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.

In the Integrated Reporting, every sector should have a specified standards. For example, Petroleum Industry should have a separate Integrated Reporting standard as compared to Plastic Industry.

A MNC should have International Integrated reporting but domestic companies following the same is futile unless they are a part of supply chain or export their products.

A simultaneous reporting standard should be developed for SMEs and Medium Scale Companies.

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, cause presently there are hardly any means to measure value creation in a standardized format and everything is scattered across. A streamlined way would help improve the process and lead to clear vision and impact.

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

For MNCs yes it should be at international scope but we should not rule out the domestic companies as well. We should prepare some measures for them too.

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, it justifies the requirement.

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 support this and would encourage them to make it industry specific as well but still at a global level.

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, but this would limit it to the MNCs. Although its scope is valid and would help in developing a broader picture for reporting.

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?

No, NPOs we can't use this, we need separate set of measure all together. For Public Sectors there would be a number of legislations to be crossed as mentioned in the paper as well. For SMEs who are in supply chain of MNCs it can be followed but the one's who are doing domestic business it would be variable.

In short, the reporting standard although would be standardized, they would be variable according to the industry implemented, size and scale of operations and other factors to be taken under consideration.

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?

It is but we need to be more intricate on its application.

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

Yes, that is what the USP is. It ensures connectivity and gives a complete picture to the investor of the ongoing in the organization.

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?

They are appropriate and as asked it would be developed further by addition of Guiding Principles from time to time.

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?

As mentioned in the previous answer they are appropriate to start with and would be developed as we start implementing it.

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?

Yes, I do since a major problem of reporting is getting fixed.

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

Yes, but am sure as we implement it there would be more challenges which would show up.

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?

To a large extent yes but it would keep on developing from time to time as per the investors demand and requirements.

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?

Yes and simultaneously also think about the domestic market and other entities apart from MNCs.

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

Each one has equal priority

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

I have mentioned my apprehensions in the first block itself.

Another comment, How can a NPO be into this, we would require an altogether different standard for them.

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

I have provided feedback that reflects:

- [x] Personal interest
- [x] Interest of an organization, please provide the name of the organization:

  Ekjaa

Which best describes your involvement with sustainability reporting?
Please tick all that apply.

- [ ] Reporter (prepare a report for my own organization)
- [x] 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