INTERNATIONAL FORUM OF INDEPENDENT AUDIT REGULATORS

IFIAR 2026 Member Profile – AJN

1. Jurisdiction	**1.1 Insert the name of the jurisdiction in English:** Estonia.
2. Member[1]	**2.1 Insert the name of the Member, both in the local language and in English:** Local language: Audiitortegevuse järelevalve nõukogu (AJN). English: The Auditing Activities Oversight Board (AJN).
	2.2 Include relevant contact information, including postal address, telephone number(s), a general email address (if any) and a link to the Member's website: Audiitortegevuse järelevalve nõukogu (AJN) Pärnu mnt 18, 10141 Tallinn, Estonia Telephone: +372 5887 0011 General email: ajn@ajn.ee Website: https://www.ajn.ee
	2.3 Include the basis for establishment of the Member, as well as the legislation or regulations which provide the Member the authority/mandate with respect to audit regulation. Please describe with an appropriate level of detail the mission and responsibilities of the Member with respect to audit regulation: AJN is the independent oversight body of Audiitorkogu. It was established under the Auditors Activities Act (Audiitortegevuse seadus, AudS). Under §§ 121 and 124 of the Act, AJN organises public-interest oversight of sworn auditors, audit firms and Audiitorkogu. AJN's statutory responsibilities include decisions on audit-firm activity licences and sworn-auditor qualifications; entries in the Auditors Activities Register; professional examinations; quality control; investigations and disciplinary proceedings; precepts and penalty payments; approval of professional standards; oversight of continuing professional education; assessment of the effectiveness of

[1] In the case where there are two or more regulators from the same jurisdiction that have been approved according to Section 2.3 of the IFIAR Charter, they together are considered as one Member. In that case, regulators are requested to include information for both organizations in the Member Profile.

	public-interest entity audit committees; and international cooperation.
	2.4 Please indicate whether the Member has responsibility for the following tasks within the area of Audit Oversight: ☒ Licensing ☒ Registration ☒ Audit and/or Ethics Standard Setting ☒ Permanent Education / Continuous Training of Auditors ☒ Inspection ☒ Enforcement ☒ Other: Complaint handling and investigations; assessment of public-interest entity audit committees; international cooperation in audit oversight.
3. Governing Body Composition and members	**3.1 Describe with an appropriate level of detail the current composition of the Member's governing body, including, where possible, the names, the organization they represent (if any) and brief backgrounds of the governing body members, or provide a link to a page on your website where this information is provided.** The governing body has seven members appointed by the Minister of Finance. The current members and their brief professional backgrounds are: - Kurmet Ojamaa, Chair since 1 April 2026. He has held senior public-sector roles as head of a division at the Ministry of Finance, head of finance at Tallinn University and director of support services at Tallinna Linnatransport AS. He served as the first Chair of the newly established AJN from 2010 to 2014. - Helene Trušina, Head of the Reporting and Information Department at the Estonian Financial Supervision and Resolution Authority, with long experience at the authority and in financial reporting. - Ene Rammo, Financial Director of the Estonian Chamber of Commerce and Industry, with experience in financial management, budgeting and accounting. - Heddi Lutterus, Deputy Secretary General for Legislative Policy at the Ministry of Justice and Digital Affairs, with a background in legal policy and public administration. - Gerli Eisberg, Audit Manager at the National Audit Office of Estonia, specialising in public-sector financial auditing. - Ellen Kass, Adviser at the Ministry of Finance, with expertise in internal audit and public-sector control systems. - Eneken Napa, Chief Financial Officer of Orien Trade Group, with a background in auditing and financial management.
	3.2 What are the eligibility criteria / requirements and composition requirements for the members of the governing body? E.g. Does

	national legislation require representatives on the governing body from certain organizations, or with specific experience, etc. AJN is a five- to seven-member administrative body. Members are appointed by the Minister of Finance for a five-year term. Under § 126 of the Auditors Activities Act, members must be experts in accounting, finance, business or law and meet the statutory requirements concerning citizenship, legal capacity, reputation and management experience. The body must collectively have sufficient knowledge of statutory audit, and at least one member must be a sworn auditor. All members must meet the independence and three-year cooling-off requirements in § 126(4).
	3.3 Is there a restriction or recusal process that is applicable to members of the governing body of the Member who are current or former auditors/practitioners? ☒ Yes ☐ No **Does this include a "cooling-off" period for former auditors?** ☒ Yes ☐ No **If yes to either of the above, please describe:** Yes. Section 126(4) of the Auditors Activities Act establishes a three-year cooling-off period. During membership and for the three years preceding appointment, a member may not have provided audit services, held voting rights in an audit firm, served on the management body or staff of an audit firm, or otherwise been related to an audit firm. Under § 126(7), a member may not vote on a decision that directly concerns the member or the member's interests.
4. Independence safeguards	**4.1 Please describe the national independence requirements for the governing body and its members, and legal or regulatory requirements/provisions in place that safeguard their independence from the audit profession.** **Are employees of the Member covered by the same or separate set of independence requirements?** ☐ Same set of requirements ☒ Different set of requirements **If there are separate independence requirements for employees, please describe:**

	The governing-body independence requirements are set out in § 126 of the Auditors Activities Act. During membership and for the three years preceding appointment, a member may not have provided audit services, held voting rights in an audit firm, served on the management body or staff of an audit firm, or otherwise been related to an audit firm. Employees are not subject to the same statutory eligibility requirements as governing-body members. Quality-control staff and experts are subject to the separate independence requirements in § 139 of the Act and the Quality Control Procedure, including conflict-of-interest checks, the applicable cooling-off requirements and confirmation of independence before assignment.
	4.2 Are there any additional safeguards in place that provide for the Member's overall independence from the audit profession? E.g. through the appointment process, specific Board actions, etc. ☒ Yes ☐ No **If yes, please describe:** Additional safeguards include appointment by the Minister of Finance, fixed five-year terms, a statutory public-interest mandate, independence from Audiitorkogu's other bodies and AJN's final decision-making authority in oversight matters.
5. Funding Arrangements	**5.1 Describe the main funding arrangements of the Member, including the setting and approval of the budget:** AJN's oversight activities are financed mainly through statutory oversight fees paid by audit firms. State-budget funding may cover up to 50% of oversight expenses. The oversight funds are held separately for oversight purposes. AJN approves the oversight budget, and the Minister of Finance establishes the oversight-fee rate.
	5.2 Is the funding free from undue influence by the profession? ☒ Yes ☐ No **Please describe with an appropriate level of detail the safeguards in place to prevent undue influence by the profession:** Yes. AJN approves the oversight budget, and the Minister of Finance establishes the statutory oversight-fee rate. The fees are determined under generally applicable statutory rules, and the audit profession has no role in approving the budget or setting the rate.
6. Audit Market	**6.1 Provide the number of audit firms subject to inspections. Include an indication of the number of public interest audits (PIEs) and other audits that fall under the Member's oversight or mandate.**

	As at 23 July 2026, 112 audit firms held a valid activity licence and were subject to AJN's inspection mandate. Six firms had 36 active audit contracts with public-interest entities, while the remaining 106 firms had no active public-interest entity audit contracts. For the latest completed activity-report period, 2024/2025, audit firms reported 5,708 audit reports in total. The available activity-report data provide only the aggregate number of audit reports and do not separately identify PIE and non-PIE audit reports. Complete figures for 2025/2026 were not yet available on 23 July 2026 because the statutory reporting deadline had not passed.
	6.2 Please describe the sizes (in terms of revenue / number of listed entity clients / number of partners and audit staff / etc. – whichever measure is commonly used and available in your jurisdiction) and market shares of each of the largest audit firms in the Member's jurisdiction. Measure used: audit-service revenue reported in Estonia. The latest complete reporting period available as at 23 July 2026 was 2024/2025. Total audit-service revenue was EUR 61,516,754. The largest firms with audit-service revenue above EUR 1 million were: 1. Aktsiaselts PricewaterhouseCoopers: EUR 12,143,735; approximately 19.7% 2. KPMG Baltics OÜ: EUR 10,623,110; approximately 17.3% 3. Ernst & Young Baltic AS: EUR 6,452,636; approximately 10.5% 4. Grant Thornton Baltic OÜ: EUR 5,228,361; approximately 8.5% 5. Assertum Audit OÜ: EUR 1,765,946; approximately 2.9% 6. OÜ Audiitorbüroo RKT: EUR 1,597,469; approximately 2.6% 7. BDO Eesti OÜ: EUR 1,392,152; approximately 2.3% 8. Baker Tilly Baltics OÜ: EUR 1,138,361; approximately 1.9% 9. OÜ E-Audit: EUR 1,063,745; approximately 1.7% The four largest firms accounted for approximately 56.0% of total audit-service revenue; the nine firms listed above accounted for approximately 67.3%. Complete 2025/2026 market-share data were not yet available on 23 July 2026 because the statutory reporting deadline had not passed.
7. Inspection System	**7.1 Does the Member have the responsibility for recurring inspections of audit firms undertaking audits of public interest entities (PIEs)?** ☒ Yes ☐ No
	7.2 Is this responsibility undertaken directly or through oversight of inspection conducted by another organization? ☒ Directly ☐ Through Oversight

	If directly, please describe the responsibility, including the follow-up and reporting process, and the regulatory measures available to be taken as a result of inspections (if described in Question 12 Enforcement, please reference that section for details on such measures). **If through oversight of another organization, please describe with an appropriate level of detail the other organization, its relation to the Member, its role, and the arrangements for oversight by the Member:** AJN directly organises and carries out quality control under §§ 136–142 of the Auditors Activities Act and the Quality Control Procedure. Each quality control is completed by an AJN decision stating whether it was passed or failed. A passed quality control is assigned a green, yellow, orange or red result. Where deficiencies are identified, AJN may require a root-cause analysis, remedial action and an implementation timetable and may verify implementation. Significant or repeated deficiencies may lead to more frequent inspection or the enforcement measures described in section 12. Quality-control results are published through the Auditors Activities Register and, in part, on AJN's website.
	7.3 Please describe with an appropriate level of detail the requirements and practices regarding the frequency of inspections: Under § 137(3)–(5) of the Auditors Activities Act, each audit firm is inspected at least once every six years. The first quality control is performed within two years after the activity licence is issued. Audit firms that perform audits of public-interest entities are inspected at least once every three years. AJN may increase the inspection frequency to at least once a year in the circumstances provided by § 142(2) of the Act and § 24 of the Quality Control Procedure. AJN prepares and approves the annual selection using random and risk-based criteria.
	7.4 Does the Member have its own inspection staff, use reviewers from the professional body or sub-contract to third parties, independent contractors, etc. for the conduct of inspections? Please tick the boxes that apply: *(multiple responses allowed) Note that there is no need to tick a box if non-employee reviewers are used very occasionally and are not a core staffing approach.* ☒ Employees of the Member ☐ Professional body ☐ Third Parties ☐ Other

	Please explain below: AJN has dedicated inspection staff, and quality control is performed primarily by AJN employees. AJN may engage a contracted expert for a specific inspection where necessary. Such occasional expert involvement is not a core staffing approach.
8. Licensing	**8.1 If the Member has the responsibility for <u>Licensing</u>, please indicate whether this responsibility is undertaken directly or through oversight of Licensing conducted by another organization?** ☒ Directly ☐ Through Oversight **If directly, please describe the responsibility, including any changes, with an appropriate level of detail.** **If through oversight, please indicate the name of the other organization and its composition. Also, give a description of the powers of the other organization and procedure applied, as well as the role of the Member in these procedures.** Directly. AJN decides whether to grant, refuse, suspend, restore or revoke an audit firm's activity licence and makes the corresponding register entries. From 1 July 2025 to 30 June 2026, AJN granted seven activity licences and revoked five: four at the firms' request and one due to infringements.
9. Registration	**9.1 If the Member has the responsibility for <u>Registration</u>, please indicate whether this responsibility is undertaken directly or through oversight of Registration conducted by another organization?** ☒ Directly ☐ Through Oversight **If directly, please describe the responsibility, including any changes, with an appropriate level of detail.** **If through oversight, please indicate the name of the other organization and its composition (i.e. whether practitioners from the audit profession are involved in decision-making). Also, give a description of the powers of the other organization and procedure applied, as well as the role of the Member in these procedures.** Directly. AJN makes entries in the Auditors Activities Register within its statutory competence, including entries concerning sworn-auditor qualifications, audit-firm activity licences and third-country auditors.

10. Audits and/or Ethics Standard Setting	**10.1 If the Member has the responsibility for <u>Audit and/or Ethics Standard Setting</u>, please indicate whether this responsibility is undertaken directly or through oversight of Audit and/or Ethics Standard Setting conducted by another organization?** ☒ Directly ☐ Through Oversight **If directly, please describe the responsibility, including any changes, with an appropriate level of detail.** **If through oversight, please indicate the name of the other organization and its composition (i.e. whether practitioners from the audit profession are involved in decision-making). Also, give a description of the powers of the other organization and procedures applied, as well as the role of the Member in these procedures.** Directly. Under § 46 of the Auditors Activities Act, AJN has final authority to approve the professional standards applicable in Estonia where national approval is required.
11. Permanent Education / Continuous Training of Auditors	**11.1 If the Member has the responsibility for <u>Permanent Education / Continuous Training of Auditors</u>, please indicate whether this responsibility is undertaken directly or through oversight of Permanent Education / Continuous Training of Auditors conducted by another organization?** ☐ Directly ☒ Through Oversight **If directly, please describe the responsibility, including any changes, with an appropriate level of detail.** **If through oversight, please indicate the name of the other organization and its composition (i.e. whether practitioners from the audit profession are involved in decision-making). Also, give a description of the powers of the other organization and procedures applied, as well as the role of the Member in these procedures.** Through oversight. Audiitorkogu, the statutory professional body whose decision-making bodies include members of the profession, organises continuing professional education. Under § 42(2) of the Auditors Activities Act, AJN approves the continuing-education procedure and oversees compliance with the statutory requirements.

12. Enforcement	**12.1 If the Member has the responsibility for <u>Enforcement</u>, please indicate whether this responsibility is undertaken directly or through referral to other organization(s)?** ☒ Directly ☐ Through Referral **If directly, please describe the responsibility and procedures applied (including investigations, disciplinary actions or sanctions), as well as the reporting process for disciplinary action.** **If through referral, please indicate the name of the other organization and its composition (i.e. whether practitioners from the audit profession are involved in decision-making). Also, give a description of the enforcement powers of the other organization and procedures applied, as well as the role of the Member in these procedures.** Directly. AJN investigates suspected breaches and conducts disciplinary proceedings under the Auditors Activities Act and the applicable procedures. It may issue precepts, require remediation, increase the inspection frequency and impose penalty payments. The available disciplinary sanctions are a reprimand and a disciplinary fine. A fine may be combined with referral to an additional professional examination. AJN may also withdraw a sworn auditor's qualification or suspend or revoke an audit firm's activity licence. Qualification and licence decisions are entered in the Auditors Activities Register; other information is disclosed only as required or permitted by law.
13. Other Responsibilities in Audit Oversight or Audit Regulation	**13.1 If the Member has the responsibility for <u>other tasks within the area of Audit Oversight or Audit Regulation</u>, please describe with an appropriate level of detail:** Other responsibilities include handling complaints, conducting investigations, organising professional examinations and dealing with qualification matters, assessing the effectiveness of public-interest entity audit committees, and international cooperation in audit oversight.
14. Main Other Responsibilities of the Member <u>outside</u> the area of Audit Oversight or Audit Regulation	**14.1 Please describe with an appropriate level of detail, the responsibility of the Member for <u>tasks outside the area of audit oversight or audit regulation</u> such as supervision of financial reporting or securities regulation:** AJN has no responsibilities outside audit oversight or audit regulation.
15. Member Update for public information (if any)	**15.1 Are there any major news, activities, events or updates (on audit matters, the Member's organization, the governing legislation or the authority/responsibilities) that you wish to keep the public informed of since completing last year's Member Profile?** ☐ Yes ☒ No

	If yes, please describe these changes with an appropriate level of detail: