51%) of organizations said the common objective for their FY24 SOX program was to re-review their key controls, followed by reducing compliance cost (42%)

#### External auditor reliance

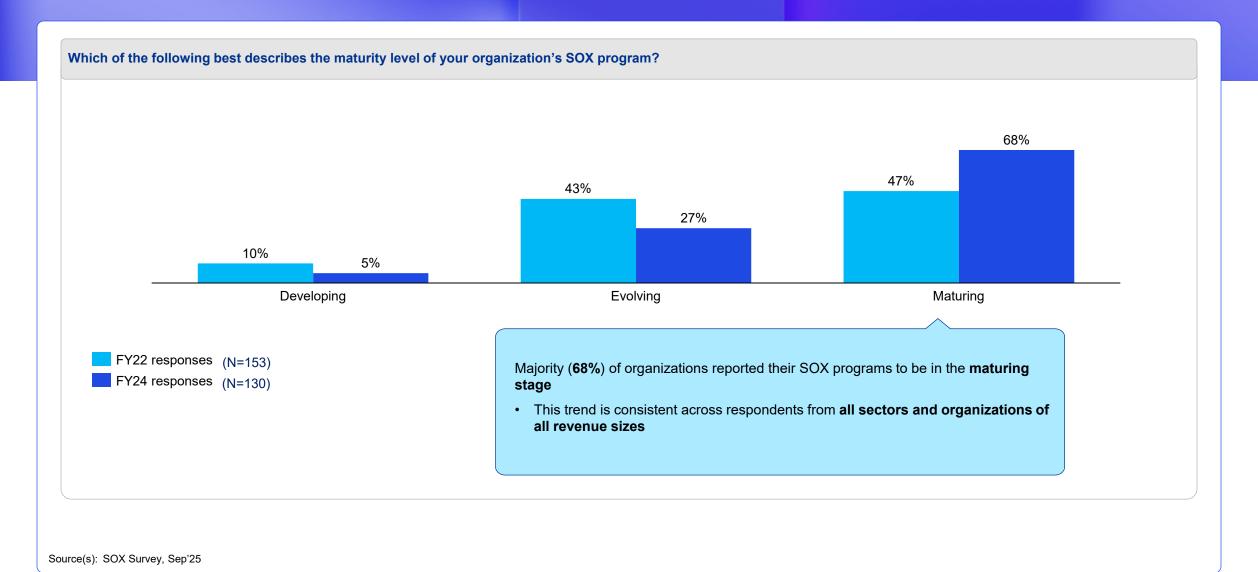
- 56% of respondents indicated that the external auditor had less controls in-scope than their organization
- Most organizations across sectors and revenue sizes, stated that external auditors relied on 50% or less of their internal business process control testing

#### **Financial impact**

 90% were unable to quantify fee savings from external auditor reliance in FY24, compared to 85% in FY22

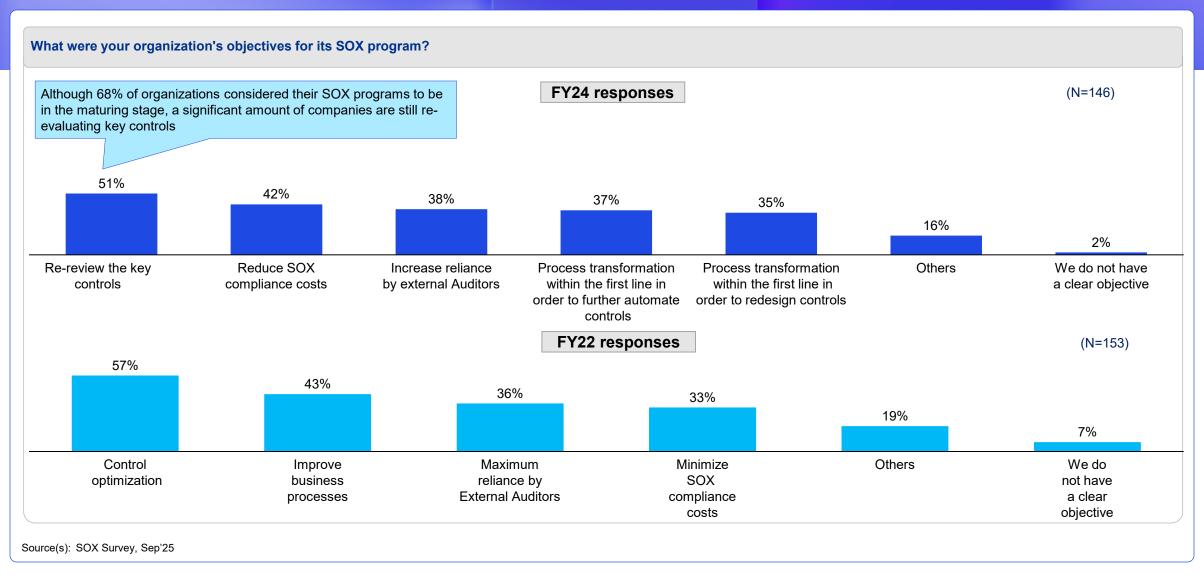


## Most organizations reported their SOX programs to be in the maturing stage, regardless of industry or size



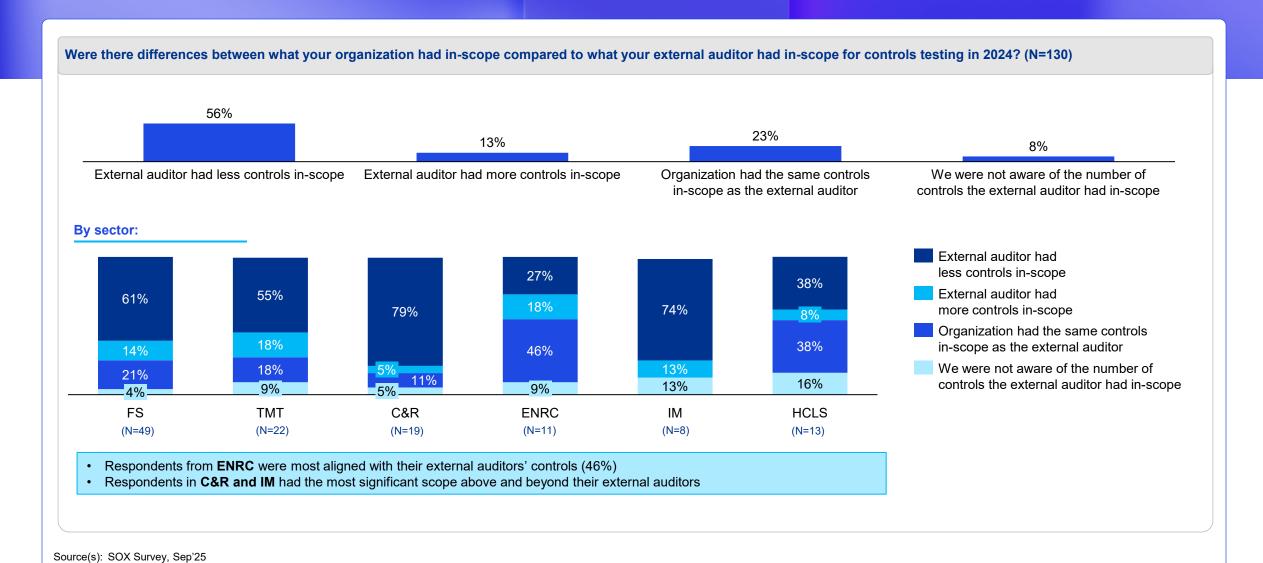


## FY24 SOX priorities shifted from control optimization to re-evaluating key controls and reducing compliance costs



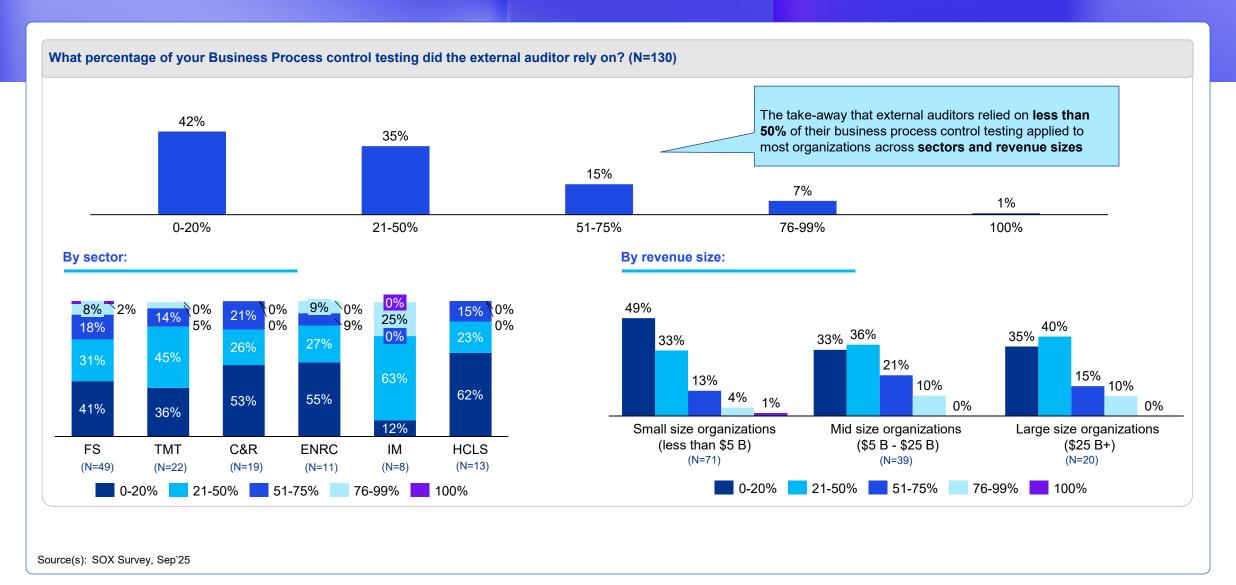


### Over 50% noted having more in-scope controls than their external auditor



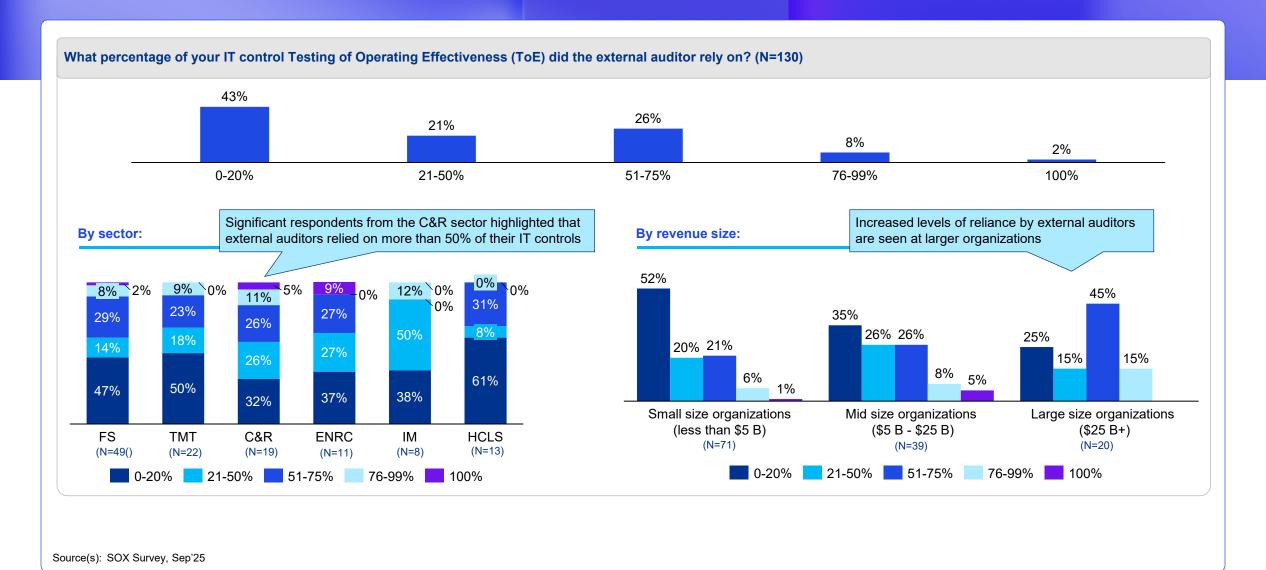


## 77% reported that external auditors relied on less than 50% of their business process control testing



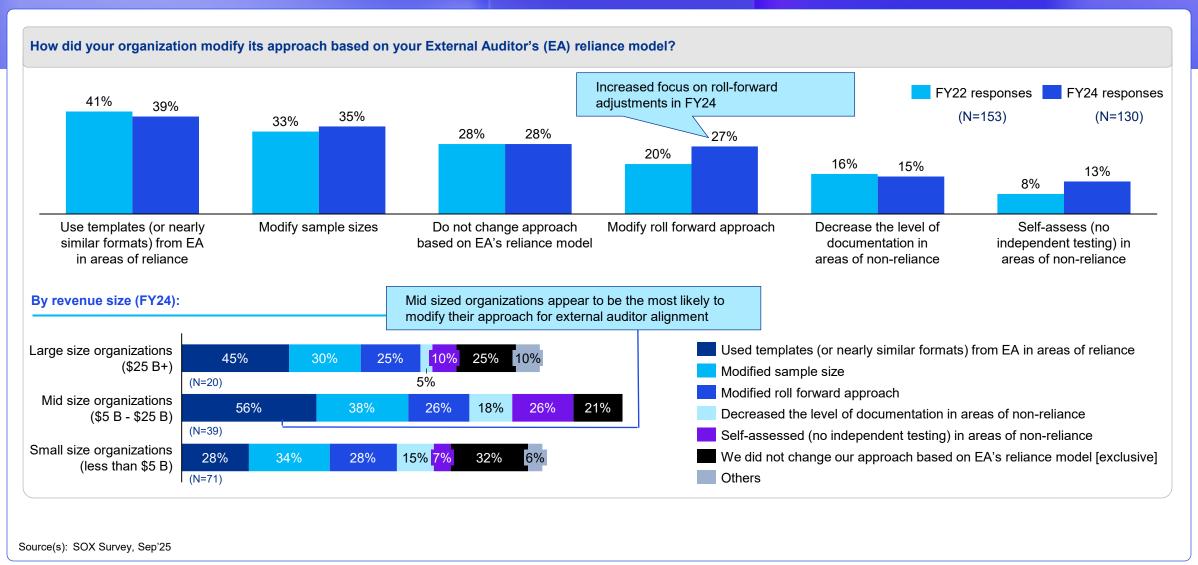


## 43% of organizations reported that less than 20% of IT controls were relied upon by external auditors



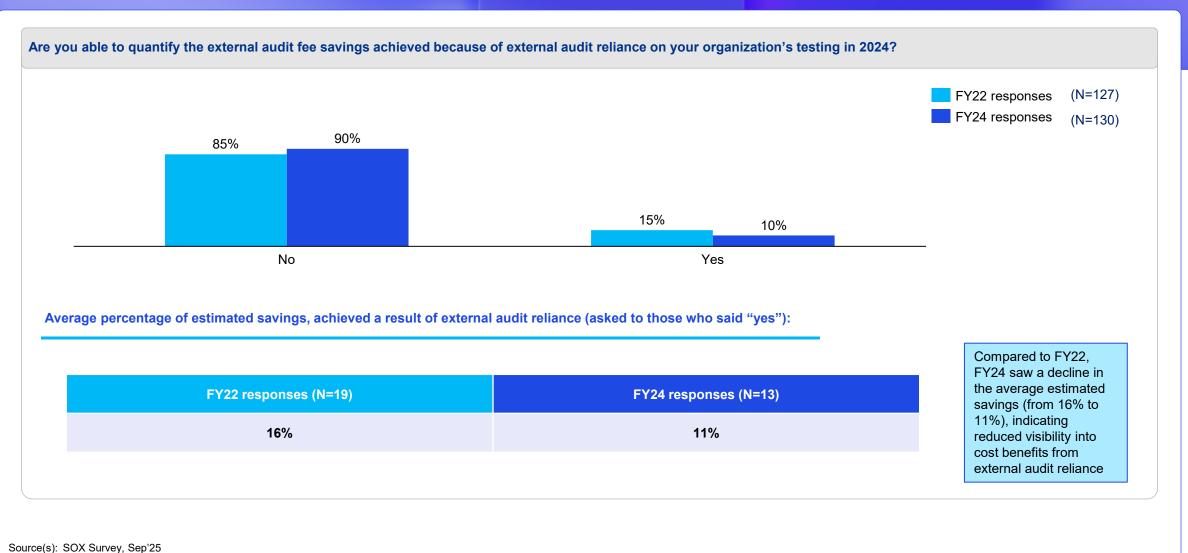


## Organizations continued to leverage external auditor templates and modifying sample sizes in FY24, with mid size organizations being more aligned to their external auditors testing approach



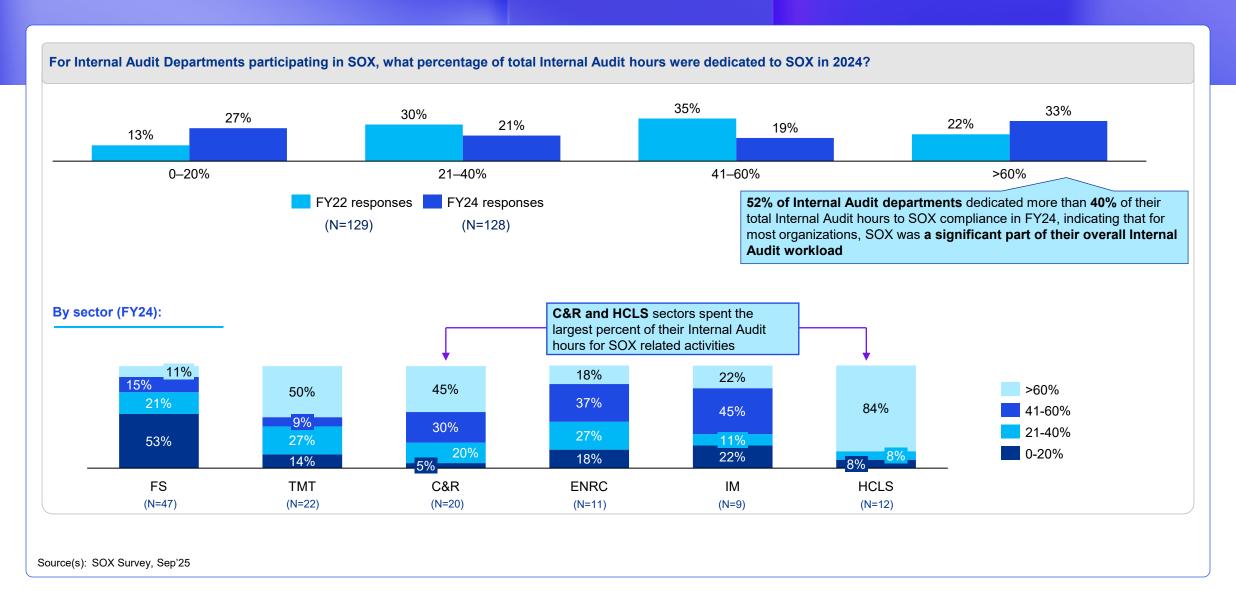


## Organizations modified their audit approach by using external auditor templates and by modifying sample sizes, yet 90% were unable to quantify fee savings from auditor reliance in FY24





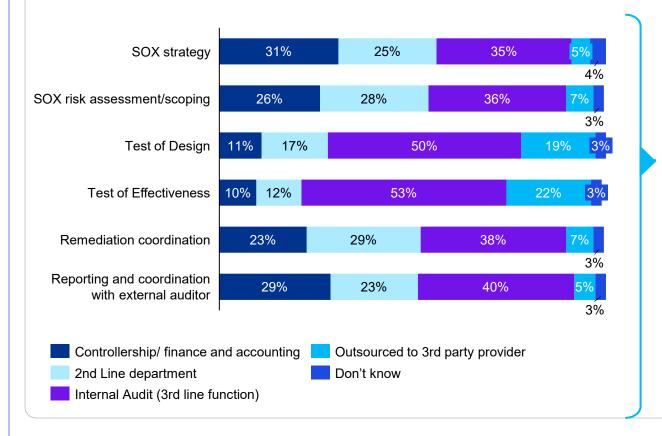
## More respondents allocated over 60% of total Internal Audit hours to SOX compliance than two years ago





## Internal Audit is identified as responsible across all SOX activities, with focus on having responsibility for ToD and ToE

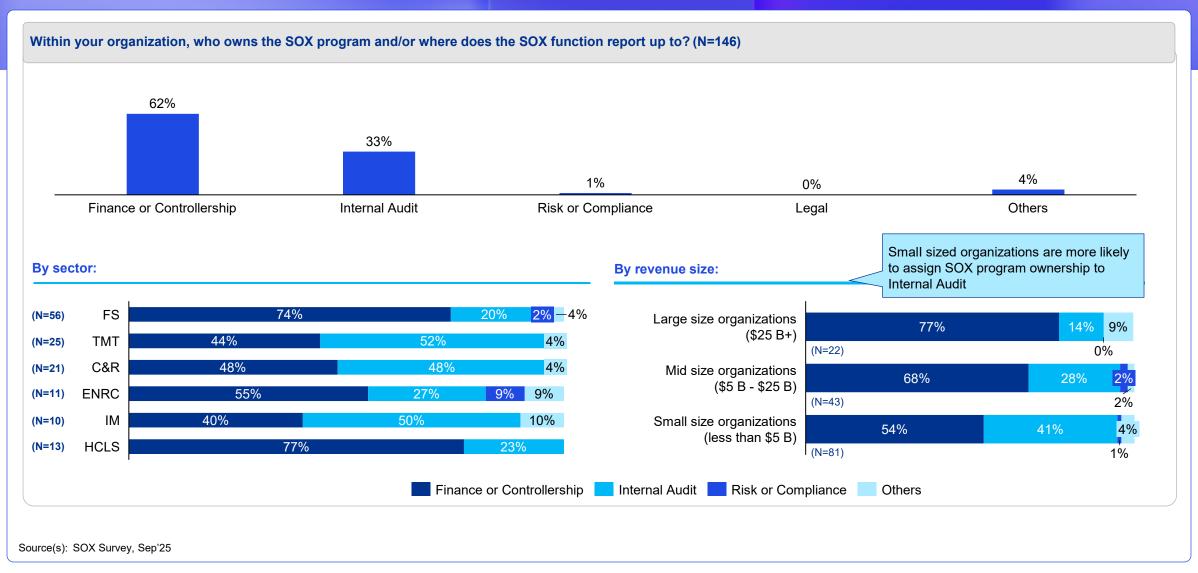
Who was responsible for the performance of the following activities in 2024? (N=146)



- A considerable number of respondents reported that Internal Audit is responsible for driving performance across all SOX activities
- Controllership/finance and accounting played a key role in SOX strategy and reporting and coordination activities, being responsible 31% of the time for SOX strategy and 29% for reporting and coordination with external auditor
- A notable number of respondents highlighted the allocation of test of effectiveness (22%) and test of design (19%) activities to outsourced 3<sup>rd</sup> party providers



## 62% of organizations assigned SOX ownership to finance or controllership, with TMT and IM more likely to assign ownership to Internal Audit







### **Key observations: Control environment**

#### **Systems in-scope**

- Only 17% of total controls were noted as automated, and 45% were noted as manual controls, highlighting the opportunity to migrate more controls to automated and IT dependent manual controls, thereby making the overall control environment more robust
- Average number of in-scope systems in FY24 was 40, compared to 17 in the previous FY22 survey, reflecting growing compliance complexity

#### **Control portfolio**

- The average number of SOX key controls increased by 18% in FY24 (546) compared to FY22 (463)
- 69% of organizations modified their control portfolios, with 55% reported increasing inscope control counts

## Integration of non-financial risk and controls

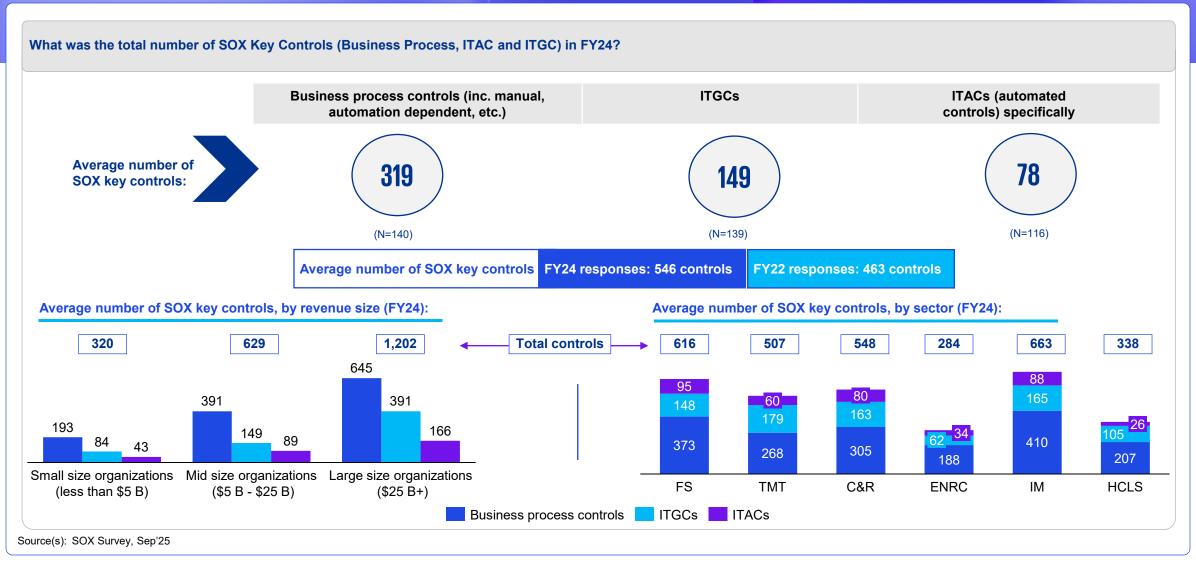
 Only 23% expanded their control environment to include non-financial risks to SOX standards, with a key focus on cyber/IT risks (73%) and thirdparty risks (70%)

## Documentation of control environment

 83% of organizations used risk and control matrices, while 70% used flowcharts, to document their control environment

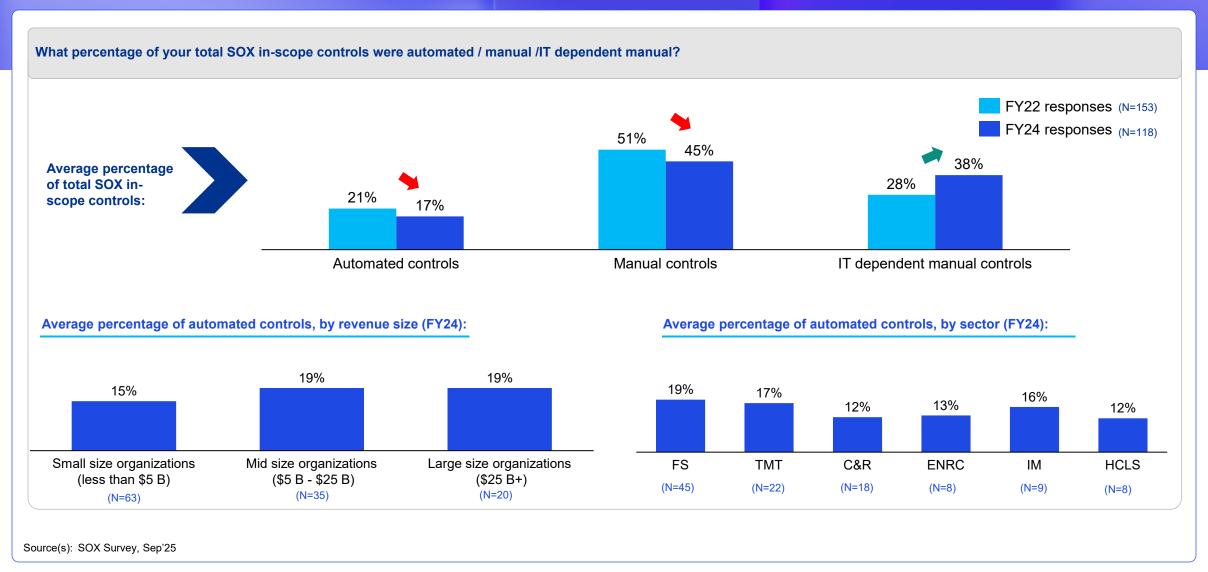


## The average number of SOX key controls increased by 18% in FY24 (546) compared to FY22 (463)



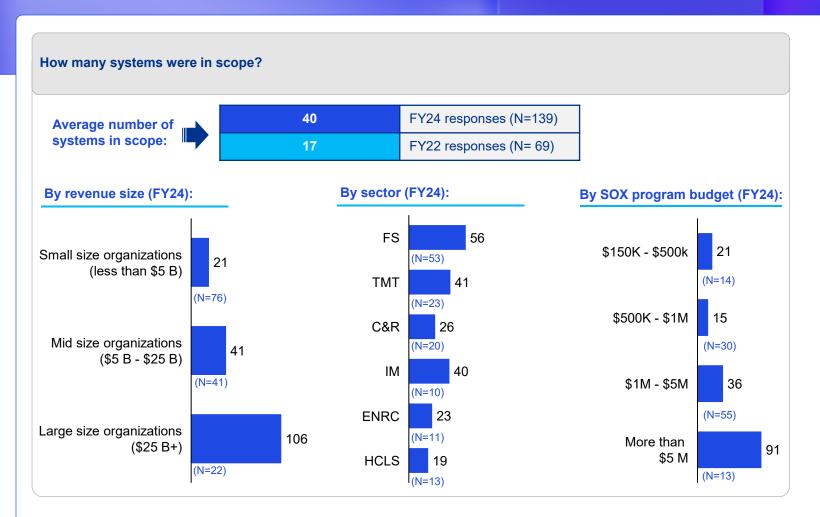


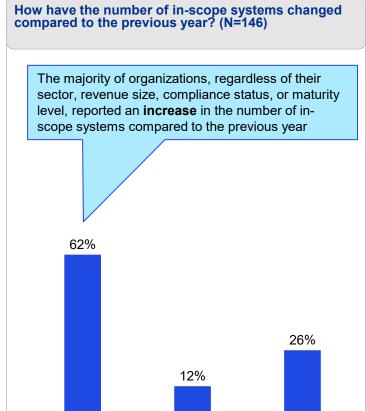
# Automated controls declined to 17%, highlighting the potential for process efficiency improvement, while IT dependent manual controls saw an uptick





## Over the past two years, the average number of systems in scope more than doubled





Decreased

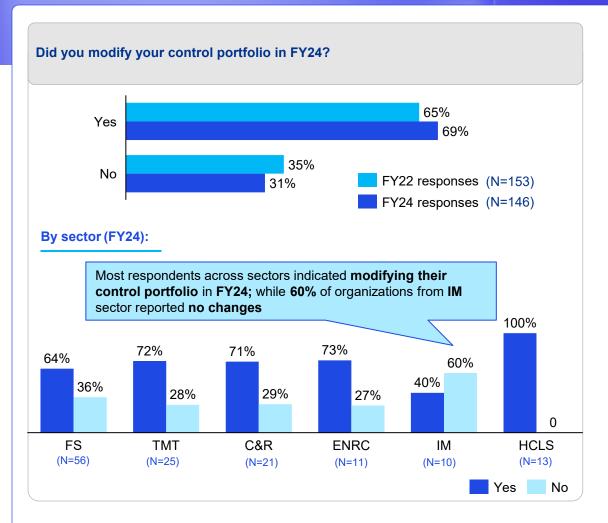
Increased

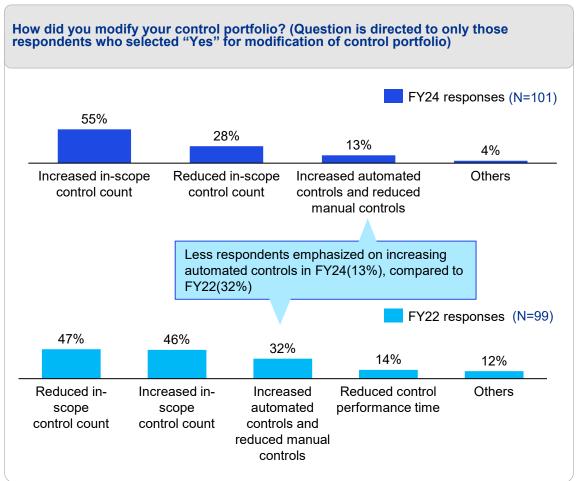
Source(s): SOX Survey, Sep'25

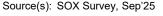


No change

### 69% of organizations modified their control portfolios during FY24, primarily by increasing in-scope controls

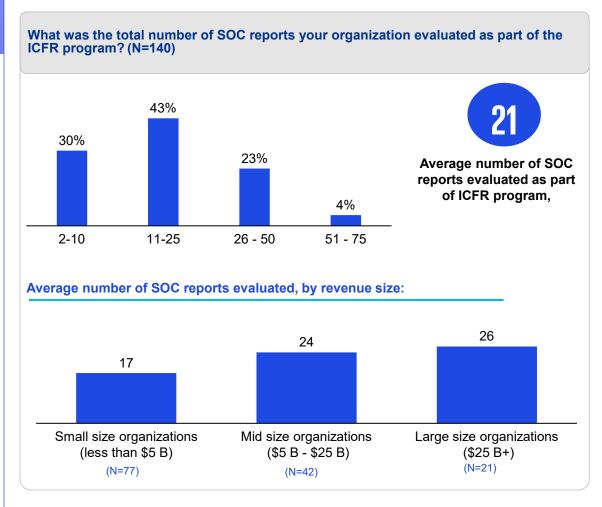


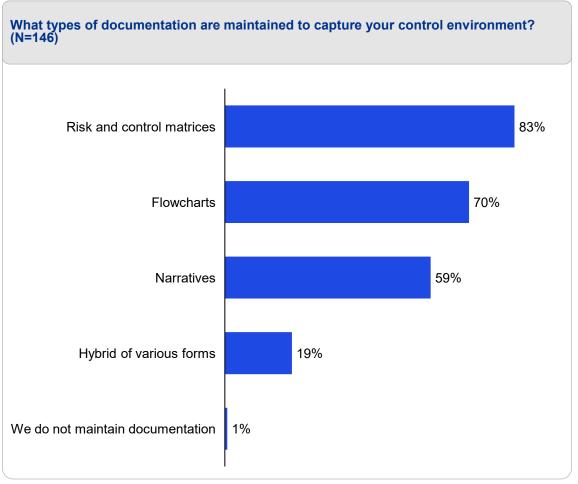






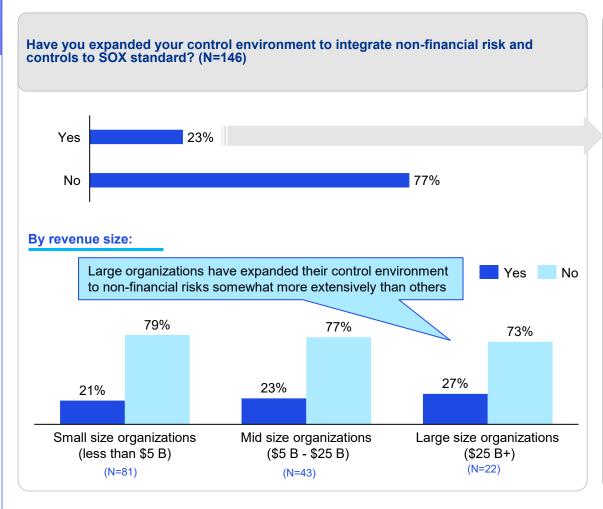
# Organizations evaluated 21 SOC reports on average; predominantly maintained risk and control matrices, and flowcharts to document their control environment

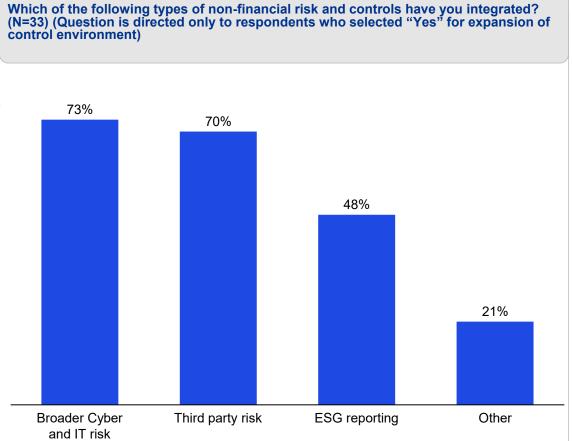




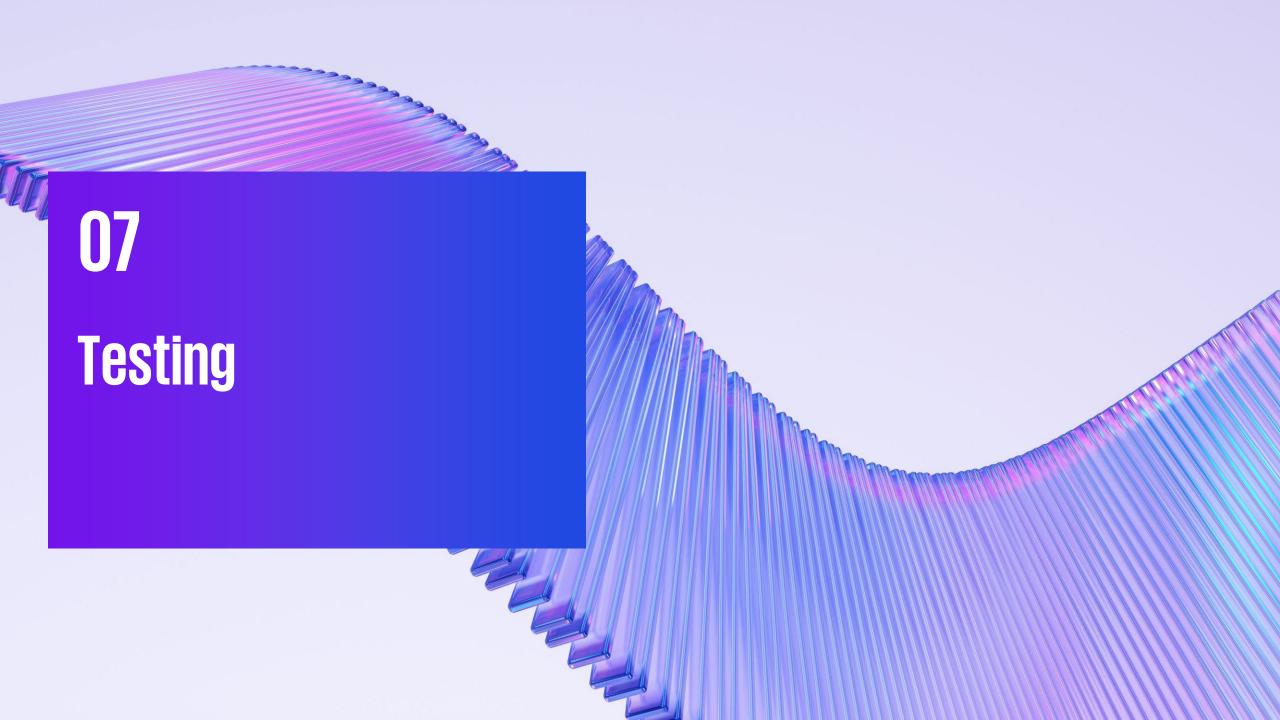


# Few organizations have extended their SOX control environment to non-financial risks, with a primary focus on cyber/IT risk and third party risk









#### **Key observations: Testing**

### Test of operating effectiveness (TOE)

- 63% of organizations performed their TOE in two phases each year, closely aligned with FY22 responses
- 57% modified their TOE sample size and testing procedures based on risk associated with controls

### Testing location and problematic areas

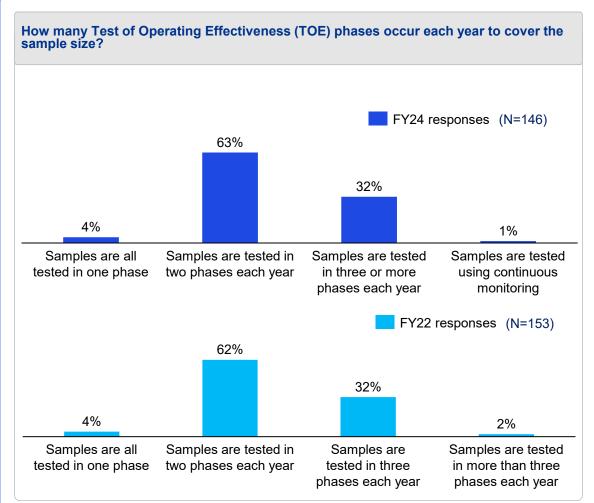
- 62% of organizations test key reports every year
- Completeness & Accuracy (C&A/IPE) remained problematic areas to a moderate extent for 55% of organizations
- Management Review Controls (MRCs) continued to pose moderate challenges (41%)

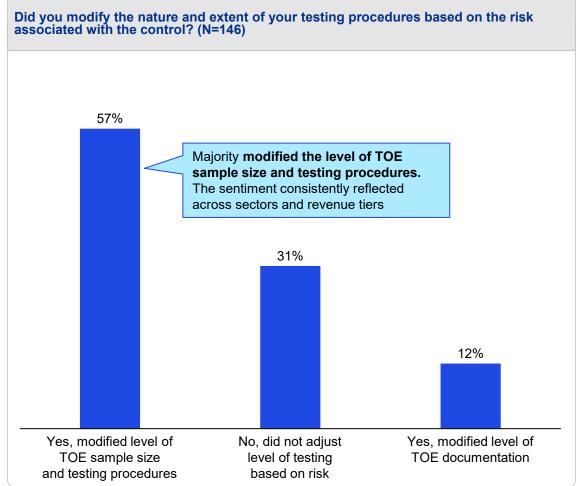
### Audit committee communications and testing walkthroughs

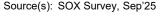
- 42% of organizations had audit committee reporting focused on high level summary with key updates
- 48% of organizations performed walkthroughs in a combination of independent execution and collaboration with their external auditor
- 70% of walkthroughs were predominantly conducted at the control and sub-process levels, with only 28% of organizations adopting an end-to-end approach



## 63% of organizations test operating effectiveness in two phases each year, and over half modified ToE sample size based on risk associated with the control

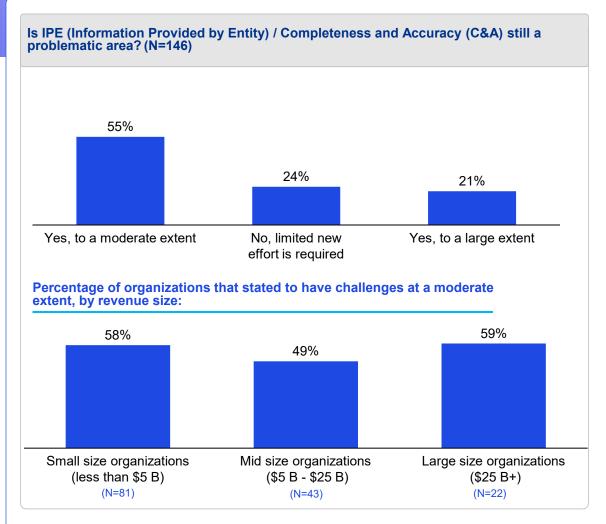


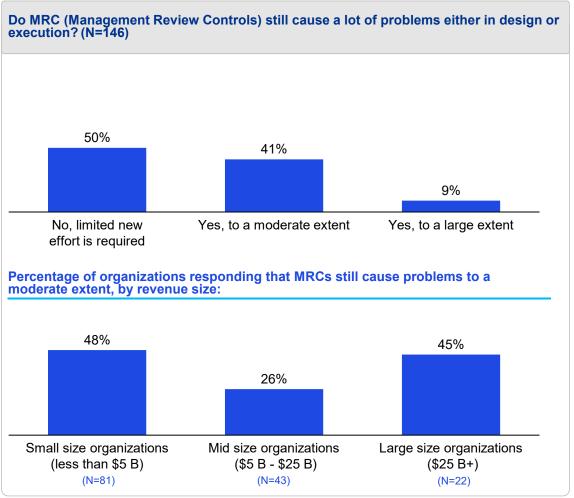






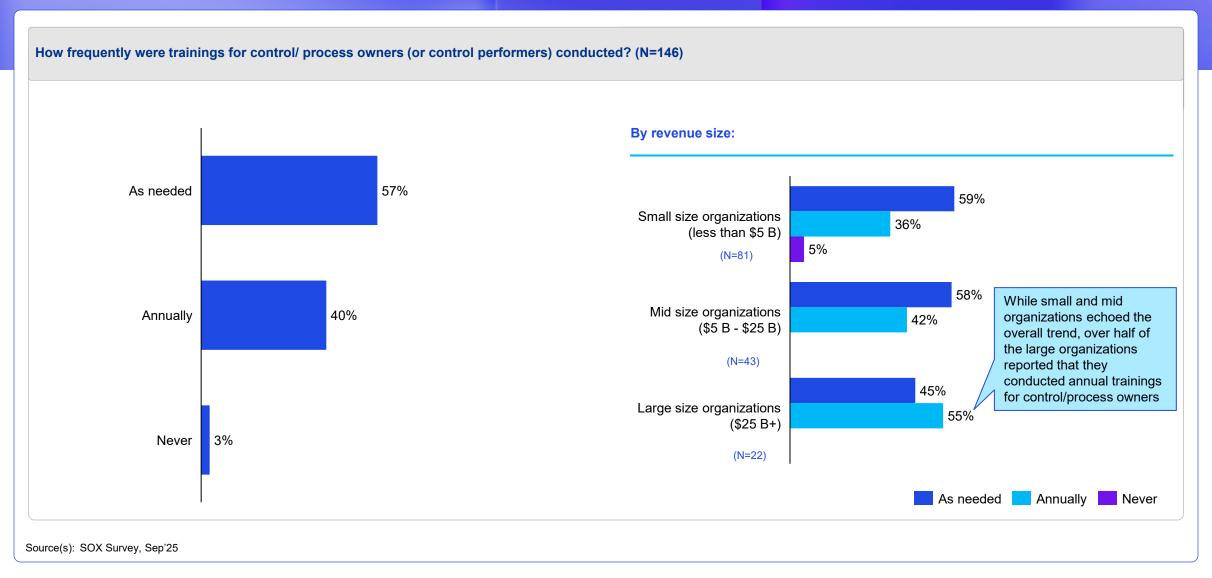
#### Both IPE/C&A and MRCs posed moderate challenges, with 55% and 41% stating the same, respectively





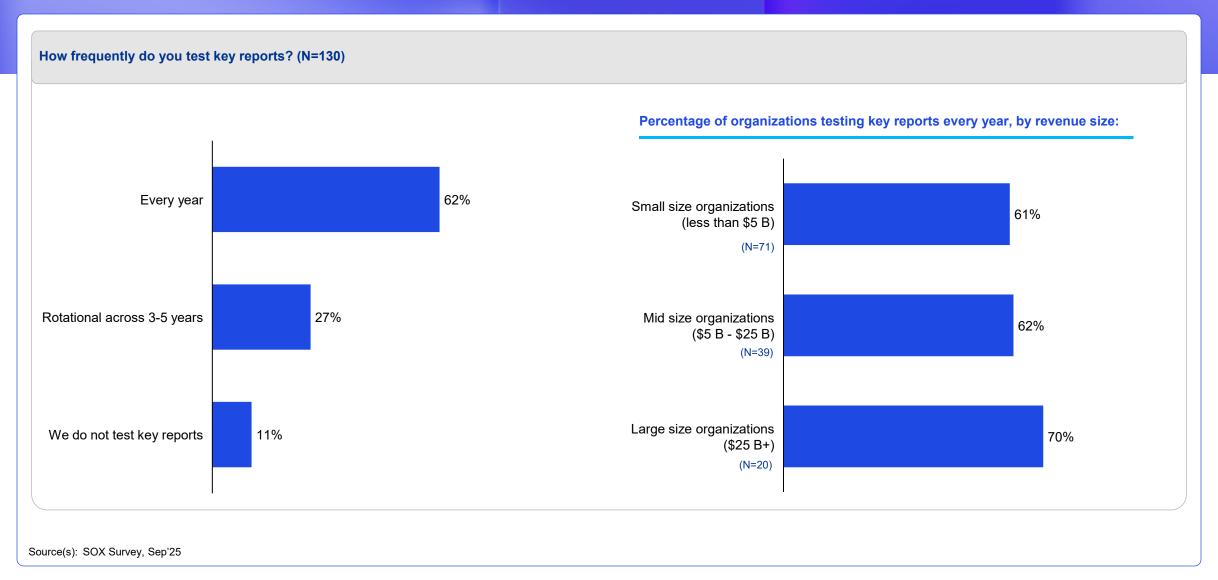


# While majority of organizations offered trainings to control and process owners on an ad-hoc basis, 55% of large organizations institutionalized annual trainings



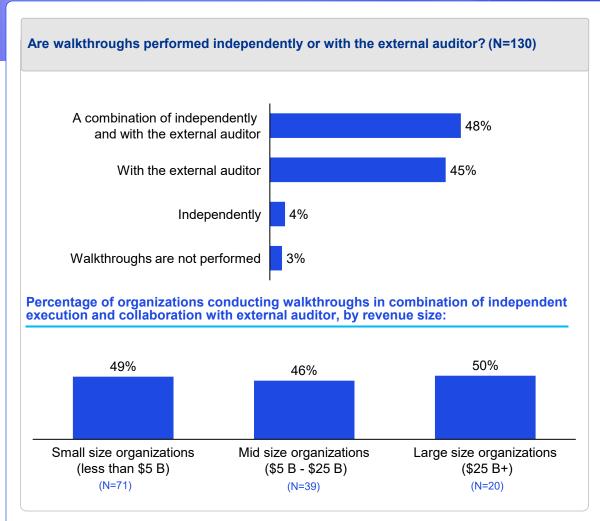


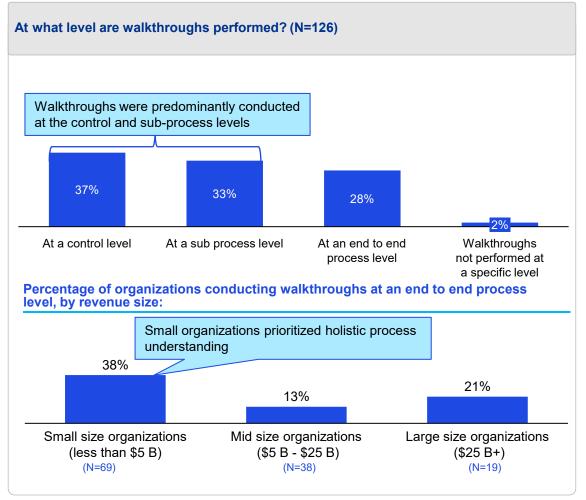
### Majority of organizations, especially large ones, tested their key reports annually





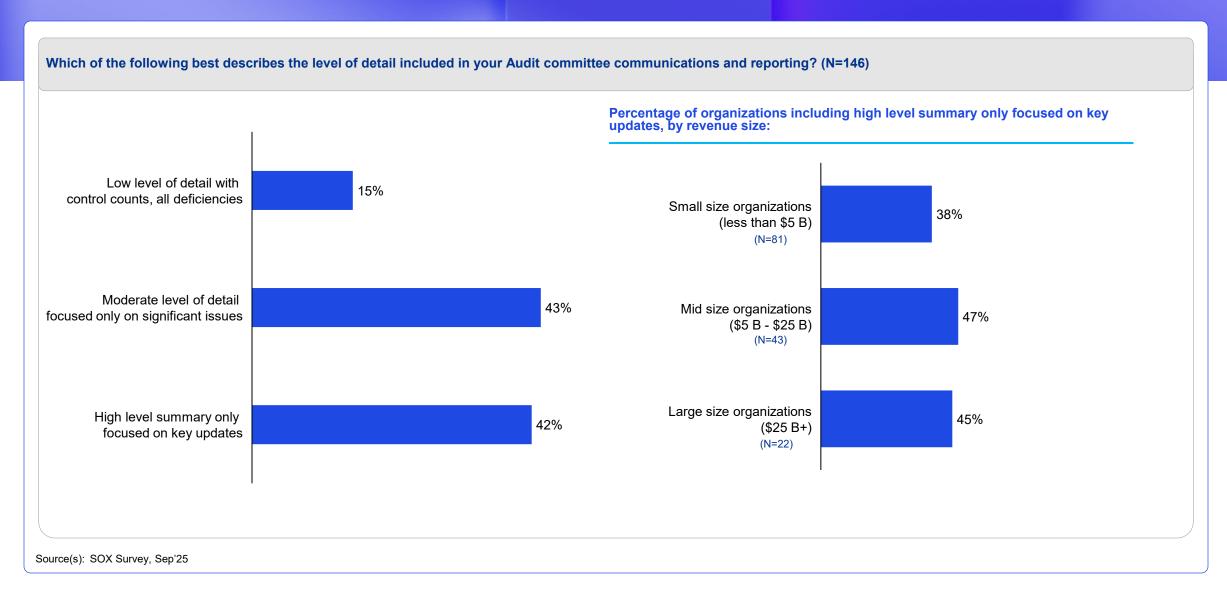
## A combination of independent execution and collaboration with external auditor walkthrough approach was preferred by 48%, while 70% of the walkthroughs were performed at a control or sub-process level







#### 42% of organizations included high level summary with key updates in their Audit committee reporting







#### Key observations: Technologies and tools

#### **GRC** technology

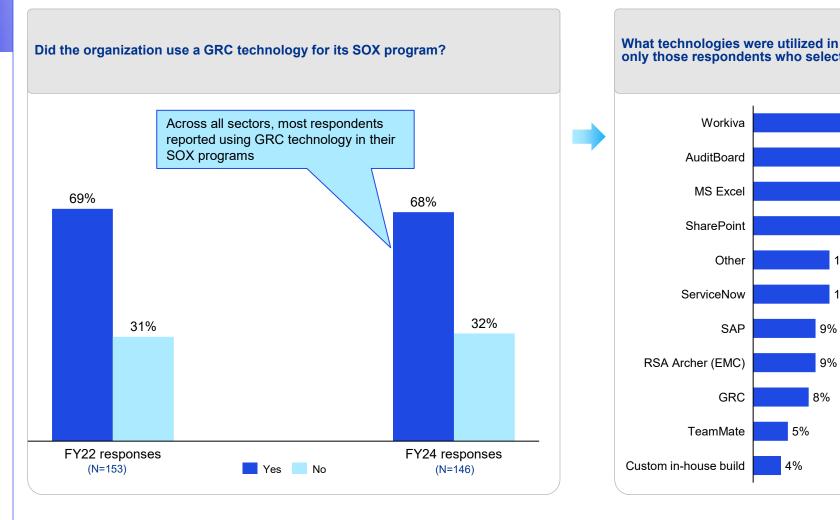
- 68% of organizations reported using GRC technology in their SOX programs, which is consistent with the FY22 survey results (69%)
- Organizations identified Workiva (39%), AuditBoard (37%), and MS Excel (29%) as the top technologies used in their SOX programs

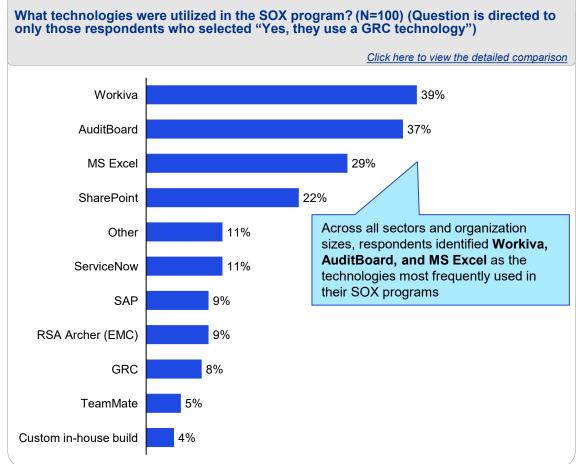
#### Satisfaction level

 The percentage of organizations satisfied with their SOX technology dropped from 92% in FY22 to 58% in FY24, indicating unmet expectations with current tools and an opportunity for improvement



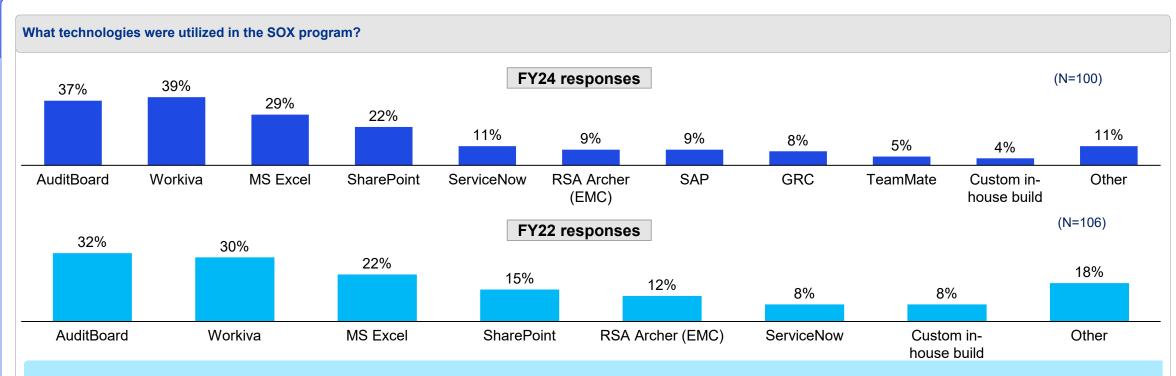
### Majority of organizations used GRC technology for their SOX programs; Workiva, AuditBoard and Excel being the most used tools







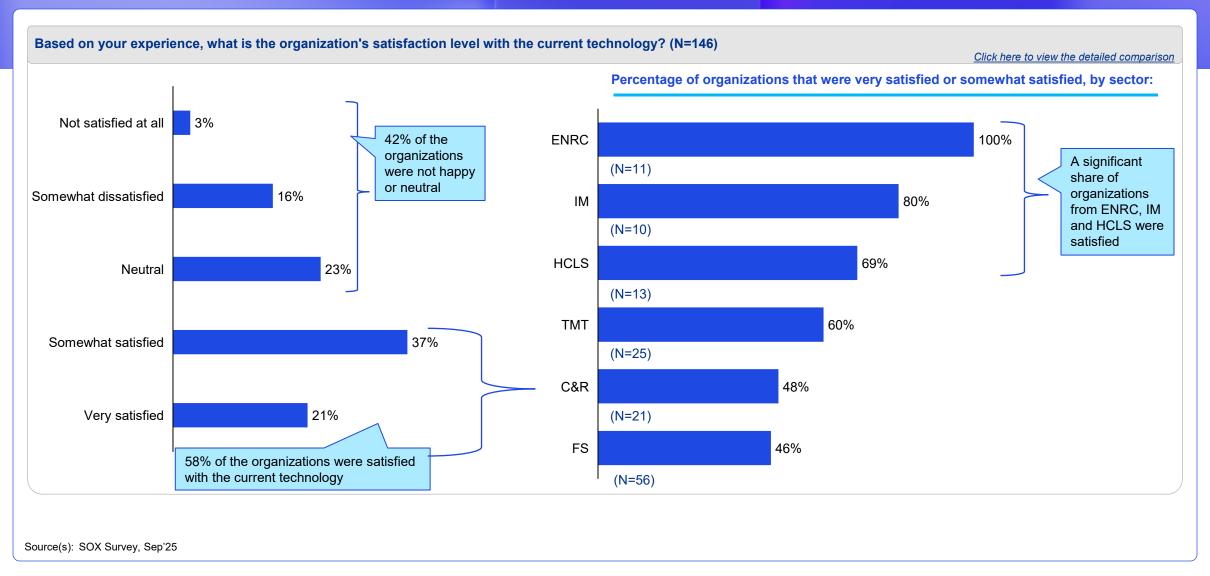
#### Workiva, AuditBoard and Excel were the most used tools in both FY22 and FY24



- Rise of Specialized Platforms: Adoption of dedicated SOX platforms like **AuditBoard** and **Workiva** increased notably—AuditBoard from 32% to 37%, and Workiva from 30% to 39%
- Usage of **custom in-hous**e builds dropped from 8% to 4%, and RSA Archer from 12% to 9%, suggesting a move away from bespoke systems in favor of scalable, vendor-supported technologies

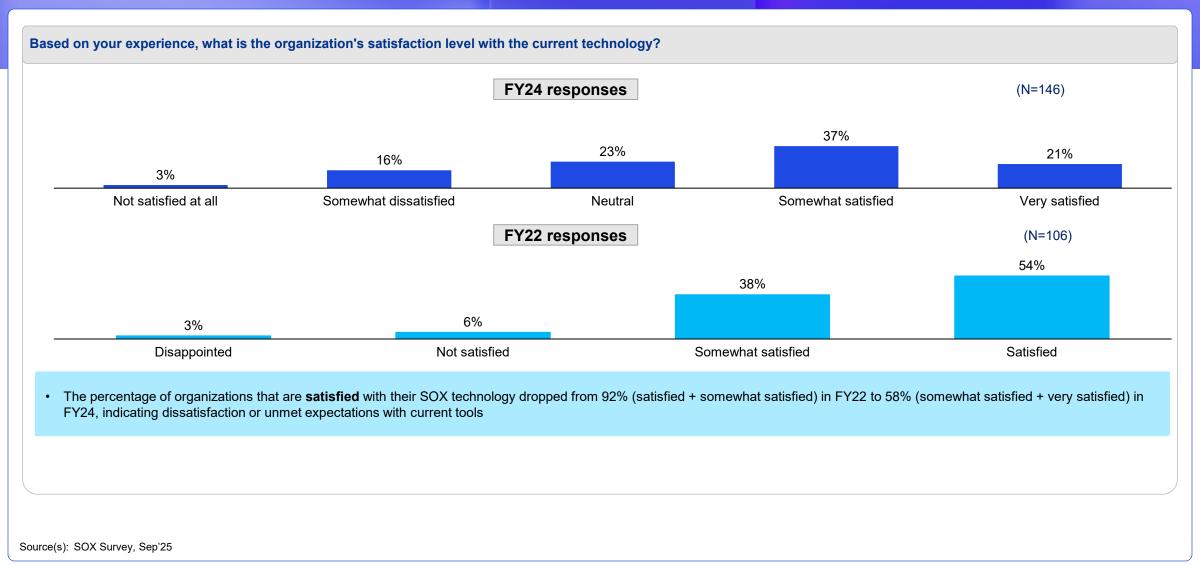


### 42% of respondents were either neutral or dissatisfied with their current technology, signifying room for improvement





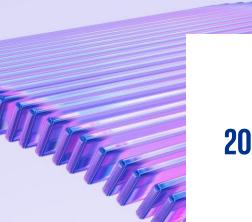
## Satisfaction with SOX technology dropped sharply from FY22 to FY24, signifying challenges faced in usability, integration or value realization from current platforms by organizations







01	C&A	Completeness and Accuracy
02	EA	External Auditor
03	GRC	Governance, Risk and Compliance
04	IPE	Information Provided by Entity
05	ITGC	Information Technology General Control
06	MRC	Management Review Control
07	PCAOB	Public Company Accounting Oversight Board
08	ToD	Test of Design
09	ToE	Test of Effectiveness
10	SOC	Service Organizational Control
11	ICFR	Internal Control over Financial Reporting



### Please scan the QR code to access KPMG's:

2024 IPO material weakness study

2024 Non-IPO material weakness study







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