



accsr

Australian Centre for Corporate Social Responsibility

Leadership and Growth

ACCSR

SUSTAINABILITY REPORT

2009-2012



TABLE OF CONTENTS

About this Report	2
About ACCSR	2
Welcome from the Managing Director	3
Our Key Issues and Stakeholders	4
Our Challenges and Successes	5
Achieving Our Performance Goals	7
FY2013 Commitments	8
ACCSR Values	8
Our Role	9

LEADERSHIP	
Professionalisation of CSR	9
SERVICES	
Delivering Shared Value – Client Impacts	13
Building CSR Capacity Through Learning Programs	14
Environmental Impacts	14
BUSINESS DEVELOPMENT	
International Contributions to Building CSR Capacity	15
Developing and Retaining Employees	16
GRI and UN Global Compact Index	18

ABOUT THIS REPORT

This is our third Sustainability Report and covers our sustainability performance in the period from 1 July 2009 to 30 June 2012. It follows our 2009 Sustainability Report. We were unable to meet our previous commitment of biennial reporting this year but propose to adopt an annual reporting period for future reports.

We used the United Nations Global Compact (UNGC) and the Global Reporting Initiative (GRI) G3.1 Framework to guide this report's development. This report has been checked by the GRI. It is a "B" level report, which means we have reported on at least 20 performance indicators. ACCSR supports the goals of the GRI, and has been an organisational stakeholder since 2004. We teach the Certified GRI Reporting Program in our public professional learning programs. ACCSR has been a signatory to the UNGC since 2007 and joined the UNGC Australian Global Compact Network when it was established during the reporting period.

The full GRI and UNGC index can be found on page 18.



ABOUT ACCSR

Australian Centre for Corporate Social Responsibility (ACCSR) is the registered trading name of Synergy Communications Pty Ltd (ABN 71 007 029 610). This is a privately held company and Dr. Leeora D. Black is the sole director.

During the reporting period we undertook a business review in line with the goals published in our previous sustainability report. As a result of this, from 1 July 2010 we restructured the business into two operating companies, ACCSR Learning and ACCSR Consulting, both wholly owned by Synergy Communications. The two operating businesses better reflect the core services provided. This restructure had no significant impact on the data contained in this report.

Our mission is to become Australia's leading management consultancy dedicated wholly to creating competitive advantage for clients through corporate social responsibility.

Our core services are the provision of advice, research and training in corporate social responsibility. These services can be separated into five core product offerings: research, learning, stakeholder engagement, reporting and strategy. Our consulting services were delivered to clients in Victoria, New South Wales, Tasmania, Queensland, South Australia and Western Australia. Our public training program during the reporting period was run in Melbourne, Sydney, Brisbane and Perth.

More information on our services, our stakeholders, our people and our impacts are contained in this report and on our website www.accsr.com.au and can be located using the navigation links on this page.

WE WELCOME YOUR FEEDBACK ON THIS REPORT.

Please email leeorablack@accsr.com.au or call +61 3 9049 9500.

WELCOME FROM THE MANAGING DIRECTOR

Welcome to the 2009-2012 Sustainability Report of the Australian Centre for Corporate Social Responsibility. This report describes our goals, activities, challenges, and impacts.

ACCSR was established in 2003 and in 2004 I coined our tag line “Leadership in CSR Research, Learning and Strategy”. That was certainly our aim then and after nine years, I think we have begun to achieve this goal. From a one-person home office to a vibrant and thriving specialist management consulting and training firm in South Yarra, Melbourne, ACCSR has well and truly passed the start-up stage.

We are proud of our achievements during the reporting period. We continued our contribution to the professionalisation of CSR by producing our State of CSR in Australia Annual Review and holding our annual conference, attended by approximately 150 people each year. We expanded our team to eleven staff and recently moved into a bigger office to accommodate future growth. Our new office provides fantastic onsite training facilities to host our public learning programs, including the GRI-certified programs which we became accredited to run in 2009.

During the reporting period we completed our initial five-year business plan and undertook a business review to establish the next stage of ACCSR’s development. As a result of this review we:

- Restructured into two operating companies, ACCSR Learning and ACCSR Consulting
- Established new policies and a performance management system for employees
- Established an employee profit-share scheme
- Reviewed marketing communications, and implemented a social media strategy
- Expanded our thought leadership program in response to client feedback, and
- Developed new consulting services and training programs.

The marketplace continues to be challenging with many of our current and prospective clients facing external pressure from changing legislation, unstable financial markets and a changing competitive landscape. This has led to greater use of CSR to manage this complexity. ACCSR Consulting doubled sales in the reporting period. Growth in ACCSR Learning, after peaking in 2010 with the introduction of the GRI-Certified Training Program, has plateaued. We attribute this to a ‘wait-and-see’ climate due to the development of G4, uncertainty surrounding the future requirements for integrated reporting and possible saturation of the market. We also need to refresh our marketing strategy to create cut-through in what is now a cluttered learning environment.



ACCSR’s Founder and Managing Director, Dr. Leeora Black

ACCSR’s employees are a talented and hard-working team with diverse backgrounds and experiences. Each has made it a personal mission to help clients and workshop participants succeed in their own goals. They bring great passion for sustainable and responsible business practice to work every day. We are very fortunate to have attracted and retained our current employees. I am grateful to our employees for their dedication and wisdom, and very confident in ACCSR’s future as a leader in responsible business management as a result of our team’s abilities and dedication.

Our work as consultants, researchers and trainers brings us into contact with hundreds of people every year working in this field. Our work is immensely satisfying, and we would like to thank all our clients and workshop participants for sharing their journeys with us as we work towards our over-arching goal of building competitive advantage and stakeholder wealth through corporate social responsibility.

A handwritten signature in black ink, appearing to read 'Leeora Black'.

Dr. Leeora D. Black
MANAGING DIRECTOR

OUR KEY ISSUES AND STAKEHOLDERS

Our stakeholders are clients, workshop participants, employees, and partners with whom we have trading relationships, such as international faculty and the Global Reporting Initiative. Other stakeholders include key suppliers, future employees, and prospective clients and workshop participants.

This report focuses on addressing the material issues and interests of our two key stakeholders, employees and clients. Engagement with other stakeholders takes place either through their established relationship management protocols (if an organisation) or informally, through personal relationships (if an individual).

To prepare this report we collated and reviewed our key performance data, and consulted our stakeholders about our impacts, our value and their expectations of us. The two stakeholder groups we engaged for this report were our clients and our employees.

In 2011 we contracted an independent consultant to conduct a materiality and impact review with clients. Our aim was to better understand not only what our key stakeholders would like to know about ACCSR's sustainability performance but also how the work that we do affects our clients and their stakeholders. We invited 17 current and former clients to participate. Ten did, and what they

told us has inspired and encouraged us and forms the basis for this report. We are deeply indebted to those clients for their wisdom and candour. We reviewed the outcomes of this process internally this year and did not identify any significant events that would have changed the expectations of stakeholders.

Material issues from an employee perspective were identified through the planning meeting held for this report and at regular strategy days. Our employees thought the biggest questions this report should help us answer were:

- What do we stand for?
- What are the challenges we face?
- Where were we most successful? and
- What is our contribution to society, including our impacts?

The final prioritised issues are listed below and details on the management of these issues are covered throughout the report.

	MATERIAL ISSUES	CLIENT-IDENTIFIED	EMPLOYEE-IDENTIFIED	REPORT LOCATION
LEADERSHIP	Provide leadership in CSR	✓	✓	p. 9
	Support the professionalisation of the CSR management function	✓	✓	p. 14
	Support the CSR industry	✓	✓	p. 11
SERVICES	Use best management tools and approaches	✓	✓	p. 13
	Improve client performance through CSR	✓	✓	p. 14
	Build client capabilities	✓	✓	p. 14
BUSINESS DEVELOPMENT	Support employee professional development and career pathways		✓	p. 16
	Diversify product offering		✓	p. 12

FIGURE 1: Material issues



OUR CHALLENGES AND SUCCESSES

The past three years have seen a growing uptake of corporate sustainability practices in Australian businesses. This has led to more organisations embracing CSR initiatives and employing sustainability staff. We have been pleased to witness and in many cases, facilitate, heightened discussion about the social and environmental impacts of business in the community.

However, the current climate in Australia and globally poses many challenges. The volatility of global financial markets has caused wavering public trust in governments and other social institutions. In this context, the role of business becomes more complex, and the need for CSR grows. It is through CSR mechanisms such as stakeholder engagement, transparent reporting and other collaborative processes of value creation that businesses maintain their resilience and ability to adapt to current and future challenges.

At ACCSR, we see the current operating environment as an opportunity for us to rearticulate the overall value of CSR as a vital opportunity for business. During times of change, an organisation's ability to adapt and transform are key capabilities in continuing to innovate and grow. Sustainability can be a driver of change, as well as a compass enabling companies to navigate their way through uncertainty.

Listening to stakeholders, improving dialogue and engagement, harnessing efficient and lean ways of doing business and understanding the life cycle of products and services across the value chain are all important sustainability activities that anchor a company's strategy and integrate CSR into how it is organised and run.

This is how we approach our own challenges. We have experienced challenges during the past reporting period and deal with these practically, through processes of continuous improvement.

FUTURE CHALLENGES

We see the following challenges as likely to continue to impact our organisation in the future:

- Organisational growth and managing the ebb and flow of consulting work
- Employee engagement and retention
- Changing competitive landscape.

We also need to prepare ourselves for challenges that our clients will face in order to support them. Our stakeholders have identified these challenges as:

- Changes to government policy and/or regulation
- Changing competitive landscape
- Increasing expectations from society
- Growing international social movements.

Our clients and our employees are interested in how we create value. Like all businesses we are on a perennial quest to create value and how we achieve this is best demonstrated by our successes.

ACHIEVEMENTS

Our achievements and successes include:

- Becoming a GRI-accredited trainer (see Spotlight on the GRI, p. 6)
- Further growth of our team
- Implementing a partnership with La Trobe University Graduate School of Management for the Graduate Certificate of Corporate Responsibility which has now been incorporated into the new MBA Program
- Extending our public training program, established in Sydney and Melbourne, to Perth and Brisbane
- Establishing new consulting services in social licence to operate and social impact assessment as an extension of our stakeholder engagement services
- Extending our reporting and strategy services to new clients in the mining, renewable energy, consumer, automotive, financial services, transport and telecommunications industries and obtaining feedback rating our standard of service as consistently high
- Contributing to the CSR agenda on the global stage through presentations at international conferences and peer reviewed publications
- Contributing to the Australian CSR industry through our annual State of CSR in Australia series and thought leadership
- Holding our annual CSR Conference, and
- Achieving most of our previously-set goals.



SPOTLIGHT ON THE GRI

THE GLOBAL REPORTING INITIATIVE

ACCSR gained accreditation as a Certified Training Partner of the Global Reporting Initiative (GRI) in 2009. ACCSR is now part of a distinguished handful of organisations that have completed a rigorous certification process with the GRI. In order to gain accreditation, ACCSR had to demonstrate substantial knowledge in the fields of CSR and sustainability and has been described by the GRI as ‘a leader in providing training for organisations in Australia and New Zealand on the application of the GRI Reporting Framework.’

Our two-day training program, “How to Prepare a Best-Practice Sustainability Report”, has been developed to help report makers and users more effectively use the GRI Framework and GRI reports. It teaches participants how to plan their sustainability reporting process, determine their organisation’s material issues, incorporate the UN Global Compact Principles into a report and how to evaluate the quality of reports.

We also introduced the GRI-certified module on stakeholder engagement as our “Stakeholder Essentials” short course.

Towards the end of the reporting period we recruited a new senior staff member to lead our sustainability reporting services, Rebecca Gunn. Rebecca is a member of the GRI’s Stakeholder Council and the Advisory Panel for the GRI Focal Point in Australia.

The GRI is a global, network-based organisation that has developed the most widely used sustainability reporting framework in the world. As of June 2012, more than 4,500 organisations from 60 countries have used the framework to produce their sustainability reports. For further information about GRI visit their website: www.globalreporting.org

“Enlightening, fast paced, fun and thorough. Met all my needs and provided great networking opportunities.”

*Justin van der Zalm,
Compliance and Sustainability Advisor,
Loy Yang Power*



Participants at ACCSR’s Certified GRI Training Program in September 2010

ACHIEVING OUR PERFORMANCE GOALS

	GOALS FY2009-FY2012	ACHIEVED	COMMENT
Supporting the Professionalism of CSR	Become a GRI-certified training partner to deliver a new training program on sustainability reporting.	Yes	Achieved in 2009. We trained 177 out of 493 people attending programs with the four Australia and New Zealand certified training partners to 30 June 2012.
	Launch an upgraded version of our web simulation-based workshop, ExperienceCSR.	Yes	We ran public programs in Melbourne, Sydney and Brisbane, and as in-house workshops.
	Publish an annual review of the State of CSR in Australia.	Yes	State of CSR in Australia Annual Reviews released each year, as well as complementary research papers, such as 'Stakeholders as Readers of Sustainability Reports'.
Quality and Range of Services	Ongoing improvement in client and workshop participant satisfaction.	Yes	Results are depicted in Building CSR Capacity in Learning Programs on page 14. Client satisfaction surveys were abandoned in favour of close-out meetings to gain a more detailed response.
	Consulting projects contribute to client's CSR skills and knowledge.	Yes	Client case studies and testimonials are published on our website.
Employees	Establish professional development policy and careers pathways.	Yes	Policies, training budgets and job specifications have been established.
	Establish performance management framework.	Yes	Yearly KPIs established with each employee and quarterly reviews conducted.
	Improve employee retention.	Yes	Voluntary departures have declined.
Strategy	Review business structure and plan to address business growth.	Yes	Completed business review, developed new business plan and restructured into two operating companies, ACCSR Learning and ACCSR Consulting.
Reducing our Environmental Impact	Encourage clients to offset plane travel they purchase for us.	Partially	All travel booked by ACCSR includes the purchase of carbon offsets.
	Replace office equipment with environmentally better solutions as replacements become due.	Yes	ACCSR moved into a new office in May 2012. Low VOC paint was used during the office fit out. Existing office equipment and furniture was reutilised during the relocation.
	Introduce environmental policy.	Yes	Environmental policy is in place and available publicly.

FIGURE 2: Progress against previously identified goals



FY2013 COMMITMENTS

GOALS FOR FY2013	
Supporting the Professionalism of CSR	Work with GRI to ensure that content of GRI-certified courses meets the needs of participants.
	Publish the State of CSR in Australia Annual Review and complementary research reports.
Quality and Range of Services	Strengthen our international and local partnerships to deliver the highest quality CSR service.
	Further develop new service lines that leverage our core capabilities in stakeholder engagement and strategy, including social impact assessment, social return on investment, carbon strategy and community investment.
	Expand our training program to cover greater geographical and subject areas.
Employees	Establish a code of conduct.
	Further develop our employees and provide career advancement opportunities.
	Formalise our internship program.
Values	Engage employees in refining and embedding ACCSR values.
Reducing our Environmental Impact	Identify new opportunities to reduce our environmental impact.
Reporting	Produce our sustainability report on an annual basis.

FIGURE 3: New commitments for FY2013

ACCSR VALUES

Like many organisations, ACCSR has a published set of values on our website. These were developed by our founder in 2004 when ACCSR was just one person working from a home office. These values have acted as an internal guiding compass for choices of the Managing Director about the services we offer, the way we work with clients, and the outcomes we strive for. However, the values have rarely been discussed by the wider employee group. An important goal for the next reporting period is to examine our organisational values and bring them to life for all our employees. As a starting point, the thinking behind ACCSR's values was described at our last strategy day in these terms:

SUSTAINABILITY

We want to leverage our impact to create transformational value for our stakeholders. This leads us to work for industries and organisations with ripple effects, such as big businesses with extended supply chains, broad stakeholder impacts, and market-shaping positions, and industry and professional associations.

PARTICIPATION

This is about the way we work and like to work with others. We are enthusiastic, pro-active, and fully present. We aim to collaborate effectively and co-create solutions to clients' problems. To do this well we need to develop team and individual competencies such as change management, facilitation and communication skills. We must also show leadership within our industry and area of influence.

PUBLIC KNOWLEDGE

We aim to share what we learn, contribute to new knowledge, shape better practices and build capability for responsible business practices. That has led us to establish an annual conference, publish an annual review of the State of CSR in Australia and other public research reports, and provide thought leadership through our csr-connected.com.au blog and other publications.

PROFESSIONALISM

This means behaving with integrity, acting with care towards colleagues, clients and self, and doing quality work. It also means we support development of the CSR profession.

LEADERSHIP

OUR ROLE

The contribution that ACCSR makes to society has both direct and indirect impacts. Our direct impacts are mainly on our employees, while our indirect impacts predominately relate to our clients, their stakeholders and our employees' families. In this section we report on our impacts on employees, workshop participants and clients.

ACCSR strives to provide meaningful and satisfying work in a way that benefits employees' career development and contributes to ACCSR's success. We also aim to minimise any negative effects of our business on the natural environment, by minimising the environmental impacts of our office and offsetting emissions from travel wherever possible.

While we strive to be a socially and environmentally responsible company, our biggest impacts are indirect, through the work we do with our clients. Our approach to engaging with clients and leveraging our positive impacts on our client's stakeholders is through empowering the organisations we work with to unlock the potential of sustainability to drive greater business performance.

Similarly, our learning programs are the catalyst for building greater capabilities within individuals and businesses so that our skills and insights can drive the professionalisation of CSR.

Our contribution to the professionalisation of corporate responsibility takes many forms. We do this by presenting at workshops and conferences and producing academic papers. The list is available on our website at www.accsr.com.au

THE ACCSR PRIZE

From 2009 to 2011 ACCSR partnered with the La Trobe University Graduate School of Management to develop and deliver Australia's first university qualification in corporate responsibility, the Graduate Certificate in Corporate Responsibility. As part of our engagement with La Trobe University, we were delighted to sponsor the ACCSR Award for the best student in the course each year from 2010 to 2012, valued at \$1,000. The Award recipients were Paul Evans (2010), Annette Sharpe (2011) and Jacinta Cubis (2012).



PROFESSIONALISATION OF CSR

At ACCSR we actively contribute to putting CSR on the management agenda through our thought leadership. As thought leaders, we seek to share our research, practices and insights as widely as possible to drive the professionalisation of CSR.

As a specialist CSR consultancy, we work every day to hone our skills and remain at the forefront of emerging sustainability practice while building our networks with local and international peers. Our skills and core competencies are brought to bear on the high quality work that we do with clients, but we are also passionate about disseminating our knowledge and being part of a meaningful dialogue about responsible business practice.

ACCSR's approach to work is underpinned by rigorous methodologies and informed, evidence-based CSR practice. It is our job to be cognisant of new and emerging trends in corporate sustainability, but we also see it as our job to be a regular commentator and opinion shaper in corporate responsibility issues.

We also participated in numerous industry events such as hosting the first GRI G4 practitioner networks, presenting a stakeholder engagement master class at the GRI conference, hosting CSRconnected events and facilitating discussions on our blog csrconnected.com.au.

Our staff continued to advance responsible business practice through their own professional development activities. Two of our Senior Consultants, Dr. Sara Bice and Rick Lambell taught in business programs at Australian universities.

Another of our Senior Consultants, Rebecca Gunn, participated as a member of the GRI Stakeholder Council which provides opportunities for engagement during the update of the GRI guidelines.

Our Managing Director, Dr. Leeora Black sat on the Board of non-profit organisation Karma Currency (2011), was on the judging panel for the Corrections Victoria Community Work Partnership Awards (2010, 2011) and joined the NAB Advisory Council on Corporate Responsibility at the end of the reporting period.

Dr. Sara Bice became co-chair of the board of International Association of Impact Assessment in July 2012, just outside the period of reporting.

Pictured at the 2012 Award Ceremony (l-r): Emeritus Professor John McKenzie AM, Deputy Chancellor, La Trobe University, ACCSR Award recipient Jacinta Cubis, and ACCSR Managing Director, Dr. Leeora Black.



SPOTLIGHT

2012 ANNUAL CONFERENCE

Each year since 2007 (except 2011), we have brought together key players within the Australian CSR industry at our annual conference. This premier networking event has been a vibrant professional development opportunity for the sustainability community.

In February 2012 ACCSR held our fifth annual conference, *The Innovation Imperative: Taking CSR from Risk Management to Value Creation*. Results of our 2011 State of CSR survey indicated that CSR in Australia has matured from a risk management and compliance approach to being a tool for business innovation. This key finding then became the theme for our conference.

The conference was attended by nearly 200 CSR professionals from across Australia and we are grateful to our hosts and gold sponsor National Australia Bank for their support. Keynote presentations were provided by Professor Dirk Matten, Hewlett-Packard Chair in Corporate Social Responsibility, Professor Malcolm McIntosh, Director Asia Pacific Centre for Sustainable Enterprise, and Dr. Ken Henry, Non-Executive Director National Australia Bank. Leading organisations including Fujitsu, Landcom, GE's ecoimagination and Streat contributed to the richness of the event and shared their experiences. Intimate and in-depth discussions of issues such as CSR as an innovation tool, supply chain, corporate transparency, as well as in developing new products were facilitated during break-out sessions.

Our conference goal was to share CSR experiences and lessons learned from leading organisations, and provide a valuable networking opportunity for CSR professionals. This goal was well-realised with feedback from attendees indicating that the most valuable component of the conference were the sharing of practical experiences and case studies, facilitated break-out sessions and quality of speakers, as well as the opportunity for networking and discussion.



Pictured at ACCSR's 2010 Annual Conference (l-r): Paul Hohnen, ACCSR Senior International Associate; Heather Campbell, CEO, Landcare Australia; Elana Ruben, Chair, Victorian WorkCover Authority; Dr. Leeora Black, ACCSR Managing Director; Louise Sylvan, Commissioner, Productivity Commission; The Hon Jason Clare MP, Parliamentary Secretary for Employment



Pictured at ACCSR's 2012 Annual Conference: Dr. Ken Henry, Director of National Australia Bank



A view of ACCSR's 2012 Annual Conference



SPOTLIGHT

THE STATE OF CSR IN AUSTRALIA ANNUAL REVIEW

One of ACCSR's major contributions to thought leadership is the production of the State of CSR in Australia Annual Review, which is now launched each year at our annual conference in February. Begun in 2007, the annual review is based on survey responses from people working in CSR and after five years remains the largest on-going study of CSR in Australia. This series shines a light on the prevailing attitudes and behaviours relating to CSR in Australia. The reports are free to download from our website.

Each year we explore trends, activities and issues in CSR and include questions around a special theme or focus area. The themes we have looked at during the reporting period include the effects of the Global Financial Crisis on CSR, the business case for CSR, the state of the CSR profession itself, industry differences in approaches to CSR, and innovation in CSR.

We frequently publish supplementary reports throughout the year. In the reporting period we published a major report on stakeholders as readers of sustainability reports, which was a special contribution to the Australian GRI Conference held in Melbourne in March 2012. Other reports were published on CSR and governance, overcoming obstacles to success in CSR, and the role of universities in CSR.

During the reporting period we undertook all State of CSR in Australia research as a public interest commitment and contribution. We receive no in-kind or monetary support for this project, with all costs covered by ACCSR. During the most recent year, the time devoted to developing these reports equated to four per cent of all consultants' hours at work.



OPINION - DR. LEEORA BLACK

At ACCSR we see our client work as a strategic response to the changing landscape of stakeholder expectations and voluntary standards for CSR.

For years now I've been interested in the relationship between action and structure. Put simply, this is the big question of how free we are as individuals to determine our own actions. Are our actions determined by the structures we create, such as political, legal, regulatory and social structures, or do our actions influence and these structures? Whatever happens - in organisations, societies and nations - is the result of the interaction between these forces.

Within organisations, this manifests as the tension between strategy, culture and structure. Put into CSR terms, this is the tension between big social ideals and movements like equality, justice, rights, sustainability and responsibility and the emerging global governance structure for CSR, that includes principles based instruments (for example, the UN Global Compact) and practical tools and guidelines, such as the GRI.

The interactions between these forces are where we must look to understand the past and envision the future. The interactions happen primarily through relationships - relationships between organisations and their stakeholders that can range from informal to formal.

So I am interested in relationships, social movements and governance and that space is where ACCSR plants its flag. This is the area where we attempt to develop and implement unique consulting tools and learning programs, and from which springs our belief in and approach to building capabilities of the organisations and people who use our services and attend our workshops.



FIGURE 9: A unique perspective on CSR



SPOTLIGHT

SOCIAL LICENCE TO OPERATE

Early in the reporting period we identified the need to diversify our services. Developing social licence to operate services was a natural extension of our strength in stakeholder research and engagement, and our experience in the mining industry, where the term was a common metaphor for harmonious relations with local communities.

We had been measuring trust and social capital in stakeholder relationships in all stakeholder research projects since ACCSR was established, working with our Senior International Associate, Dr Robert Boutilier on Stakeholder 360® research and strategy. We amassed great insights into how to measure and apply these concepts in research and strategy projects in the construction, transport, energy and mining industries.

Building on this, in 2007-2008 we developed new measures for stakeholder relations effectiveness in a stakeholder perception study for Alcoa of Australia. Alcoa wanted standardised measures and key performance indicators for stakeholder relations effectiveness across all its sites. Measures of “just treatment of stakeholders” were derived from a review of the organisational literature on justice as it touches on stakeholder theory.

We figured that corporations can control the way they behave towards stakeholders through their policies and processes, so measuring stakeholder perceptions of just treatment would

provide powerful data for evidence-based community relations strategies and a consistent and comparable metric. A paper on this work, written together with Alcoa, appears in the Resources section of our website, (www.accsr.com.au/html/papers.html).

At the same time, our colleague Robert Boutilier was working on defining and measuring the social licence to operate in his work on stakeholder-company relations. He incorporated the Alcoa justice measures into social licence projects in South America and ACCSR incorporated social licence measures into several projects, including the NSW Minerals Council’s Upper Hunter Mining Dialogue (www.accsr.com.au/html/casestudies1.html).

By the end of the reporting period, social licence to operate services were established as a core element of ACCSR’s stakeholder and community relations research and strategy work, and our collaboration with international colleagues on the concept had increased. Our clients have given excellent feedback on the usefulness of our approach. We are participating in scholarly networks to progress and share our work and are beginning to develop papers for peer review in relevant conferences and journals.

In the next reporting period we expect to grow and extend our social licence to operate services for clients and make further contributions to the body of knowledge and practice in this area.



OPINION – DR. SARA BICE

One of ACCSR’s key responsibilities to our clients is to ensure we remain at the leading edge of thinking and practice concerning corporate social responsibility and sustainable development. Since our inception, we have been concerned with how stakeholders experience and understand our clients’ impacts, and how our clients engage with their stakeholders. We have pioneered new methods in stakeholder research and we are now playing a major role in developing, testing and implementing social licence to operate measurement and management tools.

Working with our Senior International Associate, Dr. Robert Boutilier, ACCSR has undertaken this work at more than 40 sites since 2009 which measure and monitor a company’s social licence using research-validated methods. These studies help firms to understand their current level of social licence and create evidence-based strategies to either improve their licence or maintain their social licence.

ACCSR sees this work as absolutely vital to firms’ obligations to communities and to development of comprehensive risk management and project planning approaches. Debate continues as

to how best a social licence should be maintained, and even as to whether a social licence offers community members the best possible project outcomes.

ACCSR also contributed to the emerging scholarship in this field by co-convening a researcher’s seminar on the social licence to operate with the University of Queensland’s Centre for Social Responsibility in Mining and the CSIRO’s Minerals Down Under project. This took place in July 2011 and we hope to convene another meeting during Robert Boutilier’s next visit to Australia.

ACCSR will continue to contribute to these conversations as the field develops. In the meantime, however, the consequences of losing one’s social licence remain very material.



SERVICES

DELIVERING SHARED VALUE – CLIENT IMPACTS

Our primary contribution to sustainable development is through the impact that we have on clients.

Our focus is on navigating complex organisational problems through the provision of innovative CSR solutions. Empowering our clients to understand and deal with CSR enables us to scale up our impact on sustainable business practice. During the reporting period we have consolidated our working relationships with companies from the energy, mining, financial services, transport and logistics, property, renewables, automotive, retail and government sectors. Working with industry associations such as the Clean Energy Council and the New South Wales Minerals Council has enabled us to collaborate at an industry-wide level to drive advances in sustainable community development, leveraging change through multiple peer organisations.

The growth of sustainability reporting and increased acknowledgment about the importance of stakeholder engagement has reinforced our services in these areas.

We also extended our services in social impact assessment, community investment strategy and measuring organisations' social licence to operate through our Stakeholder 360® methodology based on a growing need from our clients. Research and rigorous methodologies continue to underpin all of our services.

During the reporting period we produced over two dozen sustainability reports and materiality analyses for our clients and began working with clients on integrated reporting. We were able to leverage our client work to publish a report on how stakeholders respond to sustainability reports as part of our State of CSR in Australia series, enabling us to bring the lessons of our experiences to a wider audience.

We add value to our clients as CSR experts. Our insights into the broader business-society agenda give our clients competitive advantage and ideas for innovation. As stakeholder engagement practitioners, we understand that we are only as good as our relationships, so we strive to be trusted advisors to our clients and respected and informed thought leaders to our peers.

To gain insight into the work we undertake with our clients, including sustainability reporting, stakeholder engagement, research and strategy services and in-house workshops, please read our case studies at www.accsr.com.au/html/casestudies.html

“ACCSR ran a workshop for some of our managers on a fresh approach to stakeholder analysis. The workshop methodology and the highly collaborative way of executing it was really good as it gave us better ways of building good relationships with our stakeholders. I liked the fact that ACCSR offered highly transferable techniques.”

*Dave O'Brien,
Group Manager -
Environment and Community,
Xstrata Coal NSW*



BUILDING CSR CAPACITY THROUGH LEARNING PROGRAMS

During the reporting period, we continued to offer high-quality and comprehensive workshops about CSR and business management. We are committed to providing public learning opportunities that contribute to the professionalisation of the CSR workforce and build knowledge and awareness about sustainability.

Our public access programs are available to all. We understand that to achieve our goals of professionalising CSR and addressing the challenges faced by business in society there needs to be a large resource pool of talented individuals and this is why we are happy to share our knowledge with our peers in the consulting industry.

We have several proficient trainers and facilitators within our team. Three of our senior consultants are registered GRI trainers and all of our senior consultants delivered workshops during the reporting period.

We continue to provide consistently good to excellent learning outcomes, as rated by workshop participants in evaluations taken at the end of each workshop (see Figure 5). We also track participants' willingness to recommend our workshops as this is an overall indicator of satisfaction with our programs. Over 90% of participants are consistently likely or very likely to recommend our programs. We examined our data in detail to understand why there was a slight decline in the "very likely" ratings in FY2012. Lower ratings are associated with some of our older programs which will be reviewed in FY2013. Of our individual programs, certified GRI training received the highest "very likely to recommend" ratings (61.4%).

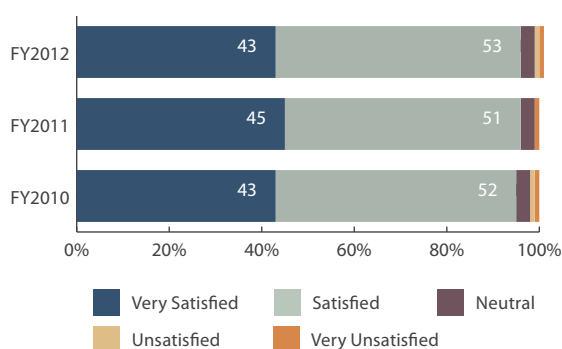


FIGURE 5: Responses to the statement, "Personal learning needs were met."

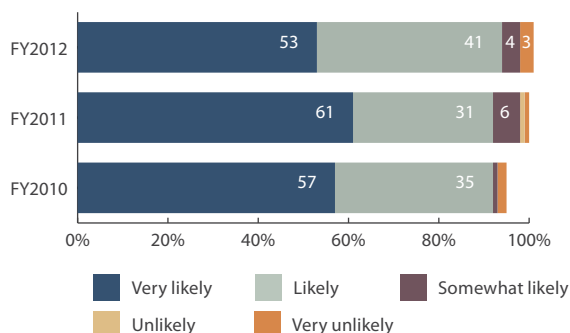


FIGURE 6: Responses to the question, "How likely are you to recommend ACCSR workshops in future?"

ENVIRONMENTAL IMPACTS

ACCSR is committed to conducting our business in an environmentally responsible manner and we support the precautionary approach to dealing with climate change issues by working to minimise our environmental impacts. We made our commitments to the environment transparent by publishing our environmental policy on our website in September 2010 and updating it in 2012.

Our efforts to reduce our environmental impacts are focused on running a green office and offsetting emissions from travel wherever possible. Our primary source of energy consumption is electricity. In FY10 this totalled 5.55 MWh (or 19.98 gigajoules), FY11 5.21 MWh (18.76 gigajoules) and FY12 6.85 MWh (24.65 gigajoules). Despite the increase in energy consumption, we reduced our carbon footprint by 21.5% per full time equivalent staff during the reporting period. This was mainly due to better space utilisation in our office, the usage of Green Energy and carbon offsets. We expect it to increase in the next reporting period as we have moved into a larger office to create capacity for future growth.

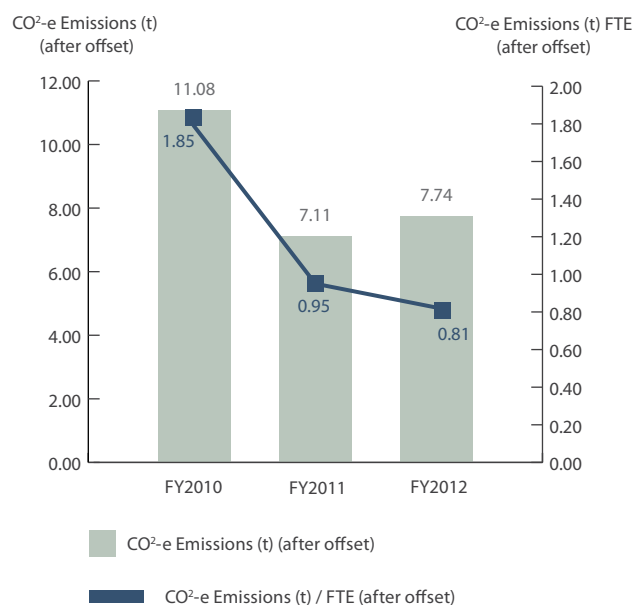


FIGURE 8: Carbon footprint

BUSINESS DEVELOPMENT

INTERNATIONAL CONTRIBUTIONS TO BUILDING CSR CAPACITY

Our local workshop program is complemented by the depth of our international partnerships. Our international faculty include global thought leaders in CSR who we bring to Australia to deliver cutting-edge workshops on strategy, innovation, international trends, social licence to operate and other relevant issues.

These workshops allow Australian CSR practitioners to learn from current international thinking about CSR. These valuable learning opportunities enable our local industry to benefit from the knowledge and experience of CSR leaders in the global arena. During the reporting period, we hosted the following international experts:



International Faculty Dr. Sanjay Sharma (now Dean of the University of Vermont's School of Business) facilitating a sustainability strategy workshop

SPEAKER	WORKSHOP	TESTIMONIAL
DR. ROBERT BOUTILIER A researcher, author (Stakeholder Politics, and A Stakeholder Approach to Issues Management), and consultant, Robert Boutilier is an associate of the Centre for Sustainable Community Development at Simon Fraser University, Vancouver.	Stakeholder Politics Stakeholder Issues Management Social Licence to Operate	"I came looking for a way to map stakeholders but I think I got something far more valuable - a way to develop stakeholder relationships so they make a strategic difference to achieving our business goals." Jasmine Green, Principal External Relations Officer, Translink Transit Authority
JONATHON HANKS (Incite Sustainability) Jonathon recently chaired the multi-stakeholder negotiation for the global standard on social responsibility (ISO 26000). He is a member of the International Integrated Reporting Council (IIRC).	Sustainability Strategy International Frameworks	"Very inspirational and informative and opened my eyes to the broader business issues and communicating 'value.' Caroline van Oosterom, Environmental Leadership Co-ordinator, Corporate Sustainability, Metropolitan Fire and Emergency Services Board
PAUL HOHNEN (Sustainability Strategies) Paul Hohnen was closely involved in the development and launch of the Global Reporting Initiative and has worked on leading corporate responsibility initiatives such as the UN Global Compact, the OECD Guidelines for Multinationals and ISO 26000.	ACCSR Annual Conference International Frameworks Materiality Master Class	"The mix of theory and examples enabled a clear practical definition of materiality and how I can apply it - much simpler than I previously thought." Marni Oaten, General Manager - Corporate Responsibility, Worley Parsons
ANN SVENDSEN (CoreRelation Consulting Inc) Ann's book The Stakeholder Strategy: Profiting from Collaborative Business Relationships has been acknowledged as the first major publication to lay out a practical approach to building stakeholder relationships.	Stakeholder Engagement	"Very well structured program that systematically works through the key phases of stakeholder engagement with practical exercises." Lucy Roberts, General Manager, Sustainable Development, Xstrata Coal
DR. SANJAY SHARMA Sanjay is currently the Dean of the University of Vermont School of Business and is a leading scholar in the field of sustainability.	Sustainability Strategy	"An extremely insightful and relevant workshop with tools to take away and utilise." Kim O'Connor, Group Environmental and Sustainability Coordinator, Centennial Coal Pty Ltd

FIGURE 7: ACCSR International Faculty

DEVELOPING AND RETAINING EMPLOYEES

As a small and highly specialised company, attracting and retaining the right people remains a very high priority for us. At the beginning of the reporting period we had five permanent employees. By the end of the reporting period we had eleven permanent employees, four male and seven female, all Melbourne based. We provide flexible working conditions that enable part-time work, work-at-home days, and additional leave without pay.

During the reporting period we redesigned job descriptions, developed performance metrics, and established an employee training and development policy. Previously, all employees were required to undertake ACCSR public programs, and external professional development was approved on a case by case basis.

Now, employees must undertake a minimum of five days per annum (or pro rata equivalent) in professional development. They are still required to undertake our own public programs, but also accrue an additional budget to undertake external professional development in line with their seniority and years of service. The first employee to benefit from this policy attended an international conference on social impact assessment in May 2011. Other employees have since undertaken training in facilitation skills and research methods.

Engagement with employees occurs through our weekly staff meeting, individual discussions, formal quarterly performance reviews, and annual strategy days. These provide employees with the opportunity to discuss individual performance, team projects and business matters on a regular basis. Major decisions about the business are made in consultation with employees. All employees received a minimum of one, and since FY2011, four formal performance reviews during each year of the reporting period.

Within the three-year reporting period, two people resigned to take up other opportunities. There were four involuntary departures.

ACCSR also hosts occasional social events for employees – usually on a theme. For example, staff attended a screening of the film *Gaslands* followed by a talk with the film's director, and a play on the theme of homelessness during the 2011 Melbourne Arts Festival.

The safety of our employees is important to us. We reported no injuries, occupational diseases or fatalities during the reporting period.

EMPLOYEE PERSPECTIVE

Senior Consultant, Dr. Sara Bice

Sara has worked with ACCSR since May 2008, when she assisted on projects as a part-time, contract researcher. Becoming a permanent employee a short time later, Sara has since worked across all areas of ACCSR's business and is a GRI certified trainer. She is also Co-Chair of the International Association for Impact Assessment's (IAIA) Corporate Stewardship and Risk Management section and recently completed her PhD at the University of Melbourne.

"ACCSR supported my PhD research pursuits and professional goals by providing me with flexible work opportunities. It was a real bonus for me that my job was so well aligned with my PhD research".

Projects Coordinator, Joyce Fok

Joyce joined ACCSR in April 2012 as Projects Coordinator after completing a practical internship with ACCSR as part of her university degree, the Bachelor of Arts in International Studies.

"Ending my university days with an internship at ACCSR allowed me to see how my studies might be applied in real life. As a graduate and as a young person, having the support at the beginning of your career is so important. ACCSR provides that for me, and has given me the opportunity to meet leaders in the CSR field. I'm very blessed to have ten mentors right at the office. I've completed the ExperienceCSR and How to Prepare a Best Practice Sustainability Report courses with ACCSR, which were great for practical application and discussing sustainability challenges from other participants' perspectives. I can't wait to learn more."

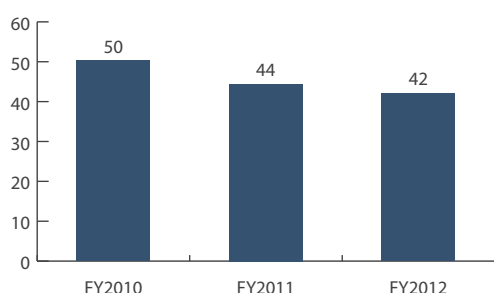


FIGURE 4: Average employee training hours



Statement GRI Application Level Check

GRI hereby states that **Australian Centre for Corporate Social Responsibility** has presented its report "Leadership in Uncertain Times" (2012) to GRI's Report Services which have concluded that the report fulfills the requirement of Application Level B.

GRI Application Levels communicate the extent to which the content of the G3.1 Guidelines has been used in the submitted sustainability reporting. The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3.1 Guidelines.

Application Levels do not provide an opinion on the sustainability performance of the reporter nor the quality of the information in the report.

Amsterdam, 24 September 2012

A handwritten signature in blue ink, appearing to read "Nelmara Arbex", is written over a faint, large circular watermark in the background.

Nelmara Arbex
Deputy Chief Executive
Global Reporting Initiative



The Global Reporting Initiative (GRI) is a network-based organization that has pioneered the development of the world's most widely used sustainability reporting framework and is committed to its continuous improvement and application worldwide. The GRI Guidelines set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance. www.globalreporting.org

Disclaimer: Where the relevant sustainability reporting includes external links, including to audio visual material, this statement only concerns material submitted to GRI at the time of the Check on 18 September 2012. GRI explicitly excludes the statement being applied to any later changes to such material.



GRI AND UN GLOBAL COMPACT INDEX

UNGC Principles	GRI Indicator	Description	Report	Reference
Standard Disclosures				
	1.1	Statement from the Managing Director	Fully	Welcome from the Managing Director page 3.
	1.2	Key impacts, risks, and opportunities	Fully	Our Role page 9.
	2.1	Name of the organisation	Fully	About this Report page 2.
	2.2	Primary brands, products, and/or services	Fully	About ACCSR page 2, Delivering Shared Value - Client Impacts page 13.
	2.3	Operational structure of the organisation	Fully	About ACCSR page 2.
	2.4	Location of organisation's headquarters	Fully	Welcome from the Managing Director page 3.
	2.5	Number of countries where the organisation operates	Fully	ACCSR currently only operates in Australia.
	2.6	Nature of ownership and legal form	Fully	About ACCSR page 2.
	2.7	Markets served	Fully	About ACCSR page 2.
	2.8	Scale of the reporting organisation	Partially	About ACCSR page 2, Our Role page 9. ACCSR does not release sales/revenue figures as we are a privately owned firm and this information is commercially sensitive.
	2.9	Significant changes during the reporting period regarding size, structure, or ownership	Fully	About ACCSR page 2.
	2.10	Awards received in the reporting period	Fully	No company awards were received during the period.
	3.1	Reporting period for information provided	Fully	Fiscal Year
	3.2	Date of most recent previous report	Fully	About this Report page 2.
	3.3	Reporting cycle	Fully	Triennial
	3.4	Contact point for questions regarding the report	Fully	Welcome from the Managing Director page 3.
	3.5	Process for defining report content	Fully	Our Key Issues and Stakeholders page 4.
	3.6	Boundary of the report	Fully	This report covers the entire organisation.
	3.7	State any specific limitations on the scope or boundary of the report	Fully	No limitations on boundary.
	3.8	Basis for reporting on joint ventures and other entities	Fully	ACCSR does not have any arrangements that affect comparability from period to period.
	3.9	Data measurement techniques	Fully	The GRI indicator protocols have been applied.
	3.1	Explanation of the effect of any re-statements of information	Fully	No restatements of data required.
	3.11	Significant changes from previous reporting periods in the scope	Fully	About this Report page 2.
	3.12	Table of standard disclosures	Fully	Content index page 18.
	3.13	Policy and current practice for receiving assurance	Fully	This report has not been independently assured due to the difficulty of finding a local AA1000-accredited assurance provider that does not compete with us in any core services. For our next report we will formalise the use of an external peer review panel.
	4.1	Governance structure	Fully	ACCSR is governed by Dr. Leeora Black, Managing Director.
	4.2	Chair of the highest governance body	Fully	There is no separation of the chair and managing director role.
	4.3	Independent and/or non-executive members	Fully	None.
	4.4	Mechanisms to provide recommendations	Fully	Weekly team meetings provide opportunities for employees to give recommendations to the managing director.
	4.5	Linkage between compensation and company performance	Fully	Profit share scheme in place in which all employees are eligible to participate.
	4.6	Conflict of interest procedure	Fully	No unitary board structure in place.
	4.7	Process for selection of highest governance body members	Fully	No unitary board structure in place.
	4.8	Values, mission, principles, code of conduct statements	Fully	ACCSR Values page 8, Code of conduct commitment page 8.
	4.9	Governance procedures monitoring performance, risk and adherence to international standards	Fully	No unitary board structure in place.
	4.10	Evaluation process for highest governance body performance	Fully	No unitary board structure in place.

UNGC Principles	GRI Indicator	Description	Report	Reference
Standard Disclosures				
Principle 7	4.11	Company response to precautionary approach/principle	Fully	We support the precautionary approach by taking action to reduce our environmental impacts and working with clients in their adoption of a precautionary approach.
	4.12	Adherence to externally developed charters, principles and initiatives	Fully	About this Report page 2.
	4.13	Memberships in associations and/or national/international advocacy organisations	Fully	United Nations Global Compact (UNGC); Global Compact Network Australia (GCNA); Global Reporting Initiative certified Training Partner, GRI Stakeholder Council membership, International Association of Impact Assessment (IAIA).
	4.14	List of stakeholder groups engaged by the organisation	Fully	Our Key Issues and Stakeholders page 4.
	4.15	Basis for identification and selection of stakeholders with whom to engage	Fully	Our Key Issues and Stakeholders page 4.
	4.16	Approaches to stakeholder engagement.	Fully	Our Key Issues and Stakeholders page 4.
	4.17	Key issues raised through stakeholder engagement and company response	Fully	Our Key Issues and Stakeholders page 4.
Disclosures on Management Approach				
Principle 6,7	DMA Economic			
	Aspects	Economic performance	Fully	Economic performance of the business is managed by the Managing Director. Updates on financial performance are provided to employees at regular strategy days.
		Market presence	Fully	ACCSR regularly assesses our position in the market and we regularly review our service offerings to ensure a sustainable presence is maintained.
		Indirect economic impacts	Partially	Our Role page 9.
Principle 7,8,9	DMA Environment			
	Aspects	Materials	Fully	Our environmental policy encourages the minimisation of waste through recycling and careful and efficient use of all materials and energy.
		Energy	Fully	Environmental Impacts page 14.
		Water	Partially	Water consumption is not available for data collection but we encourage responsible water usage in the office.
		Emissions, effluents and waste	Partially	Environmental Impacts page 14.
		Transport	Fully	We promote alternative means of transport to staff such as walking, cycling and public transport. Bike racks and showers are provided as noted in our Environmental Policy. We encourage all participants attending our learning programs to use public transport. We report data on flights for employees - Environmental Impacts page 14.
		Overall	Fully	Environmental Impacts page 14.
Principle 1,3,6	DMA Labour			
	Aspects	Employment	Fully	Developing and Retaining Employees page 16.
		Labour/management relations	Fully	Developing and Retaining Employees page 16.
		Occupational health and safety	Fully	Developing and Retaining Employees page 16.
		Training and education	Fully	Developing and Retaining Employees page 16.
		Diversity and equal opportunity	Fully	Developing and Retaining Employees page 16. Specific details will be incorporated into our Code of Conduct being developed as part of our goals for 2013.
		Equal remuneration for women and men	Fully	Remuneration is based on merit and performance. Salary bands are in place for each position and employees are not remunerated based on gender.
Principle 1,2,3,4,5,6	DMA Human Rights			
Principle 6	Aspects	Non-discrimination	Partially	We reported no incidents of discrimination during the period. We need to formalise the process for reporting incidents. Specific details will be incorporated into our Code of Conduct being developed as part of our goals for 2013.
Principle 3		Freedom of association and collective bargaining	Fully	We support the ILO conventions and individuals rights to associate. Collective bargaining is not relevant to our business sector.
		Indigenous rights	Fully	We respect indigenous rights and customs at work and during the work we undertake with our clients.
Principle 10	DMA Society			
	Aspects	Local communities	Fully	ACCSR contributes to the local community through voluntary committee positions and providing pro-bono thought leadership. More details in State of CSR page 15.
		Corruption	Not	We do not currently report this information. Corruption will be managed as part of employee code of conduct procedure being developed in 2012.
		Public policy	Fully	ACCSR actively contributes to influencing policy through public submissions processes when appropriate.
		Anti-competitive behaviour	Partially	Specific details on how anti-competitive behaviour is managed will form part of our code of conduct which is being developed as one of our goals for 2013.
		Compliance	Fully	The services provided by ACCSR are not governed by any particular compliance codes but one of our key values is professionalism. ACCSR Values page 8.

UNGC Principles	GRI Indicator	Description	Report	Reference
Principle 1,8	DMA Product Responsibility			
	Aspects	Marketing communications	Fully	ACCSR upholds an ethical approach consistent with the highest standards for our marketing communications.
		Customer privacy	Fully	ACCSR maintains a privacy policy and ensures that all client details are securely maintained.
		Compliance	Fully	The services provided by ACCSR are not governed by any particular compliance codes but one of our key values is professionalism. ACCSR Values page 8.
Indicators				
Economic				
Principle 7	EC2*	Financial implications and other risks and opportunities for the organization's activities due to climate change.	Fully	The opportunities for ACCSR related to climate change are the delivery of increased services for our clients who are affected by regulations and the implementation of efficiency measures relating to our own materials and energy use.
	EC3*	Coverage of the organisation's defined benefit plan obligations	Fully	ACCSR does not have any defined benefit plan obligations.
	EC4*	Significant financial assistance received from government	Fully	ACCSR did not receive any financial assistance from the government.
	EC6*	Policy, practices, and proportion of spending on locally-based suppliers	Fully	ACCSR engages a small number of local suppliers as a small business. We utilise the services of international thought leaders as a means of exposing our clients to a high level of CSR knowledge. We do not have a specific procurement policy.
	EC7*	Procedures for local hiring	Fully	ACCSR does not have a specified procedure for local hiring but selects the most suitable candidate for the position. All senior management were hired locally.
	EC8*	Development and impact of infrastructure investments and services provided primarily for public benefit	Partially	Spotlight: State of CSR Annual Review page 11.
Environmental				
Principle 8	EN3*	Direct energy consumption	Fully	Environmental Impacts page 14.
Principle 8	EN16*	Total direct and indirect greenhouse gas emissions by weight	Fully	Environmental Impacts page 14.
Principle 8	EN28*	Monetary value of fines for non compliance with environmental laws and regulation	Fully	There were no monetary or non-monetary sanctions for non-compliance with environmental laws and regulations.
Labour Practices and Decent Work				
	LA1*	Total workforce	Fully	Developing and Retaining Employees page 16.
Principle 6	LA2*	Employee turnover	Partially	Developing and Retaining Employees page 16. We currently do not collect this data by age group or gender but will report this in 2013.
Principle 1,3	LA4*	Percentage of employees covered by collective bargaining agreements	Fully	None of our employees are covered by collective bargaining agreements.
Principle 1	LA7*	Absentee and injury rates	Fully	Developing and Retaining Employees page 16. We had no recorded incidents of absenteeism.
	LA10*	Training per employee	Partially	Developing and Retaining Employees page 16. We currently do not have this information broken down by gender and category for each year of the reporting period. It is reported for FY2012 only.
	LA12	Employee performance reviews	Fully	Developing and Retaining Employees page 16.
Human Rights				
Principle 1,2, 6	HR4*	Total number of incidents of discrimination and actions taken	Fully	No incidents of discrimination.
Society				
Principle 10	SO5*	Public policy positions and participation in public policy development and lobbying	Fully	ACCSR participates in public policy debate through public submission processes in matters relating to CSR or reporting where appropriate. No submissions were made during the reporting period but submissions have been made in previous reporting periods.
Principle 10	SO6	Total value of financial and in-kind contributions to political parties	Fully	No financial or in-kind contributions to political parties were made by ACCSR.
	SO8*	Fines and non-monetary sanctions for non-compliance with laws and regulations	Fully	No fines in the reporting period.
Product Responsibility				
	PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction	Fully	Building CSR Capacity Through Learning Programs - page 14.
	PR6*	Programs for adherence to laws, standards, and voluntary codes related to marketing communications	Fully	We maintain a privacy policy for our marketing communications.
	PR7	Non-compliance with regulations and voluntary codes concerning marketing communications	Fully	There were no incidents of non-compliance during the reporting period.
Principle 1	PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	Fully	There were no complaints regarding breaches of customer privacy or losses of customer data during the reporting period.

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