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.

As a starting point, we would like to make the following remarks :
- we believe that the concept of value creation needs to be precisely explained, as it can be both short and long term,
- and concerning all types of stakeholders not only shareholders.

We also believe that materiality is a key point when it comes to choosing criteria, but it must not be focused only on financials and quantitative items, qualitative items should also be included (as long as they really prove to be part of means used by the organisation to implement its strategy).

Finally, we think that best practices in different countries have to be identified, and to be retained in each category. As an example, French analysts have questions about the future of social reporting as it is performed in France.

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?

We think that this action is needed because the value creation process of an organisation is very seldom explained thoroughly to financial analysts. Explaining interconnections between the different capitals could help, as could including more extra-financial criteria

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

Yes, we believe that the scope should be international for two main reasons. Firstly because it will enable comparison between companies in different countries. Secondly because it will make internal reporting easier for globalized corporations.

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?

We agree that IR must not be another type of reporting but a combination of existing reporting initiatives, both financial and non-financial. The focus on materiality and links to value creation is also considered as a positive background. We would offer a reminder that the outlook must also be taken into account.

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?

We think that the development of an International IR Framework is positive as it will enable an harmonization of the different initiatives especially in the non-financial field. We feel that investors could be more receptive than if it should remain fragmented between different countries. Also, if the reporting framework is international, it will be highly visible, and so could help make the process of integrating non-financial criteria in investment decisions and valuation processes more popular.
This said, we believe that there must be a good balance between the common base and the specific sectoral or geographical criteria

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?

We are not sure that the focus should be only on larger companies. As long as IR is a combination of existing elements, smaller companies can be involved as well. But different levels of requirements could be implemented depending on the size of the companies.

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?

As far as small and medium enterprises are concerned, please see former comment. As far as public sector and not-for-profit organizations, the type of reporting awaited is perhaps not exactly the same.

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?

The business model is appropriate as a central theme as long as it is meant in a wide definition, including the business model includes all types of capitals. It is also necessary that the impacts of the specificity of the Business model on the value creation process are explained.

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

The concept of multiple capitals is helpful as long as material criteria (both quantitative and qualitative) are identified in each criteria to make its measurement possible. Also, the interactions between the different kinds of capital have to be correctly explained.

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?

The overall principle is appropriate. But there have been comments among our working group, about the wording and signage being too "financially oriented" and focused on shareholders. Financial reporting is what we know best, but it must not be the main focus of the future reporting.

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?

Overall the content elements are appropriate. We would add the same remark as in the former question. We would also emphasize the need of a prioritization between the different contents.

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?

The answer would be yes, provided the financial perspective is not dominant, and that a long term perspective is taken into account. For instance when speaking about the outlook, the question of the ability of the organization to generate cash-flows is important, but the sustainability of this cash-flow generation is even more important.

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

We understand the point concerning business confidentiality, but a clear definition of this concept needs to be found.

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, provided that the financial perspective is not the main focus, and that information disclosed is material and consistent over time

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?

We believe that the question of governance is the first priority because it gives the pace for the overall process. Priority number two would be to include as many organizations as possible in the process. Then would come the work on the opportunities for harmonization and on emerging measurement and reporting practices.

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