

## TOWARDS INTEGRATED REPORTING

- Q1 (a) Do you believe that action is needed to help improve how organizations represent their value-creation process? Why / why not?**

Yes, we believe that organizations especially large companies need to better represent their value creation process to remain competitive in the global market. Hence actions to integrate and communicate all required and material information are needed to ensure that.

- (b) Do you agree that this action should be international in scope? Why / why not?**

Yes, we agree that the action should be international in scope for comparability reason. In fact, it is important for investors and management to measure the organization's overall performance across regions.

- Q2 Do you agree with the above definition of Integrated Reporting? Why / why not?**

Yes, we agree with the definition stated but suggest additional remarks to it. In our opinion, internal control is also a material information therefore we suggest that it should be mentioned in the definition. Internal control explains how an organization manages its risks as a part of the organization's business model.

- Q3 Do you support the development of an Integrated Reporting Framework? Why / why not?**

Yes, framework is the best solution especially in providing guidance to the preparation of an Integrated Reporting. The framework should serve the main purpose of the Integrated Reporting development.

**Q4 (a) Do you agree that the initial focus of Integrated Reporting should be on reporting by larger companies and on the needs of their investors? Why / why not?**

Yes, we agree that the initial focus is the larger companies because those companies would get the most benefits especially in further promoting their companies' performance and worth across regions. Those companies are assumed to have sufficient resources and capability to implement Integrated Reporting.

**(b) Do you agree that the concepts underlying Integrated Reporting will be equally applicable to small and medium enterprises, the public sector and not-for-profit organization?**

Yes, we agree that the underlying concepts is also applicable to small and medium enterprises, the public sector and not-for-profit organization.

**Q5 Are (a) The organization's business model, and (b) its ability to create and sustain value in the short, medium and long term, appropriate as central themes for the future direction of reporting? Why / why not?**

Future direction of reporting should be a reporting that fulfill the needs of its stakeholders the most. To sustain in a competitive global market, an organization needs to indicate their capability in the present situation and in future through a good business model. Thus, Integrated Reporting should be centralized on the organization's business model and its ability to create and sustain value.

**Q6 Do you find the concept of multiple capitals helpful in explaining how an organization creates and sustains value? Why / why not?**

Multiple capitals are the foundation of an organization. The capability of an organization to create and sustain values in short, medium and long term would rely heavily on the organization's leadership, skills and approaches in utilizing all resources (multiple capitals) to the fullest with minimum wastage.

**Q7 Do the Guiding Principles identified in the Discussion Paper provide a sound foundation for preparing an Integrated Report – are they collectively appropriate; is each individually appropriate; and are there other Guiding Principles that should be added? Why / why not?**

Yes, the Guiding Principles identified are able to provide a sound foundation for preparing an Integrated Report. They are appropriate whether collectively or individually. They are concise and sufficient in interconnecting present performance and future planning.

**Q8 Do the Content Elements identified in the Discussion Paper provide a sound foundation for preparing an Integrated Report – are they collectively appropriate; is each individually appropriate; and are there other Content Elements that should be added? Why / why not?**

Yes, the Content Elements identified are able to provide a sound foundation for preparing an Integrated Report. They are appropriate whether collectively or individually. The Content Elements further elaborate all the Guiding Principles identified.

**Q9 From your perspective as a reporting organization:**

**(a) Do you agree with the main benefits as presented in the Discussion Paper? Why / why not?**

Yes, we agree. The report enables evolving reporting requirements both market driven and regulatory to be organized into a coherent narrative. They should also be user friendly to the preparer and to the stakeholder.

**(b) Do you agree with the main challenges as presented in the Discussion Paper? Why / why not?**

Yes, we agree. The Integrated Reporting is a continuing process and effort. It would be a challenge to maintain it especially when there is new and changing regulation unless it is conducive enough to adapt and consolidate any additions or changes.

**Q10 (a) Do you agree that the actions listed in the Discussion Paper should be the next steps undertaken by the IIRC? Why / why not? Are there other significant actions that should be added?**

Yes, we agree. Transition is the most crucial and challenging step to be undertaken and it requires an objective and structured framework. As the initial focus is reporting by larger companies, a Pilot Programme involving those companies would be useful as a case study in identifying any weaknesses not anticipated before or other benefits received in return.

**(b) What priority should be afforded to each action? Why?**

Priority should be given to the consolidation and regulatory issues especially those involving different jurisdictions. This is because comparability is one of the benefits gained by preparing Integrated Report and it could only be done if the regulations applied are of the same principals / standards. Different standards could result in different presentation of information.

**Q11 Do you have any other comments that you would like the IIRC to consider?**

- a. IIRC should forge a network of expertise around the world in different sectors especially on financial or non-financial regulations / standards. The framework should be developed according to the sectors.
- b. IIRC should define the word 'larger companies' since the initial focus is on reporting by those companies.