



## ERM AT EXXARO RESOURCES LTD.

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A MANAGEMENT SYSTEM THAT ENSURES RESILIENCE

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# SPONSOR'S PERSPECTIVE

## WHAT EXXARO TEACHES US ABOUT ENTERPRISE RISK MANAGEMENT

### OVERVIEW

Stakeholders are showing increased interest in the correlations between financial capital and other capital forms when assessing the risk and growth opportunities of a company.

Some studies have shown that up to 80 percent of an organization's value is hidden in non-financial assets that are not represented in traditional financial reports.<sup>1</sup> This is despite environmental and social issues posing a greater commercial risk than ever. Integrated reporting has increased momentum as a narrative of choice for stakeholders, and enterprise risk management is the underlying foundation for integrated reporting as well as integrated thinking.

Risk managers must have a structure in place to help them think broadly and proactively with a focus on building business resilience for the longer term and developing an expanded view of risk.

This case study on Exxaro, a large mining company in South Africa, illustrates the link-

age between enterprise risk management (ERM) and integrated reporting. Best practices suggest that to be successful, risk managers need to break down silos to integrate and standardize methodologies. But are those the steps to success or the outcomes of something larger? Is integrated reporting a critical catalyst for ERM?



Source: Bob Willard, *The New Sustainability Advantage*

### RISK IS THE COMMON DENOMINATOR—VALUE IS THE MISSING LINK

We believe that most successful ERM initiatives focus first on the layer of business activities that add business value. These activities, like many forms of capital considered in integrated reporting, are often intangible. Implementing risk management in day-to-day business processes and regulatory compliance activities is important. Having outstanding ERM initiatives focus first on adding and preserving value, while building business resilience for the long term helps engage management and provides a focus for what follows.

## THE THREE VALUE QUESTIONS

Finding where business value lies is the elusive starting point for ERM. SAP created three value questions to illustrate the lessons from Exxaro.

### WHAT DRIVES BUSINESS VALUE?

ERM will not add or preserve value if it does not explicitly start where that value lies. This may change over time, but in Exxaro's case the focus of ERM was on sustainability. What could be more relevant for a resources company? Value-driving activities are often based on intangible, but very real, overarching activities or concepts.



### HOW IS THAT VALUE CREATED?

Exxaro focused their ERM approach on the five capitals model (out of the six capital forms defined by the International Integrated Reporting Council). They sought to deliver insight about connecting the dots between operational risk and strategic risk. Within financial and non-financial terms. Many risk management initiatives aim at strategic risk and lose focus on operations. But a focus on value drives that connection, and Exxaro's approach shows how it can work.

### WHAT CAN DESTROY THAT VALUE?

“Without water, you cannot mine—and South Africa is drought stricken.” For Exxaro, water intensity became one strategic risk. As the case study describes, Exxaro built a risk threshold around water intensity to manage its conservation.

We congratulate Exxaro on their excellent case study and thank APQC for preparing it. For more information on Exxaro, please read their integrated report at [http://www.exxaro-reports.co.za/reports/ar\\_2012/integrated/risk-material.php](http://www.exxaro-reports.co.za/reports/ar_2012/integrated/risk-material.php).

SAP Risk Management and SAP Process Control are part of an integrated suite of SAP solutions for governance, risk, and compliance (GRC). To learn more about GRC solutions from SAP, visit [www.sap.com/grc](http://www.sap.com/grc).

<sup>1</sup> Bob Willard. *The New Sustainability Advantage*. New Society Publishers, 2012.

# ERM AT EXXARO RESOURCES LTD.:

## A MANAGEMENT SYSTEM THAT ENSURES RESILIENCE

Exxaro Resources Ltd. is one of the largest South African-based diversified resources groups, with interests in the coal, mineral sands, and ferrous and energy commodities. Based in Pretoria, Exxaro is the second largest coal producer in South Africa, with current production of 40 million tons per annum. Beyond Africa, the company operates in Europe, Asia, and Australia. It is listed on the Johannesburg Stock Exchange (the JSE Limited), where it is a constituent of the Top 40 and the Socially Responsible Investment (SRI) indices. Exxaro was ranked among the top 10 companies globally by total shareholder returns in 2012.

Exxaro adds several key dimensions. For Exxaro, sustainability creates and maintains the conditions within five capitals (natural, human, social, manufactured, and financial) so that the organization can prosper and grow via monitoring of compliance, risk, material issues, reporting requirements, and competitive opportunities.<sup>1</sup>

GRC is a “management system to ensure you exist in the future,” Van Loggerenberg said. “It calls for clear roles, responsibilities, and effective decision making, along with transparency, accountability, and integrity across all internal stakeholders, from the board and

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*In its best practices report, Enterprise Risk Management: Seven Imperatives for Process Excellence, APQC presents the results of research on the need to evolve enterprise risk management (ERM) processes and practices. The report draws from a survey of 96 large, global organizations. Respondents were mostly chief executive officers and senior managers of finance, operations, treasury, or internal audit. The following is a case study on Exxaro Resources Ltd., a company that exhibits multiple best practices in this realm.*

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APQC spoke with Saret Van Loggerenberg, Exxaro’s manager of risk and compliance, about the organization’s risk management strategy and how its sustainability goals drive ERM processes. APQC notes in its best practices report that Exxaro’s risk management program won accolades recently from the Institute of Risk Management South Africa (IRMSA).

### VISION AND STRATEGY

For many companies, “sustainability” denotes a business strategy that drives long-term corporate growth and profitability by mandating the inclusion of environmental and social issues in the business model.

executive committee level, all the way to the individual risk owners.”

The point is to ensure resilience that benefits all stakeholders. This approach also helps to achieve something very important: “integration between enterprise and operational risk management to ensure a uniform and effective risk culture. That means that proactive thinking is instilled at the strategic, tactical, and operational layers of the organization. This kind of thinking ensures that your strategy remains flexible to negotiate the storms of an ever-changing business landscape,” said Van Loggerenberg.

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<sup>1</sup> Source: A presentation by Saret Van Loggerenberg: “How Exxaro Sustainably and Proactively Manages Internal and External Threats with SAP Risk Management and SAP Process Control,” November 2013, conference organized by Wellesley Information Services Inc.

## THE BENEFITS OF A STANDARDIZED PROCESS

Van Loggerenberg, a lawyer and former management consultant, had previously served as Exxaro's assistant company secretary but took up her current role in 2012 after leading a three-year, company-wide process reengineering program that aimed at driving cost effectiveness. Now her focus is on ensuring the company is agile and forward-looking when it comes to major business risks.

Exxaro's ERM strategy calls for proactive and efficient governance, risk, and compliance (GRC), which, according to Van Loggerenberg, requires:

- ♦ adopting a culture of sound governance, roles, and responsibilities that are clear, ensuring that everyone knows who takes which decision where (i.e., having the right mandates) and holding employees accountable in the event that issues arise;
- ♦ GRC working as a single entity in order to harness synergies, drive optimization through lessons learned (and ultimately save costs), and enforce accountability; and
- ♦ utilizing technology to enable efficiencies and effectiveness.

"Part of what I needed to do when I took on my current role was to look at how we did GRC and to determine how we can make our GRC processes more proactive and able to address future challenges that will come our way," she explained.

Van Loggerenberg stressed the value of having a "standardized, company-wide risk management process that ensures that the GRC activities carried out in all business units functions, and all the way up to the board level, are not just 'check a box exercises.' What we must have is a GRC process that is totally integrated into our sustainability framework."

The work done at Exxaro to embolden an integrated and standardized, enterprise-wide approach to risk management has been recognized as a best practice by the IRMSA.

When awarding Van Loggerenberg with the Risk Initiatives Award in Information Systems in October 2013, the IRMSA stated:

"Exxaro realized from the outset that risk management is about the improvement of risk culture and not necessarily about risk analysis [and that] risks should also be linked to business unit, departmental, and group objectives. They have embedded a process that is not compliance-driven but a tool that management wants to use because it assists in the achievement of strategic objectives."

## LEVERAGING TECHNOLOGY

Exxaro is an instructive case on several levels, especially due to its use of SAP's risk management and process control solutions.

These software modules help to foster enterprise-wide collaboration and risk intelligence, as well as ensure accountability, transparency, and business efficiency in all levels of the organization. The software allows the organization to efficiently organize, report, and manage standardized concepts and actions related to GRC and sustainability.

Exxaro's vision for ERM—to manage internal and external threats—means harmonizing business, civic, and environmental needs and obligations in order to enable the organization to make positive social and economic contributions to its community. Exxaro works to support what is known as the "triple bottom line," which differs from traditional reporting frameworks because it includes environmental and social measures.<sup>2</sup> The concept figures prominently in the way Exxaro does business.

<sup>2</sup> Timothy Slaper & Tanya Hall. "The Triple Bottom Line: What Is It and How Does It Work?" *Indiana Business Review*, 2011: 4–8.

Risks are found in all of the above and must be managed across all five capitals.

The Exxaro presentation mentioned above explained that the SAP solutions make it practical to tie forecasts and risks.

Exxaro further refined the triple bottom line into a five capitals model.

♦ **Natural capital** —natural resources including water, minerals, and air

♦ **Human capital** – human beings, including internal and external stakeholders

♦ **Social capital**—internal and external relationships

♦ **Manufactured capital**—its business process

♦ **Financial capital**—the financial outcome of the interaction of the capitals (i.e., share prices, dividends, market capitalization, etc.)

Exxaro does this by:

- ♦ integrating enterprise and operational risk management to ensure a uniform and effective risk culture;
- ♦ ensuring effective policy management in the organization, which in turn contributes to clear allocation of roles and responsibilities; and
- ♦ automatically auditing and reviewing critical controls in key business processes to ensure business efficiency as well as accountability at all levels.

## BREAKING SILOS

Exxaro looks at risk management as a way to promote its resiliency and ability to handle future challenges—and the key is Van Loggerenberg’s view on the importance of influencing the culture, not just developing policies on how risks should be identified, sized, and managed. “One of my main objectives has been to change the way that people look at risk and to break the siloed approach that our organization has traditionally followed,” said Van Loggerenberg.

Exxaro is working to break silos not only in terms of functional areas, but also in terms of seniority levels. “Our vision is to teach people that risk management is not merely checking boxes,” said Van Loggerenberg. “It’s about being resilient and proactive in every layer of the organization. The board needs to ensure that they manage those risks that will affect the strategic objectives. The miners need to think about the risks at the coal face so that they conduct themselves in a safe manner. Asking about risk is really about entrenching proactive culture and not just taking part in a routine, compliance-driven exercise.”

To do this, she adds, leadership needs to be very patient and very determined to make it succeed. “It takes time to ingrain these things in the fiber of the organization,” said Van Loggerenberg.

Moreover, this vision and strategy ensures that the leadership team gets the appropriate level of oversight from Exxaro’s board and that the board understands what the appropriate appetite or tolerance is for major strategic risks. “I think it’s very important to realize that most companies view operational risk and strategic risk as disconnected processes, and I think that’s extremely dangerous,” said Van Loggerenberg.

This is not to say that the top executive team or the board needs to dwell on, say, minor hazard risks that business unit management is capable of handling. Rather, it is important to connect the dots between (a) significant threats and responses to those threats at the operating level and (b) the long-term strategic

intent and positioning of the company. Van Loggerenberg said, “If you lose that disconnect between operational risk and how it affects the strategic focus and the strategic objectives of the organization, then you lose the ability to proactively manage your future.”

## PLANNING, ACTING, AND MONITORING

One of Exxaro’s major operational risks is the availability of water, which is used for coal cutting, dust suppression, and pipeline transportation of coal.<sup>3</sup> “Without water, you cannot mine,” said Van Loggerenberg, “and South Africa is drought-stricken.”

The lack of this necessary resource has caused water intensity to be labeled as a strategic risk. “If you have a number of capital projects that you wish to pursue but you do not have water to make those capital projects become operational, then you will never get a return on investment,” said Van Loggerenberg.

In accordance with its risk appetite framework—categorized using the five capital model—Exxaro needed to build a risk threshold around water intensity to manage its conservation.

For every measure on Exxaro employees’ balanced scorecards, there is a larger strategic objective that is measured against the organization’s risk appetite tolerance levels. Once any risk becomes significant enough, it becomes a scorecard measure. Targets such as water intensity<sup>4</sup> are attached to the performance agreement of every mine manager and every regional manager, who are each held accountable for the results.

“We have the water intensity target to ensure that our operations are more effective in the way that we manage and reuse water so that the water we save can also be used to sustain capital projects to pursue in that environment,” said Van Loggerenberg. “It affects everything that we do.”

## USING ONE PLATFORM

According to Van Loggerenberg, it is necessary when implementing any tool—in this case, SAP software—that an organization maximize its benefit by creating a standardized, integrated approach to risk management throughout the enterprise. But this can be incredibly hard to achieve. Siloed approaches are strengthened when organizations manage risk simply to satisfy regulatory and best practices requirements like Sarbanes–Oxley, COSO, ISO 31000, and Cobit rather than asking what these requirements wish to achieve. It is to be responsible and resilient so that shareholders and stakeholders are not surprised with corporate failures or the lack of transparency with regard to their asset base and earnings potential.

In the past, Exxaro's finance function would annually assess high-level risks in compliance with licensing and regulations. Its safety risk management function conducted its own methodology with separate terminology. Operational risks and project risks also had unique methodologies. “That seemed all well and good, because everyone could check all the right boxes for their function’s specific risk management methodologies,” said Van Loggerenberg. “If, however, you needed to implement a system, it would have to work off the same platform with different programs, different methodologies, and different ways of determining risk and probability—clearly not ideal.”

The first step Exxaro took toward ERM was to integrate all its risk management processes, thereby demonstrating to the organization that “by giving up a little bit of the functional meaning to certain terminology and by giving up the functional understanding of what used to be an extreme impact, we can have one platform and one system,” said Van Loggerenberg. Cost savings can only be achieved “if you roll up your sleeves and address the nuts and bolts processes beforehand.”

<sup>3</sup> Erik Mielke et al. “Water Consumption of Energy Resource Extraction, Processing, and Conversion.” Energy Technology Innovation Policy Research Group, Harvard Kennedy School Belfer Center for Science and International Affairs, 2010: 20.

<sup>4</sup> “Water intensity” refers to the amount of water consumed per square meter of space. “Water Efficiency in Government Operations.” Australian Government Department of the Environment, 2014.

With one platform, the organization was able to drive a more coordinated, enterprise-wide risk culture and behavior. "People across functions, departments, and business units can have conversations about risks with different viewpoints on impact and different thoughts on probability of risk," said Van Loggerenberg. "And when they see that a risk is raised, it means the same thing to everyone. So no matter whether you are assessing at a business unit or corporate level, if you see risk raised, you know that you need to pay attention."

With its ERM processes, Exxaro visually depicts these raised risks with color-coded heat maps. Different business units use the same product and process and frame methodology for assessing likelihood, level of impact, and so forth.

By implementing this change, the organization was able to compare things across the enterprise with one platform. "As a result," said Van Loggerenberg, "employees can share lessons learned."

Still, implementing an enterprise platform can be difficult. When it comes to changing human motivation and behaviors, "it's a long journey," said Van Loggerenberg.

The summary report, shown in Figure 1, depicts the top strategic risks for Exxaro. "It is used by executive management and the board to understand which risks will prevent us from achieving our strategic objectives, who owns each risk, and how well we control these risks versus the stage we'd ideally like to control these risks," she said.

There is reason to expect that more large business enterprises will go down this path. The upcoming generation of managers is relatively accepting when it comes to collaboration technology, automated work flows, and process-oriented management. Moreover, the level of complexity at most global companies today practically demands the adoption of process management tools such as this.

## SUMMARY OF RISKS



Risk Name	Risk Owner	Organisation	Inherent Risk	Planned Residual Risk	Residual Risk Gap	Residual Risk
1. Unable to meet production demands	Mxolisi Donald Mbuyisa Mgojo	Board	81	52	12	64
2. Safety concerns	Mongezi Vetu	Board	95	43	18	61
3. Government Bureacracy	Mzila Isaac Mthenjane	Board	86	25	31	56
4. Commodity price volatility	Mzila Isaac Mthenjane	Board	76	33	14	47
5. Unavailability of water	Peter Ernst Venter	Board	49	28	17	45
6. Infrastructure cap/access/develop/fund	Peter Ernst Venter	Board	60	32	13	45
7. Cost competitiveness of products	Mxolisi Donald Mbuyisa Mgojo	Board	77	28	15	43
8. State intervention in the mining sector	Mzila Isaac Mthenjane	Board	72	4	39	42
9. Capital project execution	Peter Ernst Venter	Board	64	34	8	41
10. Compliance to environmental legislation	Mongezi Vetu	Board	76	26	14	39
11. Maintain a social licence to operate	Mzila Isaac Mthenjane	Board	77	22	16	38
12. Mine rehabilitation	Mongezi Vetu	Board	64	18	18	37
13. Inability to meet financial closure	Mongezi Vetu	Board	60	26	11	37
14. Fraud and corruption	Willem Abraham De Klerk	Board	56	4	31	34
15. Labour unrest	Margaretha Pieter	Board	76	21	12	34
16. Legal and Regulatory non-compliance	Willem Abraham De Klerk	Board	76	11	21	32
17. Acid mine drainage/decanting	Mongezi Vetu	Board	40	4	27	31
18. Climate change concerns	Peter Ernst Venter	Board	30	5	19	24
19. Inability of IT systems to support	Willem Abraham De Klerk	Board	39	12	9	20

Figure 1

Figure 2 is a “risk per page” report that provides full details on a specific risk and is used at strategic and operational level. It sets out:

- ◆ the risk owner,
- ◆ the root causes relating to the risk,
- ◆ its potential impacts,
- ◆ its inherent and residual risk scores,
- ◆ its position on the heat map,
- ◆ the controls relating to the risk,
- ◆ how effective the controls are, and
- ◆ the control owners.

### RISK PER PAGE REPORT

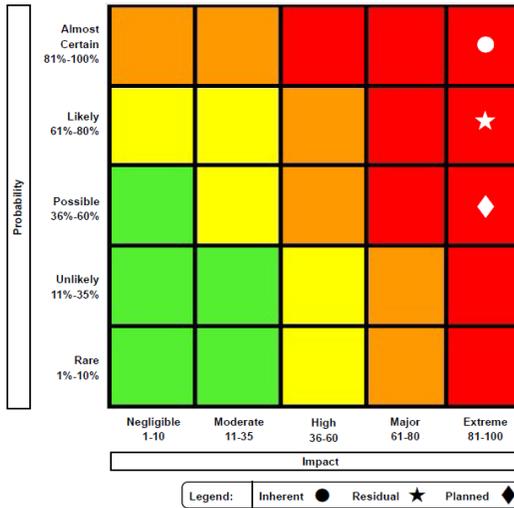


Risk Name: Unable to meet production demands	Risk Category: Production and Quality
Risk ID: 50002266	Risk Owner: Mxolisi Donald Mbuyisa Mgojo
Risk Description: Unable to meet production demands (throughput). Production demands not met as set out in targets.	Organisation: Board
Objective:	

Meta language: As a result of <<risk's causes>>, it is possible that <<the risk>> may occur, which could lead to <<impact/s on objectives>>.

Analysis	Inherent	Residual	Planned
Probability Level	Almost Certain	Likely	Possible
Probability (%)	90%	72%	58%
Impact Level	Extreme	Extreme	Extreme
Impact Score	90	90	90
Risk Level	Very High	Very High	Very High
Risk Score	<b>81.00</b>	<b>63.90</b>	<b>52.20</b>

Probability Legend		Impact Legend	
Factor	Description	Factor	Description
> 80 - 100	Almost Certain	> 80 - 100	Extreme
> 61 - 80	Likely	> 61 - 80	Major
> 36 - 60	Possible	> 36 - 60	High
> 10 - 35	Unlikely	> 10 - 35	Moderate
< and = 10	Rare	< and = 10	Negligible



Legend: Inherent ● Residual ★ Planned ◆

Causes	Cause Category
1. Ineffective planning.	1. External: Other
2. Land purchase issues.	2. Internal: People
3. Inadequate labour and union relations.	3. External: Other
4. Geological constraints/inaccurate information.	4. External: Other
5. Labour capacity (age of workforce & Employee health).	5. Internal: People
6. Infrastructure constraints.	6. External: Other
7. Environmental factors (Non-compliance with legislation).	7. Internal: People
8. Delays in licence approvals & surface delays.	8. External: Other
9. Logistical constraints.	9. External: Other

Impacts	Impact Category
1. Reputational damage.	1. Stakeholder Relations
2. Production targets missed.	2. Operations
3. Breach of contract.	3. Legal and Compliance
4. Pressure on the client (Eskom).	4. Stakeholder Relations
5. Financial losses.	5. Financial

Responses	Response Owner	Response Type	Completeness	Current Effectiveness	Response Status	Due Date	Reporting Comments
1. Accelerate Business Improvement (BI) projects currently running	Mxolisi Donald Mbuyisa Mgojo	Preventive	100%	65% - Adequate	Completed	Not specified	

Figure 2

## BOARD INTERACTION

The Exxaro board is responsible for the governance of risk, and it clearly appreciates that strategy, risk, performance, and sustainability are inseparable at Exxaro.

Exxaro has a highly structured ERM reporting process. Business units meet quarterly to go over their risk profiles, as does the operations committee. The board receives an operational risk profile quarterly, and the ERM team has an annual process with the board wherein the members use the business units and operations committee's risk profiles as input to compile the board's own risk profile.

The board's members do not re-rank risks because doing so "would take accountability away from the risk owners sitting at the operations level," said Van Loggerenberg. The point is to make sure that the risk owners at the operating level participate in a genuine manner and not simply participate out of necessity.

Moreover, Exxaro wants operating managers to act and implement controls that will ensure that their business units achieve the strategic objectives. "Every layer [has to] take accountability for their operational risk in accordance with the overall risk appetite of the company, but additionally in accordance with their own objectives," said Van Loggerenberg.

One example she gave was her department's inability to appoint a risk manager for a full year. "We simply couldn't get the required skill," said Van Loggerenberg, "so I was actually given the job without any professional training. The shortage was not something that the board took notice of, but for our own departmental objectives, this was a major risk."

The quarterly reports that the board receives are linked to Exxaro's sustainability key performance indicators, which ensures that the organization's leaders are doing integrated reporting during the year. Doing so helps to manage the organization's risk exposures and achieve strategic objectives.

All of Exxaro's key performance indicators help to ensure that the organization remains sustainable. The financial and non-financial key performance indicators are equally important, because both assist in managing risk appetite and achieving the organization's strategic objectives.

To ensure that the board understands the proper use of risk management methodology—without outwardly lecturing its members—the core ERM team hosts a risk management workshop using gamification to impart training information. Van Loggerenberg divided Exxaro into two teams, and each receives a color. She explained some terminology and context to the players, and they each have 10 minutes to match a risk to its orders and consequences. There is a prize at the end for the winning team. "We try to make it fun, mainly because it is possible that risk management could become too focused on checking a box, and that is ineffective," said Van Loggerenberg.

Clearly, it is a best practice for the ERM process owner to continually engage board members, company executives, and risk owners.

## CREATIVELY BUILDING A RISK-INTELLIGENT CULTURE

Exxaro trained employees on the risk management process and analysis methodology long before it implemented its new ERM technology.

"I physically did the training myself in 2010. And then I physically did the training on the system. At that time, Exxaro had already compiled risk registers in Excel using the same examples and populated them in the system to show how it worked."

She goes on: "We kicked off our systems training with business process and methodology recaps, and used the same risks that they were already seeing in their risk profiles." There were nearly 50 sessions in the corporate office and four or five sessions at every business unit. There was a simulated e-learning training in the SAP system that employees could use to simulate risk reporting, into which Van

Loggerenberg entered 10 risks to be sure that people were using the system properly. Members of the risk and audit committees on the board received ERM training, as well.

To achieve a common risk language, Exxaro's GRC team held "workshop after workshop." A key goal was "getting people to believe that their ideas mattered, that their way of thinking was important, and that the way they used to do it in their functional area was not incorrect by any means. We had some resistance initially, but we just kept at it," she said.

## LESSONS LEARNED

Exxaro stressed to managers that the tool would lighten the load of their risk reporting tasks. "It was really important that people saw the benefit of the implementation so that they would be convinced to use the tool rather than using an Excel spreadsheet," said Van Loggerenberg.

That said, she warns that it's easy to fall into the trap of focusing too much attention on the tool and not enough on the reporting. "The beauty of our report is that it is standardized across the group. We tell people that they need to prepare a risk management report for the risk management function. We pull those reports straight out of the system and give them to the board. It takes work away from them, and they associate that with something positive."

## CONTINUOUS IMPROVEMENT

Exxaro will continue to ensure that risk is not merely a compliance concern. "We're very good at identifying and logging risk," said Van Loggerenberg. "I think our next challenge is to make people realize that it's more important to manage it than to log it."

Additionally, the company is making sure that it paces itself when it comes to ERM implementation so as not to fatigue employees with new processes.

## SUMMARY

This case illustrates the challenges involved in driving accountability, transparency, and business efficiency on all levels of a global organization. The practical approaches to these challenges include creating an integrated view of enterprise and operational risk management so that management can prevent operations-level risks from turning into major strategic risks. A prime example is the way Exxaro manages and monitors water intensity. This case also demonstrates how risk management across an enterprise can be truly enhanced by the implementation of a single technology platform for assessing and reporting business risks. Finally, the intense dedication to training and cultural engagement is noteworthy.

## ABOUT APQC

APQC is a member-based nonprofit and one of the leading proponents of benchmarking and best practice business research. Working with more than 500 organizations worldwide in all industries, APQC focuses on providing organizations with the information they need to work smarter, faster, and with confidence. Every day we uncover the processes and practices that push organizations from good to great. Visit us at [www.apqc.org](http://www.apqc.org) and learn how you can make best practices your practices.



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