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.

Name	Grigory Sukhov
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Country	Russia
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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.

I took part in the presentation of IR concept in Moscow made by Paul Druckman and roundtable discussion in September.
I spend a lot of time in various reporting preparation as I work in International Company now and have worked in several international companies before. I have more than 10 years of experience as a Finance Director, so I witness how environment is changing.
I was interested in this subject and have decided to respond to the questionnaire.
May be it will help a bit for futher development of the concept.

Gregory Sukhov

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?

I strongly support this idea. The level of uncertainty is increasing year by year in economies. Business decisions are most commonly taken based on certain models or business plans and depend a lot on economic assumptions. No one today can predict these assumptions, which means that oftenly decisions taken are based on a business feeling, experience, belief etc. Traditional reporting represents mainly financial figures plus explanation on controls and governance system. What is becoming more important today is how to justify business decisions and how to better understand their driving force, better understand the business of a company and it's strategy. A structured but simple way of reporting all this matters is extremely

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

Agree. There are lots of multinational companies and potencial investors. They need to have reasonably equal understanding and opportunities

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?

Agree in general. I would also put more emphasys on business risks, as today any business decision is a responce or mitigation of a certain risk. This is especially important for investors.

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?

Yes. Without developping such framework the final goal will not be achieved

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?

Agree, as larger companies activities are always more complicated. If such activities are described in even more complicated report it might be difficult to understand the key consepts for the users of the report. It is a difficult task to describe comlicated things in a consise and simple manner, so I think the project of IR should start with larger companies.
For smaller companies traditional reporting could be enough.
Probably in the future it could be important to justify necessity of IR by the size of the company.

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?

I think that every company that wishes to apply such principles, should have such an opportunity. But IR is not just a one -off report. For me it is an on-going reporting system. he company should adapt it's own procedures and activities for the needs of IR. So I think that from a certain company size such reporting have to become obligatory at least for public sector.

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 this is correct. But in terms of practical implications there are many issues in the respect of business model.
- Whether there is a standard presentation of the model or each company should select its own approch
- Should this model be expressed in non-monetory terms (graphical) or in terms of the business plan
- How to justify objectivity of the business model ?
- How to deal with economic assumptions - in different models they could be significantly

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

I agree with this concept. I think that IR should contain sections per each type of capital and company should provide certain information in order to fully describe it's process of value creation

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 agree. I would add "objectivity" to the last guiding principle. The company might have ambitious and optimistic plans for the future, but for the reporting purposes it is important to be neutral. I think it also corresponds to reliability principle.

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?

I agree with the elements. I would put risks description and mitigation as a separate element

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 agree. I think a benefit for company business is a diferent focus and a different analysis of the activities that will be important.
For investor simple, short and consise report is a safe of time.
So I think that IR concepts and principles should be further developped and tested

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

To me one of the main challenges is audit. I thing that IR will require continuous disclosures and continuous audit procedures. Also as we are talking about multiple capitals, auditor's skills should be also multipe: technical. environmental, financial etc.
It is difficult to combine this skills in one company and without significant increase of audit costs.

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 I agree

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?

Agree, I think Pilot Programme is important as it will show all the issues in Practice

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

To me development of IR Framework should be the top priority.

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