

Dear Sirs,

My name is Gianluca Garbellotto, I am the current chair of the XBRL Global Ledger Working Group of XBRL International. I have enclosed my bio at the bottom of this email for your reference.

I have read the discussion paper titled “Framework for Integrated Reporting and the Integrated Report”, and I would like to provide a few personal remarks.

First of all let me express my deep appreciation for the leadership role that South Africa is taking in this space – there is little doubt that integrated reporting will play a determinant role in what is sometimes referred to as “21<sup>st</sup> century compliance” and in the way companies market themselves to global markets and to the broader community. I am sure that the experience coming from South Africa pioneering initiatives in this field will provide very useful insight and “lessons learned” that will help shape the global landscape and accelerate the impact of other global integrated reporting oriented initiatives.

I have no particular comment on the content of the discussion paper – I do think that it is a high quality document and contains all the information necessary to frame the issue and to provide as much of practical guidance as possible in terms of guidelines, which then need to be deployed by businesses according to their own strategic objectives and within the constraints of their specific corporate environment, with particular reference to the information technology environment, which is a very important factor in determining what information is actually available and how to report on it once the decision has been made that it must be included in the integrated report.

While I understand the reasons why the paper steers away from advocating specific approaches to the technical implementation of integrated reporting, I think that there is one technical aspect that could be discussed and that would provide value even at the level of abstraction that the document is meant for. I am referring to the value that a standards based approach to integrated reporting can provide, especially in the early adoption stages, in terms of

- Enabling the creation of a vendor and application neutral implementation framework that any company would then be able to use and customize to their specific needs;
- Facilitating the collaboration of global stakeholders, including the academic world, in the development of actual proofs of concepts that would speed up adoption but also provide an invaluable learning experience and a significant source of best practices and lessons learned in the deployment of integrated reporting and in the interaction between financial reporting, sustainability reporting and all other relevant components.

I believe that even a general discussion on the value of a standards-based approach to integrated reporting would bring significant benefits in terms of awareness of the availability and merits of this approach.

I further believe that among the many existing standards that are relevant in this space, the Extensible Business Reporting Language (XBRL) will play a significant role, mainly due to the following reasons:

- XBRL is quickly becoming the global standard for financial reporting, and as such it already supports one of the main pillars of integrated reporting;
- The XBRL Global Ledger Taxonomy Framework (XBRL GL) is suitable to represent transactional data and its links to summarized end reporting, both in the financial reporting space, where the ability to drill down from summarized information to its underlying detail is a key challenge, and in the sustainability reporting space, where transaction-oriented information plays an important

role and the capability of providing a standardized, automated link with other reporting components can be key to establish the link between corporate strategies and their translation into day to day operations.

I am not, at this point, suggesting that XBRL specific arguments should be part of the discussion paper. But I do think that looking ahead it would be extremely helpful and instrumental to your efforts to start considering this approach and working towards identifying a group of interested parties that would be willing to support a proof of concept that translates the integrated reporting approach into something actionable and executable. In my experience during many years of work in the standards setting world, a well designed proof of concept goes a long way in facilitating collaboration, awareness and understanding and in facilitating progresses that are otherwise very difficult to achieve.

I am currently working on a similar project in the financial reporting space, where the collaboration with a US University in the financial reporting space is producing the backbone of a collaborative environment where the global community can create standardized content that supports the convergence between different end reporting formats, such as the International Financial Reporting Standards and jurisdictional GAAPs or internal reporting formats. I believe that the same infrastructure could support an integrated reporting prototype, and I would be happy to contribute it together with my experience in the use of XBRL and XBRL GL if this proposal will generate a sufficient level of interest and the involvement of appropriate stakeholders. The results of this experience could well provide material for an addition to the discussion paper down the road, or for additional resources related to the initiative.

Thank you for giving the opportunity to comment on this document, and I look forward to future developments of this initiative.

Thanks  
GLG

.....  
Gianluca Garbellotto • Iphix, Director • 703-349-6094 • gg@iphix.net • [www.iphix.net](http://www.iphix.net)

22<sup>nd</sup> XBRL International Conference, Sharing Interactive Data Track Co-Chair

Gianluca Garbellotto is a globally acknowledged expert on the business and technical aspects of the Extensible Business Reporting Language (XBRL) and XBRL Global Ledger Framework (XBRL GL), and has extensive experience in their implementation in the government and the private sector. He is the current Chair of the XBRL Global Ledger Working Group, a past member of the XBRL Standards Board, a Founder Member of the OpenFiling Association and a member of the Institute of Management Accountants (IMA) XBRL Advisory Group.

As an active member of various working groups within the XBRL International Consortium he has helped lead the development of XBRL's standards for internal use and has been a strong influence on XBRL's technical specifications. He is a frequent and sought out lecturer and trainer on XBRL and XBRL GL topics, and has authored numerous articles and white papers.

He has extensive experience in the banking and financial industry as well as in accounting and financial software development and implementation, with a specific focus on ERP systems, consolidation/business intelligence applications and XML/XBRL implementations. His clients' portfolio

includes governments in various countries and global companies as well as leading professional, consulting and technology firms.