

The IIRC welcomes comments on all aspects of the Discussion Paper from all stakeholders, whether to express agreement or to recommend changes. Your answers to the Consultation Questions, and any other comments you would like to make, should be submitted on this form (submitted electronically at end of document) or sent via email to dpresponses@theiirc.org.

For the purpose of analysis, you are asked to identify the organization to which you belong and where it is located. All comments received will be considered a matter of public record and will be posted on [www.theiirc.org](http://www.theiirc.org).

**Comments should be submitted by Wednesday 14th December 2011.**

Name

Title

Organization

Country

Email

Type of Stakeholder (please tick one as appropriate)

Academic  
Analyst  
Assurance Provider  
Business  
Consultant  
Government  
Inter-Governmental Agency  
Investor  
Labour Representative

Non-Governmental Organization  
Professional Body  
Rating Agency  
Standard Setter  
Student  
Think Tank  
Trade or Industry Association  
Other, please specify below

**Key Points**

If you wish to express any key points, or to emphasise particular aspects of your submission, or add comments in the nature of a covering letter, then the following space can be used for this purpose.

## **The World has Changed – Reporting Must Too (page 5 of the Discussion Paper)**

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

Q1. (b) Do you agree that this action should be international in scope? Why/why not?

## **Towards Integrated Reporting (page 6 of the Discussion Paper)**

Q2. Do you agree with the definition of Integrated Reporting on page 6? Why/why not?

## **An International Integrated Reporting Framework (page 8 of the Discussion Paper)**

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

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?

Q4. (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 organizations?

### **Business Model and Value Creation (page 11 of the Discussion Paper)**

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?

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

## **Guiding Principles (page 12 of the Discussion Paper)**

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?

## **Content Elements (page 15 of the Discussion Paper)**

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?

## **What Will Integrated Reporting Mean for Me? (Reporting organizations – page 21, Investors – page 22, Policymakers, regulators and standard-setters – page 23, Other perspectives – page 24 of the Discussion Paper)**

Q9. (a) From your perspective: Do you agree with the main benefits as presented in the Discussion Paper? Why/why not?

Q9. (b) From your perspective: Do you agree with the main challenges as presented in the Discussion Paper? Why/why not?

Q9. (c) From your perspective: Do you agree that Integrated Reporting will drive the disclosure of information that is useful for integrated analysis (from the perspective of investors)? Why/why not?

### **Future Direction (page 25 of the Discussion Paper)**

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?

Q10. (b) What priority should be afforded to each action? Why?

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

Additional questions: These are NOT compulsory but will help with analysis if completed

I have provided feedback that reflects:

Personal interest

Interest of an organization, please provide the name of the organization:

Which best describes your involvement with sustainability reporting?

Please tick all that apply.

Reporter (prepare a report for my own organization)

Consultant (report preparer on behalf of a third party)

Assurance provider

Report reader (read reports for the purpose of evaluating or analyzing organizations)

Other, please specify:

Please indicate how many years of experience you have with sustainability reporting:

No experience

Less than 1 year

1-5 years

More than 5 years

**SUBMIT TO THE IIRC**