

# FACTORS HINDERING THE CONDUCT OF AUDITS OF CORPORATE SOCIAL RESPONSIBILITY REPORTS: EVIDENCE FROM POLAND

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**Abstract:** This article presents the results of empirical research conducted among audit firms in Poland regarding the factors hindering the provision of non-financial information verification and attestation services. The rapidly developing practice of non-financial reporting among socially responsible entities in Poland does not translate into the number of reports that are subjected to external audits. Despite the unquestionable need to confirm the reliability of non-financial data, services of this type are not provided by the majority of audit firms. The primary aim of the article is to identify the factors hindering the performance of audits of non-financial reports in Poland. The article identifies the entities operating in the Polish audit market in terms of selected features. The authors provided answers to three main research questions: What percentage of audit firms in Poland carry out the verification of non-financial reports? What is the size and the level of employment of audit firms in Poland? What factors hinder, in the auditors' practice, the performance of audits of non-financial reports? To achieve the objective, a survey research was conducted among audit firms under the supervision of the Polish Agency of Audit Oversight. The theoretical basis of the article included a literature study on the audit of non-financial reports as well as an analysis of regulations governing this subject matter in Poland. This study is the first such review of factors that condition the use of such an important tool as an audit in non-financial reporting. The obtained study results indicate that only 2.3% of audit firms perform audits of CSR reports. The main factor that limits audit firms in the performance of this type of services is the low demand in this regard. Moreover, the audits of non-financial reports are limited by insufficient staff.

**Keywords:** Audit, non-financial reporting, CSR, corporate social responsibility, audit, assurance, verification.

**JEL Classification:** M42, Q56.

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## Introduction

In recent years, non-financial reporting has become a global practice used by businesses almost all over the world. Its dynamic development can be also recently observed in Poland, which is reflected in the growing number

of corporate social responsibility (CSR) reports published voluntarily by enterprises. Their scope includes non-financial results obtained within the environmental, social and economic area and informs about the risk associated with the initiatives undertaken by companies.

Although the data contained in CSR reports are informative to stakeholders and are used in the decision-making process, there is a certain concern that they may lack reliability (compare with Dal Maso et al., 2020). It is not out of the question that companies, while promoting their activities, will disclose only selected, usually positive, aspects of their operations. Therefore, it appears reasonable to subject the disclosures presented in CSR reports to an audit, which, in this context, means an independent and objective verification of the non-financial information contained in the report, and their attestation (confirmation) in terms of reliability.

Until 2018, non-financial reporting in Poland was voluntary for all entities. This was changed by the Polish transposition of Directive 2014/95/EU of the European Parliament and of the Council of October 22, 2014, under which nearly 300 Public Interest Entities in Poland were obliged to disclose non-financial information. Poland implemented the provisions of Directive 2014/95/EU in the area of reporting of extended non-financial information by means of: The Act of December 15, 2016, amending the Accounting Act (Journal of Laws of 2017, item 61), and the Act of May 11, 2017, on statutory auditors, audit firms, and public oversight (Journal of Laws of 2017, item 1089). Three forms of reporting non-financial data are permitted. The first form is a statement in the area concerned, presented as a separate part in the report. The second option is a separate report on non-financial information, drawn up along with the activity report. The third form permits latitude in non-financial reporting while providing for the possibility of including their own, national, European Union, or international principles selected by the entity, with the reporting entity having to indicate them. It should be emphasized that the issuance of EU Directive 2014/95/EU, which the Member States were required to transpose into national legislation, was a breakthrough in non-financial reporting in Europe. Its content has indicated a clear direction towards greater business transparency and responsibility as regards the social and environmental issues. It should be noted that 22 countries drew the reporting framework from the Directive, while the others adapted it to the existing guidelines, and the auditor's involvement in confirming non-financial data was adopted by 19 Member States, including Poland (Fărcaș, 2020).

The reporting of information these 300 Public Interest Entities in Poland is to be confirmed by an independent third party that issues a statement in this regard. Other entities decide themselves whether to commission the attestation of non-financial data and, additionally, to subject them to a full audit, as there is no mandatory obligation to do so. It should be noted that regulations do not indicate clearly who is to confirm non-financial information. In practice, this role is assigned to the statutory auditor, since the process of disclosure verification and the methodological aspects of auditing non-financial reports are very similar to a financial review. It can therefore be assumed that a statutory auditor is a competent person in this area. A study conducted by Wiśniewska (2015) in the area of the verification of corporate social responsibility reporting on a group of 32 Polish companies found that the data confirmation services in this regard were provided in the entities under study by three groups of units: Global Reporting Initiative (GRI), consulting and audit firms and other consulting firms. Involving audit firms in the process of verification may prove to be an appropriate solution, as these entities have both the relevant experience gained in the course of auditing financial reports, access and the ability to link non-financial information with financial data and have appropriate IT tools for providing services of this type. The aforementioned components render the audit process coherent and well-targeted, which may bring measurable effects in the auditor's practice.

It is difficult to indicate the actual level of audit performance in Poland, as the data in this regard are not yet fully known. The increased reporting practices in recent years may not be consistent with the verification and attestation of the data contained in them (compare Zysnarska-Dworczak, 2016). The rationale behind this statement includes the results of an analysis of sustainable development reports for the years 2001–2010 from 15 countries which indicated an increase in their number, which, unfortunately, did not correlate with the number of reports subjected to external verification. Moreover, in certain countries, e.g., Italy and Sweden, with an increase in reporting, a decrease in the external verification of reports was noted (Zysnarska-Dworczak, 2016). It is also difficult to quote the researchers' observations in this regard, as the topics they

address focus mainly on non-financial reporting carried out by socially responsible entities, while the considerations mainly concern the scope and thematic content of the above-mentioned reports and reporting standardisation. The area of report verification is usually described by companies that commission this type of service and indicates whether a report of a particular company has been or not subjected to verification. There are no analyses of the audit market or the level of services provided by audit firms and the factors that regulate this situation. This indicates a research gap occurring in this area. The authors believe that non-financial reporting audits are rarely performed, with the identification of factors which contribute to this situation being of importance. It is also becoming reasonable to identify a hypothetical link between specific characteristics of audit firms and the barriers that prevent the auditing of non-financial reports. In the course of such considerations, the following research question arose:

*RQ1: What percentage of audit firms in Poland carry out audits of non-financial reports?*

*RQ2: How large are audit firms in Poland in terms of the turnover obtained and the number of employees?*

*RQ3: How many years of business experience do the firms providing audit services have?*

*RQ4: What factors (in the opinion of audit firms) hinder the performance of audits of non-financial reports?*

The search for answers to the above questions directed the research objective towards the "Identification of factors hindering the performance of audits of non-financial reports in Poland". The additional objectives of the study included the "Identification of the percentage of audit firms in Poland, being under audit supervision, which will perform an audit of non-financial reports" and the "Characterisation of audit firms in Poland in terms of the employment and the turnover obtained".

The context of the considerations referred to Polish auditors' practices as regards the verification of CSR reports. The current study contributes to the knowledge in the area of non-financial reporting in two ways: firstly, it characterises audit firms operating in the Polish market and indicates what percentage of these entities perform the services of auditing non-financial reports. Secondly, the

study demonstrates the barriers that hinder the audit of non-financial reports, which leads to the conclusion that the implementation of mechanisms eliminating these limitations will successfully contribute to an increase in the number of entities providing audit services in the area of CSR.

## 1. Literature Review

The conducted literature review suggests that despite many scientific papers on non-financial reporting in Poland and worldwide, research concerning verification of non-financial information is still at an early development phase. The importance of the presented subject matter and the need to develop empirical research in this area were emphasised *inter alia* by Erkens et al. (2015) who conducted a detailed bibliometric analysis of published scientific articles on non-financial information. They recognise that, at the turn of the 20th and the 21st century, there was a change towards a greater number of audits of non-financial information. However, an analysis of the research objectives applied in all analysed articles shows that most of them are based on archival methodologies. A significant proportion of the articles are in the form of an essay (25.3% of published articles), while approx. 14.4% are questionnaires or experiments and 8.4% are case studies. Only a small number of the articles are analytical in nature. The authors suggest the necessity of research into, *inter alia*, the issues of the reliability of non-financial information disclosures, difficulties in auditing CSR reporting and the need for independent audits (Erkens et al., 2015).

In foreign publications, the auditing of non-financial reports has been considered in recent years, *inter alia* by Pucheta-Martínez et al. (2018), Dal Maso et al. (2020), Rivière-Giordano (2007), Kaspina and Samoilova (2020), Coran et al. (2009), and Manetti and Toccafondi (2012). In turn, in Polish scientific publications, the *stricte* topic of verification and attestation of non-financial information was addressed *inter alia* by Zyznarska-Dworczak (2016), Hummel & Michalak (2016), Wiśniewska (2015), Wiśniewska and Chojnacka (2016), Kuterka and Zyznarska-Dworczak (2018) and Bartoszewicz (2018).

Having analysed the considerations given by the authors as regards the verification and attestation of non-financial information, three main topics can be distinguished:

- stressing the importance and necessity of performing services of this type in order to increase the reliability of non-financial data;
- emphasising methodological difficulties in the performance of non-financial audits;
- the effect of specific variables on the quality of these audits.

An important aspect in reporting non-financial information is its suitability for stakeholders. The information contained in a CSR report should be characterised by usefulness, completeness, consistency, transparency and, primarily, reliability (Fijałkowska, 2013), which should be confirmed by an independent audit. Hence, it is of importance that they are subjected to an audit. The importance of confirmation services for increasing the reliability of an entity's performance measures as part of the extended role of statutory auditors was distinguished in the 'Report of Special Committee for Assurance Services' (American Institute of Certified Public Accountants – AICPA, 1997). The content of the report suggests that the traditional role of audit in order to increase reliability and introduce an added value to the information being presented should apply whether or not it is financial or non-financial information (AICPA, 1997, as cited in Coram et al., 2009, p. 138). As Manetti and Toccafondi (2012) claim, in order to provide reports on sustainable development, an external supplier informs about the organisation's performance as regards environmental and social issues. Such an activity increases the quality of information disclosed in corporate social responsibility reports (compare with indications by Manetti & Becatti, 2009, as cited in Sierra-Garcia et al., 2018). Humel and Michalak (2016) add that the assessment of the reporting process functioning and all auditor's recommendations concerning the functioning of this process are as important as ensuring data reliability. As in the case of auditing financial reports, as part of summarising the work on the verification of non-financial reports, the auditor submits a letter to the Management Board, which summarises their observations and recommendations concerning possible improvements in the reporting process. However, as Lam and Khare (2010) point out, due to the wide thematic range of disclosures presented in non-financial reports, which results from the nature of corporate social responsibility and its multi-faceted character, the authentication of information of this type is a difficult task.

In addition, Hummel and Michalak (2016) emphasise the positive side of the audit of non-financial reports, claiming that an investment in the verification of non-financial data can make a significant contribution to building a competitive advantage. The companies that report non-financial data and subject them for verification achieve better results and higher performance in financial markets, and are much less sensitive to market-wide downward trends, because thanks to the reliable disclosure of significant data, all information is already discounted and reflected in the share market. Zysnarska-Dworczak (2016) points out, however, that despite the entities being focused on ensuring the highest quality of reports, regulations do not oblige entities to apply specific solutions including, in particular, to external verification of the data being presented. Thus, the entities themselves decide whether to subject non-financial information to external verification. In turn, Sierra-Garcia et al. (2018) note that although the Directive does not require the verification of the content of a non-financial report, in many countries this is done by an independent external service provider to increase the reliability and diligence of the information being presented. However, according to the research conducted by Wiśniewska (2015) in the area of verification of Corporate Social Responsibility reports in Polish companies which submitted reports in 2013 and 2014 to the competition 'Social Reports' in Poland in 2013, out of 32 reports submitted for the competition, 15 were subject to external verification, which accounted for 46.9%. In 2014, out of 31 submitted reports, 19 were subject to external verification, which accounted for 61.3%. Therefore, the number of reports verified by external experts increased by 14.4%, which may indicate an increase in companies' awareness of the need to authenticate non-financial data presented in reports. It is worth stressing that the study involved companies that have submitted their reports to the competition, hence it can be assumed that they understand the idea of non-financial reporting, and can see the need to confirm the information contained in CSR reports.

It is, however, difficult to determine whether this trend for increasing the verification of reports has been maintained. This statement may be based on the fact that the process

of methodological auditing non-financial information can be a significant difficulty, therefore audit firms may not be willing to provide services of this type. As Krasodomska (2014) notes, non-financial data containing issues of the environment, respecting human and workers' rights, and the prevention of corruption and bribery are descriptive information with a different structure, language, style and narrative methods, which uses industry-specific terms, therefore it is a challenge for auditors to assess them objectively. This problem was also addressed by Kaspina and Samoilova (2020). In their opinion, one of the aspects hindering the practical performance of attestation assignments concerning non-financial information is the lack of established criteria for the performance of non-financial reporting. Reports concerning sustainable development are most often drawn up in accordance with the Global Reporting Initiative's (GRI) guidelines for sustainable development reporting. In such a case, a statutory auditor will follow the standard procedures for the attestation service. The situation is different in the case of reports drawn up by foreign entities, in accordance with other countries' rules, and the very criteria for their implementation. In this case, it is difficult to select the tools for testing. Furthermore, it is difficult to determine the very significance of the investigation. At the same time, a problem arises: how to determine the appropriate approach to sampling? The selective approach results from the fact that the auditor's resources are limited, and the performance of a full audit is almost impossible, therefore a sample should be selected for auditing, and the reliability of information should be assessed based on the sample, which, in the case of non-financial information, may be an uneasy task.

The positive side of the audits of non-financial reports is indicated by the results of the study conducted by Pucheta-Martinez et al. (2018). They show that auditing firms from the so-called 'big four', and the fees for an audit performed by the firms under study encourage CSR reporting. They believe that large audit firms play an important role in disclosing information on CSR, which may help mitigate the information asymmetry between managers and stakeholders. In turn, Dal Maso et al. (2020) investigated the relationship between the confirming services performed by the same audit firm in the area of CSR and

financial reports. They assessed positively the effect of such a situation on the assessment of the continuation of the company's operations. On the other hand, Rivière-Giordano (2007) points out that firms should consider subjecting non-financial information to an audit, as it is practiced in the area of financial information authentication. He proposes an audit of social information as a measure confirming the reliability of such data. It should be emphasised that an increasing number of traditional investors (i.e., investors who are not specifically guided by the CSR-related investment strategy) are including CSR results to their decisions concerning the selection of shares and obligations (Durand et al., 2019), hence it is justified to subject the published information to audits.

Despite much evidence found in the literature, which indicate the need to verify non-financial reports and the confirmation of non-financial information by the auditor, as previously mentioned, the authors believe that the services of this type are practiced among few audit firms in Poland. In order to verify the practice in this regard, and to determine the factors which hinder the audits of CSR reports, an empirical study was conducted.

## 2. Research Methodology and Data

The article used the survey research. The study was conducted between October and November 2020 on a population of 1,410 audit firms under the supervision of the Polish Agency of Audit Oversight (PANA). The selection of the indicated group for the study was motivated by the fact that these entities are supervised by the above-mentioned Agency, which is an independent institution focusing its activities on building trust in financial information. PANA exercises independent supervision over statutory auditors, audit firms and professional self-governing bodies of statutory auditors and ensures that the audits of financial services and attestation services are appropriately performed by statutory auditors. Such a measure contributes to an increase in investor security and economic turnover. The activities of the Agency are supervised by the Minister of Finance, inter alia by means of appointing and dismissing PANA bodies, granting its statutes and approving a financial plan and a financial report. The list of 1,410 firms is available on the PANA website (as of October 15, 2020). When

the study was initiated, the contact details of particular firms listed on the PANA website were subjected to preliminary verification. The repeated records and the entities for which there were shortcomings were deleted. 1,293 entities were qualified for the further stage of the study.

The survey was addressed to all entities representing the study population. By assumption, the study was intended to be a complete population study. However, not all respondents provided comprehensive answers to all questions. The issue is described in detail below. The respondents' willingness to provide answers to individual questions was the only criterion for the inclusion of a particular audit firm in the sample. Therefore, it could not be assumed that it was a random sample, and it was not advisable to apply statistical estimation methods. For this reason, the study employed the descriptive statistics method, including interdependence testing using Cramer's V. This is a measure of the independence of variables, which can be applied for variables in all measurement scales. It can take values from the interval of [0; 1], where '0' indicates stochastic independence, and '1' indicates a deterministic dependence.

The study was conducted using the CATI (Computer Assisted Telephone Interview) technique, where the respondents were either contact persons indicated on the PANA website or persons indicated by them as competent to answer the questions concerned. The measurement tool was an interview questionnaire comprised of seven questions on the characteristics of the firms under study, the provision (or lack thereof) of the service of non-financial report auditing in the area of CSR and the factors that hinder the performance of services of this type. The contact with a respondent was successfully established for 1,109 audit firms, with some firms refusing to participate in the study. 774 firms answered a single question concerning their performance of non-financial report verification, which enabled the conclusion as to how many of them perform the services of CSR report verification. It was found that 18 entities were audit firms that performed audits of non-financial reports, while the other entities (756) were audit firms that did not provide services of this type. Ultimately, 235 respondents provided answers to all the questions asked. 226 of them are firms that

do not perform audits of non-financial reports, and only nine of them provided services in this regard. Due to the very low representation of audit firms that provide services in verifying non-financial reports and the adopted objectives of the study, further empirical considerations omitted the entities which provide services of this type. On the other hand, the answers provided by 226 respondents from audit firms, that did not perform audits of non-financial information, were subjected to a detailed analysis. Their operations are mainly focused on auditing financial reports. The direction of the adopted research enabled the characterisation of this group of audit entities, and identified the reasons for their failure to perform audits of non-financial reports. The survey checked what difficulties in the provision of services in the area of CSR auditing were most often indicated by respondents from these entities. It should be stressed that a sample of 774 entities was used only to determine the percentage of audit firms providing services of CSR report auditing. All other analyses were carried out based on a sample of 226 firms which performed no verification of non-financial information.

### 3. Empirical Results and Discussion

According to the study results, out of 774 audit firms, only 18 (2.3%) perform audits of CSR non-financial reports. Most entities do not provide services of this type. Based on a sample of 226 respondents from audit firms which performed no audits of non-financial information, the factors hindering, in the auditors' practice, the performance of audits of non-financial reports were analysed. Moreover, this group of entities was examined in terms of their experience in the performance of audits of financial reports and the size.

The results of the conducted analysis revealed the main features of audit firms in Poland and enabled their characterisation. The size of the entities was considered in terms of the annual turnover, the number of all staff employed at the unit, and the number of auditors working in a particular entity. The company's experience was described using two variables expressed in years: (1) the length of operation in the market; and (2) the experience in providing financial report verification and confirmation services.

According to the respondents' declarations, 221 entities are micro-enterprises with

**Tab. 1: The length of business operation, in years**

Number of years	Number of entities	Frequency	Cumulative frequency
[0; 5)	27	0.1195	0.1195
[5; 10)	29	0.1283	0.2478
[10; 15)	47	0.2080	0.4558
[15; 20)	35	0.1549	0.6106
[20; 25)	24	0.1062	0.7168
[25; 30)	55	0.2434	0.9602
[30; 35)	5	0.0221	0.9823
[35; 40]	4	0.0177	1
Total	226		

Source: own

a turnover of less than 2 million EUR. Only five audit firms recorded an annual turnover of more than 2 million EUR while not exceeding the 10 million EUR turnover ceiling, which classifies them as small-sized enterprises.

Based on the answers to the questions concerning the characteristics of the entities under study, the following were determined: how long these firms had been operating in Polish market (Tab. 1), how many years of experience they had in performing audits of financial reports (Tab. 2) and how many staff they employed (Tab. 3), including auditors (Tab. 4).

As indicated by the study results, the youngest of the firms under study started operating in 2020 and the oldest started in 1980.

In 1989, in Poland, there was a transformation of its centrally planned economy into the free market economy. It is worth noting that several audit firms that have been operating to date were established before the system transformations. 25% of the entities have been operating for less than 10 years and only 10% for less than 5 years. Nearly one-quarter of audit firms have been operating for 25–30 years, i.e. these are firms that were established at the beginning of the free market transformations in Poland.

Approx. 24% of firms have less than 10 years' experience in auditing activities in the area of financial reports, and 10% have less than 5 years' experience. More than 75% of entities have been involved in the verification of financial reports for 10 years or longer. More

**Tab. 2: The experience in the performance of audits of financial reports**

Number of years	Number of entities	Frequency	Cumulative frequency
[0; 5)	24	0.1062	0.1062
[5; 10)	30	0.1327	0.2389
[10; 15)	40	0.1770	0.4159
[15; 20)	41	0.1814	0.5973
[20; 25)	23	0.1018	0.6991
[25; 30)	47	0.2080	0.9071
[30; 35]	21	0.0929	1
Total	226		

Source: own

Tab. 3: Number of employees

Number of employees	Number of entities	Frequency	Cumulative frequency
[0; 5)	143	0.6327	0.6327
[5; 10)	49	0.2168	0.8496
[10; 15)	19	0.0841	0.9336
[15; 20)	3	0.0133	0.9469
[20; 25)	5	0.0221	0.9690
[25; 30)	2	0.0088	0.9779
[30; 35)	3	0.0133	0.9912
[35; 40)	1	0.0044	0.9956
[40; 45]	1	0.0044	1
Total	226		

Source: own

Tab. 4: Number of auditors

Number of auditors	Number of entities	Frequency	Cumulative frequency
[0–4)	182	0.8053	0.8053
[4–7)	35	0.1549	0.9602
[7; 10)	4	0.0177	0.9779
[10; 13)	3	0.0133	0.9912
[13; 15)	1	0.0044	0.9956
[15; 17]	1	0.0044	1
Total	226		

Source: own

than one-third of the companies that provide services in this regard have been operating for 10–20 years. Having analysed the information provided in Tabs. 1 and 2, one can conclude that among the audit firms under study, entities with extensive experience in the performance of financial audits are predominant.

The majority (63%) of the firms are entities employing fewer than five staff, while 85% of the examined firms employ fewer than 10 staff. The firms employing at least 20 staff account for 5% of the population examined.

As the study results show, more than 80% of entities employ fewer than four auditors, while 4% of the firms under study employ at least seven ones. It should therefore be concluded that the firms providing services of

auditing financial reports in Poland are micro- and small-sized enterprises in terms of the number of employees. The majority of them are microenterprises that employ highly qualified staff.

Due to the low percentage of firms providing services in the area of the verification of non-financial reports in Poland (the results of the conducted study indicate 2.3%), the crucial objective was to identify the most important factors contributing to this situation. The respondents had the opportunity to choose from five hypothetical difficulties provided in the questionnaire. Moreover, they could indicate other barriers which, in their opinion, have a considerable effect on the performance of non-financial audits, and constitute obstacles in this regard.



The questionnaire proposed the following factors hindering the performance of audits of non-financial reports:

1. 'Low demand for such services';
2. 'Lack of auditors' practical knowledge as regards the methodology of performing audits of non-financial reports';
3. 'Diversity of permitted standards as regards the performance of audits of non-financial reports';
4. 'Difficulties in the assessment of non-financial data reliability';
5. 'Considerable latitude in drawing up non-financial reports by companies';
6. 'Other, which ones?'

A summary of the respondents' answers to the question concerning the difficulties in the performance of audits of non-financial reports is presented in Tab. 5.

As demonstrated by the study results, the difficulty in performing audits of non-financial reports, most frequently indicated by the respondents, was too low demand for services of this type; it was indicated by 125 respondents, i.e., more than half of all study participants. Another important limitation is the lack of auditors' practical knowledge as regards the methodology of performing audits of non-financial reports. This answer was indicated by 64 entities, i.e. almost one-third of the respondents.

As part of providing answers to the question concerning the factors hindering the performance of audits of non-financial reports, the respondents had the opportunity to indicate

additional barriers that had not been included in the questionnaire. The conducted study demonstrates that 103 respondents (46%) proposed a different factor. The factors were grouped into the following four categories:

1. 'No assignments' (factor 7);
2. 'No time for the provision of an additional service' (factor 8);
3. 'A high cost of the service performance, and no experience in this regard' (factor 9);
4. 'Too few employees' (factor 10).

A general summary of the answers provided in this regard is presented in Tab. 6. The group of entities which mentioned the factor of 'No assignments' may be the audit firms which are prepared, in terms of staffing and substantially, to provide a service of this type, and have it in their offer, but receive no assignments for it. The reason for this may be the lack of legal obligation for most companies in Poland to draw up non-financial reports, which also translates into their subsequent verification. Even in the case of voluntary reporting carried out by some entities in the area of CSR, there is no interest on the part of the management in subjecting a report to an audit. Factor 8, 'No time for the provision of an additional service', was indicated by firms which, due to the great number of assignments in the area of financial report auditing, show no interest in extending the offer to include the verification of non-financial reports. For some of the respondents (the group indicating factor 9), the performance of audits of non-financial reports is an expensive service which requires

**Tab. 5: The number and percentage of indications of a particular factor hindering the performance of audits of non-financial reports**

	Factor	Number of entities	Percentage
1.	'Low demand for such services'	125	0.553
2.	'Lack of auditors' practical knowledge as regards the methodology of performing audits of non-financial reports'	64	0.283
3.	'Diversity of permitted standards as regards the performance of audits of non-financial reports'	33	0.146
4.	'Difficulties in the assessment of non-financial data reliability'	40	0.177
5.	'Considerable latitude in drawing up non-financial reports by companies'	42	0.186
6.	'Other, which ones?'	103	0.456

Source: own

**Tab. 6: The number and percentage of indications of 'other' factors hindering the performance of audits of non-financial reports**

	Factor	Number of entities	Percentage
7.	'No assignments'	41	0.398
8.	'No time for the provision of an additional service'	12	0.117
9.	'A high cost of the service performance, and no experience in this regard'	10	0.097
10.	'Too few employees'	31	0.301

Source: own

combined specialist knowledge and experience in verifying non-financial information. Since such determinants carry a high audit risk, this service is not present in the offer of this group of audit firms. Some respondents indicated that the limitation is the small size of the firm and a low employment level, which implies the need to restrict the offer and specialisation in a particular direction. This group comprises micro-firms whose business profile is focused on auditing financial reports.

Of the other factors, the one most frequently mentioned by the respondents as a barrier in verifying non-financial reports is 'No assignments' (40% of indications among other factors). This strengthens the limitation indicated by the respondents and is associated with the 'Small number of assignments for services of confirming non-financial audits' (factor 1). Another important barrier in the performance of

non-financial audits, indicated by audit firms, is the 'Lack of a sufficient number of employees', which accounts for 30% of indications of other hindering factors.

In the next step, the number of indications of a particular difficulty in performing audits of non-financial reports due to the entity's experience in auditing activities was summarised. In the last line, the Cramer's V coefficient values are provided. The obtained values of this measure are provided in the last line of the Tab. 7.

It is worth noting that the indication of this difficulty had little to do with the experience of a particular audit firm, as indicated by a low Cramer's V coefficient (0.1539). All Cramer's V coefficients are low, which proves that there is no strong dependence between the firm's experience and the indication of a particular difficulty. In order to better understand this issue,

**Tab. 7: The number of indications of a particular factor hindering the performance of audits of non-financial reports**

Number of years	Number of entities	Factor*					
		1.	2.	3.	4.	5.	6.
[0; 5)	24	12	7	2	3	2	12
[5; 10)	30	10	5	2	3	4	18
[10; 15)	40	25	15	4	7	5	19
[15; 20)	41	27	12	7	8	10	16
[20; 25)	23	15	5	4	4	5	11
[25; 30)	47	20	12	5	6	7	25
[30; 35]	21	16	8	9	9	9	2
Cramer's V		0.270	0.154	0.277	0.227	0.239	0.328

Source: own

Note: \* The description of factors is provided in Tab. 5.

the ratio of indications of a particular difficulty was calculated for each interval, and referred to the number of all audit entities with the experience from a particular interval (Tab. 8). It should be noted that for the entities with experience of more than 30 years, all difficulties were indicated more frequently than for the entities with shorter experience. More than 75% of them complained about the 'low demand' for services in the area of non-financial report verification. It can therefore be concluded that these firms are willing and substantially prepared to provide services of auditing non-financial information. Thus, their human resources are reserves that can be used in situations of increased demand for services of non-financial report verification. This may occur when the legal obligation of

non-financial reporting and report verifying is extended to include a larger group of entities. Such a relationship can also be forced by means of free-market mechanisms by stakeholders for whom CSR information is important in the context of the decision-making process.

Tab. 9 provides the number and percentage of indications of 'other' difficulty in the performance of audits of non-financial reports due to the entity's experience in auditing activities. The percentage of indications is entered in brackets near the number of indications. In isolated cases, no particular limitation was indicated in a particular interval of auditing experience expressed in years, therefore, the symbol '-' was entered into the appropriate cells of Tab. 9.

**Tab. 8: The percentage of indications of a particular factor hindering the performance of audits of non-financial reports**

Number of years	Factor*					
	1.	2.	3.	4.	5.	6.
[0; 5)	0.500	0.292	0.083	0.125	0.083	0.500
[5; 10)	0.333	0.167	0.067	0.100	0.133	0.600
[10; 15)	0.625	0.375	0.100	0.175	0.125	0.475
[15 ;20)	0.659	0.293	0.171	0.195	0.244	0.390
[20; 25)	0.652	0.217	0.174	0.174	0.217	0.478
[25; 30)	0.426	0.255	0.106	0.128	0.149	0.532
[30; 35]	0.762	0.381	0.429	0.429	0.429	0.095

Source: own

Note: \* The description of factors is provided in Tab. 5.

**Tab. 9: The number and percentage of indications of 'other' factors hindering the performance of audits of non-financial reports**

Number of years	Difficulties in the performance of audits of non-financial reports			
	7.	8.	9.	10.
[0; 5)	4 (0.333)	–	1 (0.083)	5 (0.417)
[5; 10)	8 (0.444)	3 (0.167)	–	4 (0.222)
[10; 15)	8 (0.421)	3 (0.158)	2 (0.105)	7 (0.368)
[15; 20)	9 (0.563)	3 (0.188)	2 (0.125)	2 (0.125)
[20; 25)	3 (0.273)	1 (0.091)	2 (0.182)	5 (0.455)
[25; 30)	8 (0.320)	2 (0.080)	3 (0.120)	8 (0.320)
[30; 35]	1 (0.500)	–	–	–

Source: own

Note: \* The description of factors is provided in Tab. 6.

**Tab. 10:** The number of indications of a particular factor hindering the performance of audits of non-financial reports

Number of employees	Number of entities	Difficulties in the performance of audits of non-financial reports					
		1.	2.	3.	4.	5.	6.
[0; 5)	143	76	36	24	27	26	12
[5; 45]	83	49	28	9	13	16	18
Cramer's V		0.057	0.092	0.081	0.041	0.014	0.197

Source: own

Note: \* The description of factors is provided in Tab. 5.

**Tab. 11:** The percentage of indications of a particular factor hindering the performance of audits of non-financial reports

Number of employees	Difficulties in the performance of audits of non-financial reports					
	1.	2.	3.	4.	5.	6.
[0; 5)	0.531	0.252	0.168	0.189	0.182	0.448
[5; 45]	0.590	0.337	0.108	0.157	0.193	0.470

Source: own

Note: \* The description of factors is provided in Tab. 5.

**Tab. 12:** The number and percentage of indications of the 'other' factors hindering the performance of audits of non-financial reports

Number of employees	Difficulties in the performance of audits of non-financial reports			
	7.	8.	9.	10.
[0; 5)	25 (0.391)	9 (0.141)	7 (0.109)	15 (0.234)
[5; 45]	16 (0.410)	3 (0.077)	3 (0.077)	16 (0.410)

Source: own

Note: \* The description of factors is provided in Tab. 6.

One of the most often indicated factors as part of the answers 'other' was the barrier associated with an insufficient number of employees (factor 10). Given the high importance of this factor and its effect on the ability of the entities under study to perform non-financial audits, it was checked, in relation to this barrier, whether there was a relationship between employing staff and indicating other limitations. Because more than 63% of audit firms employ fewer than five staff, for the purposes of this analysis, the division of all auditing entities into only two categories was adopted, i.e. fewer than five employees and more than five employees. The results in this regard (expressed in absolute terms) are

provided in Tab. 10, while the results in relative terms are provided in Tab. 11.

The result analysis shows that all Cramer's V coefficients are very low, which indicates no relationship between the number of employees and the indication of a particular limitation. Also, the indication percentages (Tab. 11) are similar in both groups. This shows that the aforementioned limitations are universal in nature and are not determined by the size of the company in the context of the number of employees.

Additionally, Tab. 12 presents the number and percentage of indications (numbers in brackets) of 'other' difficulty in the performance of audits of non-financial reports due to the number of employees.

It should be noted that limitation 10, i.e., 'too few employees', was much more frequently indicated by firms employing more people (at least five employees) than by small-sized firms which employed fewer than five staff. Therefore, it appears that the limitation resulting from 'too few employees' is probably associated with an insufficient employment level for the number of assignments, or with the insufficient number of employees in a company who have proper qualifications and skills in verifying and confirming non-financial information.

The authors believe that the conducted study is pioneering and pilot in nature, therefore the impossibility of referring to studies by other authors on this subject is a considerable limitation to a discussion. Despite the detailed literature review having been conducted, the authors have found no studies showing the practical aspects of the implementation of non-financial audits. The study results found refer mainly to the contents of non-financial reports, with no analyses indicating the determinants of the implementation of non-financial audits from the audit firms' perspective. Therefore, it is difficult to refer to the practice of verification and assurance services of non-financial reports in other countries. Dadacz indicated Poland's approach to the role of an auditor in relation to the non-financial statement is consistent with the approach of most other EU Member States. Pursuant to Directive 2014/95/EU, non-financial information is not subject to full and mandatory auditing. As for undertakings subject to the provisions of the directive, an audit firm must only check whether a non-financial statement has been published. Only selected countries, such as Italy, the Netherlands, or Bulgaria, have introduced mandatory verification of the non-financial statements (compare Dadacz, 2017). All the more so, given the absence of studies in this field, the research area addressed is important due to the need for the verification and certification of reliability of non-financial data which are increasingly being published by economic operators worldwide.

It should be noted that the study results obtained are, in many aspects, surprising. For example, in the initial stage of research, the authors assumed, taking into account the rapidly developing trend of non-financial reporting in Poland and its promotion that the percentage of audit firms that provided non-financial report audit services would be

at a level of at least 40%. As indicated by research results, this level is much lower and amounts to 2.3%. This seems to suggest that there are few entities in the Polish auditing market that perform the service of auditing non-financial reports, which are leaders in this field. This conclusion is consistent with the results reported by Krasodomska and Zieniuk (2021), who demonstrated in their study that verification and assurance services were mainly provided by audit firms identified as the so-called Big 4, mostly Deloitte and E&Y. Moreover, their research, consisting in comparing the practice of assurance services non-financial reports of 935 companies in Eastern and Western Europe, indicates that companies from Western Europe 426 (52%) decided to choose this service more often, while only 34 (30%) companies from Eastern Europe submitted a non-financial report to assurance service.

The low percentage of audit entities that provide non-financial audit services in Poland may result from the fact that some companies are prepared in terms of knowledge and resources to provide the said service, but are unable to compete with large firms. Smaller firms, in turn, do not decide to widen the scope of services offered including the auditing of non-financial reports because of the costs of training their staff and hiring new staff, or because they lack experience in this field. Moreover, reporting companies probably prefer to order a non-financial audit service to a large, experienced, and well-known company. This is consistent with the findings Martínez-Ferrero and García-Sánchez (2018), which show, "that the probability of detecting material errors and omissions in a sustainability report is higher if it is verified by a Big 4 accounting firm and by an industry expert as an assurance practitioner" (Quick & Inwinkl, 2020).

Our study attempted to find the factors that determine such a low percentage of firms providing non-financial report audit services in Poland. Based on the study results, the greatest difficulty is the low demand for such services. The cause underlying this problem is probably the reporting entities' failure to understand the idea and significance of non-financial information audit results for stakeholders. It may therefore turn out that even the extension of the offer by audit firms to include auditing non-financial information does not guarantee that such assignments will be carried out.

The authors are of the opinion that as long as there is no statutory obligation as regards certifying non-financial information, the volume of reported demand for the certification of the reliability of data provided in CSR reports will depend on the reporting entities. In this context, it is important to introduce regulations to extend the catalogue of companies that are required to certify the reliability of non-financial information. Such a change would provide guarantees of data reliability for stakeholders. It should be emphasised that, at present, a statutory auditor, when auditing a financial report, is not obliged to verify the reliability of data other than the financial data included in the report. This also applies to CSR (corporate social responsibility) reports. It is also important that regulations do not limit the confirmation of data only to the issuance of a statement that an entity reports non-financial information. Only the implementation of complete audits carried out in the CSR reporting area will reassure stakeholders of the reliability of information being disclosed.

Moreover, as indicated by the study results, a considerable limitation to the provision of audit services as regards non-financial reports is the lack of auditors' practical knowledge of the relevant methodology. It should be noted that, despite the great similarity between this type of services and financial audits (a similar procedure of planning, verification and reporting), a significant difficulty is the very selection of criteria for the assessment of non-financial information and the confirmation of its reliability. Unlike financial data, the information provided in CSRs is presented in a descriptive form and is poorly quantified, and are not monetary in nature, which renders them difficult to assess. In addition, there is arbitrariness in the selection of standards in data assessment. At this point, it is appropriate to mention the apt observation made by Kutera and Zyznarska-Dworczak (2018) who also noted the problem in a methodological aspect of non-financial report auditing while regarding the method for determining significance, risk measurement and the determination of the level of assurance as the most important issues in this area. They believe that the key to the selection of an appropriate level of confirmation of financial data by an auditor is to estimate the risk of a significant irregularity. The concept of calculating and taking this risk into account has been successfully applied for years in

financial reporting research. The calculation of the significance level, however, is fully based on monetary data, which is expressed as a specific amount. In practice, a real problem arises in implementing this approach when verifying non-financial information, since their specificity is the considerable dominance of qualitative data. It also involves risk estimation and the determination of the confirmation level which, taking into account the nature of the data provided in CSR reports, may result in different levels in particular areas of the report.

The issue of the sample selection and the determination of the significance level when auditing non-financial reports was also pointed out by Kaspina and Samoilova (2020). The authors of the article also noted the problem, since the narrative character of CSR reports provides no objective possibility of determining a sample for research. The information provided in a report must be verified in its entirety with no possibility for the use of sampling, hence reliability testing is, from the methodological point of view, difficult. It should be also added that, in practice, there is a great diversity of standards concerning the auditing of CSR reports, and there are no strict guidelines in this regard. Thus, a significant difficulty arises in carrying out the verification and confirmation of the information provided in a report. The authors noted the need to introduce uniform standards of assessment of the disclosures presented by enterprises. The analysis of the assurance service standard of non-financial reports used in Europe carried out by Krasodomska and Zieniuk (2021) indicates that the most frequently used standard in audits of this type of reports is the ISAE 3000 standard. This standard offers two levels of assurance 'reasonable (sufficient) assurance' and 'limited assurance'. As noted by Quick and Inwinkl (2020), 'limited assurance' offers an acceptable level of certainty but is a conclusion given in a negative form and therefore it is not as strong as 'reasonable assurance' (compare Quick & Inwinkl, 2020). Therefore, it does not fully guarantee the accuracy of the data.

Apart from the main factors, which include low demand for services and the lack of auditors' practical knowledge on the methodology of carrying out a study in the scope discussed, the authors identified additional barriers that hinder the provision of audit services in the area of non-financial reports in Poland. These include:

no assignments, no time for the provision of an additional service (in addition to those being currently provided, the high cost of the service, and no experience in the area concerned. Another barrier is understaffing in an audit firm.

The first of the above-mentioned factors concerns 'No assignments', which may indicate that firms operate on the Polish auditing services market which are prepared (in terms of staffing and resources) to provide services of this type but receive no assignments for it. This issue is probably related to the absence of the obligation to legally confirm data. Thus, the voluntary preparation of non-financial reports by a growing number of firms in Poland does not translate into subjecting them to external verification. Another barrier is 'no time for the provision of an additional service'. The audit firms under the study pointed out that, due to the number of assignments concerning the auditing of financial reports, they were not interested in expanding their offer to include the verification of non-financial reports. For a proportion of audit firms, the performance of audits of non-financial reports is a costly service which requires combined specialist knowledge and experience in this regard. Since this also carries a high audit risk, therefore this service is not provided in the offer of this group of audit firms. Another limitation is the small size of a firm and a low employment level, which affects the narrow range of services offered by a particular entity. These firms are most often specialised in financial report auditing and do not seem interested in expanding the range of services offered.

It is certainly the structure of audit firms in Poland that has an influence on the identified limitations in performing audits of non-financial reports. As indicated by the results of research conducted by the authors, these firms are mostly small-sized entities in terms of both the annual turnover and the number of employees which, in most cases, is below five. This state of affairs can be explained by the firms' unwillingness to become involved in an additional service, even though this does not harmonise well with the extensive experience of the entities under study in the area of auditing. This, in turn, is expected to encourage companies to take on new challenges, especially as many entities have been operating in the market for more than 25 years. It can be assumed that firms' reluctance to expand their offer to include non-financial

audits is dictated by the need to bear additional financial expenses to improve the qualifications of the audit staff. In many cases, it also involves employing additional people to provide such services. It is worth stressing that this condition of non-financial audits is also affected by the previously mentioned methodological difficulty in providing such a service due to the lack of uniform criteria, measures or indices that would enable the performance of an objective assessment of non-financial information, and confirm the reliability of the disclosures being presented.

Apart from the above-mentioned factors, a considerable impediment to audit services in the area of both financial and non-financial audits is the ongoing COVID-19 pandemic of 2020. It has undoubtedly had an impact on many areas of life and impaired the functioning of many individuals. Firms have had to re-establish priorities for their activities and restructure their strategies and action plans in the risk management process. The uncertainty of tomorrow has made it much more difficult for auditors to assess and confirm the information provided in reports. Currently, some areas require deeper analysis (e.g., continuity in a firm's operations) and the auditor's professional scepticism should be regarded as very important in the assessment. The aforementioned need to increase staff in the audit firm, or to bear additional financial costs, e.g., for training in the current pandemic era, is often impossible.

## Conclusion and Directions for the Future Research

The analysis of the completed questionnaires gives the answer to the research questions. According to the study results, most audit entities in Poland do not provide non-financial audit services. Thus, the level of carrying out this type of audits is low and amounts to 2.3% (research question 1). Our research results indicate that audit entities in Poland are mainly micro-enterprises with a turnover of less than 2 million EUR. Only five audit firms recorded an annual turnover of more than 2 million EUR while not exceeding the 10 million EUR turnover ceiling, which classifies them as small-sized enterprises. The majority of the research firms are entities employing fewer than five staff, wherein more than 80% of entities employ fewer than four auditors,

while 4% of the firms under study employ at least seven ones. Moreover, the firms providing services of auditing financial reports in Poland are micro- and small-sized enterprises in terms of the number of employees. The majority of them are microenterprises that employ highly qualified staff (research question 2). Among the audit firms under study, entities with extensive experience in the performance of financial audits are predominant. More than 75% of entities have been involved in the verification of financial reports for 10 years or longer (research question 3). In the opinion of audit firms, the main factors that hinder the performance of audits of non-financial reports are the low demand for such services and the lack of auditors' practical knowledge on the methodology of carrying out a study in the scope discussed. Moreover, additional barriers that hinder the provision of audit services in the area of non-financial reports in Poland are no assignments, no time for the provision of an additional service (in addition to those being currently provided), the high cost of the service, no experience in the area concerned, as well as understaffing in an audit firm (research question 4).

In summary, taking into consideration the existing auditing practice in Poland, the authors believe that certain measures need to be taken to increase and standardise both reporting and the provision of audit services in the CSR area. These include:

(1) a national solution in the legal area, which would involve the introduction of an obligatory requirement of a legal audit of non-financial reports for all firms that publish non-financial reports;

(2) solutions in the methodological area, which would indicate the need to confirm the reliability of data based on the performance of complete audits based on uniform audit standards and methodological guidelines in the area concerned;

(3) the promotion of good audit practices by auditors' organisations in a particular country, which would provide a reference point for certain solutions that may be applied in the area of data verification and confirmation. Such a measure would be a support and recommendation for the audit sector;

(4) European harmonisation of standards as regards the preparation of non-financial reports, and in relation to the performance of the audit

of the information provided in CSRs. Such a measure would facilitate the performance of a data assessment, and enable the comparison of the information being verified with the information provided in other entities' reports;

(5) unification of regulations being implemented at the level of all European Union countries as regards auditing of non-financial information. In this context, it should be noted that non-financial reporting and an audit of information provided in CSR report not only concerns Poland, as it is a global problem that requires certain solutions to be developed at the entire EU level. Hence, it is important to develop uniform standards and regulations that will apply in all countries.

The authors are of the opinion that undertaking the above measures would both enable a reduction in the existing barriers occurring on the audit service market and increase the number of non-financial report audits being implemented. Thus, the main added value in the above-mentioned measures would primarily be an increase in the quality of non-financial information and an assurance to stakeholders about its reliability. In view of the widespread problem related to the verification and assessment of non-financial data occurring in many countries, subsequent studies on the subject concerned should be carried out. The authors of the article believe that future research in the CSR area should focus primarily on the methodological aspect of non-financial reports. Research in this area would provide an opportunity to create a certain framework and methodological guidance for auditors carrying out the audits concerned. A further step in the research should be an expansion of the study population to include advisory entities which could also confirm non-financial information. Conducting studies of a similar nature in other countries would allow a comparative analysis to be carried out. Such a research trend would enable a broader view of the problem under study and allow future regulatory measures to be steered on the right track.

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### Electronic and Online Materials

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