

CONSULTATION DRAFT IIRC <IR> FRAMEWORK

1. Intellectual Capital

The draft considers the points relating to development and exploitation of intellectual capital of the company.

The fundamental concept on Intellectual capital must also include respecting the IPR of other owners, with specific reference to geographical indications, traditional knowledge and biodiversity.

With respect to recent cases on Patent violation by drug Pharma, the relative disclosures should also includes pending litigations and verdicts thereby. Disclosures should also include details of not only developed IPR but also those acquired from others.

2. Engagement with regulators

In India we have witnessed corporate lobbying as one of the major causes of concerns in the recent past. Considering this we suggest to include specifically in the framework, companies disclose their policy on lobbying.

The disclosures may include the policy, adherence and non-adherence of the policy.

3. Under the Guiding Principles Para3.11 (sub head financial information and other information)

Inclusion of supply side cost: On the supply side cost of essential inputs, analysis of alternate energy sources, etc. may be included.

4. Considering Para 3.27 under the head Materiality and conciseness

Materiality assessments: the guiding principle suggests for materiality assessments need to performed at least annually; it is suggested that any change perceived in the materiality assessment based on change in external environment should be identified and reported.