

December 14, 2011

Professor Mervyn King
Chairman
International Integrated Reporting Committee

Response e-mailed to dpresponses@theiirc.org

RE: IIRC's Discussion Paper - Towards Integrated Reporting - Communicating Value in the 21st Century

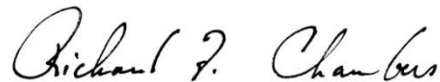
Dear Professor King:

The Institute of Internal Auditors (IIA) appreciates the opportunity to provide comments on the IIRC's Discussion Paper - Towards Integrated Reporting - Communicating Value in the 21st Century. We collaborated with a number of internal audit thought leaders in the United States and globally in developing our comments. Our comments are based on discussions conducted by a core team of internal audit professionals who serve on The IIA's Professional Issues Committee. These professionals consist of Certified Public Accountants, Chartered Accountants, and Certified Internal Auditors who have worked in the public and private sectors, internal and external auditing, and small, medium, and large domestic and multinational companies.

We appreciate the ambitious nature of this project and look forward to the next iteration and pilot program. An integrated reporting framework will be useful to reporting entities as well as investors and other constituents, if the framework is universally accepted, if it replaces current reporting structures and if the benefits outweigh the costs. Another matter to be addressed is the clarity and definition of the details in the framework; measurements need to be universally understood and consistently accumulated and reported so they are susceptible to audit. Our more detailed comments and observations are included in Appendix A.

The IIA welcomes the opportunity to discuss any and all of these comments with you. We offer our assistance to the IIRC in the continued development of the concepts surrounding integrated reporting.

Best regards,



Richard F. Chambers, CIA, CGAP, CCSA, CRMA
President and Chief Executive Officer

About The Institute of Internal Auditors -

The IIA is the global voice, acknowledged leader, principal educator, and recognized authority of the internal audit profession and maintains the International Standards for the Professional Practice of Internal Auditing (Standards). These principles-based standards are recognized globally and are available in 29 languages. The IIA represents more than 173,000 members across the globe and has 105 institutes in 165 countries that serve members at the local level.

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