

# **ESG Strategies**

Webinar for FDF Member Companies Simon Hodgson Nov 2024

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# ESG is not about compliance



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# Outline

- 1. ESG: origins and contents
- 2. The tsunami of compliance
- 3. Other big stories
- 4. The importance of strategy





## Making Sustainability Happen



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# ESG: Origins and contents

## Remember when....

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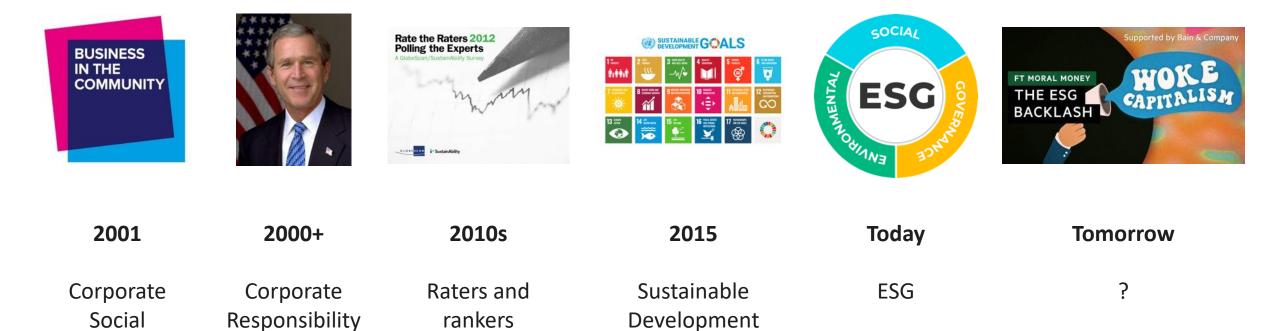
sandals")

"Social

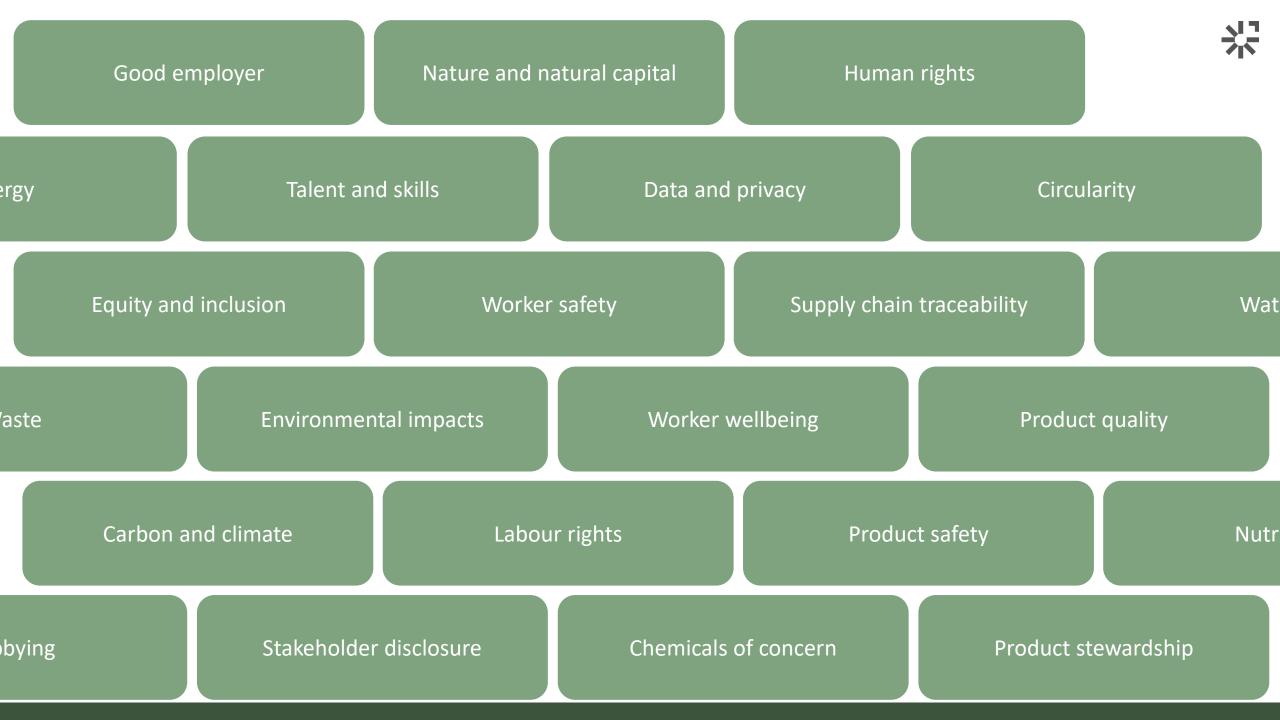
Ethical

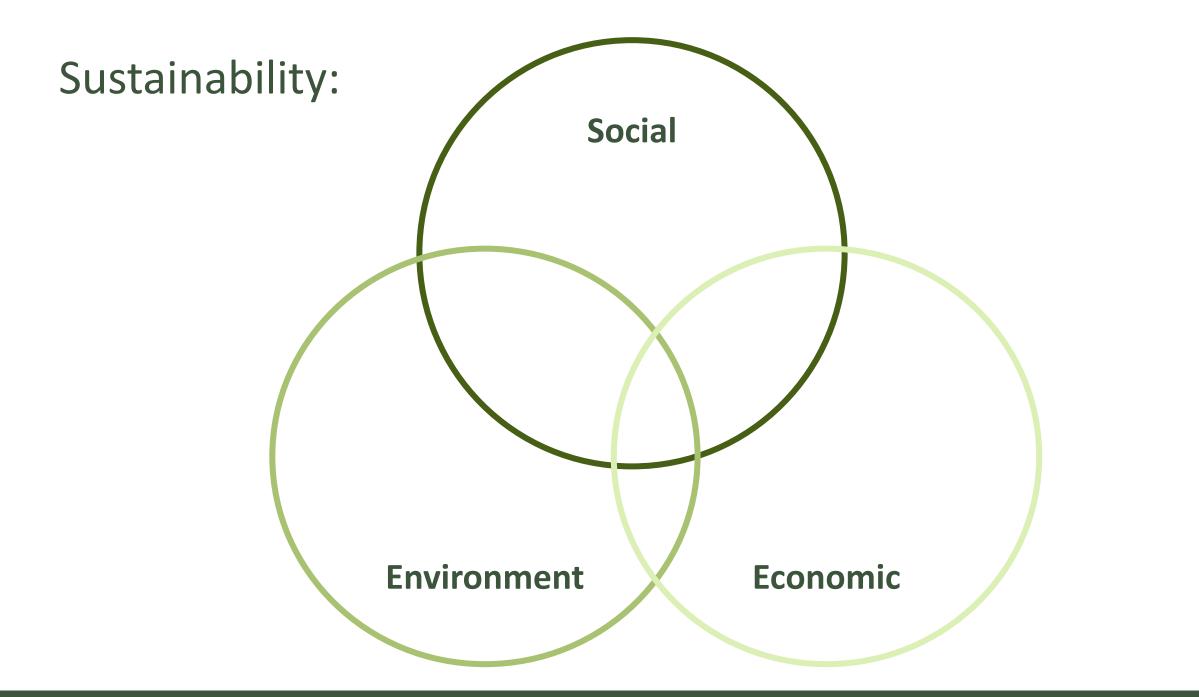
Environmental"

Responsibility



Goals





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# The tsunami of compliance

We asked 250 companies...

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What is your main objective for your ESG Programme?



(Hint – last year the winner was

'Brand and reputation with stakeholders' at 62%)

## **Compliance – 70%**

							Proposed	Adopted/ Agreed	Enters int Force	Transposed Action required
		Pre-2021	2021	2022	2023	2024	2025	2026		2027/2028
REACH EU	R	2007								
EUTR (timber)	R	2010								
Pay Transparency Law	D		Proposed Mar	Approved Dec	Adopted April	Enters into force?		(Transposed 2	026)	
EU Corp Sustainability Reporting Directive (CSRD)	D		Proposed April	Adopted June Published Dec	Enters into force, Jan	1 Jan: New rules apply, replace NFRD		First [X] report d (on '25 data)	ue	
EU regulation on waste shipments	R		Proposed in Nov		Agreed, Nov	Enters in	o force?			
Regulation on deforestation-free supply chains	R		Proposal agreed Nov	EU agreed regulation terms	Enters into force (repeals EUTR)	Develop process; 1 <sup>st</sup> statement due 30/12				
EU Corporate Sustainability Due Diligence (CSDE	D DD)			Proposed Feb		Endorsed by Council in Mar Parliament still to approve		Deadline for nation		
New Eco-design for Sustainable Products	R			Proposed Mar	Provisionally agreed, Dec	Enters int	o force?			
Empowering Consumers for the Green Transition	D			Proposed Mar		Parliament adopted. Awaiting Council.		Deadline for nation transposition?		ompany actions?
EU Deforestation and forest degradation regulation	R			Approved	Effective?	Enford	eable			
Amendments to Unfair Commercial Practices and Consumer Rights Directives	D		Proposed Mar			Enters into force?		Deadline for nati transposition		
Forced Labour Regulation	R			Proposed Sept		Provisionally agreed, Mar	Enters into force?			ountries will have 3 s to apply new rules
Waste Framework Directive Revision	D			Proposed	Adopted, due '23	Enters into	o force?			
EU Taxonomy	D	2020		Enforceable for climate adaptation and mitigation	Enforceable all other categories					
EU Green Claims Directive	D				Proposed Mar		Adopted?		Enters into	force?
Microplastics Initiative	R	Proposed 2019	Proposal agreed			Enters into force?				

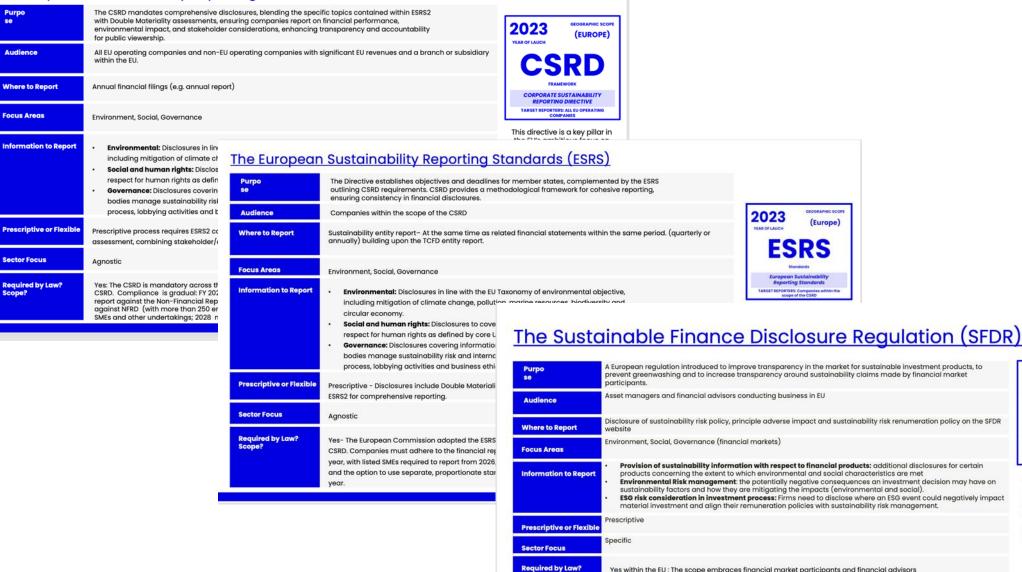
Proposed	Enters into

Force

Transposed/ Action required

	Pre-2021	2021	2022	2023	2024	2025	2026
Companies Act	Enforceable 2006						
Packaging Waste Regulation	Enforceable 2014						
ESOS	Enforceable 2014						
K UK Modern Slavery Act	Enforceable 2015						
SECR	Enforceable 2018						
EPR on packaging	Enforceable		Proposed	Enforced from Jan 2023			
🗮 UKTR (timber)	Enforceable 2021						
Green Claims Code UK		Enforceable					
The UK Environment Act		Enforceable, Nov					
Plastics Packaging Tax	Proposed 2020		Enforceable Apr				
🗮 TCFD	Proposed 2020	Enters into force					
🗮 Gender Pay Gap	Enforceable 2017						
Mandatory Transition Plans		Announced				Enters into force?	1st reports due?
PS22/3: Diversity and inclusion on Boards and ExCo			Enforceable	[X] 1 <sup>st</sup> reporting			
Supply Chain Due Diligence		Proposed		Enforceable Jan			
Gender Diversity on Corporate Boards		Enforceable					Evaluation
Child Labour Due Diligence	Proposed 2019		Enforceable Jan				
Equal Pay Law (Law 162/2021)		Enters into force	Enforceable				
Duty of Care Law	Enforceable 2017						
French Env. Code			Enforceable				
SEC Climate Disclosure Rule			Proposed		Adopted		1st reports due?
California SB253 and SB261				Announced			Enforceable

#### The Corporate Sustainability Reporting Directive (CSRD)



Scope?

Yes within the EU: The scope embraces financial market participants and financial advisors in the EU, financial market participants (FMPs) with EU shareholders, and those marketing themselves in the EU. Examples include asset managers, banks, financial advisors, pension fund providers and insurers.



The SFDR will require Financial Market Participants (FMPs) and financial advisors to evaluate and disclose sustainability-related data and policies at entity, service and product level.

#### Sustainability-related disclosure in the financial services sector (europa.eu)



# Focus on four:

CSRD

- ... and specifically double materiality
- Corporate Sustainability Due Diligence Directive

A great way to begin a strategy (if you do it right)

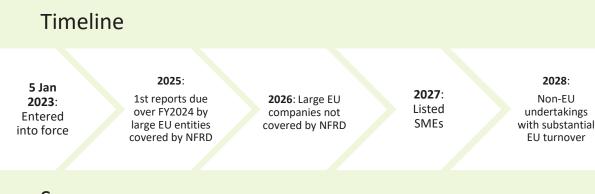
Customer demand

TCFD (Taskforce on Climate Related Financial Disclosures)

Gets the attention of senior leadership!

## EU Corporate Sustainability Reporting Directive (CSRD)

- Aims to standardise ESG disclosures.
- Disclosure and compliance requirements are set out in a new set of European Sustainability Reporting Standards (ESRS)
- Key requirements include:
  - Conducting a Double Materiality Assessment to determine which material issues the company should report on
  - Limited assurance over reported sustainability information, moving towards reasonable assurance from 2028



#### Scope

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- Companies operating in the EU, and/or have EU investors, and/or are part of an EU entity's supply chain:
  - Large EU-listed entity or group with >500 employees
  - Large EU undertakings and EU parent undertakings meeting any two criteria: Balance sheet >€20mln / Net turnover >€40mln / Average employees >250
- SMEs that are listed on EU-regulated markets, except microenterprises (<10 employees and turnover <€2mln)</li>
- Non-EU companies generating >€150mln net turnover in EU and have at least 1 EU subsidiary/branch generating >€40mln

# What is double materiality?

Materiality assessments have traditionally looked at materiality on two axes: importance to the company and importance to stakeholders. The concept of double materiality has gained traction recently due to it being mandated in the EU CSRD as the method for companies to determine which sustainability issues to report against in the European Sustainability Reporting Standards.

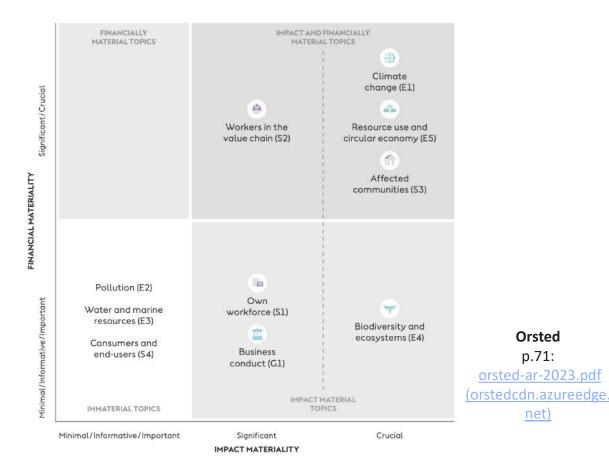
**Double materiality** considers both financial and impact materiality:

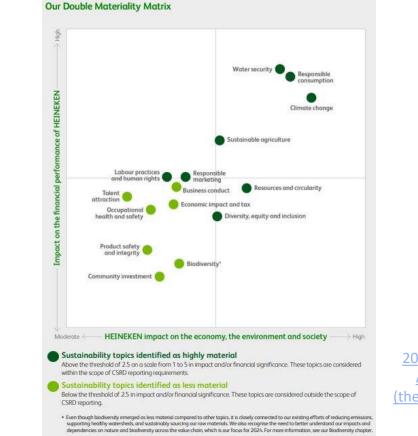
**Financially material** matters are those which (may) generate risks or opportunities that (are likely to) have a material influence on the undertaking's cash flows, development, performance, position, cost of capital or access to finance in the short, medium, and long-term time horizons.

**Impact materiality** is defined as matters which have an actual or potential significant impact on people or the environment over the short, medium or long term, caused or contributed to by the undertaking's own operations, products, or services or through its business relationships.

At its heart, the concept is quite straightforward and aims to ensure that a company's sustainability strategy is correctly focused on the risks and opportunities that could affect its long-term success while simultaneously addressing the social, economic and governance impacts arising from its own operations and those of its value chain.

# Example double materiality assessments – Ørsted and Heineken





Heineken p.135 <u>2023 Heineken NV</u> <u>Annual Report</u> (theheinekencompan <u>y.com)</u>

## EU Corporate Sustainability Due Diligence Directive (CSDDD)

- Aims to foster sustainable and responsible corporate behaviour and to anchor human rights and environmental considerations in companies' operations and corporate governance
- Key requirements include:
  - Integrate human rights and environmental due diligence into policies
  - Develop a process to identify and assess actual or potential adverse human rights and environmental impacts – both in own operations and in the supply chain (upstream and downstream 'chain of activities')
  - Prevent or mitigate potential impacts
  - A transition plan



#### When, who, what?

#### Timeline



#### Scope

- Large EU limited liability companies:
  - From 2027: companies with 5,000+ employees and a net worldwide turnover of 1,500mEUR must comply
  - From 2028: companies with 3,000+ employees and a net worldwide turnover of 900mEUR must comply
  - From 2029: companies with 1,000+ employees and a net worldwide turnover of 450mEUR must comply
- Non–EU companies: third country companies active in the EU with turnover threshold aligned with above, generated in the EU.

## The Task Force on Climate-related Financial Disclosures (TCFD)

- Aims to encourage and standardise climate risk disclosures enabling investors to make better decisions.
- Originated as a Task Force, the recommendations of which became a UK listing requirement. Now replicated in Climate Related Financial Disclosures (CFD) in amended UK Companies' Act.
- Key requirements include:
  - **Governance:** Regarding climate-related risks and opportunities
  - Strategy: The actual and potential impacts of climate-related risks and opportunities on the organisations businesses, strategy and financial planning where such information is material.
  - **Risk management:** How an organisation assesses and manages climate-related risks.
  - Metrics and targets: The metrics and targets used to assess and manage relevant climate-related risks and opportunities where information is material



The Financial Stability Board created the TCFD to develop recommendations on the type of information that companies should disclose to support investors, lenders and insurance underwriters in appropriately assessing and pricing climaterelated risks.



## CFD reporting recommends four focus areas.

#### Figure 4

#### **Recommendations and Supporting Recommended Disclosures**

Governance	Strategy	Risk Management	Metrics and Targets
Disclose the organization's governance around climate- related risks and opportunities.	Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning where such information is material.	Disclose how the organization identifies, assesses, and manages climate-related risks.	Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.
Recommended Disclosures	Recommended Disclosures	Recommended Disclosures	Recommended Disclosures
<ul> <li>a) Describe the board's oversight of climate-related risks and opportunities.</li> </ul>	<ul> <li>a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.</li> </ul>	<ul> <li>a) Describe the organization's processes for identifying and assessing climate-related risks.</li> </ul>	a) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.
b) Describe management's role in assessing and managing climate-related risks and opportunities.	<ul> <li>b) Describe the impact of climate- related risks and opportunities on the organization's businesses, strategy, and financial planning.</li> </ul>	<ul> <li>b) Describe the organization's processes for managing climate-related risks.</li> </ul>	b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.
	c) Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	c) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.

## **Climate Scenarios**

Scenario 2: An Uncertain and Volatile World (2°C)



Scenario 1: A Better World (1.5°C)

#### RCP1.9 / SSP1-1.9 PRI IPR: 1.5°C Required Policy Scenario

- Action taken around the world has achieved the aims set out in the 2015 Paris Agreement - global temperatures have been limited to 1.5°C compared to pre-industrial levels.
- But that does not mean everything is the same as today. There have been some physical changes and achieving this goal has required <u>a substantial shift in policy</u> <u>and behaviour.</u>



#### RCP3.4 / SSP2-4.5 PRI IPR: Forecast Policy Scenario

- Considered by most sources as the "most plausible scenario". Some of the ambitions set nowadays are met with slow, incremental improvements, but no consistent action and commitment.
- Some action has been taken, but it's very much business as usual. It's a bit better but global temperatures continue to climb, albeit slowly, and the <u>impacts are</u> clear to see for many.

Emissions starting to fall around 2050.

#### Scenario 3: An Irreversible World (3°C)



#### RCP6.0 / SSP3-7.0

- Economies around the world continue to be powered by fossil fuels and promises made by global leaders have been largely ignored. Life has continued much the same.
- Global warming has accelerated and well past the point of no return by 2030. This is not doomsday, but <u>the consequences are</u> <u>all around, tangible and in some cases</u> <u>catastrophic.</u>

#### Time horizons:

- Short → 0-2 years
- Medium 🗲 2-5 years
- Long 🗲 5+years



# Other big stories









# Scope 3 and SBTI

#### Human influence has warmed the climate at a rate that is unprecedented in at least the last 2000 years

#### Changes in global surface temperature relative to 1850–1900

(a) Change in global surface temperature (decadal average) as reconstructed (1-2000) and observed (1850-2020)

(b) Change in global surface temperature (annual average) as observed and simulated using human & natural and only natural factors (both 1850-2020)

observed

uman &

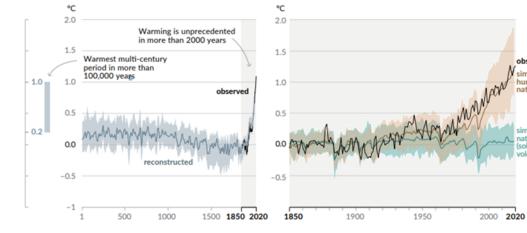
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olar & volcanic)

natural only

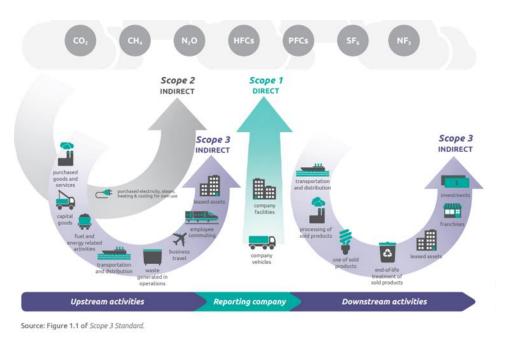
natural

ulate





DRIVING AMBITIOUS CORPORATE CLIMATE ACTION





CDP

# **Responsible Sourcing**



#### Advancing Human Rights in our

#### Supply Chain

#### Responsible Sourcing Manual,

Clothing and General Merchandise Suppliers

July 2021



#### ETI Base Code

The ETI Base Code is an internationally recognised set of labour standards based on ILO conventions. It is used by ETI members and others to drive improvements in working conditions around the world.

#### www.ethicaltrade.org







Ethical Trading Initiative

Employment is freely chosen

Freedom of association Working conditions and the right to are safe and collective bargaining hygienic are respected











Child labour shall not be used

Living wages are paid

Working hours are not excessive









No discrimination is practised

Regular employment is provided

No harsh or inhumane treatment is allowed

For human rights, for better business

Gangmasters and Labour Abuse Authority 꾻

# Biodiversity





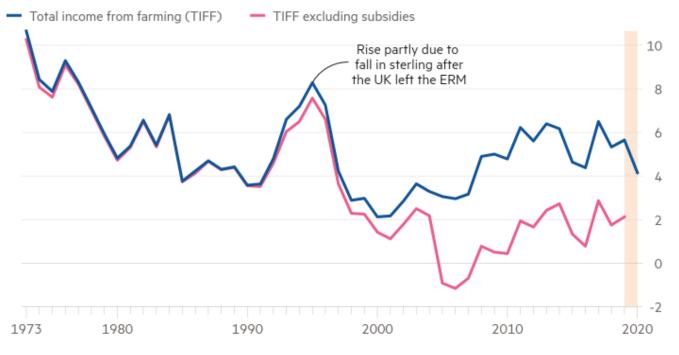
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# INDUSTRIAL AGRICULTURE REGENERATIVE

# Skills and succession

#### Aggregate income from farming fell back last year

£bn at constant 2020 prices



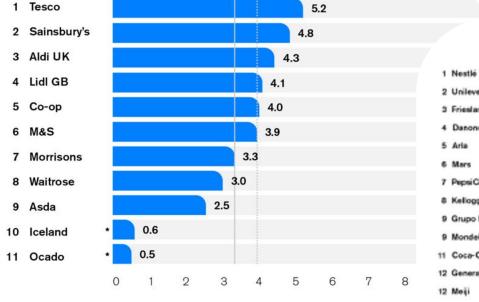
TIFF is net value added at factor cost less wages, rent and interest. 2020 total = provisional Sources: Defra, FT calculations © FT







# **Nutrition**



\*Did not provide information to ATNI

I Average score (3.3) : Media

2 Unilever **3** Friesland Campina BMS 5. 4 Danone BMS 5 Aria 6 Mars 7 PepniCo 8 Kellogg 9 Grupo Bimbo 4.2 9 Mondelēz 4.2 11 Coca-Cola 12 General Mills 12 Meiji 31 14 Ajinomoto 3.0 14 Campbell 3.0 16 Ferrero 2.8 17 Conagra 2.3 **18 BRF** 1.2 19 Keurig Dr Pepper 1.5 19 Kraft Heinz BMS 1.5 21 Suntory 1.1 21 Yili + EMS 23 Lactais 0.5 23 Mengniu 0.5 25 Tingyi

BIMS



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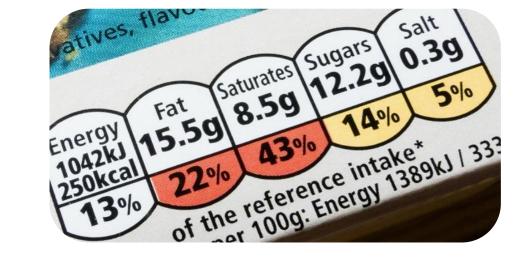
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· Did net provide information to ATNI

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6.7



# The importance of strategy

# Developing an overall ESG Strategy

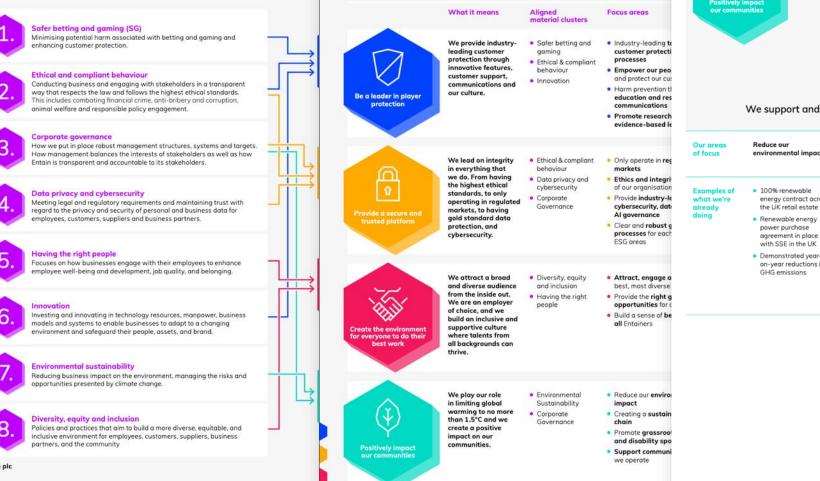
- Strategy is your chance to:
  - Define your own narrative
  - Engage decision-makers and get their sign-off
  - Communicate externally and internally

The structures and definitions may change – the strategy endures



# From materiality to strategy

Our material issues underpin the development of our approach t This captures the areas where we want to be a leader and fram to positive impact. It also provides a framework for assessing th performance of the business.



Sustainability at Entain

Our new

strategy

sustainability

Sustainability at Entain

For each of

sustainabiliti identified ou Positively impact our communities



**Our ambition** 

We support and positively impact our communities around the globe

Our areas of focus	Reduce our environmental impact	Creating a sustainable value chain	Promote grassroots, women's and disability sports	Support communities where we operate
Examples of what we're already doing	<ul> <li>100% renewable energy contract across the UK retail estate</li> <li>Renewable energy power purchase agreement in place with SSE in the UK</li> <li>Demonstrated year- on-year reductions in GHG emissions</li> </ul>	<ul> <li>Launched partnership with EcoVadis</li> <li>Evaluation of supply chain sustainability risks with UnSeen</li> <li>Established the Modern Slavery Working Group</li> </ul>	<ul> <li>Strategic initiatives in place with Pitching-In and SportsAid</li> <li>Launched the Pitching-In volunteer hub</li> </ul>	<ul> <li>Ladbrokes Coral Trust has raised £10m since its inception</li> <li>Committed to contributing £100m through the Entain Foundation</li> <li>Introduced annual Social Impact Report to measure impact-based outcomes</li> </ul>

Entain plc

## **FDF Strategy**



Contribute to a 50% reduction in emissions across the agrifood supply chain by 2030



Contribute to the UK's Nature Positive ambition to halt and reverse nature loss by 2030.



Contribute to halting commodity-driven deforestation and conversion by 2030.



Halve per capita food waste by 2030, contributing to UNSDG12.3 and the Courtauld 2030 commitment.



Contribute to implementing a worldclass packaging recycling system in the UK, reducing the environmental impact of packaging.



Driving a sustainable

food and drink industry

# At a glance



Don't fix your approach to any 'ESG' structure



Try not to get lost in compliance



Remember there are other essential topics



The importance of setting your own strategy





# Do you have any questions?

# Appendix 1: ESG Disclosure and Regulatory Frameworks

Slides from the ICRS



# Navigating Sustainability: An ESG Framework Overview

This document describes the main global sustainability reporting standards and frameworks, covering those already in operation and those that are likely to materialise in the near future. It is not intended to provide a definitive guide to all relevant legislation and regulation in every country and professional advice should be sought where necessary.

Please note: This document is accurate as of January 2024. We acknowledge current and emerging frameworks.



# Regulatory Disclosures & Standards

ESG regulatory frameworks establish government and regulatory guidelines to mandate sustainable and responsible business practices, encompassing reporting standards and disclosure requirements to promote transparency and accountability.

Please note: This document is accurate as of January 2024. We acknowledge current and emerging frameworks.

#### The Corporate Sustainability Reporting Directive (CSRD)

Purpo se	The CSRD mandates comprehensive disclosures, blending the specific topics contained within ESRS2 with Double Materiality assessments, ensuring companies report on financial performance, environmental impact, and stakeholder considerations, enhancing transparency and accountability for public viewership.	2023 VEAR OF LAUCH GEOGRAPHIC SCOPE (EUROPE)
Audience	All EU operating companies and non-EU operating companies with significant EU revenues and a branch or subsidiary within the EU.	CSRD
Where to Report	Annual financial filings (e.g. annual report)	FRAMEWORK CORPORATE SUSTAINABILITY REPORTING DIRECTIVE
Focus Areas	Environment, Social, Governance	TARGET REPORTERS: ALL EU OPERATING COMPANIES
Information to Report	<ul> <li>Environmental: Disclosures in line with the EU Taxonomy of environmental objective, including mitigation of climate change (Scope 1, 2 and 3 emissions)</li> <li>Social and human rights: Disclosures to cover gender equality, working conditions and respect for human rights as defined by core UN and EU human rights conventions</li> <li>Governance: Disclosures covering information on how management and supervisory bodies manage sustainability risk and internal controls over the sustainability reporting process, lobbying activities and business ethics.</li> </ul>	the EU's ambitious focus on corporate sustainability and sits alongside other major European legislative and regulatory initiatives aimed at advancing the green economy. <u>Corporate sustainability</u> <u>reporting (europa.eu)</u>
Prescriptive or Flexible	Prescriptive process requires ESRS2 compliance and mandates Double Materiality assessment, combining stakeholder/environment impacts with financial issues.	* * * * * CSRD *
Sector Focus	Agnostic	* * * *
Required by Law? Scope?	Yes: The CSRD is mandatory across the EU and member states can set penalties for companies that don't follow the CSRD. Compliance is gradual: FY 2024 (reporting 2025) – large companies (over 500 employees) already required to report against the Non-Financial Reporting Directive (NFRD) ; FY 2025 large companies not already required to report against NFRD (with more than 250 employees and/or €40m turnover and/or €20m in total assets; FY 2026 for listed SMEs and other undertakings; 2028 non-EU companies with net turnover above €150 m in the EU.	

#### The European Sustainability Reporting Standards (ESRS)

Purpo se	The Directive establishes objectives and deadlines for member states, complemented by the ESRS outlining CSRD requirements. CSRD provides a methodological framework for cohesive reporting, ensuring consistency in financial disclosures.	
Audience	Companies within the scope of the CSRD	2023 GEOGRAPHIC SCOPE
Where to Report	Sustainability entity report– At the same time as related financial statements within the same period. (quarterly or annually) building upon the TCFD entity report.	VEAR OF LAUCH (Europe)
Focus Areas	Environment, Social, Governance	Standards European Sustainability
Information to Report	<ul> <li>Environmental: Disclosures in line with the EU Taxonomy of environmental objective, including mitigation of climate change, pollution, marine resources, biodiversity and circular economy.</li> <li>Social and human rights: Disclosures to cover gender equality, working conditions and respect for human rights as defined by core UN and EU human rights conventions</li> <li>Governance: Disclosures covering information on how management and supervisory bodies manage sustainability risk and internal controls over the sustainability reporting process, lobbying activities and business ethics.</li> </ul>	Reporting Standards TARGET REPORTERS: Companies within the scope of the CSRD The ESRS detailing requirements for sustainability disclosures by undertakings in their management reports, effective from 1 January 2024, to enhance transparency and
Prescriptive or Flexible	Prescriptive - Disclosures include Double Materiality assessment results, extending beyond ESRS2 for comprehensive reporting.	comparability of sustainability-related information in the EU.
Sector Focus	Agnostic	EUR-Lex - 32023R2772 - EN - EUR-Lex (europa.eu)
Required by Law? Scope?	Yes- The European Commission adopted the ESRS on the 31 <sup>st</sup> July 2023 to compliment the CSRD. Companies must adhere to the financial reporting standards starting in the 2024 fiscal year, with listed SMEs required to report from 2026, allowing for a voluntary opt-out until 2028, and the option to use separate, proportionate standards developed by EFRAG in the following year.	European Financial Reporting Advisory Group

#### <u>The Task Force on Climate-related Financial Disclosures (TCFD)</u>

Purp ose	To encourage firms to align climate-related risk disclosures by publicly disclosing better reporting processes to help inform investors with better investment decision making. Whilst the TCFD has now ceased to exist as an entity, the reporting requirements developed by the TCFD have been adopted by the IFRS with additional elements such as the IFRS2.	2017 YEAR OF LAUCH GEOGRAPHIC SCOPE (GLOBAL)	
Audience	Investors, lenders, insurers		
Where to Report	Annual financial filings (e.g. annual report)	FRAMEWORK	
Focus Areas	Environment, Governance	TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES TARGET REPORTERS: ALL COMPANIES	
Information to Report	<ul> <li>Governance: Regarding climate-related risks and opportunities</li> <li>Strategy: The actual and potential impacts of climate-related risks and opportunities on the organisations businesses, strategy and financial planning where such information is material.</li> <li>Risk management: How an organisation assesses and manages climate-related risks.</li> <li>Metrics and targets: The metrics and targets used to assess and manage relevant climate-related risks and opportunities where information is material</li> </ul>	The Financial Stability Board created the TCFD to develop recommendations on the type of information that companies should disclose	
Prescriptive or Flexible	Flexible (may enter into force later)	to support investors, lenders and insurance underwriters in appropriately assessing and pricing climate-related	
Sector Focus	Agnostic (+ some sector-specific guidance)	risks.	
Required by Law? Scope?	Varies on domain: It is mandatory within the UK and New Zealand, voluntary within domains such as the EU, Canada and Japan and considered within the US. The scope specifies companies that have more than 500 employees, have a total operating income over £500 million or been instructed by their sponsoring department to follow this guidance.		

### The Sustainable Finance Disclosure Regulation (SFDR)

Purpo se	A European regulation introduced to improve transparency in the market for sustainable investment products, to prevent greenwashing and to increase transparency around sustainability claims made by financial market participants.	2021 GEOGRAPHIC SCOPE (EUROPE)
Audience	Asset managers and financial advisors conducting business in EU	SFDR
Where to Report	Disclosure of sustainability risk policy, principle adverse impact and sustainability risk renumeration policy on the SFDR website	FRAMEWORK
Focus Areas	Environment, Social, Governance (financial markets)	SUSTAINABLE FINANCE DISCLOSURE REGULATION (SFDR) TARGET REPORTERS: COMPANIES OPERATING
Information to Report	<ul> <li>Provision of sustainability information with respect to financial products: additional disclosures for certain products concerning the extent to which environmental and social characteristics are met</li> <li>Environmental Risk management: the potentially negative consequences an investment decision may have on sustainability factors and how they are mitigating the impacts (environmental and social).</li> <li>ESG risk consideration in investment process: Firms need to disclose where an ESG event could negatively impact material investment and align their remuneration policies with sustainability risk management.</li> </ul>	IN EUROPE The SFDR will require Financial Market Participants (FMPs) and financial advisors to
Prescriptive or Flexible	Prescriptive	evaluate and disclose sustainability-related data and policies at entity,
Sector Focus	Specific	service and product level.
Required by Law? Scope	Yes within the EU : The scope embraces financial market participants and financial advisors in the EU, financial market participants (FMPs) with EU shareholders, and those marketing themselves in the EU. Examples include asset managers, banks, financial advisors, pension fund providers and insurers.	Sustainability-related disclosure in the financial services sector (europa.eu)



#### The Corporate Sustainability Reporting Directive (CSRD)

Purpo se	The CSRD mandates comprehensive disclosures, blending the specific topics contained within ESRS2 with Double Materiality assessments, ensuring companies report on financial performance, environmental impact, and stakeholder considerations, enhancing transparency and accountability for public viewership.	2023 YEAR OF LAUCH GEOGRAPHIC SCOPE (EUROPE)
Audience	All EU operating companies and non-EU operating companies with significant EU revenues and a branch or subsidiary within the EU.	
Where to Report	Annual financial filings (e.g. annual report)	CORPORATE SUSTAINABILITY REPORTING DIRECTIVE TARGET REPORTERS: ALL EU OPERATING COMPANIES
Focus Areas	Environment, Social, Governance	COMPANIES
Information to Report	<ul> <li>Environmental: Disclosures in line with the EU Taxonomy of environmental objective, including mitigation of climate change (Scope 1, 2 and 3 emissions)</li> <li>Social and human rights: Disclosures to cover gender equality, working conditions and respect for human rights as defined by core UN and EU human rights conventions</li> <li>Governance: Disclosures covering information on how management and supervisory bodies manage sustainability risk and internal controls over the sustainability reporting process, lobbying activities and business ethics.</li> </ul>	This directive is a key pillar in the EU's ambitious focus on corporate sustainability and sits alongside other major European legislative and regulatory initiatives aimed at advancing the green economy.
Prescriptive or Flexible	Prescriptive process requires ESRS2 compliance and mandates Double Materiality assessment, combining stakeholder/environment impacts with financial issues.	<u>Corporate sustainability</u> <u>reporting (europa.eu)</u>
Sector Focus	Agnostic	* * * * CSRD * * * *
Required by Law? Scope?	Yes: The CSRD is mandatory across the EU and member states can set penalties for companies that don't follow the CSRD. Compliance is gradual: FY 2024 (reporting 2025) – large companies (over 500 employees) already required to report against the Non-Financial Reporting Directive (NFRD) ; FY 2025 large companies not already required to report against NFRD (with more than 250 employees and/or €40m turnover and/or €20m in total assets; FY 2026 for listed SMEs and other undertakings; 2028 non-EU companies with net turnover above €150 m in the EU.	

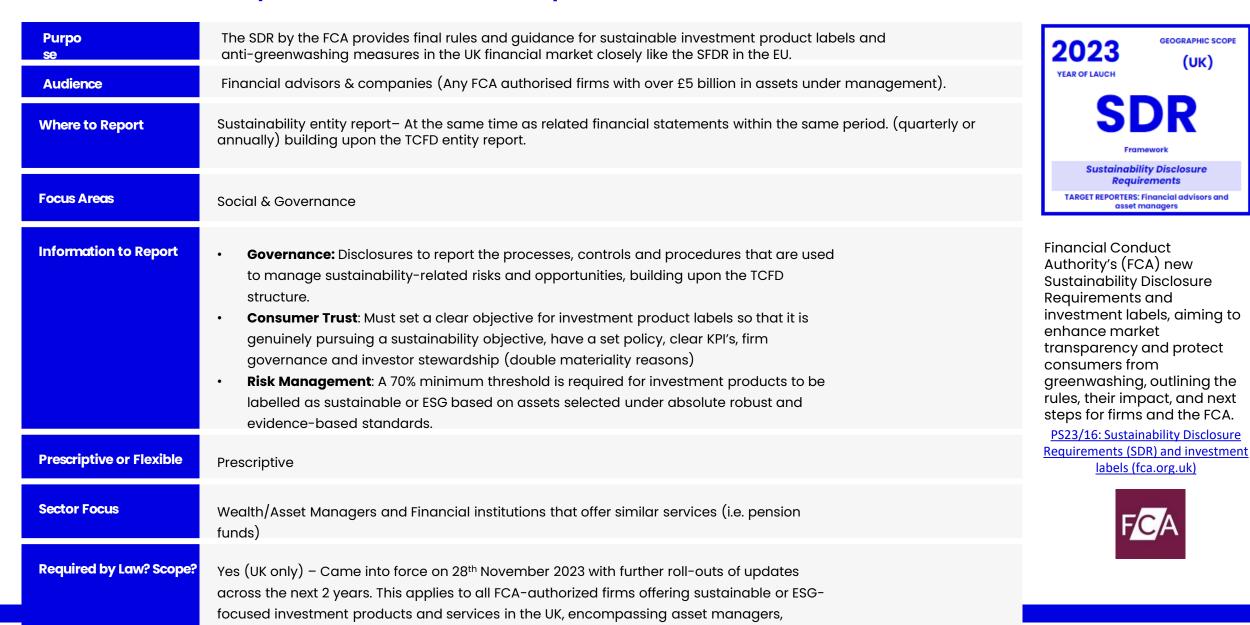
#### The European Sustainability Reporting Standards (ESRS)

Purpo se	The Directive establishes objectives and deadlines for member states, complemented by the ESRS outlining CSRD requirements. CSRD provides a methodological framework for cohesive reporting, ensuring consistency in financial disclosures.	2023 YEAR OF LAUCH GEOGRAPHIC SCOPE (Europe)
Audience	Companies within the scope of the CSRD	ESRS
Where to Report	Sustainability entity report– At the same time as related financial statements within the same period. (quarterly or annually) building upon the TCFD entity report.	Standards European Sustainability Reporting Standards
Focus Areas	Environment, Social, Governance	TARGET REPORTERS: Companies within the scope of the CSRD
Information to Report	<ul> <li>Environmental: Disclosures in line with the EU Taxonomy of environmental objective, including mitigation of climate change, pollution, marine resources, biodiversity and circular economy.</li> <li>Social and human rights: Disclosures to cover gender equality, working conditions and respect for human rights as defined by core UN and EU human rights conventions</li> <li>Governance: Disclosures covering information on how management and supervisory bodies manage sustainability risk and internal controls over the sustainability reporting process, lobbying activities and business ethics.</li> </ul>	The ESRS detailing requirements for sustainability disclosures by undertakings in their management reports, effective from 1 January 2024, to enhance transparency and comparability of sustainability-related information in the EU.
Prescriptive or Flexible	Prescriptive - Disclosures include Double Materiality assessment results, extending beyond ESRS2 for comprehensive reporting.	EUR-Lex - 32023R2772 - EN - EUR-Lex (europa.eu)
Sector Focus	Agnostic	European Financial Reporting Advisory Group
Required by Law? Scope?	Yes- The European Commission adopted the ESRS on the 31 <sup>st</sup> July 2023 to compliment the CSRD. Companies must adhere to the financial reporting standards starting in the 2024 fiscal year, with listed SMEs required to report from 2026, allowing for a voluntary opt-out until 2028, and the option to use separate, proportionate standards developed by EFRAG in the following	

# International Financial Reporting Standards (IFRS SDS S1 & S2)

Purpo se	IFRS SI aims to make companies disclose material sustainability-related risks and opportunities that could impact their financial prospects. S2 focuses on specific climate-related disclosures.	2023 (Worldwide)
Audience	Firms and various stakeholders.	YEAR OF LAUCH
Where to Report	General Purpose Financial Reports (GPFR) – At the same time as related financial statements within the same period. (quarterly or annually)	IFRS Standards
Focus Areas	Environmental & Governance	International Financial Reporting Standards TARGET REPORTERS: Firms and various stakeholders
Information to Report	<ul> <li>Environmental: Disclosure of cross-industry metrics that are relevant to all companies e.g. GHG emissions.</li> <li>Governance: Disclosures to report the processes, controls and procedures that are used to manage sustainability-related risks and opportunities as well as individuals responsible and management's role in managing such risks and opportunities.</li> <li>Risk Management: How the company assesses the likelihood and impact of risks, prioritises them, input parameters and if it is consistent with previous years as well as how they assess and prioritise opportunities as well as how they monitor, manage and mitigate them.</li> </ul>	IFRS S1 & S2 is aiming to enhance global sustainability reporting consistency and quality, and to address challenges like greenwashing by requiring companies to disclose sustainability-related financial information alongside financial statements.
Prescriptive or Flexible	Flexible – In relation to GAAP, the IFRS S1 & S2 are far more open to interpretation.	IFRS - IFRS S1 General Requirement for Disclosure
Sector Focus	Agnostic	IFRS - IFRS S2 Climate-related Disclosures
Required by Law? Scope?	Globally: Not currently a mandatory standard but gaining traction and expected to become compulsory in many jurisdictions. Jurisdiction-Specific: Individual countries decide whether to adopt IFRS S1 and S2 into their regulations i.e., the UK has committed to incorporating them, but the official implementation date is yet to be confirmed.	<b>®IFRS</b>

#### Sustainability Disclosure Requirements - FCA (SDR)





# Sustainability Reporting Frameworks & Indices

Reporting frameworks provide a structure and indicators that organisations can use for their sustainability reporting while sustainability indices help evaluate companies on ESG criteria and inform ethical investment decisions. Although not legally required, they assist investors and other stakeholders in assessing corporate performance and the progress companies are making towards achieving their sustainability ambitions and specific targets.

Please note: This document is accurate as of January 2024. We acknowledge current and emerging frameworks.

## <u>The Global Reporting Initiative (GRI)</u>

Purpo se	To help organisations report on economic, environmental and social impacts considering a wide range of interests	1997 GEOGRAPHIC SCOPE
Audience	A broad set of stakeholders	YEAR OF LAUCH
Where to Report	Corporate sustainability report	
Focus Areas	Environment, Social, Economic, Governance	GRI STANDARDS
Information to Report	<ul> <li>General disclosures: An organisational profile, strategy, ethics and integrity, governance, stakeholder engagement practices and reporting process.</li> <li>Economic: Performance, market presence, indirect economic impacts, procurement practices, anti-corruption and anti-competitive behaviour</li> <li>Environment: Materials, energy, water and effluents and waste, environmental compliance and supplier environmental assessment</li> <li>Social: Employment labour/management relations, occupational health/safety, training and education, diversity and equal opportunity, non-discrimination, freedom of association and collective bargaining, child labour etc.</li> </ul>	TARGET REPORTERS: ALL COMPANIES The aim of the GRI was to create the first accountability mechanism to ensure companies adhere to responsible environmental conduct principles, which was then broadened
Prescriptive or Flexible	Prescriptive	to include social, economic and governance issues.
Sector Focus	Agnostic (+ some sector-specific guidance)	<u>GRI - Home (globalreporting.org)</u>
Required by Law? Scope?	No	GRI

### <u>The S&P Global Corporate Sustainability Assessment (CSA)</u>

Purp ose	The CSA is intended for companies that want to establish a sustainability baseline as well as gain independent insight into their sustainability efforts compared to other companies.	1999 GEOGRAPHIC SCOPE (GLOBAL)	GEOGRAPHIC SCOPE (GLOBAL)
Audience	Large companies will be invited, starting with those elidable for the Dow Jones Sustainability Index (DJSI)	YEAR OF LAUCH	
Where to Report	CSA questionnaire		5 <b>A</b>
Focus Areas	Environment, Social, Governance	FRAM S&P GLOBA	EWORK
	• Governance and Economic Dimensions: Company Information, Material Issues Risk and Crisis management, Business	SUSTAINABILI	TY ASSESSMENT
Information to Report	Ethics, Policy Influence, Tax Strategy, Information Security etc.	TARGET REPORTE	RS: ALL COMPANIES
	<ul> <li>Environmental Reporting: Environmental Policy and Management Systems, Operational Eco-Efficiency, Climate Strategy etc.</li> <li>Social Dimension: Reporting, Labour Practice Indicators, Human Rights, Human Capital Development, Talent Attraction and Retention, Corporate Citizenship and Philanthropy, Occupational Health and Safety, Customer Relationship Management, Sustainable Marketing and Brand Perception, Privacy Protection</li> </ul>	The CSA is ar evaluation of sustainability Results from	companies' practices. the CSA, the
Prescriptive or Flexible	Flexible (invite sent to certain companies - If companies choose not to actively participate in the assessment, they will still be scored by an S&P Global analyst based exclusively on publicly available information, such as the company's annual report and corporate website.)	S&P Global ESG Scores, are a key factor to select eligible companies into S&P Global ESG Indices, including the world famous Dow Jones Sustainability Indices, or the S&P Global Large Midcap ESG Index. https://www.spglobal.com/e	
Sector Focus	Specific		
Required by Law? Scope?	No		



# <u>The Carbon Disclosure Project (CDP)</u>

Purp ose	To capture environmental performance data related to GHG emissions, water, forests and supply chain	2000 GEOGRAPHIC SCOPE (GLOBAL)
Audience	Investors, private and public sector buyers of goods and services, and other stakeholders	YEAR OF LAUCH
Where to Report	CDPs online reporting platform	CDP
Focus Areas	Environment, Governance	FRAMEWORK
Information to Report	<ul> <li>Climate change: Risks and low carbon opportunities for your organisation.</li> <li>Forest: How an organisation produces, sources and utilises major soft commodities associated with</li> </ul>	CDP QUESTIONNAIRE AND REPORTING GUIDANCE
	detrimental impacts on natural resources.	TARGET REPORTERS: COMPANIES, CITIES, STATES AND REGIONS
	<ul> <li>Water security: Company management, governance, use and stewardship of water resources</li> <li>Supply chain: Management of climate change, forest and water security</li> </ul>	
		CDP is a not-for-profit charity that runs the global
Prescriptive or Flexible	Prescriptive	disclosure system for
		investors, companies, cities, states and regions to
Sector Focus	Specific	manage their environmental impacts.
Required by Law?		https://www.cdp.net/en/
Scope?	No	_



#### International Integrated Reporting Framework (<IR>)

Purp ose	The Integrated Reporting Framework (IIRC) aims to enhance corporate reporting by promoting a holistic and integrated approach across financial, social, and environmental factors. In August 2022, the IIRC was fully incorporated into the IFRS foundation in which on June 2021, the IIRC merged with the SASB to form the value reporting foundation(VRF)	2010 GEOGRAPHIC SCOPE (Global)
Audience	Investors	<ir></ir>
Where to Report	Stand-alone integrated report	Framework
Focus Areas	Environment, Social, Governance	International Integrated Reporting Framework TARGET REPORTERS: Investors and Public Companies
Information to Report	<ul> <li>Organisational overview: and external environment</li> <li>Governance Structure: How it supports the ability to create value in the short, medium and longer term</li> <li>Business model: Of the organisation</li> <li>Risks and opportunities: That affect the ability to create value over the short, medium and longer term and how these issues will be dealt with</li> <li>Strategy: Including resource allocation</li> <li>Performance: The extent to which objectives were achieved for the period; outcomes and their effect on capitals.</li> <li>Outlook: Challenges and uncertainties likely to be encountered; implications for the business model and future performance</li> <li>Basis of presentation: How the organisation determines what to include in its integrated report</li> </ul>	The <ir> is a global coalition of regulators, investors, companies, standard setters, the accounting profession, academia and NGOs. The coalition promotes communication about value creation as the next step in the evolution of corporate reporting.</ir>
Prescriptive or Flexible	Flexible	https://www.integratedreporting.org/
Sector Focus	Agnostic	
Required by Law? Scope?	No	

## The Sustainability Accounting Standards (SASB)

Purp ose	To facilitate the disclosure of material sustainability information in SEC filings . As of August 2022, is International Sustainability Standards Board (ISSB) of the IFRS Foundation assumed responsibility for the SASB in which they continue to evolve, maintain and enhance the SASB.	2012 GEOGRAPHIC SCOPE (Global)
Audience	Investors	YEAR OF LAUCH
Where to Report	SEC form 10-K, 20-F filings	Framework SUSTAINABILITY ACCOUNTING STANDARDS
Focus Areas	Environment, Social, Governance	TARGET REPORTERS: PUBLIC COMPANIES
Information to Report	<ul> <li>Environment: Corporate impacts on the environment</li> <li>Social Capital: Human rights, protection of vulnerable groups, local economic development, access to and quality of products and services, affordability, responsible marketing and customer privacy.</li> <li>Human capital: Issues affecting employee productivity (e.g., employee engagement, diversity, incentives and compensation)</li> <li>Business model and innovation: Impact of sustainability issues on innovation and business models and the integration of these issues in a company's value-creation process.</li> <li>Leadership and governance: Management of issues inherent to the business model or common practice in the industry that are in potential conflict with the integress of broader stakeholder groups</li> </ul>	The SASB require Financial Market Participants (FMPs) and financial advisors to evaluate and disclose sustainability-related data and policies at entity, service and product level. <u>https://www.sasb.org/</u>
Prescriptive or Flexible	Prescriptive	
Sector Focus	Specific	SASB
Required by Law? Scope?	Not yet, but some jurisdictions recommend using these standards for mandatory reporting	

#### <u>The Taskforce on Nature-related Financial Disclosures</u>

Purpose	The TNFD aims to provide a framework towards nature-related impacts, risks and opportunities for businesses. Through such public disclosures, investors and stakeholders will have additional information to make more informed decision-making capabilities.	2023 YEAR OF LAUCH GEOGRAPHIC SCOPE (GLOBAL)
Audience	Investors, lenders, insurers	TNFD
Where to Report	Annual financial filings (e.g. annual report)	FRAMEWORK Taskforce on Nature-related Financial Disclosures
Focus Areas	Environment, Governance	TARGET REPORTERS: ALL COMPANIES TNFD has developed disclosure recommendations that are
Information to Report	<ul> <li>Governance: Around nature-related dependencies, impacts, risks and opportunities.</li> <li>Strategy: Disclose the actual and potential impacts of nature-related risks and opportunities on the organisations businesses, strategy and financial planning where such information is material</li> <li>Risk and Impact Management: How the organisation identifies/assesses/manages nature-related dependencies/impacts/risks and opportunities</li> <li>Metrics and Targets: Used to assess and manage relevant nature-related dependencies, impact risks and opportunities where such information is material.</li> </ul>	intended to provide business and capital markets with better quality information on an organisation's impacts and dependencies on nature. It adopts a similar approach to that of TCFD and aims to ensure that, equipped with this information, investors and other capital providers can shift the flow of capital to provider more positive outcomes for nature and society.
Prescriptive or Flexible	Flexible (may enter into force later)	, https://tnfd.global/
Sector Focus	Agnostic (+ some sector-specific guidance)	TN
Required by Law? Scope?	Νο	FD



# Reporting Disclosure Frameworks & Standards to be rolled out in the shortterm (0-3 years)

Whilst not yet released, it would be of value to be aware of upcoming standards and frameworks to raise awareness for future expectations and plan before/if they are rolled out.

Please note: This document is accurate as of January 2024. We acknowledge current and emerging frameworks.

#### <u>Corporate Sustainability Due Diligence Directive (CSDDD)</u>

Purpo se	The Corporate Sustainability Due Diligence Directive (CSDDD) aims to enhance corporate accountability by mandating thorough assessments of environmental, social, and governance impacts, fostering sustainable business practices and transparency.	2023 GEOGRAPHIC SCOPE (EU)
Audience	Large Corporations operating in the EU, investors and stakeholders.	CSDDD
Where to Report	Not explicitly stated yet but would most likely be in either a company's sustainability report or separate report.	Framework Corporate Sustainability Due
Focus Areas	Environmental, Social & Governance	Diligence Directive TARGET REPORTERS: Large companies (per ruling), stakeholders and investors
Information to Report	<ul> <li>Environmental: The directive will ensure compliance with international environmental conventions is paramount in addressing adverse impacts within value chains.</li> <li>Social: The directive will contribute to the EU Pillar of Social rights such as fair working conditions, international labour standards and thus help compliment the EU regulatory environment to assess and manage sustainability risks and impacts with respect to core human rights and environmental risks including across their value chains.</li> <li>Governance: Due diligence must be conducted by applicable companies on the following: Integrating due diligence into internal policies, identifying actual/potential impacts, preventing and mitigating potential adverse impacts, establishing/maintaining a complaints procedure, monitoring and updating the due diligence policy where accordingly.</li> </ul>	The Corporate Sustainability Due Diligence Directive (CSDDD) represents a regulatory framework designed to advance sustainable corporate practices. Its core objective is to compel companies to systematically identify, prevent, and alleviate adverse human rights and environmental impacts emanating from their operations and supply chains.
Prescriptive or Flexible	Prescriptive	<u>EUR-Lex - 52022PC0071 - EN - EUR-Lex</u> (europa.eu)
Sector Focus	Agnostic (Both for EU and Non-EU companies)	<u>(europa.eu)</u>
Required by Law? Scope?	Yes (if approved) –The Scope states both EU companies and non-EU companies operating within the EU that either have more than 500 employees and a turnover above €150 million worldwide or have more than 250 employees and a turnover above €40 million that operate in defined high impact sectors (textiles, agriculture, etc.) should prepare to meet the requirements. If approved by the EU Council, member states will have 2 years to transpose the CSDDD into national law.	

### <u>UK Sustainability Disclosure Standards (UK SDS)</u>

Purpo se	The UK SDS will set out corporate disclosures for sustainability-related risks and opportunities that companies face, drawing upon the ISSB Standards. The Sustainability Disclosure Technical Advisory Committee (TAC) and Sustainability Disclosure Policy and Implementation Committee) (PIC) are	2024 GEOGRAPHIC SCOPE VEAR OF LAUCH (UK)
Audience	UK-listed and UK-registered companies	SDS
Where to Report	General Purpose Financial Reports (GPFR) – At the same time as related financial statements within the same period. (quarterly or annually) (assuming it follows similar procedures as the IFRS S1&2.)	Standards Sustainability Disclosure Standards TARGET REPORTERS: Listed and/or UK- registered companies
Focus Areas	Social & Governance (assuming it follows similar procedures as the IFRS S1&2.)	The UK SDS is proposed to roll out in July 2024, aiming
Information to Report	<ul> <li>Environmental: Disclosure of cross-industry metrics that are relevant to all companies e.g. GHG emissions.</li> <li>Governance: Disclosures to report the processes, controls and procedures that are used to manage sustainability-related risks and opportunities as well as individuals responsible and management's role in managing such risks and opportunities.</li> <li>Risk Management: How the company assesses the likelihood and impact of risks, prioritises them, input parameters and if it is consistent with previous years as well as how they assess and prioritise opportunities as well as how they monitor, manage and mitigate them.</li> </ul>	to help companies disclose climate-related information and act alongside future frameworks such as the proposed UK Green Taxonomy in the same period. <u>UK Sustainability Disclosure</u> <u>Standards - GOV.UK</u> (www.gov.uk)
Prescriptive or Flexible	Prescriptive	Department for
Sector Focus	Agnostic	Business & Trade
Required by Law? Scope?	No – Still not officially rolled out but it should be by July 2024. Afterwards, it may be referenced for any legal/regulatory requirements.	

# International Standard on Sustainability Assurance (ISSA)

Purpo se Audience Where to Report	The proposed ISSA 5000 will serve as a standard for sustainability assurance engagement to be used by professional accountant and non-accountant assurance practitioners, enhancing trust/confidence in financial and non-financial reporting.         Professional service firms, assurers, accountants.         General Purpose Financial Reports (GPFR) – At the same time as related financial statements within the same period. (quarterly or annually)	2024 VEAR OF LAUCH COORAPHIC SCOPE (Worldwide) ISSSA Standards International Standard on Sustainability Assurance
Focus Areas	Environmental, Social & Governance	TARGET REPORTERS: Professional service firms, assurers and accountants
Information to Report	<ul> <li>Environmental: Disclosures related to sustainability matter (than financial) and cover topics related to climate, energy and water among others depending on firm specific requirements/interests.</li> <li>Social: Offers guidance on application of requirements including identifying and assessing risks of material misstatements but may express them differently if need-be for tailored specifics (A286-A521).</li> <li>Governance: Disclosures to report the processes, controls and procedures that are used to manage sustainability-related risks and opportunities as well as individuals responsible and management's role in managing such risks and opportunities.</li> </ul>	engagement on sustainability information, creating a framework for practitioners to evaluate a firm against suitable criteria to provide greater transparency and reporting standards for informed decision-making capabilities.
Prescriptive or Flexible	Prescriptive	Understanding International Standard on Sustainability Assurance 5000   IAASB
Sector Focus	Agnostic	IAASB
Required by Law? Scope?	No – Not officially rolled out but firms should follow the ISSA in line with respective jurisdiction laws.	

#### Transition Plan Taskforce (TPT)

Purpo se	The TPT offers comprehensive guidelines and standards for businesses to develop and disclose their transition strategies to closely align with the UK's goal of becoming a net-zero financial centre complimenting/building upon the IFRS S1&S2 and components identified by GFANZ.	2
Audience	UK based Companies, Suppliers (for information documentation).	
Where to Report	General purpose financial reports- Eventually it would be good practise (though not required) to publish it in a standalone document.	١,
Focus Areas	Environmental, Social & Governance	
Information to Report	<ul> <li>Environmental: Disclosures must explain whether and how the company is applying a carbon price in decision-making and the price for each metric tonne of ghg emissions in accordance with the Greenhouse Gas Protocol: A corporate Accounting and Reporting Standard (2004).</li> <li>Social: Disclosures must explain the policies and practises for firm workforces, social impact under element 2.3 and risk and opportunity in their value chain defined under Strategic Ambitions.</li> <li>Governance: Companies must disclose any target it has set required by law or regulation and how the targets reflect Strategic Ambition, Implementation and Engagement strategy listed under sub-element 4.1 a.</li> </ul>	Th Ta to an rel ac as pro- fin ec cli pla
Prescriptive or Flexible	Prescriptive	
Sector Focus	Agnostic	
Required by Law? Scope?	No - It is currently (as of recent developments) voluntary, however with the mandate until July 31 <sup>st</sup> with potential extensions, it is likely it could eventually be. There is also a strong chance the FCA will incorporate some elements into their disclosure requirements (SDR).	

CEOGRAPHIC SCOPE (UK)

The Transition Plan Taskforce (TPT) report aims to improve the consistency and quality of climaterelated transition plans. It addresses challenges such as greenwashing by providing a framework for finance and the real economy to disclose their climate-related transition plans.

<u>TPT\_Disclosure-framework-</u> <u>2023.pdf</u> (transitiontaskforce.net)

TPT



Making Sustainability Happen