

Sustainability Reporting Practices: A Study of Selected Banking Companies of Bangladesh

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Abstract

This study examines the current reporting practices of sustainability issues of Bangladeshi Banks. This paper examines the annual report of 2016 of selected Private Commercial Banks (PCBs) in consideration of GRI G4 guidelines. This study has found that 100% of the sample bank has participated in sustainability reporting. Most reported sectors are labor, product responsibility, energy, emission. Most of the banks have used a separate section in annual report for sustainability reporting. Mostly narrative disclosures have been used by most of the banks. Even though banks have reported about different issues mentioned in G4, most of the disclosure lacks specificity and clear initiatives.

Keywords: Sustainability, Reporting, GRI, Disclosure, Private Commercial Banks.

1. Introduction

Financial and non-financial organizations do business using the factors of production of the society. The association of the society thus creates implication to the business to raise accountability and responsibility towards the people of the society and the environment as a whole. The notion of sustainability reporting is such an indication of the companies' compliance towards the society and environment.

Sustainability reporting is a format of reporting that follows the guidelines of Global Reporting Initiative (GRI) to prepare a report similar to financial reporting that contains three broad areas on economic, environment and social. The report is a showcase of responsibility and accountability of the company towards the economy of the country, environment and the society as a whole. The report also indicates the sustainable development of the company. Companies are following the guidelines of Global Reporting Initiative to prepare the report since this is the standardized format adopted by the companies globally in order to eradicate the hassle of preparing report making the criteria under each area (economic, environment and social) unified. In this way, companies can express their transparency of actions to their stakeholders.

Touhidul Alam (2015), in his study stated that sustainability reporting is a key tool to help the organization to set goals, measure progress and manage sustainability within the organization. He also added reporting on the organization's sustainability performance will give internal and external stakeholders a clear idea of its impact and can increase the efficiency and improve the performance.

According to Rosie Bristow (2011), non-financial reporting, such as sustainability and CSR reporting, is a fairly recent trend which has expanded over the last twenty years. Many companies now produce an annual sustainability report and there are a wide array of ratings and standards around. There are a variety of reasons that companies choose to produce these reports, but at their core they are intended to be "vessels of transparency and accountability".

The study provides a synopsis of present scenario of sustainability reporting practices followed by listed Private Commercial Banks in Bangladesh. This study strives to find out the extent of disclosure concerning the measures related to economic, environment and social grounds that banks in Bangladesh are showcasing in their reports. Both quantitative and qualitative disclosures are taken into account in preparing the report.

2. Objective:

The aim of this study is to portrait overall sustainability reporting practices of selected Private Commercial Banks (PCBs). This study investigates the nature, extent and way of sustainability related disclosures of selected PCBs in consideration with GRI G4 guideline.

3. Literature Review:

Sustainable economic development is defined the optimal interaction among three systems: biological, economical and social (Barbier, 1989). Sustainable economic development ensures the quality of natural resources while maximizing the net benefits of economic development (Pearce *et al.*, 1996). The definition of sustainable development got highlighted two decades ago in Brundtland report where the goal of sustainable development is defined to "meet the needs of the present without compromising the ability of future generations to meet their own needs" (Brundtland, 1987). Sustainability does not only include environmental safety but also include economic development, human rights, social issues, community, corruption, corporate governance and responsibility of product and services. Sustainable reporting demonstrates the strategy taken by companies to ensure sustainable global economy. Sustainable reporting is also called triple bottom line reporting or

nonfinancial reporting and so on (Khan, 2015).

Sustainability reporting assists an organization to measure progress and manage sustainability performance. Through sustainability report business firms demonstrate their responsible act on economic, social and environmental issue. Information regarding to sustainability performance can easily attained by stakeholders from sustainable report. Researchers (Amran & Keat, 2014) found that business companies get pressure from different stakeholders to ascertain business responsibilities, accountability and transparency through sustainable disclosure. Business firms should satisfy demands of stakeholders through sustainability performance and reporting process. Gray concluded that many organizations have been criticized for creating social problems though they have contributed economic growth. Environmental protection, waste recycling, product safety and quality, employee benefits and rights have become concerned issues (Gray *et al.*, 1987).

Though sustainable reporting is practiced in developed country from many years ago but it is still very recent concept in Bangladesh. Nowadays, companies try to act responsibly on social, environmental issue. According to Gill, Dickinson and Scharl, firms in North America disclosed sufficient amount of TBL (Triple Bottom Line) factors for both environmental and economic issues whereas Asian firms revealed the utmost optimistic bias in their sustainable reporting. In addition, business firms from European countries are the most prevailing reporters of social indicators (Gill, Dickinson & Scharl, 2008). In Uganda, four companies were observed by Kisenyi and Gray and they found that none of these companies made any environmental disclosure (Kisenyi & Gray, 1998). Top companies of India, Brazil and South Africa, which are emerging nations, perform sustainability reporting and disclosure (KLD, 2008). Around the world, a growing number of companies now publish sustainability reports (KPMG, 2008).

Very few prior studies conducted research to find out whether companies of Bangladesh follow sustainable reporting practices according to GRI guidelines. In banking sector of Bangladesh, Prime Bank first published G4 Sustainability Report on March, 2015. Much more studies were conducted in Bangladesh to investigate corporate social responsibilities practices by companies. Major findings of some prior studies are discussed in the next section.

Imam (1999) surveyed 34 companies from all sectors and found that companies which disclosed environmental issues increased from four in 1992-1993 to seven in 1996-1997. In another study (Imam, 2000) 40 companies were surveyed and the result demonstrated that companies reported on community issues (25%), environmental matters (22.5%) and consumer disclosures (10%).

Hossain *et al.* (2006) examined annual reports of 107 non-financial organizations for the financial year 2002-2003 and declared that only 8.33% sample companies disclosed social and environmental information in their corporate annual report which are mostly qualitative in nature. Researchers (Dutta & Bose, 2007) examined the internet corporate social and environmental reporting practices of listed companies of Bangladesh and the results showed that internet reporting of corporate social and environmental information was still in its infancy stage. Moreover, local companies lag behind in internet reporting of corporate social and environmental information than multinational companies.

Khan *et al.* (2011) examined annual reports of twelve major commercial banks of Bangladesh for the financial year 2008 -2009 to investigate social disclosure practices. They found that only seven (7) items out of all sixteen (16) FSS specific GRI are disclosed by surveyed banks. This implies that more than half of the financial sector specific disclosures were not revealed in their annual reports. Furthermore, information regarding to human rights and product responsibility were insufficient whereas information on society was addressed most extensively in the annual reports of the surveyed banks.

Masud and Hossain investigated CSR reporting practices of selective private commercial banks by analyzing annual reports for the year 2010. The study revealed that 100% banks reported CSR activities but it was important that less than 60% banks participated in prescribe CSR according to financial act (Masud & Hossain, 2012) .

In another research work Sobhani *et al.* (2012) used content analysis for assessing annual reports of 100 companies listed both DSE and CSE and the results illustrated that companies disclosed at least one item of disclosure on human issues whereas they disclosed on community issues (47%), consumer issues (23%) and environmental issues (19%).

A study conducted on pharmaceutical companies by Azim and Azam and they claimed that only 26.67% of listed pharmaceutical companies made some CSR disclosure and 75% of these disclosures are qualitative statement without any attempt at quantification (Azim & Azam, 2013).

Masud *et al.* (2017) found that banks significantly disclosed environmental information for the 12 categories. In addition, most of the banks disclosed environmental information about green banking and renewable energy, whereas environmental recognition and waste management categories are least revealed by them. They also asserted that disclosure of environmental information increased sharply from 16% in 2010 to 83% in 2014.

Mahmud *et al.* (2017) conducted a research work on banking sector of Bangladesh and taken 30 banks

enlisted in Dhaka Stock Exchange and Chittagong Stock Exchange. Their study revealed that from the year 2011 to 2015, only eight banks (2011-0%, 2012-3.33%, 2013-6.67%, 2014-6.67% and 2015-10%) disclosed sustainability related information in their annual report according to GRI reporting framework but that was not satisfactory enough. In addition, they found that most of the cases sustainability related information did not meet the standard of GRI guidelines.

In another study, researchers (Akhter & Dey, 2017) examined listed companies of Bangladesh to demonstrate the sustainability reporting practices. They used content analysis as a research tool and studied annual reports (2015-2016) and website of the top 50 listed companies. The study revealed that companies focus on community development (90%), employment and employee benefits (67%). Furthermore, only 26% of the sample companies disclosed at least one indicator in their website which was very insufficient and less than 25 sentences were found in sustainability report only by 66% of sample companies. They also arrested that only 16% of sample companies used separate sustainability reporting section and the limited disclosure regarding sustainability performance due to voluntary sustainability reporting in Bangladesh.

4. GRI Framework:

In every economic system, banking institutions are considered to play significant role for economic growth. Keeping the significance in mind Bangladesh Bank (Central Bank of Bangladesh) in 2008 issued many circulars about social and environmental issues (Sayaduzzaman & Masud, 2012). Bangladesh Bank issued a guideline which directed all banks to develop sustainability reporting system according to global standard by December 2013 (Daily sun). In that circular it was stated *“to adopt a comprehensive Green Banking Policy in a formal and structured manner in line with the global norms so as to protect environment degradation and ensure sustainable banking practices”*. To protect environment Bangladesh Bank issued guidelines for banks in 2011 on “Environmental Risk Management” which was updated on February 2017 named “Environment & Social Risk Management”. Among 57 scheduled banks in Bangladesh, some has started to incorporate sustainability reporting into their annual reports in a separate section or throughout the report. The number of banks disclosing the report in a separate report format is quite a few. Since the way of reporting lacks uniformity and specificity, the need of a standardized format to showcase the indicators based on the areas (economic, environment and social) has become crucial to follow by banks in Bangladesh. Bangladeshi banks have to practice sustainability report in standards format with external verification under GRI method as per Bangladesh Bank’s (Central Bank) circular (Khan, 2015).

As per definition of Global Reporting Initiative (GRI), "A sustainability report enables companies and organizations to report sustainability information in a way that is similar to financial reporting. Systematic sustainability reporting gives comparable data, with agreed disclosure and metrics." Companies can demonstrate their contribution to sustainability goals through annual financial report or stand-alone sustainability reports and websites. A sustainability report contains disclosure on an organization’s most critical impacts on the environment, society and economy. Nowadays, companies realize the need to make their operations more sustainable and for this a global shared framework is needed and in this perspective Global Reporting Initiative’s (GRI) provides a trusted and credible framework for sustainability reporting that can be used by any organization regardless of size, type and location. 74% of the largest 250 companies in the world demonstrate their sustainability performance through GRI’s sustainability reporting framework (GRI, 2018). The GRI sustainability reporting guidelines are widely accepted reporting standard in the world. The major performance disclosure indicators of G4 are given below:

Economic	Environmental	Social
Economic performance, Market presence, Indirect economic impacts, Procurement practices.	Materials, Energy, Water, Biodiversity, Emissions, Effluents and Waste, Products and Services, Compliance, Transport, Supplier Environmental Assessment, Environmental Grievance Mechanisms.	Labor practices and decent work, Human rights, Society, Product responsibility.

5. Sample and Data Collection:

5.1. The Sample:

Private Commercial Banks (PCBs) listed with Dhaka Stock Exchange (DSE) has been considered as sample for this study. Among thirty listed private commercial banks fifteen banks which is 50% of the population has been selected for analysis. For a descriptive study, a minimum acceptable sample size is 10% (Gay and Diehl, 1992). This selection of annual reports for analysis is consistent with many other studies (see, for example, Adams et al., 1995, 1998; Gray et al., 1995a, b; Guthrie and Parker, 1990; Roberts, 1990; Singh and Ahuja, 1983; Belal, 2001). Therefore the sample size selected for the study (50%) is acceptable. In the study judgment sample has been used for choosing fifteen banks which is consistent with Masud & Hossain (2012). The sample banks are: Dutch Bangla Bank Ltd, Mercantile Bank Ltd, Prime Bank Ltd, Southeast Bank Ltd, Eastern Bank Ltd,

National Bank Ltd, Bank Asia Ltd, Dhaka Bank Ltd, City Bank Ltd, Brac Bank Ltd, Premier Bank Ltd Mutual Trust Bank Ltd, Trust Bank Ltd, United Commercial Bank Ltd, Standard Chartered Bank Ltd.

5.2. Data Collection and Analysis:

The study is descriptive in nature and it is based on information from secondary sources. To analyze the sustainability reporting practices of Bangladeshi Banks annual reports of sample banks have been used. Annual reports are thought to be a common and popular means of communicating with stakeholders and its credibility is also widely accepted (Adams, 2004; Gray et al., 1995a, b; Guthrie & Parker, 1990; Raman, 2006; Singh & Ahuja, 1983). Annual reports for 2016 of the sample banks have been collected from the website of Dhaka Stock Exchange (www.dsebd.org). Websites of each bank have also been checked to obtain further disclosures related to sustainability.

Content analysis has been used in this study as the key technique to investigate annual reports and websites of the sample banks about sustainability reporting. This technique has been widely used for descriptive studies by earlier researchers (see, for example, Abbott and Mosen, 1979; Ernst and Ernst, 1978; Gray et al., 1995b; Guthrie and Mathews, 1985; Zeghal and Ahmed, 1990; Williams and Pei, 1999; Akhter and Dey, 2017; Khan, Islam and Ahmed, 2010). Content analysis has been defined as, —A technique for gathering data that consists of codifying qualitative information in anecdotal and literary form, into categories in order to derive quantitative scales of varying levels of complexity (Abbott and Mosen, 1979).

For the purpose of the study three broad areas – Economical, Environmental and Social have been considered for examining the nature and extent of sustainability reporting of the selected banks. Table 1 presents the detailed areas under each category. Under these areas 34 indicators (appendix I) based on GRI G4 guideline have been used to examine the sustainability reporting practices of the banks.

Table 1: Major areas of sustainability reporting

Areas	No. of Indicators
1.Economical	3
2.Environmental	
a. Material	2
b. Energy	3
c. Water	2
d. Bio-Diversity	1
e. Emission	2
f. Overall	1
3.Social	
a. Labor	6
b. Human rights	4
c. Society	5
d. Product Responsibility	5

6. Results and Discussion:

Sustainability reporting disclosures have been categorized into three major classes in correspondence with the guidelines of GRI. Among the three major class of reporting Environmental and Social area includes respectively six and four areas.

Table 2: No of Banks Reporting Sustainability Issues

	No of selected banks	No of banks making Sustainability disclosure	Result
Banking Companies	15	15	100%

Table 2 shows the number of banks who have made minimum one disclosure in any of the category. All of the sample banks have disclosed at least one issue related to sustainability reporting.

Table 3: Area Wise Disclosure

Areas	Economical	Environmental	Social
No. of Banks	15	15	15
Percentage	100%	100%	100%

Table 3 shows area wise disclosure of sustainability reporting of the banks. 100% banks have disclosed issues related all the major three categories of the sustainability reporting. A more detail picture can be obtained from analyzing the disclosure practice from the sub categories of the environmental and social reporting issues presented in table 2 and 3 respectively.

Table 4: Environmental Disclosure

Areas	Material	Energy	Water	Bio-Diversity	Emission	Overall
No. of Banks	5	14	8	2	13	15
Percentage	33.33%	93.33%	53.33%	13.33%	86.66%	100%

From Table 4 extent of environmental related disclosure can be observed. The least reported area by banks is bio diversity where 13.33% banks (2 banks) have reported about this issue. The highest reported area is energy where 93.33% (14 banks) have reported about this issue. 80% banks (12 banks) have reported about emission related issues. Only 5 banks disclosed about material related issues.

Table 5: Social Issues

Areas	Labor	Human rights	Society	Product Responsibility
No. of Banks	15	11	12	15
Percentage	100%	73.33%	80%	100%

In Table 5 extent of social issues related to sustainability reporting has been analyzed. All banks have reported about product and responsibilities and labor related issues. And disclosure about human rights and society is 73.33% and 80% respectively.

Table 6: Sub category wise Disclosure (Appendix I)

Area of Disclosure	Code	Percentage of Disclosure
Economical	EC 1	100%
	EC 3	66.66%
	EC 7	80%
Material	EN 1	40%
	EN 2	40%
Energy	EN 3	86.66%
	EN 4	20%
	EN 6	86.66%
Water	EN 8	80%
	EN 10	20%
Bio-Diversity	EN 12	13.33%
Emissions	EN 16,17	60%
	EN 18	86.66%
Overall	EN 31	100%
Labor	LA 1	100%
	LA 2	100%
	LA 9	86.66%
	LA 10	80%
	LA 11	80%
	LA 14	60%
Human Rights	HR 1	6.66%
	HR 3	46.66%
	HR 4	40%
	HR 7	6.66%
Society	SO 1	80%
	SO 3	26.66%
	SO 4	80%
	SO 6	66.66%
	SO 7	20%
	Product Responsibility	PR 3
PR 4		73.33%
PR 5		40%
PR 7		40%
PR 8		33.33%

Individual reporting issues under each sub category have also been analyzed which has been presented in Table 6. As all the banks have disclosed about economic value generated by them, it is clear that banks are aware about making a difference in the economy with their activities. 80% banks disclosed about impact of infrastructure investments which also shows their cautiousness about exposing contribution towards economy. But reluctance is observed in case of reporting about their defined benefit plans as disclosure regarding this issue is only 66.66%.

Banks are highly reluctant about reporting about material used and recycled as only 40% (6 banks) are observed to disclose these issues. Although 86.66% of the banks have disclosed about their energy consumption within the organization, only few banks have reported exact amount of consumption. Most of the banks (86.66%) have reported about the measures taken by them to reduce energy consumption which shows that banks to some extent feel obligated to protect energy. Disclosures about water recycling and bio-diversity are very dissatisfactory. Total disclosure related to emissions is 86.66% and all of which is related to the extent of energy and indirect greenhouse gas emission. None of the banks have reported anything about initiatives taken to reduce greenhouse gas emissions. Though the nature of business activities of banks don't require them to directly engaged in initiatives to reduce pollution, and toxic gas emission, all the banks have invested in projects to protect environment.

From Table 6, it can be observed that 100% banks have reported about employment rates, benefits provided. Though 86.66% banks have disclosed about training provided to the employees, none of the banks have provided details about specific training hours. This scenario in the labor related disclosures is probably because organizations seek to attract resourceful employees and want to reduce employee turnover (Hossain et al., 2012).

It is clearly obvious from table6 that human rights is the most ignored category for sustainability reporting by banks.46% banks have reported about holding training about human rights policies but none of the banks mentioned the percentage of employees trained or any details about such trainings. 40% banks have reported about discrimination but again there were no specific information about number of incident of discrimination and corrective measures. Banks have been observed to only declare they do not discriminate among employees without any description how nondiscrimination work place is achieved.

In society related issues, the most (80%) reported information is communication and training on anti-corruption policies. May be the recent scams and scandals in the banking sector of Bangladesh have made private commercial banks concern about anti-corruption initiatives.

There is 100% disclosure related to product responsibility. But most (93.33%) of the disclosure is confined to description of the products and services. Banks are not concerned about surveying customer satisfaction, handling customer complaints and breach of customer privacy as in both case disclosure is 40%. 73.33% banks have reported about incidents of non-compliance regarding codes of service. But there was no specific number of such incidents.

Table 7: Location of disclosure

Location of Disclosure	Percentage
Directors' report	33.33%
Chairman's report	20%
Separate section of annual report	60%
Throughout Annual Report	60%
Separate report	20%
Separate Section in website	6.66%

Table 7 displays the location of sustainability related disclosures by sample banks. Only 20% banks (three banks) have used separate report for disclosing sustainability related information. It displays that banks still don't grasp the importance of sustainability reporting and reluctant to put extra report by preparing a separate report. 60% banks have used both separate section in annual report and other sections of annual report for sustainability reporting. Messages about sustainability practices are mentioned in directors' report and chairmen's report respectively 33.33% and 20% of all the selected banks' annual reports. Only one bank has separate section in website about sustainability information.

Table 8: Nature of disclosure

Type of Disclosure	Percentage
Quantitative Information	0
Qualitative / Descriptive Information	33.33%
Quantitative & Qualitative Information	66.66%
No information (Quantitative & Qualitative)	0

Table 8 presents the scenario of whether the nature of disclosing sustainability information was quantitative or descriptive. 66.66% of the banks used both quantitative and descriptive both type of information for sustainability reporting. 33.33% banks only reported descriptive information. Quantitative information mostly included amount of investment in projects related to protection of environment. In all other cases where specific numbers are requirement by GRI guideline banks have been observed to disclose with description about their concern and participation about that issue.

6. Conclusion:

In this study we investigated 15 listed banks sustainability reporting practices in Bangladesh based on GRI G4

standard. The findings of the study say that sustainability reporting concept has been adopted by all the banks and it is not an unknown concept to the banking industry anymore. Being an emerging concept in Bangladesh, all the banks have moderately reported about sustainability issues which are appreciable effort by banks. All the banks have reported about all the three categories namely-economical, environmental and society. Most reported issues are number of employees, employee benefit, training, product description, reduction of energy consumption and gas emission. Most ignored issues are human rights, product responsibility, materials, water, and bio-diversity. Analysis of location of disclosure it is found that most of the banks have used a separate section in annual report for sustainability reporting. Only one bank used separate report. Nature of disclosure is mostly descriptive. An important observation is that though in many criteria where 100% participation has been observed, the disclosures were mostly narrative and vague even when the requirement of GRI guideline was any specific number or amount. For example, many banks mentioned they take initiatives to reduce greenhouse gas emission, protect environment, and reduce energy consumption but specific initiatives in justification of such effort have not been mentioned in the report. Another mentionable observation is that negative news has been totally avoided by banks. This observation is similar with Akhter & Dey (2017). The overall scenario picturizes that banks have reported about several issues of GRI guideline but not with proper efficiency and accuracy as mentioned in GRI guideline. Though banks have become familiar with the concept of sustainability reporting, they are yet to grasp the true impression of reporting such issues and put more effort and time in reporting. But obviously the current endeavor to report sustainability issues though not adequate is appreciable.

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Appendix I:

1.Economical	
EC 1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.
EC 3	Coverage of the organization's defined benefit plan obligations.
EC 7	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.
2.Environmentment	
Material	
EN-1	Materials used by weight or volume
EN-2	Percentage of materials used that are recycled input materials
Energy	
EN-3	Energy consumption within the organization
EN-4	Energy consumption outside of the organization
EN-6	Reduction of energy consumption
Water	
EN-8	Total water withdrawal by source
EN-10	Percentage and total volume of water recycled and reused
Bio-Diversity	
EN 12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas
Emissions	
EN-16,17	Energy and other indirect greenhouse gas (GHG) emissions
EN 18	Initiatives to reduce greenhouse gas emissions and reductions achieved
Overall	
EN-31	Total environmental protection expenditures and investments by type
Social	
Labor	
LA 1	Total number and rates of new employee hires and employee turnover by age group, gender and region
LA 2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation
LA 9	Average hours of training per year per employee by gender, and by employee category
LA 10	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings
LA 11	Percentage of employees receiving regular performance and career development reviews, by gender and by employee category
LA 14	Ratio of basic salary of men to women
Human Rights	
HR 1	Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening
HR 3	Total hours of employee training on human rights policies or procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained
HR 4	Total number of incidents of discrimination and corrective actions taken
HR 7	Percentage of security personnel trained in the organization's human rights policies or procedures that are relevant to operations
Society	
SO-1	Percentage of operations with implemented local community engagement, impact assessments, and development programs
SO-3	Total number and percentage of operations assessed for risks related to corruption and the significant risks identified.
SO-4	Communication and training on anti-corruption policies and procedures
SO-6	Total value of political contributions by country and recipient/beneficiary
SO-7	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes
Product Responsibility	
PR-3	Type of product and service information required by the organization's procedures for product and service information and labeling, and percentage of significant product and service categories subject to such information requirements
PR-4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes
PR-5	Results of surveys measuring customer satisfaction
PR-7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by type of outcomes
PR-8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data