

SUSTAINABILITY REPORTING

**SUSTAINABILITY DISCLOSURE AMONGST COMPANIES IN SELECTED
ASEAN MEMBER COUNTRIES AND RESPONSES FROM STAKEHOLDERS**

The Rise of the Report and the Regulator

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Acknowledgement

ACCA would like to express its gratitude to all organisations who took part in the [Sustainability Reporting: Sustainability Disclosure amongst companies in selected ASEAN member countries and responses from Stakeholders](#) report. ACCA would also like to express our special thanks to those individuals who participated in the interview process to share the experiences and contributions to the report.

We wish to acknowledge the extensive use made of the www.corporateregister.com global reporting website. This free site provides a directory of CR reports and resources, and its structure and content formed the initial foundation of this regional overview, augmented by further original research. Our special thanks to CorporateRegister.com - for invaluable resources in the field of corporate responsibility reporting.

ACCA commissioned CSR Asia to produce this report with the aim to understand how sustainability reporting is being undertaken, used and understood in selected member countries of the Association of Southeast Asian Nations (ASEAN).



CSR Asia is the leading provider of information, training, research and consultancy services on sustainable business practices in Asia.



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Introduction

Corporate sustainability reporting did not exist 20 years ago. A few corporate *environmental* (or “environment, health and safety”) reports trickled onto the market in 1990 and 1991. Social reports began to be issued in the mid-1990’s and the first true sustainability reports were issued at the end of the decade, coinciding with the establishment of the Global Reporting Initiative (GRI) and the issuance of the first set of GRI sustainability reporting guidelines in 1999.

In 2010 it is likely that over 3,000 companies world-wide will issue sustainability (or corporate responsibility) reports, with a substantial proportion being based on the third generation of the GRI guidance. Considering it has taken nearly 200 years for financial reporting to reach its current stage of maturity, we have come a long way in a remarkably short time in terms of developing an entirely new corporate reporting framework.

ACCA is proud to have been present throughout the birth and maturing of sustainability reporting as a communication form. There are very few multi-stakeholder reporting initiatives that we have not been associated with – the GRI, the Accounting for Sustainability “Connected Reporting framework and the proposed carbon disclosures from the Climate Disclosure Standards Board are just three examples of where ACCA has been deeply engaged in the development process. We have consistently encouraged and promoted best practice in environmental and sustainability reporting. What started as a purely local environmental reporting award scheme in the UK in 1991 has now become a world-wide network of sustainability reporting award schemes – with several highly successful ones operating in the ASEAN region.

In December 2009 ACCA partnered with the GRI to produce a pre-COP 15 survey on climate change disclosures by high impact companies across a range of countries. We reported then that *“Developing countries are expected to account for 75% of GHG emissions over the next 25 years, with China alone already responsible for one third of the global total. If we accept the premise that reporting drives behaviour, the extent to which corporates in these emerging economic powerhouses embrace climate change reporting will be critical to the future of the planet. On the evidence of this report, BRICSA corporate reporters in high impact sectors are laying good foundations. But, with the increased focus on carbon reduction, will companies be able to develop reporting at the pace required?”*

There is a danger, however, that with the current focus on climate change and carbon emissions, the need for a broader sustainability focus will become obscured. It is with great pleasure therefore that we launch this new survey of the corporate sustainability reporting experience across a range of ASEAN countries. We would like to thank CSR Asia who conducted the survey and CorporateRegister.com and the GRI for their assistance in providing some of the underlying data.

This report provides a valuable overview of both the level of sustainability reporting activity in the ASEAN region as well as the extent of regulatory interest in this fast developing activity. We hope this report will be useful to all those with an interest in sustainability reporting in this most significant of emerging market economic regions.

Roger Adams

Executive Director – Policy

ACCA

March 2010

Executive Summary

The global economy is rapidly evolving along with the understanding of the urgent requirement to balance current demands with the need to ensure stability for future generations. The private sector is accepting the key role it has to play in addressing global sustainable development challenges. At a local level in ASEAN member countries the private sector is beginning to accept this responsibility, recognise the challenges and opportunities it presents and many have, over the past decade, begun to publicly explain how they are implementing sustainable business practices.

This report provides an analysis of companies producing reports, describing their sustainability strategies, performance data and targets (Sustainability Reporting) in selected member countries of the Association of South East Asian Nations (ASEAN). This report also examines regulatory demands and voluntary guidelines for Sustainability Reporting in each selected country and outlines the usage of globally accepted standards and linkages to stakeholder expectations. The selected ASEAN member countries are: Indonesia, Malaysia, the Philippines, Singapore and Thailand.

In line with global trends the past decade has seen a rise in the number of companies producing Sustainability Reports throughout the selected ASEAN countries. ASEAN governments and regulators have been keen to promote sustainability to companies operating in their markets and have begun to put law, regulation and guidelines in place to direct companies in this regard. A variety of stakeholders around the ASEAN region are also taking a keen interest in the sustainability practices of companies and are looking to engage with companies on pertinent sustainability issues.

Companies within the countries that comprise the ASEAN region in high impact industries, with large global clients and with increasingly vocal local communities recognise the strategic importance of sustainability practices and reporting. With eighty percent of the Global Fortune 250 companies reporting it is inevitable in our globalised economy that companies operating in ASEAN markets will need to report to meet rising stakeholder expectations and to demonstrate an ability to operate in accordance with global norms.

Sustainability reporting in ASEAN countries has considerable scope for improvement but there is no doubt that the number of companies producing reports will increase over the coming years. Sustainability reporting within the selected ASEAN countries cannot yet be described as mainstream but the increase in disclosure and heightened commitment to transparency over the last decade shows a clear trend that cannot be dismissed. The upcoming publication of the ISO 26000 Social Responsibility Guideline is expected to have an impact within ASEAN countries, especially in Singapore and Malaysia which favour the use of international certification. Whilst ISO 26000 is not a certification standard it is expected it will still be widely promoted and used with ASEAN countries to demonstrate compliance with international norms. ASEAN itself has established the ASEAN Foundation, which will help to promote corporate social responsibility within member countries. This means that the trends of the last decade are expected to continue if not to escalate further with respect to both the number and quality of Sustainability Reports.

¹ KPMG International Survey of Corporate Responsibility 2008

THE RISE OF THE REPORT

Over a hundred and twenty companies operating in the selected ASEAN countries are producing, or have in the past decade produced, a Sustainability Report, or include substantial sustainability related reporting in this area within their annual report. The number of companies reporting increased dramatically in 2006, almost doubling the number of reports produced in previous years. This growth is attributed to government and regulatory involvement and also to a growing awareness amongst local media and civil society of sustainability concerns and the role of the private sector in this regard.

Malaysia has the highest number of reporters with a total of forty nine companies overall producing ninety seven Sustainability Reports in the past eight years. Eleven companies produced twenty nine reports in the Philippines, the lowest number of Sustainability Reports by country in the region. Twenty five companies in Indonesia and twenty two Thailand have produced respectively fifty five and sixty eight reports. Twenty one Singaporean companies have produced fifty nine reports.

Whilst the countries that comprise the ASEAN region are very diverse most reports are produced in English only, with only just over a quarter of all reports in more than one language. Companies in Thailand and Indonesia produce the most reports in the national language. ASEAN companies are clearly recognising the need to communicate with a large body of stakeholders beyond just those within the markets in which they operate.

Throughout the past decade the number of companies using the Global Reporting Initiative (GRI) has increased as has the number of companies having reports assured. It is also interesting to note that a number of companies in the selected countries in the ASEAN region are also receiving requests for information from the Carbon Disclosure Project (CDP). Companies who are already reporting are in a strong position to respond to this request for further information from investors and the overwhelming majority from whom information is requested do provide data.

In accordance with global trends¹ the industry producing the highest number of reports is the electronics sector, reflecting the high level of interest in this area. Unsurprisingly companies with high environmental and social impacts are also producing the most reports. The oil and gas industry comes just behind the electronics sector. The nature of the industry to be found in each country is also important. For Indonesia and the Philippines mining is a key sector for reporting and for Malaysia the large conglomerate companies with a variety of diversified interests are publishing the most reports.

Of those companies reporting, there is an almost equal balance between private and listed companies. This figure is slightly misleading if read in isolation as there are a high number of the private companies producing Sustainability Reports which are subsidiaries of parent companies with recognised brand names listed in other countries. It is clear that companies with high environmental and social impacts and high brand recognition recognise the business requirement to report how they manage sustainability.

THE RISE OF THE REGULATOR

There is clearly a strong intention by government and regulators around much of the ASEAN region to ensure companies are addressing sustainability concerns.

Since 2007 Indonesia has had CSR legislation which requires companies in the natural resources sector to disclose their 'CSR activities'. This is unique both in the selected ASEAN countries and in the world. The Philippines may soon follow suit. At the time of writing Philippines House of Representatives member and son of the President, Rep. Diosdado "Dato" M. Arroyo, had filed House Bill 6414 or the "Corporate Social Responsibility Act of 2009" mandating corporations to 'observe its corporate social responsibility'. However, it is unclear at this stage whether there is an intention to include a requirement for sustainability disclosure.

Regulators around the region are also mandating that companies produce Sustainability Reports. In 2006 Bursa Malaysia, the Stock Exchange of Malaysia introduced an amendment to the listing rules to include a requirement for listed companies to provide 'a description of the corporate social responsibility activities or practices undertaken'. The Stock Exchange of Thailand (SET) is also intending to introduce reporting guidelines in early 2010, although it is as yet unclear whether any amendments will be made to the listing rules. Singapore has not set any legislation or regulations with respect to sustainability disclosure.

Within each country studied for this report, few voluntary initiatives exist that encourage disclosure. Singapore is however an exception to this overall trend with initiatives that cover specific areas of sustainability disclosure rather than the entirety, for example in relation to employment practices. The same is true for sustainability reporting awards and monitoring. Whilst there are a growing number of 'CSR Awards', very few address disclosure and most are in respect of specific areas such as a; community investment project or environmental impact reduction rather than a holistic approach that encompasses all areas of sustainability and disclosure of progress on that approach. Some training and support is provided in each country for companies wanting to undertake sustainability reporting, and the number of companies offering advice and support is increasing. As the awareness of sustainability increases the consultancy industry that supports companies is developing within the selected ASEAN countries.

THE RISE OF THE REPORT WRITER AND THE READER

Companies unanimously state that they are reporting in order to provide information to stakeholders. When asked which stakeholders, specifically shareholders were the group most frequently referred to followed by: government and local authorities; customers; business partners; the general community and NGOs. It is clear that companies in the ASEAN region produce a Sustainability Report to gain a competitive edge when attracting and retaining capital, dealing with global clients and managing relationships with governments.

Reporting is still a relatively new process for many companies. Unsurprising therefore the collection of data for a report is the key challenge for companies. Nevertheless, companies are able to clearly articulate the benefits of reporting: to improve branding and image; and, to strengthen dialogue with stakeholders who are key to their business.

For report writers there is still a huge debate about the future of sustainability reporting. Just under half of the respondents interviewed think that real time reporting will become standard whilst the same number think that reports will become both stand alone and integrated with the annual report. For many companies reporting started as disclosure on environmental issues and has now developed into something much more encompassing. For others it began as a report on philanthropic activities and expanded to address business operations pertinent to the attainment of sustainable development.

Sustainability report readers in the ASEAN region are becoming increasingly sophisticated with respect to reports. Stakeholders interviewed for this report stated that the use of internationally accepted reporting guidelines was important for them as it allowed for comparison and benchmarking. Stakeholders expect that companies should use these global tools and demonstrate that activities are consistent with global norms. Readers also felt that assurance was even more important than accepted guidelines in order to provide credibility for the information provided. The future seems a little clearer for report readers who felt that more reporting would become available online, that reporting would become real time, that it would be integrated with the Annual Report, that more international standards would be used and that reports would be increasingly issue focused.

Report readers are also challenging report writers to ensure Sustainability Reports address material issues - reporting the challenges and stresses as well as the nice stories. Whilst the focus is on companies to report, it is clear that the future of quality reporting is also dependent on stakeholders responding to Sustainability Reports and recognising and rewarding best practice.

RECOMMENDATIONS

- Companies who are reporting should be encouraged, rewarded by the market and steps should be taken to enforce existing legislation and regulation where it exists.
- Further studies with reporting companies should be undertaken to determine the benefits of reporting in order to encourage others.
- Support for companies is required to enable them to comply with and improve existing disclosure requirements.
- Support for monitoring organisations is required in order to ensure adequate checks and balances with respect to the quality of reporting.
- The benefits of using internationally accepted reporting guidelines needs to be communicated with the selected ASEAN countries.

METHODOLOGY

Data for this report was collected from a variety of sources which included: Corporate Register www.corporateregister.com; the Global Reporting Initiative (GRI) www.globalreporting.org; the Carbon Disclosure Project www.cdproject.net; and the Global Compact www.unglobalcompact.org

This report examines companies who are producing stand alone Sustainability Reports or detailed sustainability information only and does not include companies who include minimal sustainability information in their Annual Report. The report only includes publicly available sustainability information as at 1 October 2009. Historical data is only included where still publicly available.

Interviews for this report were undertaken by phone, in person and by e-mail. Confidentiality was provided to each individual company who participated and each individual stakeholder. The survey was kept short to allow for maximum participation. Interviews were also conducted with representatives from local CSR organisations, stock exchanges and individuals to compile the information in this report. We would like to thank all those who participated for their contribution.

NOTE ON LANGUAGE

This report uses the term sustainability reporting. For the purposes of this report sustainability reporting refers to Corporate Social Responsibility (CSR) reports, Corporate Responsibility (CR) reports, Corporate Citizenship Reports and any other language that is understood to describe the same type of reporting linked, at least in part to the concept of sustainable development. Where appropriate in the report other language is used in keeping with its use by the government, company or organisation in question.

Sustainability Disclosure

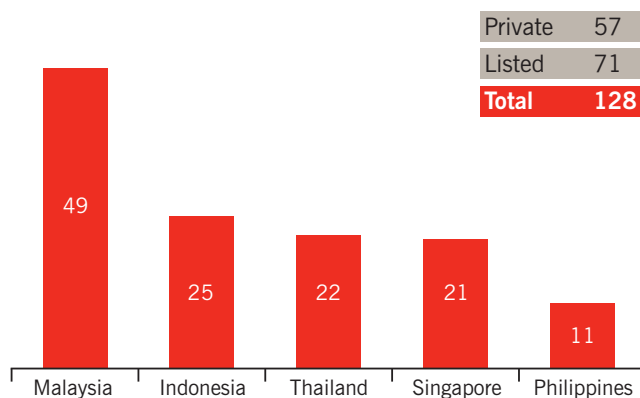
CURRENT REPORTING

Companies in the selected ASEAN countries first started reporting in 1999. Since then the number of companies producing sustainability reports has increased overall. In each ASEAN country there are between eleven and forty nine companies producing sustainability reports as well as others who are including information within their Annual Reports. This is a very small percentage of the overall number of companies operating within ASEAN. Out of the total number of companies producing a report, seventy one are listed companies and fifty seven are private companies.

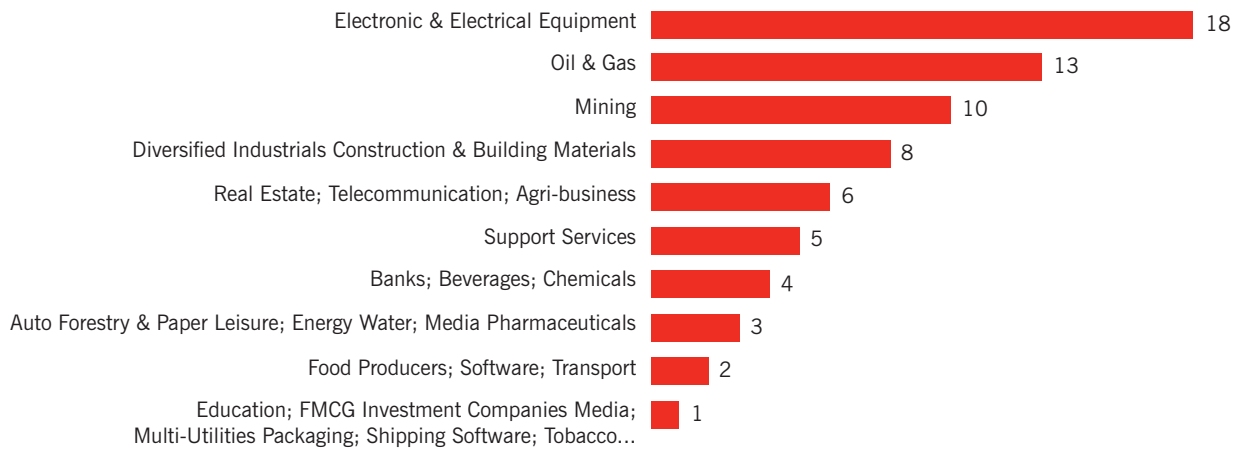
The industry producing the highest number of reports is the electronics sector, reflecting the high level of interest in this sector globally. The oil and gas industry produces the second highest number. For Indonesia and the Philippines mining is the key sector for reporting and for Malaysia the large companies with a variety of diversified interests are publishing the most reports. The country that currently has the highest number of companies producing Sustainability Reports is Malaysia. Thirty six companies are using the Global Reporting Initiative (GRI) and eighteen companies are having their reports assured externally.

The vast majority of companies producing reports are making the information available in English only. Of the total number of companies reporting (128), only thirty six were producing information in the national language as well as in English. A number of companies in the region are also receiving requests for information from the Carbon Disclosure Project (CDP). Out of seven companies who are producing a Sustainability Report and received a request for information four responded and provided data that is publicly available, one responded publicly and declined to complete the questionnaire and two responded but declined to make their response publicly available.

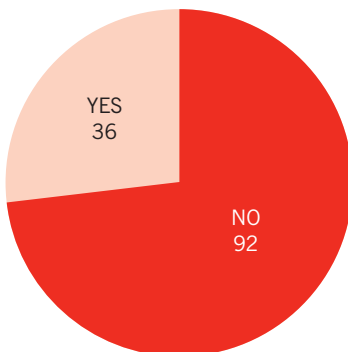
Number of companies that produced a report by country



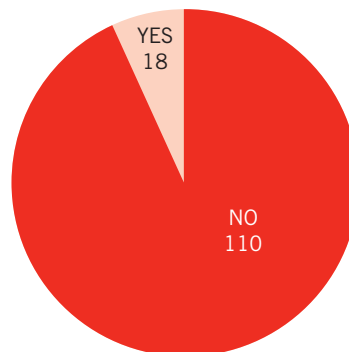
Number of report by industry



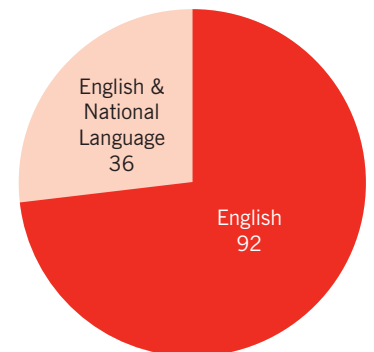
Global Reporting Initiative



External Assurance



Language of Reporting



Most companies who are reporting have been doing so consistently over the past three to four years. There are a small number who produce a stand-alone one off report that has not subsequently been repeated (15%). For many companies (20%), reporting began with an environmental report or health and safety report that has developed into a more comprehensive Sustainability Report. For the last reporting year thirty nine companies describe their report as a CSR Report, fifty three as a Sustainability Report, twenty nine as Social or Environmental report and nineteen have other specific names.

The tables below outline which companies in each market are producing reports and which industry they are in, how regularly the companies report, whether they are using the GRI guidelines, having the reports assured and what language the reports are written in.

INDONESIA

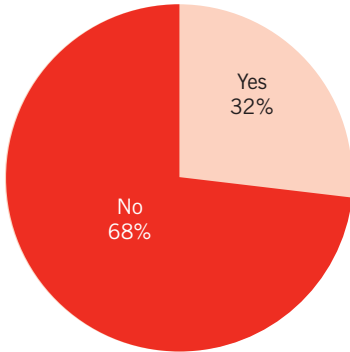
COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ¹	CDP ²	LANGUAGE	INDUSTRY	LISTED/ PRIVATE
BP Kangean Ltd - District Pagerungan	Environmental Statement for Year 2001	2002	Y	N	NR	English	Oil & Gas	Private
BP West Java Ltd	2007 Environmental Statement	2007	Y	N	NR	English	Oil & Gas	Private
CV Manunggal Aswinabawa Sejahtera	2006-2007 Sustainability Report	2008	N	Y/ C	NR	English	Tourism/ Leisure	Private
PT Adhi Karya (Persero) Tbk	Re-Born CSR Report 2007	2008	N	N	NR	English/ Bahasa Indonesia	Construction & Building Materials	Listed
PT Antam Tbk	2008 Sustainability Report Sustainability Report Year 2007 2006 Sustainability Report Sustainability Report 2005	2009	N	Y/ Undeclared	NR	English, Bahasa Indonesia	Mining	Listed
PT Astra International Tbk	2008 Astra Sustainability Report Astra Sustainability Report 2007	2009	N	Y/ Undeclared	NR	English, Bahasa Indonesia	Diversified Industrials	Listed
PT Bening Big Tree Farm	Sustainability Report 2007 Sustainability Report 2006	2008	N	Y/ C	NR	English	Agriculture	Private
PT Freeport Indonesia	Sustainability Report 2008 Sustainability Report 2007 Sustainability Report 2006	2009	Y	G2/ IA	NR	English	Mining	Private
PT Holcim Indonesia Tbk	Sustainable Development 2008 Report Sustainable Development 2007 Report Sustainable Development Report 2006	2009	N	Y / B (Self)	NR	English	Construction & Building Materials	Listed
PT Intaran Indonesia	Sustainability Report 2007 Sustainability Report 2006	2008	N	Y/ C	NR	English	Agriculture	Private
PT Jasa Marga (Persero) Tbk	Corporate Social Responsibility Report 2008 Corporate Social Responsibility Report 2007	2009	N	N	NR	English Bahasa Indonesia	Construction & Building Materials	Listed
PT JVC Electronics Indonesia	JVC Group Site Report 2008	2008	N	N	NR	English	Electronic & Electrical Equipment	Private
PT Kaltim Prima Coal	Sustainable Development Report 2007 Sustainable Development Report 2006 Sustainable Development Report 2005 HSE Annual Report (2003) Social Report 2001 Social Report 2000	2008	Y	Y/ B+ (Self)	NR	English, Bahasa Indonesia English	Mining	Private

¹ Y indicates that the company is using GRI but is not declaring an application level. In all other instances where companies are using GRI the application level is stated.

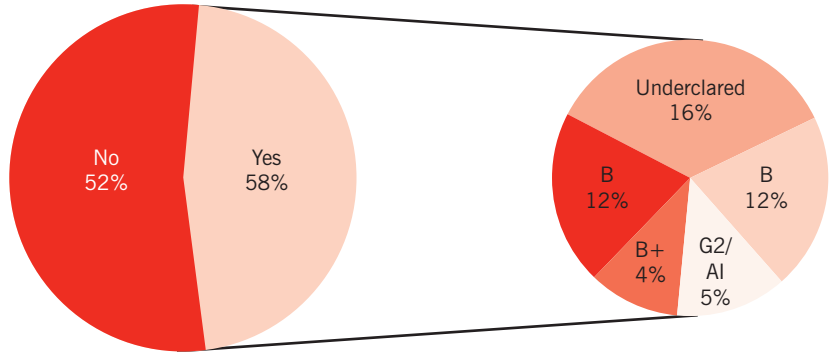
² NR indicates no request. R indicates a response but that the content of the response is not publicly available, PR (with data) indicates a response with relevant data that is available publicly, PR (declined) indicates a response that is publicly available but that participation in the questionnaire was declined.

COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ¹	CDP ²	LANGUAGE	INDUSTRY	LISTED/ PRIVATE
PT Kelian Equatorial Mining	Social and Environmental Report 2003 Social & Environmental Report 2002 / Laporan Sosial & Lingkungan 2002 Social & Environmental Report 2001 Social and Environment Report 2000. Working Together for Sustainable Solutions Social and Environmental Report (1999)	2004	N	N	NR	English/ Bahasa Indonesia	Mining	Private
PT Medco Energi Internasional Tbk	Maintaining a Balanced Life for Future Growth	2007	N	Y/ B Self Declared	NR	English	Oil & Gas	Listed
PT Newmont Nusa Tenggara	NOW & BEYOND 2005 Sustainability Report. BATU HIJAU, Indonesia Now & Beyond 2004 - Batu Hijau Now & Beyond 2003 - Batu Hijau Now & Beyond 2002 - Batu Hijau	2006	N	N	NR	English/ Bahasa Indonesia	Mining	Private
PT PLN (Persero)	Sustainability Report 2008	2009	N	N	NR	English, Bahasa Indonesia	Electricity	Private
PT Tambang Batubara Bukit Asam (Persero), Tbk	Sustainability Report 2007 Sustainability Report 2006	2008	N	N	NR	English, Bahasa Indonesia	Mining	Listed
PT Telekomunikasi Indonesia Tbk	Laporan Keberlanjutan 2007 Sustainability Report Sustainability Report 2006 / Laporan Keberlanjutan 2006	2008	N	Y/ Undeclared	PR - 2006	Bahasa Indonesia	Telecommunication Services	Listed
PT Timah (Persero) Tbk	Laporan Keberlanjutan 2008 Laporan Keberlanjutan 2007	2009	N	Y/ B Self Declared	NR	English	Mining	Listed
PT Unilever Indonesia Tbk	Sustainability Report 2006 Corporate Social Responsibility (2004)	2007	Y	N	NR	English, Bahasa Indonesia	FMCG	Listed
PT International Nickel Indonesia, Tbk	CSR Report 2006 CSR Report 2005	2007	N	N	NR	English	Mining	Listed
PT Apexindo Pratama Duta, Tbk	Annual Report 2008 Annual Report 2007	2009	N	N	NR	Bahasa Indonesia	Oil & Gas	Listed
PT.Indosat, Tbk	Making the world a better place	2009	N	Y/ Undeclared	NR	English/ Bahasa Indonesia	Telecommunication Services	Listed
PT.Saptaindra Sejati	Corporate Social Responsibility Report 2007	2008	N	N	NR	English, Bahasa Indonesia	Mining	Private

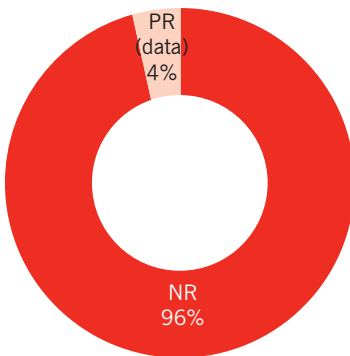
Assurance



GRI

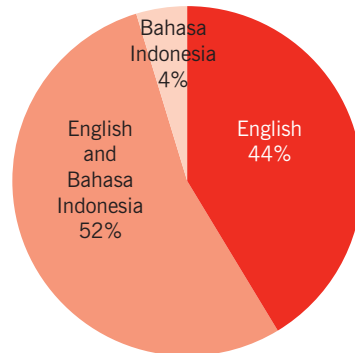


CDP



- NR: 96%
- R: 0%
- PR (data): 4%
- PR (declined): 0%

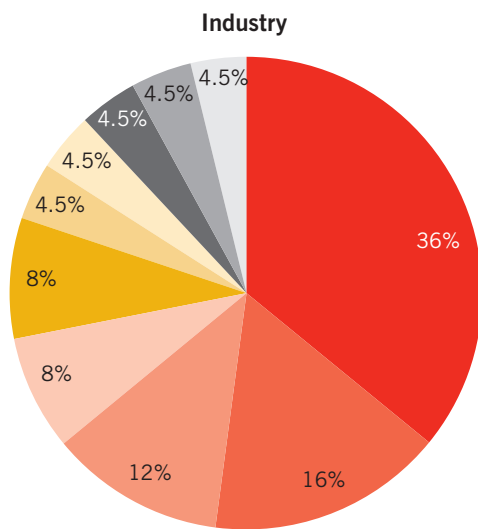
Language of report



Last reporting year	Number of companies
2002	1
2004	1
2006	1
2007	4
2008	8
2009	10
Total	25

Listed/ Private

Listed companies	13
Private companies	12
Total	25



- Mining: 36% (9)
- Oil & Gas: 16% (4)
- Construction & Building Materials: 12% (3)
- Telecommunication Services: 8% (2)
- Agriculture: 8% (2)
- FMCG: 4.5% (1)
- Diversified Industrials: 4.5% (1)
- Electronic & Electrical Equipment: 4.5% (1)
- Tourism/Leisure: 4.5% (1)
- Electricity: 4.5% (1)

MALAYSIA

COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ³	CDP ⁴	LANGUAGE	INDUSTRY	LISTED/ PRIVATE
1st Silicon (Malaysia) Sdn Bhd (now X-FAB)	1Si Environmental and Social Report 2005 1Si Environmental Report 2004	2005	N	N	NR	English	Electronic & Electrical Equipment	Private
Amoco Chemical (Malaysia) Sdn Bhd	Environmental Statement for Year 2000	2002	N	N	NR	English	Oil & Gas	Private
Astro All Asia Networks plc	Inspiring Sustainability	2009	N	N	NR	English	Media	Listed
Boustead Holdings Berhad-Plantation Div.	Towards Sustainability Agriculture	2009	N	N	NR	English	Agri-Business	Listed
British American Tobacco (Malaysia) Berhad	Social Report 2006-2008 Laporan Sosial 2005-2006 Social Report 2004-2005 Social Report Overview/ Imbasan Laporan Sosial (Summary) Social Report 2004-2005 2004-2005 Social Report Overview/ Imbasan Laporan Sosial Laporan Sosial 2003-2004 Social Report Social Report 2002-2003. A Summary (Summary) Social Report 2002-2003 Social Report 2001-2002	2009	Y	Y/ A+ (Self)	NR	English, Malay	Tobacco	Listed
Bumiputra Commerce Holdings Berhad	Annual Report 2008: Creating Value Through Corporate Social Responsibility	2009	N	N	NR	English	Investment Companies	Listed
Chemical Company of Malaysia Berhad	Corporate Responsibility Report 2008	2009	N	N	NR	English	Chemicals	Listed
DiGi Telecommunications Sdn Bhd	Annual Report 2008 Online Reporting	2009	N	N	NR	English	Telecommunication Real Estate	Listed
Faber Group Berhad	Annual Report 2008: Integrating Strengths	2009	N	N	NR	English	Automobiles & Parts	Listed
Ford Malaysia Sdn Bhd	Environment Report 2002 Shah Alam Assembly Plant	2003	N	N	NR	English	Beverages	Listed
Guinness Anchor Berhad	Corporate Responsibility Report 08	2008	N	N	NR	English	Bank	Listed
HSBC Bank Malaysia Berhad	Corporate Sustainability Report 2008 Corporate Sustainability Report 2007	2009	N	N	NR	English	Diversified	Listed
IJM Corporation Berhad	Annual Report 2008: Health, Safety & Environment Report and Corporate Social Responsibility Report	2008	N	N	NR	English	Industrials	Listed

³ Y indicates that the company is using GRI but is not declaring an application level. In all other instances where companies are using GRI the application level is stated.

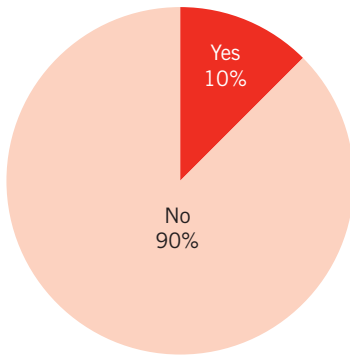
⁴ NR indicates no request. R indicates a response but that the content of the response is not publicly available, PR (with data) indicates a response with relevant data that is available publicly, PR (declined) indicates a response that is publicly available but that participation in the questionnaire was declined.

COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ³	CDP ⁴	LANGUAGE	INDUSTRY	LISTED/ PRIVATE
IJM Plantations Berhad	Annual Report 2008: Nurturing Sustainability	2009	N	N	NR	English	Agri-Business	Listed
Industrial Concrete Products Berhad	Annual Report 2008 Annual Report 2009: Corporate Social Responsibility	2009	N	N	NR	English	Construction & Building Materials	Listed
IOI Corporation Berhad	Annual Report 2008: Corporate Social Responsibility Annual Report 2007: Corporate Social Responsibility Annual Report 2006: Environmental & Social Responsibility	2009	N	N	NR	English, Malay	Agri-Business	Listed
JVC Manufacturing Malaysia Sdn Bhd	JVC Group Site Report 2008	2008	N	N	NR	English	Electronic & Electrical Equipment	Private
Kulim (Malaysia) Berhad	Sustainability Report 2007/2008. Embracing the challenges ahead	2008	N	Y/ C (Self)	NR	English, Malay	Food Producers & Processors	Listed
Lafarge Malayan Cement Berhad	Sustainable Development	2007	N	N	NR	English	Construction & Building Materials	Listed
Malaysian Airline System Berhad	Annual Report 2008 Annual Report 2007	2009	N	N	NR	English	Transport	Listed
Malaysian Resources Corporation Berhad	Environmental & Social Report 2007	2008	Y	Y/ A+ (GRI)	NR	English, Malay	Diversified Industrials	Listed
Media Prima Berhad	2008 Annual Report: Corporate Responsibility Section (Malay) Corporate Responsibility Section of Website (English)	2009	N	N	NR	English, Malay	Media	Listed
Mesiniaga	Corporate Responsibility Report 08	2009	N	N	NR	English	Telecommunication Services	Listed
Microsoft Malaysia Sdn Bhd	Social Report 2006 Citizenship Report 2005	2007	N	N	NR	English	IT	Listed
MISC Bhd	Annual Report 2009: Corporate Social Responsibility Annual Report 2008: Corporate Social Responsibility Annual Report 2007: Corporate Social Responsibility Annual Report 2006: Corporate Social Responsibility	2009	N	N	NR	English	Diversified Industrials	Listed
Nestle (Malaysia) Berhad	Creating Shared Value 2008 Creating Shared Value 2007 Corporate Responsibility Review 2006	2009	N	N	NR	English, Malay	Food Producers & Processors	Listed
Opus Group Berhad	Sustainability Report 2008 Social Report 2007 Online Reporting on CSR from 2005 to 2009	2009	N	N	NR	English	Support Services	Private
Petra Perdana Berhad	Sustainability Report 2008	2009	N	N	NR	English	Diversified Industrials	Listed
PETRONAS	'Sustainable' Review (Environment/ Social/ Economic)	2007	N	N	NR	English	Oil & Gas	Listed

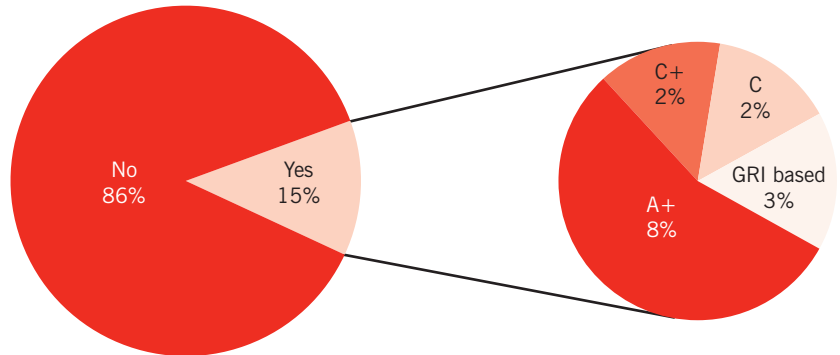
COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ³	CDP ⁴	LANGUAGE	INDUSTRY	LISTED/PRIVATE
Pfizer Malaysia	Working for a healthier world 2006 Reaching out 2005	2006	N	N	NR	English	Pharmaceutical	Private
Pharmaniaga	Annual Report 2008: Creating Sustainable Communities Annual Report 2007: Culture of Caring Annual Report 2006 Annual Report 2005 Annual Report 2004	2009	N	N	NR	English	Pharmaceutical	Listed
Pricewaterhouse Coopers Malaysia	Corporate Social Responsibility Overview 2006	2006	N	N	NR	English	Support Services	Private
Public Bank Berhad	2008 Annual Report: Enriching Communities	2009	N	N	NR	English	Banks	Listed
Puncak Niaga (M) Sdn Bhd	Annual Report 2008: Building Socially Responsible business Annual report 2007: Environment and community Annual report 2006: Environment and community Ensuring Our Future (2003)	2009	N	N	NR	English	Water	Listed
Ranhill Utilities	Sustainability Report 2008	2009	N	GRI Based	NR	English	Water	Listed
Shell Malaysia Ltd	The Shell Malaysia Sustainability Report 2007 Shell Malaysia Sustainable Development Report 2006 Sustainable Development Report 2005 Sustainable Development Report 2004 Sustainable Development Report 2003 Sustainable Development Report 2002 Sustainable Development Report 2001 Sustainable Development Report 2000 Sustainable Development Report 1999	2008	N	N	NR	English	Oil & Gas	Private
Shell Refining Company (Federation of Malaya) Berhad	Sustainable Development Reports 2007 Sustainable Development Reports 2006 Sustainable Development Reports 2005	2008	N	N	NR	English	Oil & Gas	Listed
Silterra Malaysia Sdn Bhd	CSR and Environmental Reporting Online Data from 2003 to 2009	2009	N	N	NR	English	Manufacturing	Private
Sony EMCS (Malaysia) Sdn Bhd	Environmental Report 2006 Environmental Site Report Year 2004 (Penang Tec) Environmental Report 2003 (Kuala Lumpur Tec) Environmental Report 2002 (produced by Sony Technology Malaysia Sdn Bhd) Environmental Report (2002) (produced by Sony Electronics Malaysia Sdn Bhd)	2007	N	N	NR	English	Electronic & Electrical Equipment	Private

COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ³	CDP ⁴	LANGUAGE	INDUSTRY	LISTED/ PRIVATE
Star Publications (Malaysia) Berhad	Annual Report 2008 Annual Report 2007	2009	N	N	NR	English	Media	Listed
Sunway City	Annual Report 2008: Corporate Responsibility Annual Report 2007: Corporate Citizenship	2009	N	N	NR	English, Malay	Real Estate	Listed
Sunway Holdings Berhad	Annual Report 2008: Corporate Responsibility Annual Report 2007: Corporate Social Responsibility	2009	N	N	NR	English, Malay	Diversified Industrials	Listed
Telekom Malaysia Berhad	Sustainability Report 2008 Annual Report 2007: Corporate Responsibility Report Annual Report 2006: Corporate Responsibility Report Annual Report 2005: Corporate Responsibility Report	2009	Y	A+	PR	English, Malay	Telecommunication Services	Listed
Tenaga Nasional Berhad	Annual Report 2008: Corporate Social Responsibility	2009	N	N	NR	English, Malay	Electricity	Listed
Hustman Tioxide (Malaysia) Sdn Bhd (Inactive)	Responsible Care Report 2003 Teluk Kalung Site	2004	N	N	NR	English	Chemicals	Private
Tradewinds Plantations Berhad	Annual Report 2008: Delivering A Sustainable Future Annual Report 2007 Annual Report 2006	2009	N	N	NR	English	Agri-Business	Listed
UEM Environment Sdn Bhd	Sustainability Report 2007 Sustainability Report 2006 Sustainability report 1996-2005	2008	Y	Y/ C+ (Third party)	NR	English	Support Services	Private
UMW Holdings Berhad	Corporate Social Responsibility Summary Report 2007	2008	Y	Y/ A+ (GRI)	NR	English	Diversified Industrials	Listed
YTL Corporation Berhad	Sustainability Report 2008 Sustainability Report 2007 Annual Report 2006	2008	N	N	NR	English	Diversified Industrials	Listed

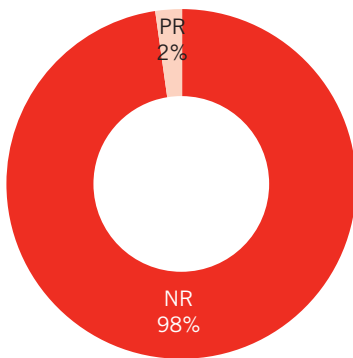
Assurance



GRI

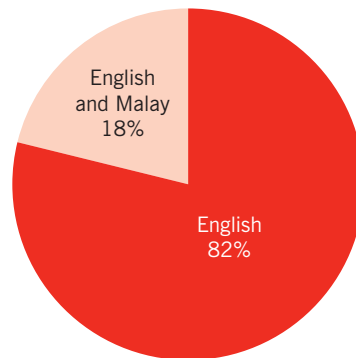


CDP



- NR: 98%
- R: 0%
- PR (data): 2%
- PR (declined): 0%

Language of report

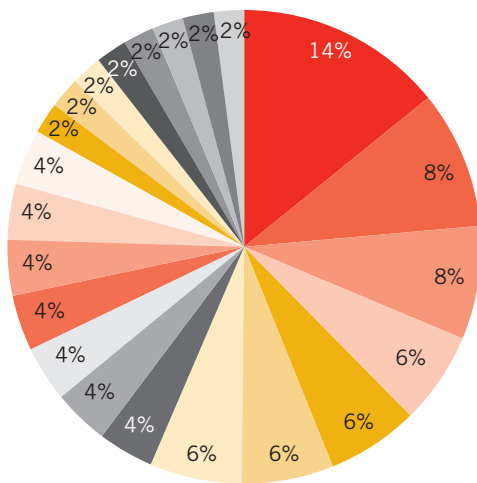


Last reporting year	Number of companies
2002	1
2003	1
2004	1
2005	1
2006	2
2007	4
2008	11
2009	28
Total	49

Listed/ Private

Listed companies	38
Private companies	11
Total	49

Industry



■ Diversified Industrials: 14% (7)	■ Food Producers & Processors: 4% (2)
■ Oil & Gas: 8% (4)	■ Construction & Building Materials: 4% (2)
■ Agri-Business: 8% (4)	■ Pharmaceuticals: 4% (2)
■ Electronic & Electrical Equipment: 6% (3)	■ Beverages: 2% (1)
■ Telecommunication Services: 6% (3)	■ Automobiles & Parts: 2% (1)
■ Media: 6% (3)	■ Investment Companies: 2% (1)
■ Support Services: 6% (3)	■ Tobacco: 2% (1)
■ Banks: 4% (2)	■ Energy: 2% (1)
■ Water: 4% (2)	■ Transport: 2% (1)
■ Chemicals: 4% (2)	■ Manufacturing: 2% (1)
■ Real Estate: 4% (2)	■ Software: 2% (1)

PHILIPPINES

COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ⁵	CDP ⁶	LANGUAGE	INDUSTRY	LISTED/ PRIVATE
Asian Development Bank	Sustainability Report 2009 Environment Program 2003-2007 Sustainability Report. Spotlight on the Environment, Social Development, and Governance (2006)	2009	N	Y/ Undeclared	NR	English	Banks	Private
Association of Development Financing Institutions in Asia and the Pacific	2008 Integrated Annual and Sustainability Report 2007 Annual Report	2009	N	Y/ C (Self)	NR	English	Banks	Private
Ayala Land Inc	Ayala Land Sustainability Report 2008 Sustainability Report 2007	2009	N	Y/ B (Self)	NR	English	Real Estate	Listed
Cebu Holdings Incorporated	2008 Integrated Annual and Sustainability Report Integrated Annual & Sustainability Report 2007	2009	N	Y/ B (Self)	NR	English	Real Estate	Listed
NEC TOKIN Electronics (Philippines) Inc	Annual Environmental Report 2005	2005	N	N	NR	English	Electronic & Electrical Equipment	Private
Petron Corporation	2008 Sustainability Report. Fueling Hope Fueling Life Petron Health, Safety & Environment 2006 Annual Report Petron Health, Safety & Environment 2005 Annual Report Petron Health, Safety & Environment 2004 Annual Report	2009	N	Y/ B (Self)	NR	English	Oil & Gas	Listed
Sagittarius Mines Inc	Tampakan Project Sustainability Report 2008 Tampakan Project Sustainability Report 2007	2009	N	Y/ Undeclared	NR	English	Mining	Private
San Miguel Corporation	A Commitment to Social Responsibility (2003). Doing Well, Doing Good	2004	N	N	NR	English	Beverages	Listed
Shell Philippines	Shell companies in the Philippines. Sustainability Report 2007 Health, Safety and Environment Report 2006 Health, Safety and Environment Report 2004 Health, Safety and Environment 2003 Summary Report (Summary) Health, Safety and Environment Report 2003 Health, Safety and Environment Report 2002	2008	N	N	NR	English	Oil & Gas	Private
The Manila Water Company Inc	2008 Sustainability Report Sustainability Report 2007 Sustainability Report 2006 Sustainability Report 2005 Sustainability Report 2004	2009	N	Y/ B (Self)	NR	English	Water	Listed
Toyota Motor Philippines Corporation	2007 Sustainability Report 2006 Sustainability Report	2008	N	N	NR	English	Automobiles & Parts	Private

⁵ Y indicates that the company is using GRI but is not declaring an application level. In all other instances where companies are using GRI the application level is stated.

⁶ NR indicates no request. R indicates a response but that the content of the response is not publicly available, PR (with data) indicates a response with relevant data that is available publicly, PR (declined) indicates a response that is publicly available but that participation in the questionnaire was declined.

Last reporting year	Number of companies
2004	1
2005	1
2008	2
2009	7
Total	11

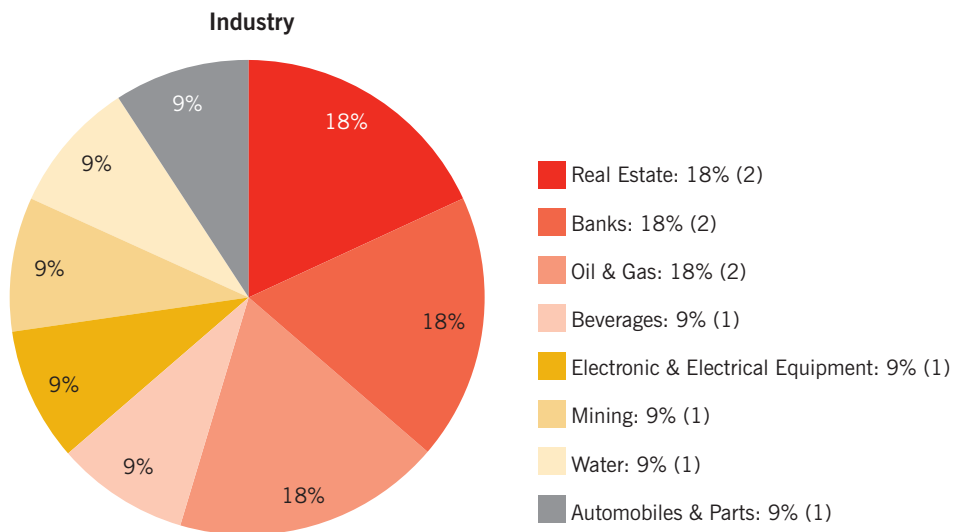
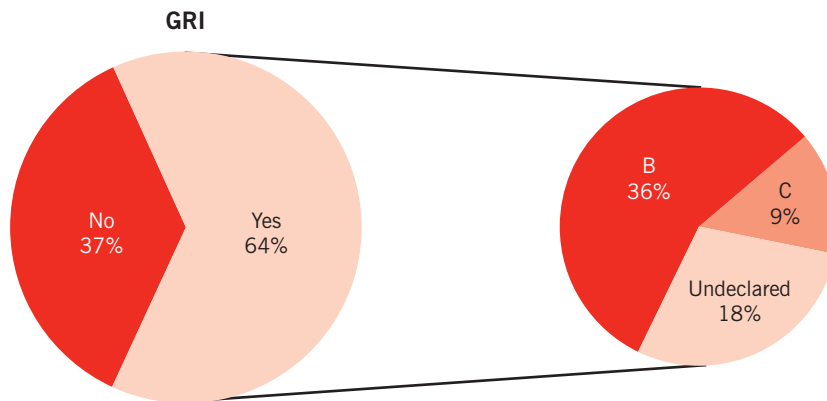
Listed/ Private

Listed companies	5
Private companies	6
Total	11

Assurance	Percentage of companies assured
Yes	0
No	100%

CDP	Percentage of companies
NR	100%
R	0
PR (data)	0
PR (declined)	0

Language	Percentage of companies
English	100%



SINGAPORE

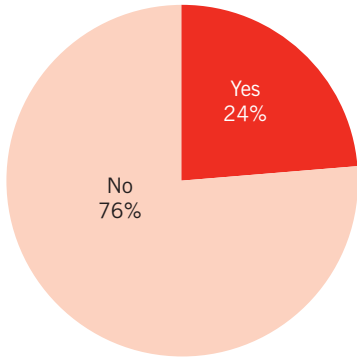
COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ⁷	CDP ⁸	LANGUAGE	INDUSTRY	LISTED/ PRIVATE
Asia Pacific Breweries Limited	Environmental and Safety Reporting 2003-2005 Environment & Safety Report Update 2005 Environment & Safety Report 2001-2003	2006	N	N	NR	English	Beverages	Listed
Asia Pacific Resources Holdings Ltd	Quarterly updates also provided 2008 Sustainability Report 2006 Sustainability Report 2004 Sustainability Report 2002 Sustainability Report	2009	Y	Y	NR	English	Forestry & Paper	Private
Asia Pulp and Paper Company Ltd	2007 Environmental and Social Sustainability Report for Indonesia 2005-2006 APP Environmental and Social Report for Indonesia	2008	Y	N	NR	English	Forestry & Paper	Private
Banyan Tree Holdings Limited	Corporate Social Responsibility Report 2008 Corporate Social Responsibility Report 2007 Sustainability Report 2006	2009	N	N	NR	English & Chinese	Leisure, Entertainment & Hotels	Listed
Chartered Semiconductor Manufacturing Ltd	Environment Report 2006 Environment Report 2005 Environment Report 2004 Environment Report 2003 Environmental Report 2002	2007	N	N	NR	English	Electronic & Electrical Equipment	Listed
City Developments Limited	Sustainability Report 2009 Social and Environmental Report 2008	2009	Y	B+	PR (with data)	English	Real Estate	Listed
JVC Electronics Singapore Pte Ltd	JVC Group Site Report 2008 JVC Group Site Report 2007	2009	N	N	NR	English	Electronic & Electrical Equipment	Private
Keppel Land International Limited	Sustainability Report 2008 Corporate Social Responsibility Report 2007 Environmental Report 2006 Environmental Report 2005 Report to Shareholders 2004 Report to Shareholders 2003 Report to Shareholders 2002 Report to Shareholders 2001	2009	N	C	NR (parent co request only)	English	Real Estate	Listed
Olam International Limited	Corporate Responsibility & Sustainability Report 2008	2009	N	N	NR	English	Agri-Business	Listed
Origin Exterminators Pte Ltd	Origin's Environmental and Social Report 2008 Origin's Environmental and Social Report 2008	2009	N	N	NR	English	Service	Private
Power Seraya Limited	Sustainability Report 2009	2009	Y	B+	NR	English	Electricity	Private

⁷ Y indicates that the company is using GRI but is not declaring an application level. In all other instances where companies are using GRI the application level is stated.

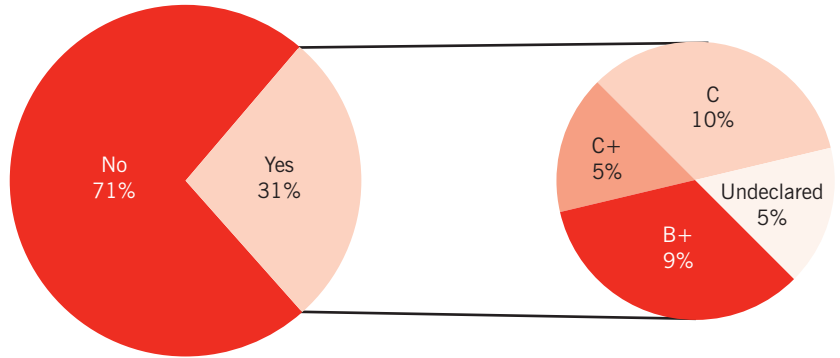
⁸ NR indicates no request. R indicates a response but that the content of the response is not publicly available, PR (with data) indicates a response with relevant data that is available publicly, PR (declined) indicates a response that is publicly available but that participation in the questionnaire was declined.

COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ⁷	CDP ⁸	LANGUAGE	INDUSTRY	LISTED/PRIVATE
SembCorp Industries Ltd	SembCorp Industries Annual Report 2008: Corporate Social Responsibility section Annual Report 2007: Corporate Social Responsibility section Annual Report 2006: Corporate Social Responsibility section Annual Report 2005: Corporate Social Responsibility section Annual Report 2004: Corporate Social Responsibility section	2009	N	N	PR (with data)	English	Multi-Utilities	Listed
Singapore Airlines Limited	Environmental Report 2008/09 Environmental Report 2007/2008 Environmental Report 2006/2007 Environmental Report 2005/2006 Environmental Report 2004/2005	2009	N	N	R (not public)	English	Transport	Listed
Singapore Epsom Industrial Pte Ltd	Environmental Site Report 2008 Environmental Site Report 2007 Environmental Site Report 2006 (April 2005 to March 2006)	2008	N	N	NR	English	Electronic & Electrical Equipment	Private
Singapore Polytechnic	Environment and Sustainability Report 2007 The Singapore Polytechnic Environment and Sustainability Report 2005	2008	N	C	NR	English	Education	Private
SingTel Group	Annual Report 2008/2009: Corporate Social Responsibility Annual Report 2007/2008: Corporate Social Responsibility and Our People Annual Report 2006/2007: Corporate Social Responsibility and Our People	2009	N	N	PR (decline)	English	Telecommunication Services	Listed
Sony Display Device (Singapore)	Environment & Social Report 2006 Environmental & Social Report 2005 Environmental & Social Report 2004 Environmental & Social Report 2003	2007	N	N	NR (parent co request only)	English	Electronic & Electrical Equipment	Private
Sony Electronics (Singapore) Pte Ltd	Environmental Report 2002	2003	N	N	NR (parent co request only)	English	Electronic & Electrical Equipment	Private
Sony Precision Engineering Center	Our Earth, Our Home 2006 Our Earth, Our Home 2004 Our Earth, Our Home 2003	2007	N	N	NR (parent co request only)	English	Electronic & Electrical Equipment	Private
Swire Pacific Offshore	Sustainable Development Report 2008	2009	Y	C+	NR (parent co request only)	English	Shipping	Listed
Tetra Pak South East Asia Pte Ltd	Environment, Health & Safety Report 2002/03	2003	N	N	NR	English	Packaging	Private

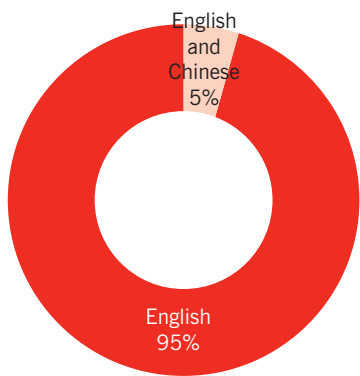
Assurance



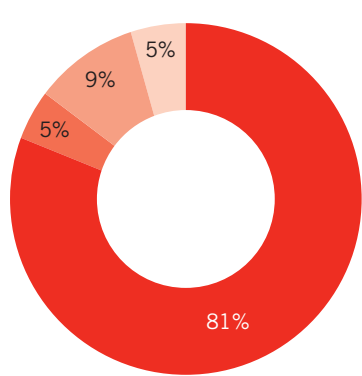
GRI



Language of report



CDP

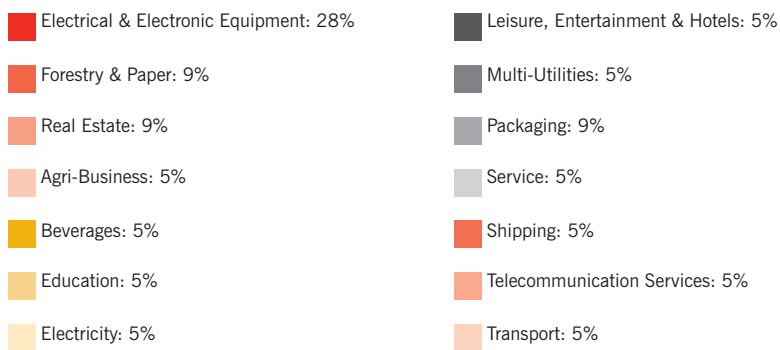
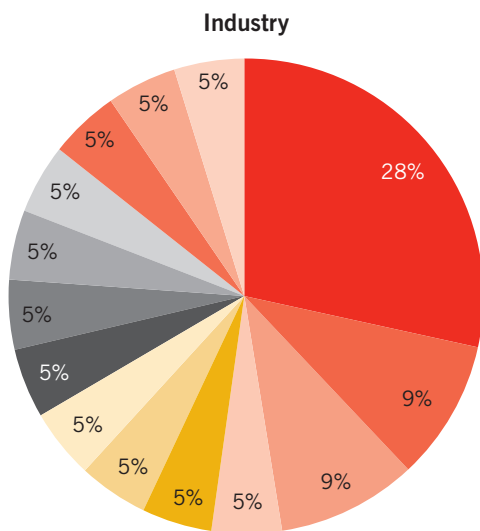


- NR: 81%
- R (not public): 5%
- PR (data): 9%
- PR (declined): 5%

Last reporting year	Number of companies
2003	2
2006	1
2007	3
2008	3
2009	12
Total	21

Listed/ Private

Listed companies	10
Private companies	11
Total	21



THAILAND

COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ⁹	CDP ¹⁰	LANGUAGE	INDUSTRY	LISTED/PRIVATE
Bayer Thai Co Ltd	Sustainable Development Report 2007 Sustainable Development Report 2006	2008	N	N	NR	English, Thai	Chemicals	Private
Diageo Moet Hennessy (Thailand) Limited	Corporate Citizenship Report 2007	2007	Y	Y/ CI ¹¹	NR	English, Thai	Beverages	Private
Evason Phuket & Six Senses Spa	Sustainability Report 2007 Sustainability Report 2006	2008	N	N	NR	English	Leisure, Entertainment & Hotels	Private
JVC Manufacturing (Thailand) CO LTD	JVC Group Site Report 2008	2008	N	N	NR	English	Electronic & Electrical Equipment	Private
KPMG Phoomchai Holdings Co Ltd	Corporate Citizenship Report. Making Thailand a Better Place 2008	2009	N	N	NR	English	Support Services	Private
Merck Ltd Thailand	Corporate Social Responsibility Annual Report 2006/07 Corporate Social Responsibility Annual Report 2006 Corporate Social Responsibility Annual Report 2004 Corporate Social Responsibility Annual Report 2003	2008	N	Y/ Undeclared	NR	English, Thai	Pharmaceuticals & Biotechnology	Private
NEC Infrontia Thai Limited	Environmental Report 2008 Environmental Report 2007 Environmental Report 2006 Environmental Report 2004 Environmental Report 2003	2008	N	N	NR	English	Electronic & Electrical Equipment	Private
NEC Tokin Electronics (Thailand) Co Ltd	Annual Environmental Report 2007 Annual Environmental Report 2006 Annual Environmental Report 2005 Annual Environmental Report 2003 Annual Environmental Report 2002	2008	N	N	NR	English	Electronic & Electrical Equipment	Private
Oki (Thailand) Co Ltd	Environmental & Safety Report 2004	2004	N	N	NR	English	Software & Computer Services	Private
PTT Exploration and Production Public Company Limited	Corporate Social Responsibility Report 2008 PTTEP Corporate Social Responsibility Report 2007 Social Sustainability Report (2006) 2006 Report Safety, Security, Health, and Environment 2004 SSHE Report. Safety, Security, Health and Environment SSHE 2003 Our Commitment to Safety, Security, Health and Environment Health, Safety and Environment Report 2002	2009	N	N	NR	English, Thai	Oil & Gas	Listed

⁹ Y indicates that the company is using GRI but is not declaring an application level. In all other instances where companies are using GRI the application level is stated.

¹⁰ NR indicates no request. R indicates a response but that the content of the response is not publicly available, PR (with data) indicates a response with relevant data that is available publicly, PR (declined) indicates a response that is publicly available but that participation in the questionnaire was declined.

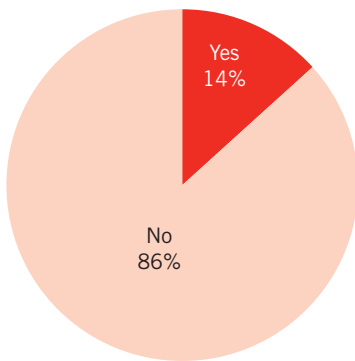
¹¹ GRI 2002 'CI' - Meaning 'Content Index': report includes a GRI Content Index, mapping responses to some or all of the 2002 Guidelines indicators.

COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ⁹	CDP ¹⁰	LANGUAGE	INDUSTRY	LISTED/PRIVATE
PTT Public Company Limited	PTT's Sustainability Report 2007 PTT's Sustainability Report 2006 PTT's Sustainability Report 2005 PTT's Sustainability Report 2004 PTT's Quality, Safety, Health and Environment Annual Report 2003 PTT's Environmental Annual Report 2002 PTT's Environmental Annual Report 2001	2008	N	N	NR	English, Thai	Oil & Gas	Listed
Siam Cement Group plc	Sustainability Report 2008 ¹² Sustainability Report 2007 Sustainability Report 2006 Sustainability Report 2005 Sustainability Report 2004 Sustainability Report 2003 Sustainability Report 2002 Environment Report 2001	2009	Y	Y/ A (GRI)	R	English, Thai	Construction & Building Materials	Listed
SCG CEMENT Company Limited	Sustainable Development Report 2006-2007 Sustainable Development Report 2005 2004 Sustainable Development Report	2008	Y	N	NR	English, Thai	Construction & Building Materials	Private
Siam Pulp and Paper Public Company Limited	SCG Paper Sustainability Report 2008 SCG Paper Sustainability Report 2006	2009	N	Y/ B	NR	English, Thai	Forest and Paper Products	Private
Siam City Cement Public Company Limited	Sustainable Development Report 2006 Environment Initiatives (2001)	2006	N	N	NR	English, Thai	Construction & Building Materials	Listed
Solvay Thailand	Toward Sustainable Development 2002-2004 Environment-Responsible Care Report 1999-2001	2005	N	N	NR	English, Thai	Chemicals	Private
Sony Device Technology (Thailand) Co Ltd (Bangkadi)	Environmental Site Report 2003 Environmental Report 2002	2004	N	N	NR	English	Electronic & Electrical Equipment	Private
Sony Magnetic Products (Thailand) Co Ltd	Environmental Report 2000	2001	N	N	NR	English	Electronic & Electrical Equipment	Private
Sony Technology (Thailand) Co Ltd	2005 Environmental Site Report Environmental Site Report 2003. April 03 - March 04 (Chonburi) 2003 Environmental Site Report (Ayuthaya) Environmental Report 2002 (Chonburi) Environmental Report 2002 (Ayuthaya)	2007	N	N	NR	English	Electronic & Electrical Equipment	Private
The Bangchak Petroleum Public Company Limited	Sustainability Report 2008 Sustainability Report 2007 Sustainability Report 2006	2009	N	N	NR	English	Oil & Gas	Listed

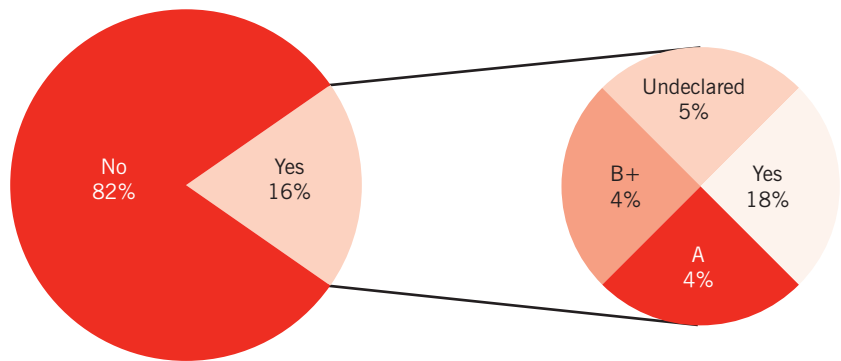
¹² From 2008 onwards, the SCG Cement Sustainability report has been incorporated into SCG Sustainability report.

COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ⁹	CDP ¹⁰	LANGUAGE	INDUSTRY	LISTED/PRIVATE
Toshiba Hokuto Electronic Devices (Thailand) Co Ltd	Environmental Report 2006	2007	N	N	NR	English	Electronic & Electrical Equipment	Private
Toyota Motor Thailand Co Ltd	Sustainability Report 2008 Sustainability Report 2007 Sustainability Report 2006 Environmental Report 2005 Environmental Report 2003	2009	N	N	NR	English, Thai	Automobiles & Parts	Private

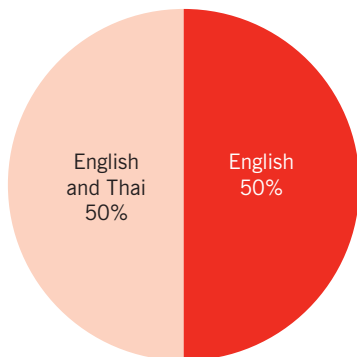
Assurance



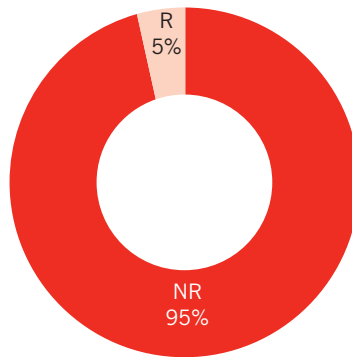
GRI



Language of report



CDP

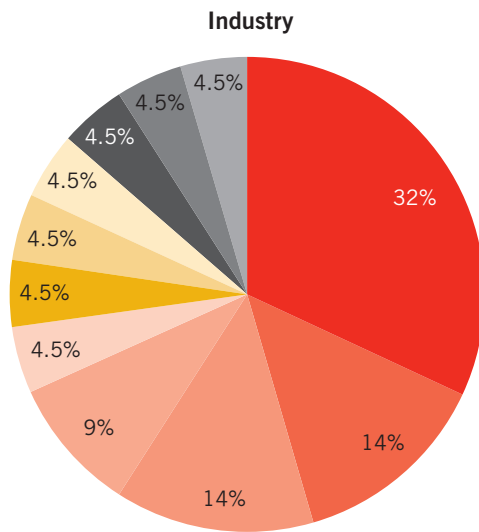


- NR: 95%
- R: 5%
- PR (data): 0%
- PR (declined): 0%

Last reporting year	Number of companies
2001	1
2004	2
2005	1
2006	1
2007	3
2008	9
2009	6
Total	22

Listed/ Private

Listed companies	5
Private companies	17
Total	22



- Electrical & Electronic Equipment: 32% (7)
- Oil & Gas: 14% (3)
- Construction & Building Materials: 14% (3)
- Chemicals: 9% (2)
- Beverages: 4.5% (1)
- Automobiles & Parts: 4.5% (1)
- Software & Computer Services: 4.5% (1)
- Leisure, Entertainment & Hotels: 4.5% (1)
- Support Services: 4.5% (1)
- Pharmaceuticals & Biotechnology: 4.5% (1)
- Forest & Paper Products: 4.5% (1)

COMPANY	REPORTING HISTORY	LAST REPORTING YEAR	ASSURANCE	GRI ¹³	CDP ¹⁴	LANGUAGE	INDUSTRY	LISTED/PRIVATE
BRUNEI	No Companies Listed							
CAMBODIA								
ACLEDA Bank Plc	Annual Report 2008 Annual Report 2007 Annual Report 2006 Annual Report 2005	2009	N	Y/ 2002 CI	NR	English	Banks	Private
MYANMAR	No Companies Listed							
LAOS	No Companies Listed							
VIETNAM								
JVC Vietnam Limited	JVC Group Site Report 2008	2008	N	N	NR	English	Electronic & Electrical Equipment	Private
Sony Vietnam Limited	Sovinam Report 2003 Environmental Report 2002	2005	N	N	NR	English	Electronic & Electrical Equipment	Private
Holcim (Vietnam) Ltd	Annual Report 2004	2004	N	N	NR	English	Construction & Building Materials	Private

¹³ Y indicates that the company is using GRI but is not declaring an application level. In all other instances where companies are using GRI the application level is stated.

¹⁴ NR indicates no request. R indicates a response but that the content of the response is not publicly available, PR (with data) indicates a response with relevant data that is available publicly, PR (declined) indicates a response that is publicly available but that participation in the questionnaire was declined.

Sustainability Regulation

Sustainability reporting in the ASEAN countries surveyed is currently at a very nascent stage, but it is expanding rapidly. In recent years there has been a move by regulators and governments to promote sustainability disclosure in some Asian markets: Indonesia, Malaysia and Taiwan being the most recent. This section of the report looks at the promotion of sustainability disclosure within the selected ASEAN countries.

The most widely accepted sustainability disclosure tool is the Global Reporting Initiative (GRI), which is seeing rapidly increasing usage in Asia. In 2009, forty one out of four hundred and seventy three reports listed on the GRI website¹ were from companies based in Asia, thirteen of which are companies from the selected ASEAN countries for the purpose of this study. These numbers are up from a total Asian GRI usage of one out of ten in 1999 and thirty eight out of three hundred and seventy six in 2005. Many more organisations are using the GRI without declaring the reports to the GRI database. Whilst the GRI is the most widely accepted tool it is not currently officially promoted in any of the ASEAN countries in this study other than by sustainability organisations and consultants working in each country.

Whilst many organisations have launched sustainability awards, very few specifically have awards for sustainability disclosure. Captured below are those awards or activities that are specifically related to disclosure. Global voluntary sustainability organisations such as the Global Compact have not been included and reference has only been made to voluntary reporting codes promoted within each country.

ASEAN COUNTRY	MANDATORY REQUIREMENTS	VOLUNTARY CODES	AWARDS AND MONITORING	TRAINING AND SUPPORT
Indonesia	Limited Liability Company Law Number 40/2007 Capital Market Supervisor Agency Bapepam-LK X.K.6 Regulation: "Reporting Requirements for Issuers and Public Companies-Annual Reports"	Program for Pollution Control Evaluation and Rating (PROPER)	Indonesia Sustainability Reporting Award (ISRA) KEHATI-SRI Index	NCSR - Certified Sustainability Reporting Specialist (CSRS) and the Certified Sustainability Report Assurer (CSRA)
Malaysia	Bursa Malaysia (Stock Exchange) Listing Rules requirement to provide a description of the corporate social responsibility activities or practices undertaken by the listed issuer and its subsidiaries or if there are none, a statement to that effect	Silver Book: Achieving value through social contribution. Reporting Guidelines.	ACCA Malaysia Sustainability Reporting Awards (MaSRA) Asian Sustainability Rating™	CAUX Round Table Reporting Training CSR Asia Reporting Training OWW Consulting CSR Reporting Training
Philippines	The Philippine Securities and Exchange Commission (PSEC) encourages listed companies to make additional statements such as environmental reports and value added statements when management believes they will assist users in making economic decisions, particularly in industries where environmental factors are significant and when employees are considered to be an important user group	None	PICPA recognition of best CSR reports The Management Association of the Philippines (MAP) issues annually the Best Corporate Annual Report Awards. One of the criteria is the integration of CSR-related disclosure within the reports Asian Sustainability Rating™	The Philippine Institute of Certified Public Accountants (PICPA) has established a special committee on Sustainability Reporting and Assurance to "play a key role in promoting Sustainability Reporting and Assurance practices in the Philippines" with reference to GRI
Singapore	None	Voluntary packaging agreement includes requirement for annual reporting against action plan Tripartite Alliance for Fair Employment Practices (pledge required that is made public) SIA Anti-corruption and compliance declaration	ACCA Singapore Awards for Sustainability Reporting Asian Sustainability Rating Governance and Transparency Index (GTI) Asian Sustainability Rating™	ACCA and Singapore Compact Reporting Training CSR Asia Reporting Training
Thailand	Corporate Governance Code requires "clear policies on environmental and social issues"	Thai Labour Standard (TLS 8001 – 2003) includes requirements for Corporate Social Responsibility and reporting.	SET CSR awards (Top Corporate Governance Awards and Best Corporate Social Responsibility Awards) mentions disclosure in each category Asian Sustainability Rating™	None

¹ <http://www.globalreporting.org/GRIReports/GRIReportsList/>

INDONESIA

Mandatory

Indonesia is currently unique amongst the selected ASEAN countries, and indeed globally, in its mandatory approach to sustainability and sustainability disclosure. It has both the government directly mandating sustainability and sustainability disclosure through the Limited Liability Company Law Number 40/2007 and the Capital Market Supervisor Agency requiring sustainability disclosure through the Bapepam-LK rule X.K.6 (“Reporting Requirements for Issuers and Public Companies-Annual Reports”).

Law No 40/2007 for Limited Liability Companies, which was the first in the world to mandate that companies ‘undertake CSR’ passed on 16 August 2007. When a draft of the law was first released in early 2007 it stated that the law would be applicable to all Limited Liability Companies, this provoked widespread complaints from the business community in Indonesia, including a Jakarta based NGO promoting CSR, Indonesia Business Links². The law was subsequently amended and made the front page of the Jakarta Post³ when it was reported that Article 74 of the bill requires “natural resources companies” to enact CSR programs, stating that they will be liable to sanctions if they fail to do so. No details were provided as to how ‘CSR funds’ must be spent and in what amounts or where it should be spent. The law only specifies that CSR programs must be budgeted for and calculated as an operating cost that can be offset against taxation liabilities.

According to the Law, activities related to CSR implementation need to be disclosed in a companies’ Annual Report. However, no implementing regulation for Article 74 currently exists, rendering the law unenforceable. In April 2009 the law was challenged in the Indonesian Constitutional Court but the law was upheld: “Environmental damage in Indonesia has reached a critical level... It’s time for the state, along with society and businesses, to be responsible for the negative impacts of the damage,” said presiding judge M. Mahfud M.D.

The Bapepam-LK rule X.K.6, introduced in December 2006, requires that all listed companies submit an Annual Report. The rule requires each company to include in their Annual Report a “description of the activities and expenditures related with corporate social responsibility towards society and environment”⁴ but no further guidance or detail on disclosure requirements is provided. Companies are increasing the amount of CSR information included in Annual Reports but for most companies if it is included it is often only disclosure regarding philanthropic activities.

² <http://www.ibl.or.id/execution/index.php>

³ <http://www.thejakartapost.com/news/2007/07/21/csr-becomes-mandatory-most-companies.html>

⁴ http://www.bapepam.go.id/pasar_modal/regulasi_pm/peraturan_pm/X.K.6.pdf (2.g.8)

⁵ http://www.aecen.org/article_file/RFF-PROPER%20Discussion%20Paper.pdf

⁶ <http://www.idx.co.id/NewsAnnouncements/EventsPressRelease/tabid/124/articleType/ArticleView/articleId/481/The-Launching-of-SRIKEHATI-Index.aspx>

Voluntary

Indonesia’s Program for Pollution Control, Evaluation, and Rating (PROPER) is a national-level public environmental reporting initiative that started in 1995. This voluntary scheme is built on the premise that public disclosure will empower communities to achieve sustained pollution control practices. Participating companies monitor their environmental performance against existing regulation, the results being then published in the media. The program collapsed in 1998 after the Asian financial crisis, but was revived in 2004. The results show that there was a positive response to PROPER, the companies reducing their pollution levels in time⁵.

Awards and monitoring

The National Center for Sustainability Reporting (NCSR) has as its main purpose to support and promote sustainability reporting in Indonesia. NCSR was founded in 2005 by five organisations: the Indonesian Management Accountants Institute (IAMI / prev. IAI-KAM), the Indonesian-Netherlands Association (INA), National Committee on Governance (KNKG), Forum for Corporate Governance in Indonesia (FCGI) and the Public Listed Companies Association (AEI). The centre has cooperated with GRI to translate the GRI G3 Reporting Framework into the Bahasa Indonesia as well as to formulate a draft national annex of the GRI G3 Reporting Guidelines. The organisation is also the promoter of the annual Indonesian Sustainability Report Award (ISRA) in partnership with the Indonesian Institute of Management Accountants. In 2009 the awards were running for the fifth year.

Several organisations offer specialised reporting training. NCSR conducts regular training programs for two levels of certification: Certified Sustainability Reporting Specialist (CSRS) and Certified Sustainability Report Assurer (CSRA).

The Indonesian Biodiversity Foundation KEHATI in partnership with the Indonesian Stock Exchange⁶ launched in July this year the first SRI Index for Indonesia. The SRI-KEHATI index, which lists 25 companies, is the second single-nation sustainability index in Asia after Japan, according to the Indonesian Biodiversity Foundation. The ranking criteria are environment, community involvement, good corporate governance, respect for human rights, business behaviour and labour practices.

MALAYSIA

Mandatory

In 2004, the then Minister of Finance, Tan Sri Nor Mohamed Yakcop, shared the government's perspective on CSR in a special address at a Corporate Social Responsibility conference titled "CSR: Creating Greater Competitive Advantage." He announced that the government "strongly supports the adoption of voluntary CSR reporting and standards", stating that the government does not favour regulations interfering with the private sector's CSR initiatives which exist within a voluntary framework. In addition, he encouraged companies to disclose their CSR activities to help investors identify those with sustainable practices⁷.

The government's budget speeches began focusing on CSR from 2006. The then Prime Minister and Minister of Finance Dato' Seri Abdullah Badawi announced that all public-listed companies (PLCs) must disclose their CSR activities, in a move to "inculcate the culture of corporate social responsibility". In the 2007 budget speech he also specified that from FY/08, all PLCs must disclose their workforce diversity statistic – by race and gender, as well as "programmes taken to develop Bumiputera vendors".

Whilst the government has made positive statements with respect to encouraging CSR it has not introduced any mandatory requirements to date.

In September 2006 the Stock Exchange of Malaysia, Bursa Malaysia, amended its Listing Requirements to include a "requirement to provide a description of the corporate social responsibility activities or practices undertaken by the listed issuer and its subsidiaries or if there are none, a statement to that effect". At the same time Bursa Malaysia launched a CSR Framework as a guide for PLCs in implementing and reporting on CSR. "The Bursa Malaysia CSR Framework looks at four main focal areas for CSR practice – the Environment, the Workplace, the Community and the Marketplace, in no order of priority⁸". Although this has provided a useful guide to businesses, no requirements are outlined with respect to the amount of disclosure required.

Voluntary

In September 2006, the Putrajaya Committee on Government Linked Company (GLC) Performance (PCG)(a body established by the government to drive development and grow the economy) released as part of an ongoing series within the Transformation Manual, *the Silver Book: Achieving Value through Social Contribution*. The Silver Book's key objective is to "understand and make transparent GLCs' social obligations and the implications of meeting them (i.e. well beyond normal private sector practices of Corporate Social Responsibility) by clarifying the trade-offs made between social development and shareholder value creation in making social obligations". Within the Silver Book GLCs are advised that they should "develop and implement communications and reporting programme to communicate their contributions to society on an annual basis. The Silver Book also provides reporting guidelines.

Awards and monitoring

The ACCA Malaysia Sustainability Reporting Awards (ACCA MaSRA) previously known from 2004-2007 as the ACCA Malaysia Environmental and Social Reporting Awards (ACCA MESRA) and in 2002 to 2003 as the ACCA Malaysia Environmental Reporting Awards (MERA), aims to recognise companies who disclose environmental and social information, to encourage others to disclose these information, and to raise awareness on corporate transparency issues⁹. The MaSRA Awards in Malaysia for 2009 solicited 56 entrants up from just 11 in 2002.

The Asian Sustainability Rating™ an online tool for companies and their stakeholders with respect to sustainability disclosure includes Malaysia¹⁰.

⁷ Ministry of Finance YB. Tan Sri Nor Mohamed Yakcop, "CSR & SRI: The Way Forward for Malaysia," in Corporate Social Responsibility conference, (CSR: Creating Greater Competitive Advantage: 2004). http://www.treasury.gov.my/index.php?option=com_content&view=article&id=898%3Acsr-a-sri-the-way-forward-for-malaysia&catid=53%3Aucapan&Itemid=251&lang=my

⁸ http://www.klse.com.my/website/bm/about_us/the_organisation/csr/approach.html

⁹ ACCA, "Sustainability Awards (Malaysia)," <http://www.accaglobal.com/malaysia/publicinterest/sustainability/>.

¹⁰ www.asiansr.com

PHILIPPINES

Mandatory

In August 2007 the Philippine Board of Investment (BoI) adopted a new policy that requires companies who have registered for Investment Assistance which included income tax holidays to implement CSR programs to ensure that the fiscal incentives granted to them trickle down to the communities hosting their projects¹¹. The new policy is mandatory for companies that registered under the 2007 Investment Priorities Plan (IPP). In September 2009 the BoI were quoted saying: "The grant of the last two years of income tax holidays shall be subject to the submission of proof that they have actually undertaken CSR". It has not been stated what level of public disclosure is required for this proof. In August 2009 Philippines House of Representatives member and son of the President, Rep. Diosdado "Dato" M. Arroyo, filed House Bill 6414 or the "Corporate Social Responsibility Act of 2009" mandating corporations to observe its corporate social responsibility or the obligation to consider the interests of society by taking responsibility for the impact of their activities on customers, employees, shareholders, communities and the environment in all aspects of their operations. It is unclear whether any sustainability disclosure is envisaged under this Bill.¹²

The Philippine Securities and Exchange Commission (PSEC) encourages listed companies to make additional statements such as environmental reports and value added statements when management believes they will assist users in making economic decisions, particularly in industries where environmental factors are significant and when employees are considered to be an important user group.¹³

Voluntary

No voluntary reporting requirements in any CSR areas have been identified in the Philippines.

Awards and monitoring

No sustainability reporting awards have been identified in the Philippines. The Asian Sustainability Rating™ an online tool for companies and their stakeholders with respect to sustainability disclosure¹⁴. includes the Philippines.

¹¹ <http://www.csr-asia.com/index.php?id=10536>

¹² <http://www.congress.gov.ph/press/details.php?pressid=3675>

¹³ <http://www.sec.gov.ph/Documents/fs-checklist.pdf>

¹⁴ www.asiansr.com

SINGAPORE

Mandatory

The Singapore government has to date not engaged in any direct involvement in CSR. The reason for this is (as CSR expert and Professor at Singapore Management University Eugene Tan notes) that the government “prefers to use persuasion in accord with Singapore’s political and cultural values which emphasises ethical leadership and the promotion of social responsibility.”¹⁵ This approach has also been described by Melissa Ong, CSR researcher with the Centre on Asia and Globalisation at the Lee Kuan Yew School of Listed policy: “In an attempt to make Singapore as business friendly as possible, the government is reluctant to legislate on issues that could otherwise be voluntarily addressed by companies either through the guise of CSR or otherwise. One of the reasons for this is that the government does not want to hamper business activities by increasing business costs. Instead, it favours a mixture of consensus building and the carrot approach, with awards for good corporate behaviour and voluntary guidelines to help companies get there”.¹⁶

There has been government encouragement for the improvement of performance in specific CSR areas, for example, within employment practices and environmental performance, where the government has made information and funding available to assist with improvement but this has not been labeled as CSR. Nor has reporting on improvements been encouraged other than through the sharing of case studies on specific issues. This comment from the Minister of Defence and Chairman of SPRING Singapore, a government agency, illustrates this point:

“There are various stakeholders advocating different areas of CSR. For example, NTUC (National Trades Union Congress) advocates CSR from a workers’ perspective while the Consumers Association of Singapore (CASE) promotes CSR from a consumer protection perspective. The Singapore National Employers and Business federations (SNEF and SBF) and other chambers promote various CSR-related programmes to their members. The Ministry of Finance and the Monetary Authority of Singapore advocate CSR from a corporate governance perspective.”¹⁷

No comments in relation to sustainability disclosure have been recorded from the Singapore Stock Exchange (SGX).

Voluntary

Voluntary agreements that address CSR concerns (but do not deal with CSR holistically) include the Voluntary Packaging Agreement (VPA)¹⁸ which includes a performance indicator that requires an annual reporting requirement. The VPA as described by Ong: “The government recognised that waste management is a large problem for Singapore. It consulted with one of the main civil society organisations, Singapore Environmental Council (SEC), gave them the necessary support to draft a voluntary packaging agreement for food manufacturing industries that would commit these companies to reducing the amount of packaging they used. When the agreement was ready, SEC gathered all food producing companies to present the draft and encouraged them to sign it. This was underlined with the point that if the businesses did not commit to this voluntarily then the government would be forced to legislate. This whole process was conducted with strong support from the government.”¹⁹

Other voluntary arrangements with similar government support include the Tripartite Alliance for Fair Employment Practices²⁰ which promotes fair employment practices and the Employer Alliance²¹ promoting work-life balance strategies for companies and employees. Whilst these two promote CSR practices they do not include a specific recommendation to companies to disclose performance in this area.

The Singapore Compact also encourages companies to sign the UN Global Compact and to produce an annual Communication on Progress (COP).

¹⁵ “Moulding (sic) the Corporate Social Responsibility Agenda in Singapore,” Singapore Management University, February 4th, 2008, available at: <http://knowledge.smu.edu.sg/article.cfm?articleid=1119>.

¹⁶ Contextualising Corporate Social Responsibility in Singapore, September 2008, Working paper 004 available at www.lkyspp.nus.edu.sg/CAG

^{17,19} Ibid.

¹⁸ National Environment Agency sees food & beverage companies under voluntary pact cut waste by 17% for specific products,” National Environment Agency, October 30th, 2008, available at: http://app2.nea.gov.sg/news_detail_2008.aspx?news_sid=20081103156474129205

²⁰ <http://www.fairemployment.sg/>

²¹ <http://www.employeralliance.sg/>

Awards and monitoring

The major element of sustainability reporting that has seen active promotion and monitoring is corporate governance and this area of disclosure is also monitored by the local media, The Business Times, in partnership with the Corporate Governance and Financial Reporting Centre (CGFRC) at the National University of Singapore (NUS), under the guidance of corporate governance advocate Prof Mak Yuen Teen. The collaboration has resulted in the newly created Governance and Transparency Index (GTI) which is sponsored by CPA Australia and supported by the Investment Management Association of Singapore and replaces the Corporate Transparency Index (CTI), which assessed the financial transparency of companies based on their annual announcements and which had been published by the Business Times since 2000.

The GTI is divided into two broad sections: governance and transparency (including investor relations) with the maximum points for each section being 75 and 25 respectively. The governance section covers the following items: Board Matters, Remuneration Matters, Accountability and Audit. The transparency section focuses on how companies communicate with their shareholders. In addition, the Index includes a “bonus and penalty” system where companies which go beyond the requirements of the code (e.g. by including limits on directorships held by the their directors) will be awarded additional points while negative events (e.g., directors or management resigning and raising corporate governance concerns) will lead to a deduction in the company’s GTI score. The GTI does not focus on any other areas outside of governance at this time.

The ACCA Sustainability Awards in Singapore was introduced in 2002 and solicited 15 entrants in 2009.

The Asian Sustainability Rating™ an online tool for companies and their stakeholders with respect to sustainability disclosure includes²² Singapore.

THAILAND

Mandatory

The Thai government along with a range of stakeholders from the finance sector has recently begun to encourage Sustainability Reporting in Thailand. In September 2007 the then Deputy Prime Minister and Minister for Social Development and Human Security Mr. Paiboon Wattanasiritham led Thai business leaders in launching the Corporate Social Responsibility Institute (CSRI²³). Ten organisations participated in the Institute's inauguration: the Association of Investment Management Companies, Association of Securities Companies, Federation of Thai Capital Market Organizations, Federation of Thai Industries, Listed Companies Association, Securities Analysts Association, The Stock Exchange of Thailand (SET), Thai Bankers' Association, Thai Chamber of Commerce and Thai Investors' Association.²⁴

However it has been noted by those in government that more could be done. Kasit Piromya, current Minister for Foreign Affairs and chairperson of the Good Governance Promotion Association declared in 2008 that: *"We need to push CSR practices at the political level as currently there is no political party that offers [a] CSR policy. Without political leadership, Thailand's private sector is reluctant [to embrace CSR]."*²⁵

The Sufficiency Economy Philosophy (SEP) promoted by his Majesty the King of Thailand is often cited alongside CSR as the way to achieve sustainable development for Thailand. No clear guidelines have been issued on SEP implementation so companies do not have clear direction in this regard or guidance on disclosure principles. Companies often refer to the SEP in their reports and when speaking publicly about their CSR motivations.

One initiative that relates to sustainability reporting is the Stock Exchange of Thailand's (SET) corporate governance code, where the setting and disclosure of "clear policies on environmental and social issues" is mentioned as required to all listed companies.²⁶ However, the guidelines on disclosure for listed companies have no specific CSR related prerequisites.²⁷ The listed companies handbook, which incorporates the conditions for listing on the SET, only states that companies need to "establish an effective internal control system, which includes appropriate environmental controls" mentioning nothing about the need to also disclose these issues.²⁸

It has been noted that the SET have a working committee on 'listed companies corporate social responsibility' to establish sustainability reporting guidelines and have announced that they are working in collaboration with the Thaipat Institute.²⁹ The stated aim is to 'standardise Thailand's listed companies' CSR³⁰ and this is intended to conform with the GRI and adjusted to fit with Thai culture and is reported to be available in early 2010.³¹

²³ <http://asia.usppr.th/>

²⁴ <http://www.thaipr.net/nc/readnews.aspx?newsid=112209163E07054015336F1433E8550>

²⁵ <http://siamreport.blogspot.com/2009/01/kasit-piromya.html>

²⁶ <http://www.set.or.th/en/regulations/cg/files/CGPrincipleforListedCompany2006.zip>

²⁷ http://www.set.or.th/dat/content/rule/en/BorJorPor2300_EN.pdf

²⁸ http://www.set.or.th/en/regulations/supervision/files/listed_companies_handbook2009eng.zip

²⁹ <http://thaipat.blogspot.com/>

Voluntary

Disclosure efforts in Thailand to date have focused on promoting the implementation of good corporate governance policies.

The only relevant guideline available was established by the Thai Ministry of Labour, the Department of Labour Protection and Welfare in the form of the Thai Labour Standard (TLS 8001 – 2003) that includes Thai Corporate Social Responsibility requirements for the adhering companies. The standard has the objective of being a voluntary certification that companies can undertake to demonstrate their social responsibility practices. Communication on standard implementation is a prerequisite: "The establishment shall provide for and maintain procedures to communicate to parties concerned the data and information on the activities as well as its results in accordance with the implementation of this Standard"³²

Awards and Monitoring

Unlike the trend spreading around the region of a multitude of organisations awarding different CSR practices, in Thailand the number of local CSR awards is limited to two: the AMCHAM CSR Excellence Awards Program and the SET CSR Awards. However, neither has an award for CSR reporting alone. Even though the SET CSR Awards have reporting and disclosure criteria for the 'Top Corporate Governance Award', they do not have this condition for the 'Best Corporate Social Responsibility Award'.

In term of supporting organisations, even though there are a few entities that promote and engage in CSR activities, none of them has an agenda of monitoring Sustainability Reporting. This can be also observed in the current lack of training available at country level for those interested in the topic.

The Asian Sustainability Rating™ an online tool for companies and their stakeholders with respect to sustainability disclosure³³ includes Thailand.

³⁰ http://www.nationmultimedia.com/2009/01/26/business/business_30094195.php

³¹ Interview with SET September 2009

³² Interview with SET September 2009

³³ [http://tls.labour.go.th/download?path=tlslload/file/&file=Requirement%20Thai%20Labour%20Standard%20\(English\).pdf&id=load4-2](http://tls.labour.go.th/download?path=tlslload/file/&file=Requirement%20Thai%20Labour%20Standard%20(English).pdf&id=load4-2)

Interviews with Report Writers

Interviews with companies producing sustainability reports were conducted for the purpose of this report. A variety of companies were selected for interview: listed and private companies; small and large companies; and five in-depth interviews were conducted in each ASEAN country surveyed. Each company interviewed was granted confidentiality. Details relating to twenty five companies are represented in the findings below. The questions were split into the following sections: **Report Resources and Drivers, Report Benefits and Obstacles, Report Standards and Assurance, Report Audience and the Future of Reporting.**

A number of companies approached found it difficult to identify the person internally who was responsible for the report, some were reluctant to answer the questions and a number of respondent companies found it challenging to answer each of the questions outlined below. This suggests that the reporting culture is not fully integrated within corporate operations yet. Indeed when contacted a number of companies found it difficult to discuss the process of producing their Sustainability Report.

The majority of companies write their reports in-house, with a number of those surveyed outsourcing their report, the remainder doing a combination of both. Seven of those surveyed have an in house CSR team to compile the report whilst eleven of the respondents have a variety of departments contributing to the report. Thirty six percent of respondents find that the reporting process takes three to four months to complete, eleven percent state that it takes longer than six months and a small number who include the sustainability information in their Annual Report state that it takes one to two weeks only.

When asked what internal drivers exist for producing the report, companies say that the ability to provide key information to stakeholders is an important driver. Others responded that they report to fulfil management requirements and commitments and that they report in order to ensure continuous improvement. When asked about external drivers to report, companies responded that they had a commitment to report publicly about the activities of their organisation. Other reasons cited included requirements by affiliates and by customers and also to improve government understanding of activities undertaken.

Respondents were asked what the key benefits of reporting are. An equal number responded that the benefits were their branding and image, and to ensure continuous improvement of internal processes. Others talked about the need to strengthen dialogue with stakeholders, to be transparent, to be accountable and inspire confidence, to have informed employees, to be compliant with regulations, to gain a competitive advantage, to be seen to be a leader in CSR and to improve relations with shareholders and potential investors.

When asked what obstacles there were to reporting, respondents found that data collection was the most significant challenge. Some reported that content was the biggest obstacle – striking the balance between ‘positive’ and ‘self-critical’ information. Others reported that as sustainability is a new concept there is limited knowledge within the company and others found reporting difficult as they did not have management support.

Respondents were asked which reporting standards or guidelines they used for their Sustainability Reports.

Fourteen use the Global Reporting Initiative (GRI), four use either internal standards or the Bursa Malaysia guidelines. Other companies used: standards recommended by ACCA; AA1000AS; and, the UN Global Compact Communication on Progress (COP). Only two companies surveyed do not use any reporting standards.

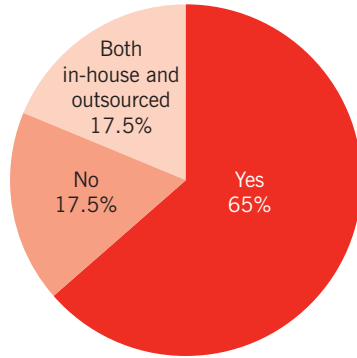
When asked about Sustainability Report assurance, ten companies responded that they have their report assured and five stated that they planned to have the report assured in the future. Those who are having their reports assured stated that: they did so to give the report greater credibility; to be compliant with international standards; to have an independent view and feedback and to be transparent; to meet shareholders expectations; because it is recommended by ACCA Awards judges; and, to be sure the report is accurate. Those who don't have their report assured state this is the case because: they have limited time or because reporting standards they use don't demand it; because the information covered in the report is small; because of budget restraints; or, because they have not seen the major benefits of assurance.

When asked who they were writing the Sustainability Report for the majority stated they were writing for a variety of stakeholders. Stakeholders mentioned in descending order were shareholders, government and local authorities, customers, business partners, the general community, NGOs, media, employees, potential investors and financial institutions, analysts and academics, business leaders, the company board, competitors and the Stock Exchange.

Finally each company surveyed was asked what they considered to be the future of sustainability reporting. Based on these interviews with companies it is hard to predict the future as many of the responses were conflicting. The highest number of respondents, consider that quarterly or real time reporting will become standard but this was contradicted by a number who felt that real time reporting would not be possible. In the same way, the highest number of respondents felt that the future will bring integrated reporting as opposed to others who felt that the Sustainability Report would become standalone. Others responded that reports will go online and will become standard corporate practice.

REPORT RESOURCES & DRIVERS

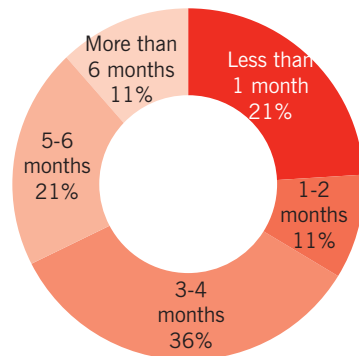
1. DO YOU WRITE YOUR SUSTAINABILITY REPORT IN HOUSE?



1A. WHAT RESOURCES DO YOU HAVE?



1B. HOW MUCH TIME DOES IT TAKE?

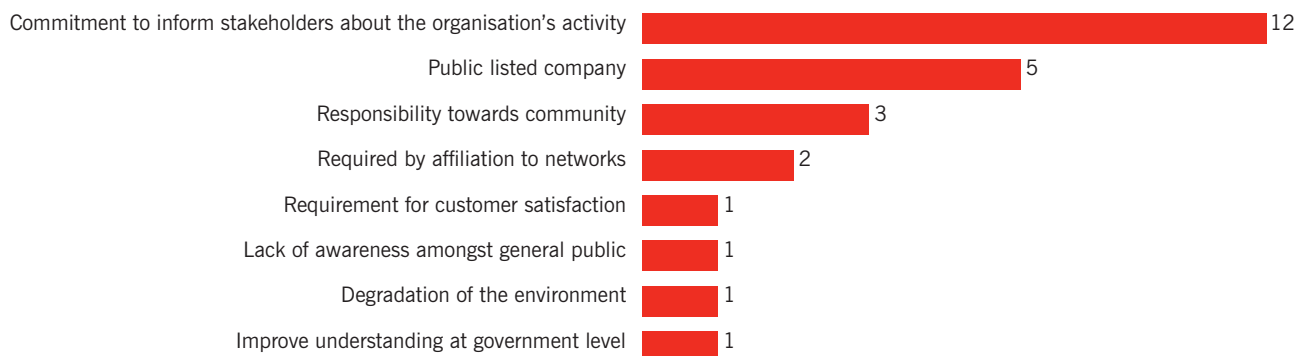


REPORT BENEFITS & OBSTACLES

2A. WHAT ARE THE MAIN INTERNAL DRIVERS FOR REPORTING IN YOUR ORGANISATION?



2B. WHAT ARE THE MAIN EXTERNAL DRIVERS OF REPORTING IN YOUR ORGANISATION?



3. WHAT ARE THE KEY BENEFITS OF REPORTING?

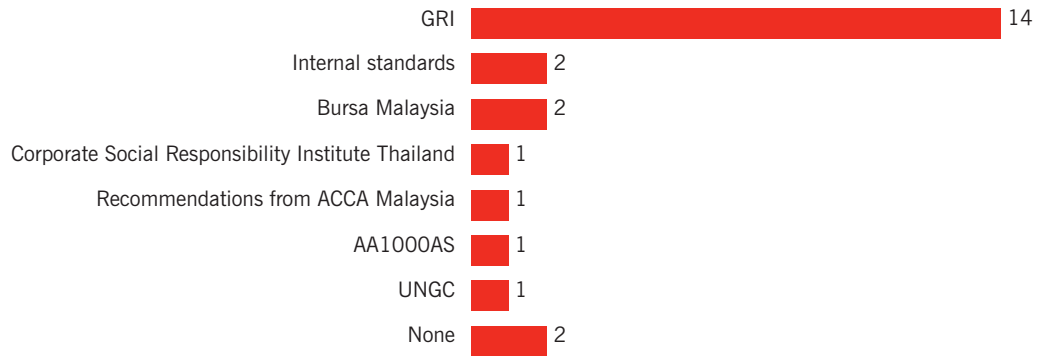


4. WHAT ARE THE MAIN OBSTACLES (IF ANY) TO REPORTING?

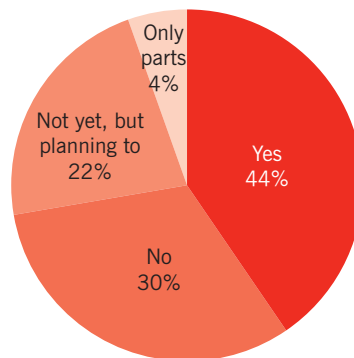


REPORT STANDARDS & ASSURANCE

5. WHICH REPORTING STANDARDS DO YOU USE?



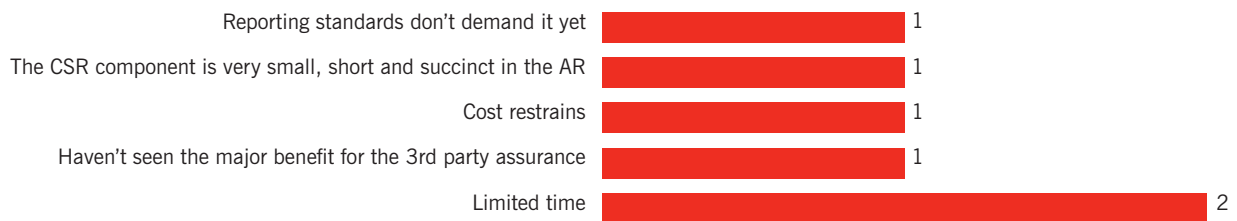
6. DO YOU HAVE YOUR REPORT ASSURED BY A THIRD PARTY?



6A. IF YES, WHY?

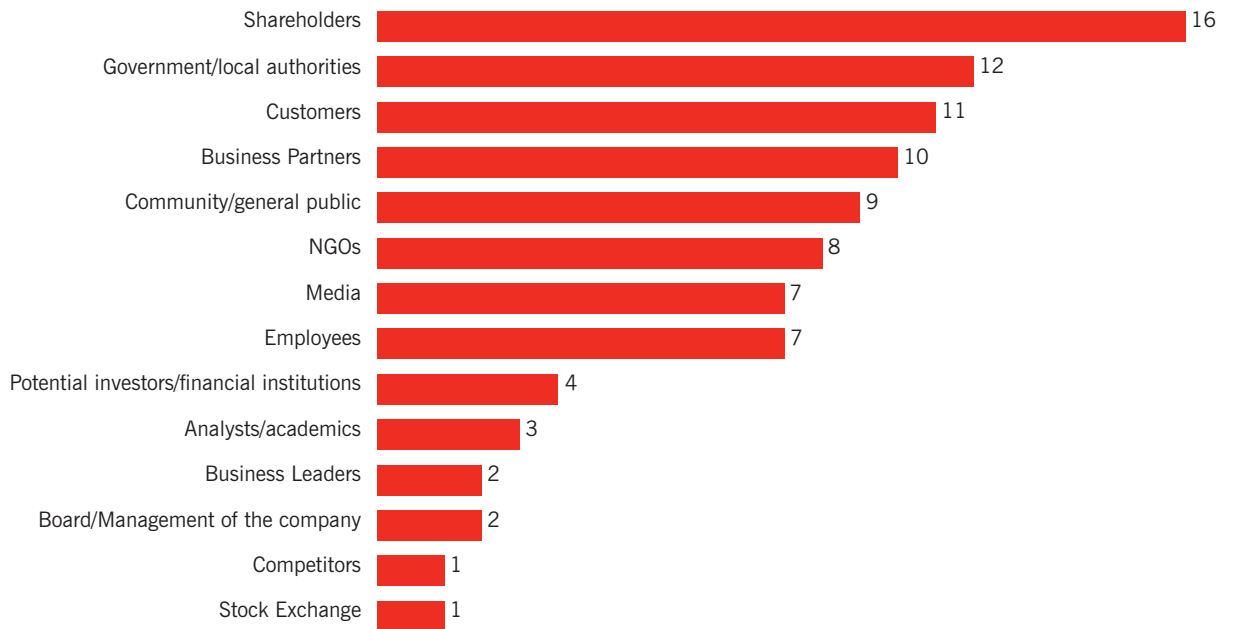


6B. IF NO, WHY NOT?



REPORT AUDIENCE AND THE FUTURE OF REPORTING

7. WHAT AUDIENCE DO YOU WRITE YOUR REPORT FOR? WHO ARE YOUR READERS?



8. WHAT DO YOU THINK IS THE FUTURE FOR CSR REPORTING?



Interviews with Report Readers

A series of interviews were conducted with a variety of stakeholders within each of the selected ASEAN countries. At least five stakeholders were interviewed in each country with twenty six interviews in total. The stakeholders included: NGOs, financial analysts, academics, CSR practitioners and associations, accountants, asset managers, and journalists. The questions were split into the following sections: **How Reports are Read, Significant Issues, Report Expectations, Report Standards and Assurance and the Future of Reporting.** Those interviewed were forthcoming with their opinions on current reporting and most felt that the awareness of the need to report and that the number and overall quality of reporting was low but some did feel that reporting was improving.

Stakeholders do not necessarily always read Sustainability Reports in full. Only thirteen percent say that they read reports in full and forty three percent state that they read reports both in full or in part, depending on the quality of the report and the company in question. Stakeholders also read Sustainability Reports in both online and hard copy formats with no clear preference overall. Stakeholders surveyed found that they had both companies sending the reports to them and that they also had to request copies of reports or they searched online for those they needed to read.

Worryingly, nearly three quarters of those surveyed felt that companies were mostly not reporting on the significant and material issues. When asked why, respondents felt this was because there had not been enough stakeholder engagement to identify what the material issues were, that the companies did not report on performance or specific issues, that companies had a tendency to report only 'good things' and that only environmental and community investment projects were included.

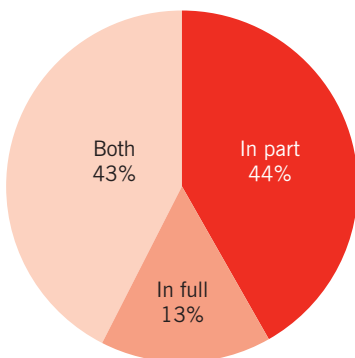
When asked what issues stakeholders wanted companies to report on there was a wide variety of responses indicating the different priorities that different stakeholders have. Those most frequently mentioned were: impact measurements; workplace practices; disclosure on controversial/negative impacts; and disclosure of strategy.

Stakeholders were asked whether or not it was important if the report used accepted guidelines. An overwhelming majority of stakeholders felt this was important. The main reason given was that it enabled comparison. Others felt that rather than simply comply with the GRI the report should respond to stakeholders needs. Slightly more stakeholders felt that assurance was more important than the use of accepted guidelines. Report readers felt that assurance provided credibility.

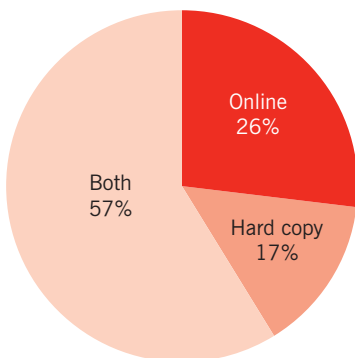
Finally when asked about the future of Sustainability Reports the most common responses were that more reporting would become available online, that reporting would become real time, that it would be integrated with the Annual Report, that more standards would be used and that reports would be issue focused.

HOW REPORTS ARE READ

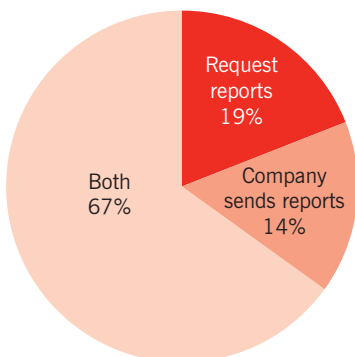
1. DO YOU READ REPORTS IN FULL OR IN PART?



2. DO YOU READ SUSTAINABILITY REPORTS ONLINE OR IN HARD COPY?

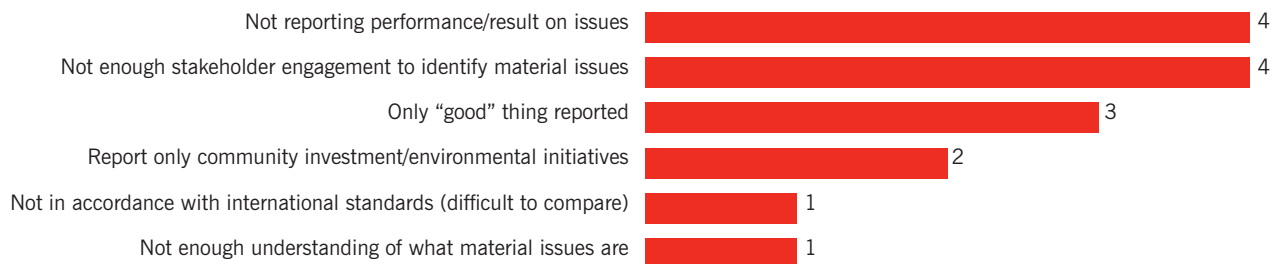
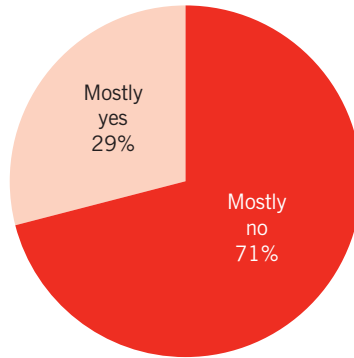


3. DO YOU REQUEST REPORTS OR DO THE COMPANY SEND THEM TO YOU/DOWNLOAD ONLINE?



SIGNIFICANT ISSUES

4. DO YOU THINK COMPANIES ARE REPORTING ON THE SIGNIFICANT/MATERIAL ISSUES?



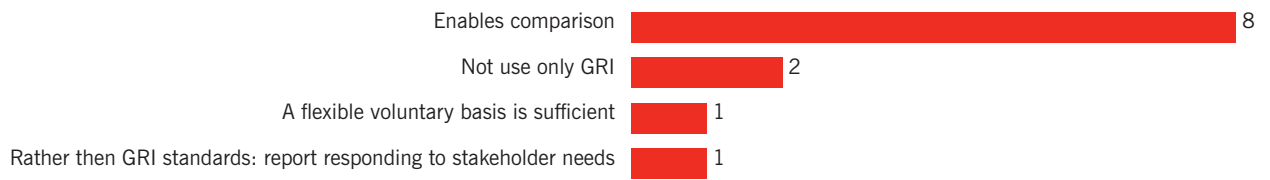
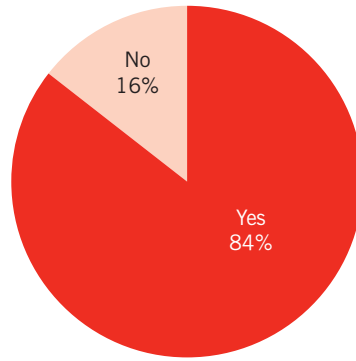
REPORT EXPECTATIONS

5. WHAT ISSUES DO YOU WANT TO SEE COMPANIES REPORTING ON?

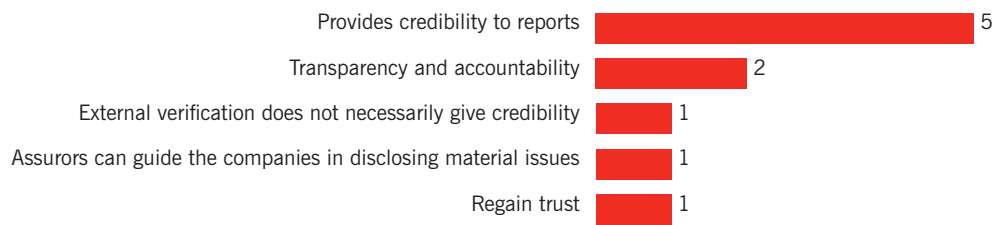
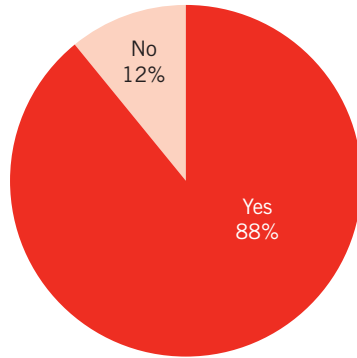


REPORT STANDARDS AND ASSURANCE

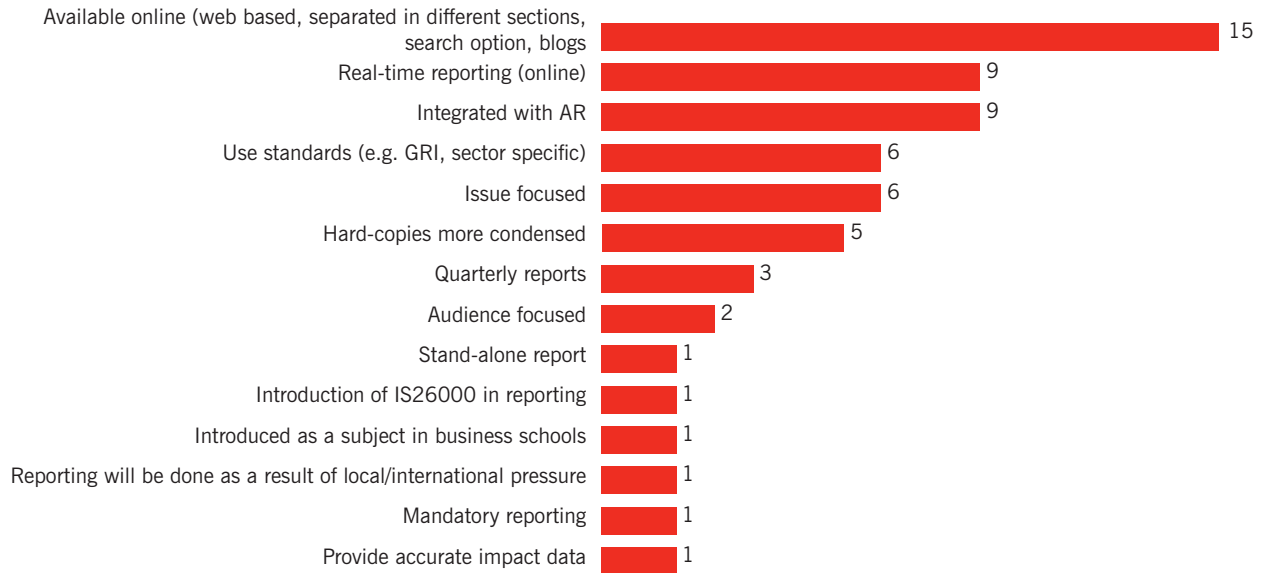
6. IS IT IMPORTANT THAT THE REPORT MEETS ACCEPTED STANDARDS?



7. IS IT IMPORTANT THAT THE REPORT IS ASSURED?



8. WHAT IS THE FUTURE FOR SUSTAINABILITY REPORTING?



ACCA and Sustainability

PROMOTING TRANSPARENCY

ACCA has been actively involved with the unfolding debate on sustainability since 1990. We promote transparency and best practice in a number of areas including:

- reporting and disclosure
- auditing
- research
- climate change
- risk and governance

We aim to help businesses and organisations realise the growing importance of sustainability, and have launched a number of high profile initiatives, including:

- the ACCA Awards for Sustainability Reporting – held in various countries around the world in Europe, North America, Africa and Australasia – with the aim to identify and reward innovative attempts to communicate corporate performance, although we do not comment on performance itself, only transparency and reporting standards.
- research projects covering topics such as analyst interest in narrative disclosures, sustainability assurance, standards of sustainability reporting on a regional basis
- collaboration with sustainability-related organisations such as Transparency International, GRI, FTSE Group and FEE to drive forward the sustainability agenda;
- the carbon ‘accountancy futures’ theme, to drive forward a work programme highlighting the importance of climate change to business
- partnering with GRI and KPMG in the delivery of GRI’s first worldwide online sustainability reporting awards scheme.

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About ACCA

ACCA is the global body for professional accountants. We aim to offer business-relevant, first-choice qualifications to people of application, ability and ambition around the world who seek a rewarding career in accountancy, finance and management. We have 362,000 students and 131,500 members in 170 countries worldwide.

Our mission is to be the leading global professional accountancy body by reputation, influence and size, offering the first choice qualifications to people of application, ability and ambition around the world who seek a rewarding career in accountancy, finance and management.

We use our expertise and experience to assist governments, donor agencies and professional bodies to develop the profession. ACCA aims to achieve and promote the highest professional, ethical and governance standards and advance the public interest. ACCA's reputation is grounded in over 100 years of providing accounting and financial qualifications. Our long traditions are complemented by modern thinking, backed by a predominantly young, dynamic membership.

ACCA has been actively involved in the unfolding debate of CSR and sustainability reporting for nearly 20 years. ACCA promotes transparency and aims to help businesses and organisations realise the growing importance of sustainability. ACCA promotes CSR and sustainability globally and in Malaysia through recognition of best practices, capacity building, education/information and research.

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