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.

Comments should be submitted by Wednesday 14th December 2011.

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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?

Yes, I believe reporting has to collect and communicate more material information and also present investors and stakeholders with a clearer picture of ESG risks.
Why? Because the potential impact of ESG is growing and growing in a more interconnected world where resources are limited and their growing exploitation is touching finite borders. Meanwhile information asymmetries are growing and also the social impact of big corporation operations is exponentially increasing. These megatrends need to be considered by each corporation and a clear picture of how strategically the management is going to tackle them needs to be provided to stakeholders and investors.

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

Yes, I agree. To me however is not only relevant how companies are reporting but mostly how influential investors are taking their decisions incorporating ESG data. This is according to me the turning point. In such a sense integrated reporting is going to be successful and bringing value if it is demand driven. Once the information is provided has also to be used, This is not always the case, because of inherent conflicts of interest in the markets and among market players.

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?

Yes, I do agree. I like the focus on stewardship and value creation in the future, not in short term horizon. Also compacting together different reports is relevant and stressing the fact that material information has to do with an organization strategy, governance, performance and future prospects. A short term strategic vision is contributing to destroying value, inhibiting investment which needs a time frame and resulting in a mere window dressing exercise to capture the attention of the markets.

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?

I do think that creating such a framework can be useful and also pragmatic. We are starting a process which will be definitively fine tuned within the time. ESG integration from an investment perspective is also a process as well as reporting.

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?

I think that larger companies are the one which are running the highest ESG risks and can also cause systemic risks as it has happened with the sub-prime financial crisis originated by big banks. Investors need to better assess those risks and integrated reporting can help.

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?

Yes, it will equally applied because best practise will set the development trends. But it is clear to me that the great need is for big corporations, these are the ones which run the biggest risks for themselves and for the economy as a whole.

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?

I think the relevant part is how a company is investing for its future, how it is investing in its own sustainability. It is important that big corporation are starting again to invest in R&D and in innovation rather then in short term shareholders value. I think the mantra of the shareholders value which eventually has destroyed shareholders value has done its time.

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

Yes and no. It is relevant the focus on innovation rather than on different capital and also on resources allocation.

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?

Yes I think that form a general point of view are appropriate. Integrated Reporting has however to run the test of how it is implemented by each single organization. The test is that is not used as window dressing. But in communication there is always such a risk and it's up to the stakeholders and their work to detect and demistify such expedients.

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?

Yes they do. Relevant as said before it is the text with stakeholders.

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?

I partially agree. What is relevant the process and the text of the shareholders on the truth, consistency and reliability of the information provided.

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

Yes, but as usual it will be relevant the process and its results.

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?

Yes, it should provide more adequate and relevant information. But of course, information asymmetries will always be there. They are part of the game. What's is relevant is monitoring and supervision that what is communicated is real and consistent.

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?

I do agree form a general point of view. However I think that most of the resources should be devoted to reading through the reporting rather than on harmonization of the reporting....relevant fundamental analysis and investors capability. Stakeholders engagement.

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

In the order: outreach, governance and measurement.
Why? Because it is relevant to listen to insiders who are dealing daily with reporting.
Governance is relevant to make sure that such a project doesn't become self-referential.
Measuring is relevant as a process not as a conclusion. So that awareness on relevant topics and impacts is shared by and among stakeholders.

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

My comments are made starting from my experience of how markets work and how often information asymmetries and experiences lead to sub-optimal result in legislation and consultation processes. If we were to tackle conflict of interests, reporting would dramatically improve!

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

I have provided feedback that reflects:

- [x] 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
- [x] 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