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Enhancing Relevance: Shaping the Future of Corporate Reporting

By Alan Willis, FCPA, FCA

Alan Willis, FCPA, FCA, a former partner in one of the Big Four accounting firms, has since 1991 been an independent researcher, writer and advisor on corporate reporting and performance measurement beyond the scope of financial statements alone, and the implications of such reporting for corporate governance, internal control and assurance. He became an early pioneer in the concept, development and practice of sustainability reporting and later of integrated reporting about value creation, and of related guidelines and standards.

Corporate business enterprises today are inescapably affected by the world around them – the ever-changing landscape of economic, market and regulatory conditions, global geo-political instability, demographic and technological megatrends, and a web of interconnected social and environmental issues – all of which can sooner or later have an impact on a company's prospects for success in doing business and creating value.

Conversely, corporate business enterprises inevitably affect the interests of those in the world around them: investors whose financial capital they deploy, other stakeholders – such as employees, customers and communities whose well-being and cooperation are directly linked to their success – and those in the broader global community of today and tomorrow who expect a habitable, life-supporting planet and a just, thriving society, without either of which no enduring business or economic activity is possible in the long term.

Given these realities, financial statements alone are clearly unable to communicate adequately, even just to investors, the external conditions, operating activities, intangible resources and relationships and governance processes that drive present and future value creation, and determine the worth of a business enterprise. Indeed, financial statements and GAAP, such as IFRS, were never designed with such a broad purpose in mind; investors have always looked to other sources of information in annual reports, company news releases, other mandatory disclosures and external analysis and commentary for a more complete picture of company performance and prospects.

In other words, while financial statements – consistent, comparable and reliable as they strive to be – are an important component of corporate reporting, they cannot alone provide the wider spectrum of relevant information necessary either for investor or other stakeholder assessment of enterprise performance and for value creation in today's business environment.

To address this information deficit, various supplementary reporting initiatives and disclosure requirements have emerged piecemeal over the last four decades, each aiming to enhance the relevance of corporate reporting to users. Unfortunately, the result has become a jungle of corporate disclosures, reporting frameworks and standards, each based on disparate views about relevance and materiality to users, while failing to promote consistency and comparability between companies in any given sector.

This is confusing and frustrating for companies as preparers, as well as for investors and other stakeholders seeking decision-useful information. What can be done to clear this jungle?

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First this paper traces briefly, at a 30,000 foot level, the evolution of corporate reporting outside financial statements over the last three or four decades; next it describes the reporting scene today – the jungle of user needs, reporting frameworks and disclosures. Finally it offers a concrete two-part approach and a path forward for shaping – even reinventing – the future of corporate reporting so as to be truly relevant to the decision-making needs of (a) investors and (b) other stakeholders in the 21st century social and economic accountability context, not that of the 19th or 20th centuries!

Reporting Outside Financial Statements – Recent History

Until the middle of the 20th century, financial information for internal management and external reporting to shareholders, based on historical cost accounting standards (generally accepted accounting principles (GAAP) of the day), was the sole manifestation of corporate accountability in a business world that, for centuries, had paid little if any heed to enterprise impacts on nature, the environment or society. Financial statements, typically voluntarily included in narrative style annual reports produced by companies to “tell their story” to their shareholders, were the anchor – the centre piece – of corporate reporting, as required under company law and securities regulations for accountability to shareholders.

Meanwhile, during the last 30 years or so in Canada (earlier in the USA), investors have also had the benefit of securities regulators’ requirements whereby public companies must issue Management’s Discussion & Analysis (MD&A)[1] as narrative information to supplement financial statements, providing a broader context for understanding what the financial statements say and do not say about a company’s financial performance and prospects.

In 2002, CICA (the Canadian Institute of Chartered Accountants, now a legacy body of CPA Canada) developed and issued its own guidance on preparing MD&As[2]; this was similar in purpose but broader in scope than the regulatory MD&A requirements by also focusing on how companies create value and their prospects for future value creation. Though still not widely enough used by public companies in Canada, it was instrumental, along with similar guidance from the UK and Germany, in the subsequent development of International Accounting

Standards Board (IASB)'s 2010 *Practice Statement on Management Commentary*[3] (which itself is now about to be updated).

During this same period, looking to similar initiatives in the US, Canadian securities regulators gradually introduced other disclosure requirements about corporate governance policies and practices, executive compensation, other basic information about a company's business and risks, including significant environmental and social risks and policies. And, following the Enron and WorldCom debacles, came new requirements for CEO and CFO certifications as to the integrity of financial reporting and related internal controls.[4] Financial reporting to capital markets, quarterly and annually, became significantly more onerous and voluminous. But was it more relevant and useful to investors? Or more reliable? Or connected with MD&A disclosures?

> The potential power and reach of information technology for creative use of innovative linked, layered and customized reporting formats is growing fast but largely unrealized to date.

A noteworthy initiative in this period was the AICPA's Jenkins Committee on "Improving Business Reporting – a Customer Focus, Meeting the Information Needs of Investors and Creditors,"[5] which proposed a broad reporting framework in 1994 that, sad to say, was never implemented. Jenkins himself went on to become chair of the US Financial Accounting Standards Board!

Meanwhile, the winds of change in corporate reporting were beginning to blow in another direction. In the 70s and 80s, economists, scientists, academics and even social philosophers began to call attention to alarming stresses and strains on the planet and society caused in considerable measure by business enterprises in quest of profit, as well as by population growth and other factors.[6] Tragic business accidents incurring grave damage on people and the environment added to these voices of concern. Thus, were the concepts of "corporate social performance" and "corporate social responsibility" (CSR) born, leading – one may be surprised to know – to studies by a few visionary accounting profession leaders about the need for, and methods of, measurement and reporting on corporate social performance, and whether this could be accommodated within the framework of financial reporting.[7] But how important or useful might such reporting be to shareholders in assessing stewardship of their invested funds, or to companies seeking to be seen as responsible corporate citizens, or to other stakeholders actively wanting to hold companies to account for their environmental and social impacts?

From the 80s onward, companies gradually began to respond to these growing expectations and pressures from other stakeholders and civil society NGOs for additional disclosures beyond just financial reporting – first about environmental policies and performance and later about social policies and performance, i.e., non-financial performance and impacts beyond just the extent of compliance with applicable environmental and social legislation and regulations. Environmental disasters, such as Bhopal and Exxon Valdez, acid air emissions and dumping of waste and pollutants increased the pressure on companies to be more transparent and accountable for their environmental performance. "Social license to operate" entered the business vocabulary.[8]

Only in the last two decades did mainstream institutional investors such as public pension funds begin to pay serious attention to such "non-financial" disclosures where they were deemed material to assessing financial performance and prospects and, therefore, necessary for prudent investment analysis and decision making. Before this, only so-called "ethical investors" were concerned with, and even demanding, such disclosures to fulfil their particular mandates and investment policies. What had started out being called "non-financial" reporting was becoming seen as having potential financial impacts not revealed in financial statements.

Companies, in certain sectors faster than in others, accordingly began to produce and publish separate, stand-alone "corporate social responsibility" oriented reports about the environmental and social impacts of their business, which were of varying degrees of interest to different categories of external stakeholders, civil society and the general public. In the absence of prescribed, rigorous standards for such reporting, however, much of it tended to focus just on the positive aspects of performance and the success of "corporate citizenship" programs, and to omit or downplay aspects that might be prejudicial to corporate image and reputation. The term "Greenwash" was coined!

More Relevant Reporting

Two significant phenomena coming into play since 2000 should now be noted. First, the emergence in 2000 of the Global Reporting Initiative (GRI)'s Sustainability Reporting Guidelines[9] to bring law and order to this wild west of non-financial reporting to stakeholders about a company's environmental and social policies, practices and performance. Early global uptake of these voluntary Guidelines and successive updated versions was slow, but now they have become the *de facto* standard for this type of reporting worldwide, followed by a majority of the worlds' largest public companies.[10]

> The corporate reporting landscape is onerous, complicated, fragmented and confusing, and is shaped by the hands of a wide array of standard setters, regulators and voluntary initiatives, while not yet providing either investors or other stakeholders with the information they respectively seek.

Second, was the gradual shift in the investor world from little, if any interest, in such disclosures (except by the relatively small "ethical" or "social" investment community) to "responsible" investing by mainstream institutional investors (e.g., pension fund/asset owners and managers) in which environmental, social and governance (ESG) factors became considered potentially material to investment decision making. This instigated new demands for relevant reporting.[11]

This shift was enabled in part by legal clarification of fiduciary duty for pension fund trustees, (i.e., fiduciaries),[12] in part by empirical research showing that companies demonstrating superior ESG policies and practices outperformed their peers in financial returns over the longer term[13] and, in part, by an SEC Interpretive Release in 2010 about its definition of materiality for climate change risk and uncertainty disclosures required in SEC 10K and MD&A filings.[14]

This shift is evident from the steady growth in institutional investor appetite for more decision-useful corporate disclosures about policies, risks, performance and prospects – an appetite that stand-alone sustainability or "CSR" reports shaped by the GRI Guidelines did not and were not designed to satisfy. From the mid-2000s, momentum for public companies to produce more "investor-relevant" ESG disclosures was fuelled partly by investor-led organizations such as the UN Principles for Responsible Investment (PRI)[15] with its investment principles for member-investor signatories, and partly by the recognition of Greenhouse Gas (GHG) emissions as a major factor driving climate change. This latter resulted in the investor-driven Carbon Disclosure Project, now known as CDP,[16] motivating companies to provide rigorously prescribed data and narrative disclosures about their emissions of GHGs and related management and governance practices for GHG mitigation.

Another UN initiative convened in 2000, the Global Compact (GC),[17] also emerged as a driver of environmental and social disclosures based on the GRI Guidelines by companies that had signed up to adhere to the compact's 10 principles for environmental, social, human rights and anti-corruption policies and that were, accordingly, obliged to report periodically on their progress in living up to the GC principles. There is a wide global network of companies signed up to the GC, including nearly 80 of all sizes and sectors in its Canadian chapter.

In the last decade, three more investor-focused reporting initiatives have arrived on the scene. First, late in 2013 the International Integrated Reporting Council (IIRC)[18] issued its framework for Integrated Reporting (IR). This was designed for companies to use in producing and issuing for the benefit of "providers of financial capital" a succinct report on how they create value over the short, medium and longer term, not only in terms of returns on financial capital, but also in terms of impacts (value created or destroyed) on the manufactured (physical equipment and infrastructure), human, intellectual, natural and social/relationship capital resources on which financial value creation and business models depend.[19]

Second, in 2016 the Sustainability Accounting Standards Board (SASB),[20] a US-based non-profit organization, issued its voluntary "standards" for use by public companies in each of more than 70 sectors in making MD&A disclosures about specified ESG topics that would be material to investors, in accordance with the SEC definition of materiality.

Third, in 2017, the G20's Financial Stability Board, led by Bank of England Governor Mark Carney, convened a Task Force on Climate-related Financial Disclosure (TCFD),[21] which in 2017 issued its recommendations for companies (and institutional investors) to provide robust, comparable and decision-useful disclosures to capital markets about their governance, risks, strategy, targets and metrics for dealing with climate change, including reduction of GHGs and making the transition to doing business in a low carbon economy by 2030. Such disclosures may, of course, also be of interest to other stakeholders, including civil society, governments and central banks. In light of the TCFD recommendations[22] and also of the 2019 final report of the Canadian government's Expert Panel on Sustainable Finance,[23] the Canadian Securities Administrators (CSA), building on their 2010 "Staff Notice on Environmental Reporting Guidance," issued new guidance on "Reporting of Climate Change-related Risks."[24]

In passing, it's important not to forget that, until quite recently, company reporting – both financial and otherwise – was designed around the production and distribution of hard copy, printed materials to shareholders and other stakeholders. Electronic media, such as website postings in PDF or HTML formats and XBRL-tagged securities filings, are a comparatively recent reporting technology.[25] The potential power and reach of information technology for creative use of innovative linked, layered and customized reporting formats is growing fast but largely unrealized to date.[26] *ThinkTwenty20*'s July-August 2019 Newsletter includes an important and informative July 2019 blog on electronic distribution of corporate reporting (and the accounting profession's comparatively slow uptake on it).[27]

One other overarching and significant trend in the last 30 years has been the growing practice of companies seeking input from and responding to the interests of external stakeholders other than investors. Stakeholder engagement has become a major strategic function in many companies, way beyond traditional public relations activities. It provides an effective channel for companies to ascertain the issues that are of most interest and concern to their stakeholders.[28] Indeed, recent changes to the wording in the Canada Business Corporations Act (CBCA) about directors' duties explicitly empower (i.e., permit, not require) boards to consider the interests of stakeholders other than just shareholders in decisions they take in fulfilling their duty to promote a company's best interests.[29]

> There is now an opportunity to boldly reinvent and redesign the landscape of corporate reporting over the next decade or sooner. The actors in information supply chains, the report users, the stakeholders, the standard setters and the frameworks are all known today, but are they ready and willing to collaborate?

Today's Reporting Jungle – A Muddling Mosaic

Fast forward, therefore, to summarize the jungle of today's corporate reporting landscape – a muddling mosaic to say the least. Beyond the annual GAAP-based financial statements they must prepare and file (i.e., ignoring the burden of quarterly filings), companies are now confronted by a challenging array of supplementary reporting expectations to deliver on. Pity the CFO trying to decide among seemingly competing voluntary frameworks, recommendations and standards and to establish a company-specific business case for any reporting, especially for investor purposes, beyond the mandatory financial statements and MD&A.[30]

Investor information needs
To meet capital market/investor information needs, increasingly driven by expectations for investment decision-useful disclosures about material ESG topics in general or, more specifically, about climate-change related matters that may have shorter and longer-term financial implications, the CFO must not only comply with the onerous *pot-pourri* of securities regulators' quarterly and annual disclosure rules and related CEO/CFO certification requirements, but also review and evaluate the benefits and costs associated with providing additional investor-relevant disclosures based on the recommendations of, to name the leading sources:

- the IIRC International Integrated Reporting Framework,
- the SASB Sustainability Accounting Standards Board, and
- the TCFD, about climate-related disclosures.

Institutional investors are taking on increasingly activist positions with investee companies about ESG matters, not only through engagement with boards and management, but also through shareholder resolutions calling for enhanced disclosures about climate change strategy and risks and ESG risk management and performance. But they frequently complain that the information typically provided by companies does not focus on what is relevant and material to investors is not consistent from period to period and lacks comparability among companies in the same sector.[31]

Debt rating agencies such as Moody's and Standard & Poors are now factoring climate and ESG issues into their rating algorithms and screens, based both on corporate disclosures and information from researchers and data aggregators (e.g., Bloomberg and Sustainalytics).[32]

Further, companies are expected to respond to a variety of questionnaires from "sustainability rating" organizations, used by many investors as a convenient source of input about ESG issues for use in their investment research and analysis, but a time-consuming drain on company resources, typically causing "survey fatigue" and resulting in annoying inconsistencies in sustainability ratings and metrics for the companies subject to such ratings. Useful, valid benchmarking becomes impossible.

Arguably, the MD&A, with its disclosure requirements prescribed by securities regulators, as enhanced by the CPA Canada guidance on MD&As, is a more appropriate channel for inclusion of environmental and social performance, risk and uncertainty information that would be considered material to investors. This is the premise of the SASB standards, and is supported by the CSA Guidance mentioned earlier regarding environmental disclosures.

A further twist in this era of SOX-driven CEO and CFO certification of financial filings, which include the MD&A, is to ensure that information disclosed in voluntary reporting, if material from an investor point of view, is not inconsistent with disclosures in mandatory filings, such as the MD&A. Plus, care is needed to ensure that what is included in the MD&A, certified by the CEO and CFO, represents fair presentation of financial condition and is free from misleading statements or omissions. These reporting twists and traps are also increasingly a challenge to audit committees, charged with oversight of integrity in financial reporting.

Information for other stakeholders

Meantime, to meet broader stakeholder needs, a company typically turns to the GRI Standards for Sustainability Reporting (formerly GRI Guidelines) to guide the preparation of its stand-alone sustainability (or CSR) report, a report that is likely to be too long, broad in scope and detailed to be readily useful to investors and financial analysts. The reports tend to cover issues and topics that are not all relevant to them and are based on concepts of materiality as viewed by various stakeholders that differ from materiality as defined by securities regulators for financial reporting.[33]

Since the 2015 advent of the UN Sustainable Development Goals (SDGs),[34] a further dimension has been added to the range of topics about which companies may feel obliged to report voluntarily. Questions arise as to why, how and where companies should make such disclosures, since some of them may be deemed material from an investor perspective as well as from that of stakeholders more broadly, even though SDG related disclosures are not yet explicitly embedded in any particular reporting framework.[35]

In summary, the *status quo* in the corporate reporting landscape is onerous, complicated, fragmented and confusing, and is shaped by the hands of a wide array of standard setters, regulators and voluntary initiatives, while not yet providing either investors or other stakeholders with the information they respectively seek in a way they can best use it, when they want it, where they want it, and often not aligned meaningfully with information used internally by companies in strategic decision making and managing the business.[36]

Shaping the Future of Corporate Reporting

Today’s corporate reporting landscape has grown piecemeal and disjointedly over many decades, from a time when the business landscape and concept of corporate accountability were very different from today’s. Imagine resetting the clock, as if today we could boldly rethink, reinvent and redesign all of external corporate reporting to reflect the realities and context of the 21st century in which businesses must operate.

Suppose we were to consider separately the reporting expectations of (a) a company's "providers of financial capital" (investors, lenders and creditors) and (b) other stakeholders and the general public whose interests are, or are likely to be, influenced by a given corporate business enterprise (and who may in turn influence company policy and action). This idea can be evidenced in contemporary thinking and jurisprudence about the purpose of a corporation, its accountabilities to investors and to other stakeholders, and directors' duties and responsibilities.[37] Reporting would be designed in a holistic, connected manner, not piecemeal and fragmented. South Africa's *King IV Report on Corporate Governance*[38] is the pioneering example today of such integrated thinking about governance, accountability and disclosure.

We need to consider each of these two broad categories of reporting expectations in turn and their respective information needs, seen through a value creation and accountability lens, i.e., one that considers the decisions and judgments that (a) investors and (b) other stakeholders respectively want to be able to make about value creation by the company and the quality of its governance. Value is considered relative to changes in, and impacts on, each of six connected capitals on which value creation depends: financial, manufactured (i.e., infrastructure, plant & equipment), human, intellectual, social and natural, as described in the IIRC Integrated Reporting Framework.[39]

We also need to imagine that every company maintains an integrated data base of all the information, qualitative and quantitative, financial (transactions and events) and "non-financial" (other performance data points and events) that is drawn upon for all internal as well as external reporting purposes. Design of this data base has to incorporate the necessary systems, procedures and controls to ensure its integrity.

Two small signs of hope should be noted here. First, in 2015 the IIRC convened a "Corporate Reporting Dialogue"[40] among leading global corporate reporting standard setters and regulators. It aims for collaboration in cutting through this jungle and the ensuing reporting clutter, with a view to suggesting the most effective and efficient way of meeting investors' information needs. It is currently undertaking a "Better Alignment"[41] project that seems timely to cut through the jungle described above.

Second, the International Accounting Standards Board (IASB) has recently started a project[42] to update its 2010 *Practice Statement on Management Commentary* (MD&A in North American lingo) to better incorporate what investors need to know as broader context for understanding the related financial statements and what they say (or do not and cannot say) about value creation, e.g., a company's business model, the present and likely future economic environments in which it is operating, the extent to which environmental and social issues are among the principal business risks and opportunities a company faces, etc.

We now have the opportunity to examine and consider how all the various reporting channels, standards and frameworks, financial and otherwise, mandatory and voluntary, might be harnessed, integrated and – where necessary – modified or enhanced into two broad reporting "bundles" that respectively meet the needs of (a) investors ("providers of financial capital") and (b) other stakeholders.

The Reporting Bundle for Investors

Investor needs might be satisfied by a two-part reporting bundle that comprises a super integrated MD&A (MD&A on steroids!), perhaps better called a Value Creation Report, accompanied by a company's financial statements based on International Financial Reporting Standards (IFRS). The form and content of the Value Creation Report would be designed by selecting – modifying as necessary – and integrating relevant elements of what is currently called for in existing elements of the IIRC Framework, the SASB standards, the TCFD recommendations, CPA Canada's MD&A Guidance, securities regulators' MD&A requirements, the revised IASB *Management Commentary Practice Statement* and, possibly, subject to a relevance and materiality test, informed by other sources such as the ICGN Guidance on Integrated Business Reporting, the UN SDGs or the Future Fit Business Benchmark.[43]

This new Value Creation Report would aim to provide in a connected way, as concisely as possible, all the information that would be deemed material to investors beyond what is disclosed in the GAAP financial statements. Hyper-links or icons would enable on-line user access to more detailed information on some issues and topics.

The Value Creation Report would need to be customizable in places for each of the 70-plus industry sectors covered by the SASB standards. Although it would, for a while, need to include the MD&A disclosure items currently called for by securities regulators, in the fullness of time, with IOSCO encouragement, it could replace current MD&A requirements in North America and similar "Management Commentary" style requirements in other jurisdictions (e.g., the EU and the UK, Asia, South Africa, etc.). Securities regulators in Canada and the US would, for example, simply require a Value Creation Report plus financial statements in their periodic filings.

Design and development of the Value Creation Report would be undertaken by a credible consortium similar to the IIRC's Corporate Reporting Dialogue, convened by organizations accustomed to due process in setting corporate reporting standards. This work would not necessarily call for establishment of a new global organization if an existing one, such as the IIRC, were widely seen as capable of undertaking it, subject to showing it had or could acquire suitable leadership, governance and resources.

To meet investor needs, the familiar MD&A model that has been around for decades, suitably updated, adapted and enhanced as suggested above, could thus become the ideal Value Creation Report to accompany IFRS financial statements, eventually achieving securities regulators' recognition. Interestingly, the integrated reporting model proposed by the IIRC in its 2013 framework has many of the same content elements as the Value Creation Report suggested above.[44] It is unlikely that audited financial statements will disappear anytime soon because of their familiarity and foundational, albeit narrow, function in accounting for investors' contributions of financial capital, so they would accompany the Value Creation Report to provide an additional level of detailed financial information.

The appended table portrays what the existing frameworks, standards and regulations the proposed two reporting bundles might draw on for their respective design specifications.

The Reporting Bundle for Other Stakeholders
For other stakeholders' purposes, the widely used and accepted GRI's Sustainability Reporting Standards could be used as the basic model or point of departure for designing the second report "bundle," let's call it the Accountability and Sustainability Report – enhanced as necessary by incorporation of appropriate elements of the IIRC Framework, the TCFD recommendations, the SASB Standards and, say, the Future Fit Business Benchmark and UN SDGs. To accomplish this work, the GRI could convene an appropriate new multi-stakeholder collaborative task force to design and develop the new Accountability and Sustainability Report, building on the GRI's original mission and its current reporting standards. There would need to be, as now, sector-specific versions of the GRI Standards for the newly devised Accountability and Sustainability Report.

If investors, business sectors, civil society and other stakeholders were all on board with the two-part approach proposed above, then securities regulations and company law might be the last remaining obstacles to address for, at least, the investor bundle. But, as we saw in the 1933 Securities Exchange Act of the US, in the 1975 re-write and subsequent changes to the CBCA, in SCC references to corporate citizenship in the BCE decision, in South Africa's *King Report* and in EU directives about reporting, the concept of protecting the public interest is not static or immutable – it evolves to meet societal values and economic circumstances over time. The new regime for corporate reporting might eventually be widely embedded in company law and securities regulations.

Working with the New Realities

What we don't need now is even more piecemeal reporting frameworks for this and that – we need integration and consolidation of what's already out there, through a meaningful, trusted contemporary process and a lens that all stakeholders, including investors and companies, can align with: long-term value creation, the importance of ESG factors and wide acceptance of the new realities and corporate accountabilities for doing business outlined earlier this paper.

There is now an opportunity to boldly reinvent and redesign the landscape of corporate reporting over the next decade or sooner. The actors in information supply chains, the report users, the stakeholders, the standard setters and the frameworks are all known today, but are they ready and willing to collaborate, just as the GRI and Accounting for Sustainability did in 2010 to create the International Integrated Reporting Council? They simply need to be convened to collaborate in two parallel and connected (but not competing) task forces for the sake of relevance in 21st century corporate reporting.

Corporate reporting in tomorrow's world must be like what financial reporting tried to be in yesterday's world – essential for enlightened capital market decision-making about value creation and accountability, but now needing to be relevant to 21st century investor and other stakeholder decisions about value and value creation in today's and tomorrow's broader accountability context.

Does all this sound too far-fetched, simplistic or impossible to implement? We hope that this paper will be a catalyst for renewed dialogue within and beyond the accounting profession. There's too much at stake to postpone action on enhancing the relevance of corporate reporting.

Table of Possible Sources to Consider in Developing New Reporting Guidance/Standards		
	Investors	**Other Stakeholders & Public**
Sources to Consider include:	Value Creation Report	Accountability & Sustainability Report
IIRC Framework	Yes	Possible
SASB Standards	Yes	Possible
TCFD Recommendations	Yes	Possible
ICGN Guidance on Int. Bus. Reptg.	Yes	Unlikely
Securities Regns. for MD&A	Yes	Unlikely
CPA Canada MD&A Guidance	Yes	Unlikely
IASB Statement on Mgmt. Comm'ty	Yes	Unlikely
Sec. Regns. for Corp. Governance	Yes	Possible
GRI Standards for Sust. Reporting	Possible	Yes
UN SDGs	Possible	Yes
Global Compact Principles	Unlikely	Yes
CDP	Possible	Possible
Future Fit Business Benchmark	Unlikely	Yes
Other Sec. Regns. (10K, AIF, etc.)	Yes	Unlikely
Etc.		

[1] See https://www.osc.gov.on.ca/documents/en/Securities-Category5/rule_20111031_51-102_unofficial-consolidation-post-ifrs.pdf, Part 5 and Form 51-102-F1 *MANAGEMENT'S DISCUSSION & ANALYSIS*.

[2] https://www.cpacanada.ca/en/business-and-accounting-resources/financial-and-non-financial-reporting/mdanda-and-other-financial-reporting/publications/mda-preparation-and-disclosure-summary-guidance.

[3] https://www.ifrs.org/issued-standards/management-commentary-practice-statement/.

[4] https://www.osc.gov.on.ca/documents/en/Securities-Category5/rule_20101210_52-109_unofficial-consolidated-post-ifrs.pdf.

[5] http://3197d6d14b5f19f2f4405e13d29c4c016cf96cbbfd197c579b45.r81.cf1.rackcdn.com/collection/papers/1990/1994_0101_ReportingJenkins.pdf.

[6] See, for example, the 1972 landmark *Report of the Club of Rome on the Predicament of Mankind*, "The Limits to Growth," http://www.donellameadows.org/wp-content/userfiles/Limits-to-Growth-digital-scan-version.pdf.

[7] See, for example, Leonard J. Brooks, Jr., "Canadian Corporate Social Performance" (Toronto: Society of Management Accountants of Canada, 1986), and the AICPA Committee report, "The Measurement of Corporate Social Performance" (New York: The American Institute of Certified Public Accountants, 1977).

[8] Some of this early history is outlined in https://www.cpacanada.ca/en/connecting-and-news/blogs/cpa-stories/the-other-bottom-line.

[9] See https://www.globalreporting.org/information/about-gri/gri-history/Pages/GRI's%20history.aspx (See also the author's description of the GRI's early history in https://link.springer.com/article/10.1023/A:1022958618391).

[10] See, for example, https://home.kpmg/be/en/home/insights/2017/10/the-kpmg-survey-of-corporate-responsibility-reporting-2017.html.
[11] https://www.theglobeandmail.com/globe-investor/confused-by-ethical-investing-heres-a-primer/article34332548/.
[12] See https://www.unepfi.org/investment/fiduciary-duty/. For a more extensive, scholarly and authoritative discussion about this in a Canadian context, look no further than https://digitalcommons.osgoode.yorku.ca/cgi/viewcontent.cgi?referer=https://www.google.com/&httpsredir=1&article=1271&context=clpe.
[13] https://hbswk.hbs.edu/item/corporate-sustainability-first-evidence-on-materiality.
[14] https://www.sec.gov/rules/interp/2010/33-9106.pdf.
[15] https://www.unpri.org.

[16] https://www.cdp.net/en.
[17] https://www.unglobalcompact.org; for Canadian chapter, see https://www.globalcompact.ca.
[18] http://integratedreporting.org/.
[19] https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3345590.
[20] https://www.sasb.org.
[21] https://www.fsb-tcfd.org.
[22] https://www.fsb-tcfd.org/publications/final-recommendations-report/.
[23] https://www.canada.ca/en/environment-climate-change/services/climate-change/expert-panel-sustainable-finance.html.
[24] https://www.osc.gov.on.ca/en/NewsEvents_nr_20190801_csa-guidance-on-climate-change-related-disclosure.htm.
[25] Gerald Trites, "Adapting Corporate Reporting to the Information Age," *ThinkTWENTY20* (April 2019), p. 21. See https://thinktwenty20.store/a/downloads/-/d4190375e54a8987/58e907d5ed550f29.
[26] https://www.cfainstitute.org/advocacy/policy-positions/data-and-technology-transforming-the-financial information landscape.
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