European Lab project on risk and opportunities and linkage to the business model (RNFRO)

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Co-Chairs

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European Financial Reporting Advisory Group





DISCLAIMER

The views expressed in this presentation are those of the presenter, except where indicated otherwise. They are not approved by the European Lab Steering Group nor do they represent the official views of EFRAG.

Structure of session



- 1. Introduction and context
- 2. Key Findings (Good practices, aggregate findings, stakeholder survey)
- 3. Panel discussion









Purpose of the PTF RNFRO

The aim of the second project of the European Lab is to identify good reporting practices around the theme of the project from a sustainability perspective and addressing what is commonly known as ESG factors. The project is expected to consider the needs and expectations of a wide range of users and other stakeholders, the extent to which they are addressed by current reporting practices, and the challenges faced by companies in providing that information.



Scope of project

- Focus is on business model reporting and how opportunities and risks to it are described (if at all)
- Companies typically do not tag risks as financial/non-financial but some do recognise that some risks are in fact pre-financial (measurement uncertainty/future events)
- Placement/ location of disclosures- will look at the legal filing and voluntary reports (such as sustainability reports)
- Adopting a multi-capital business that includes all the 'capitals' typically reported under Integrated Reporting- but we will remain framework neutral
- Build on existing research including the Alliance of Corporate Transparency Report (2019), the Corporate Reporting Dialogue publications and other publications







2A. ILLUSTRATIVE GOOD PRACTICE EXAMPLES







- 65 companies considered
- Sample of 43 (from 16 European countries and 19 sectors) considered on the basis of
 - Existing initiatives highlighting recognized good practices (e.g. Alliance for Corporate Transparency)
 - 20% of companies from the EFRAG Stakeholder Survey

Comprehensive business model description-Neste



NESTE

01 Strategy

02 Sustainability

03 Governance

04 Review by the Board of Directors

05 Financia

Read more about Neste's value creation on our website @



Input Output Outcome Neste business model Indirect upstream Direct upstream Direct downstream Indirect downstream Impact Number of suppliers in Total equity 5,922 MEUR Market cap 23,861 MEUR · Increase in the value of the · Creating new jobs and Neste helps transport and cities, (at the end of 2019) shares and dividends supporting the existing R&D expenditure 54 MEUR - Renewable Products 95 as well as customers in the aviation, ones in the company's (+160 Demeter suppliers) Comparable operating New business opportunities · Interest-bearing net Governance value chains polymers and chemicals sectors make profit 1,962 MEUR · Renewables help customers - Oil Products 48 9 debt -191 MEUR Redirecting consumer BOACE 26 6% their business more sustainable. to meet their greenhouse - Indirect procurement 7.607 Purchases of expenditure towards . Dividends 783 MEUR from 2019 gas emission (GHG) · Operations in 11 countries - refinery feedstocks sustainable solutions reduction commitments and 12,299 MEUR. Net sales 15,840 MEUR Production in 4 countries support UN Sustainable · Supporting the development - other goods and services Our businesses · Share of Clean Development Goals of customers' brand value Revenue 25.5% 29 · Helping end users to and brand awareness - Use of renewable raw · Neste MY Renewable Renewable Oil Marketing avoid infrastructure and materials 3.5 Mt Diesel sales 0.5 Mt **Products Products** & Services other investments with · Sales from in-house production, Sourced crude oil and drop-in solutions Producing a fossil feedstock 15.6 Mt Offering renewable We market Oil Products 14.4 Mt M&S B2B Customer diesel and jet fuel wide variety and sell a 991 service stations satisfaction: Net Promoter Indirect procurement refined from waste of traditional wide variety Score (NPS) 59% spend 2,518 MEUR in 4 countries and residues. oil products of services Cash-out investments · Oil Products and Renewable Taxes and tax-like fees and renewable and related and highpaid and remitted by 568 MEUR Products in the wholesale solutions to the services quality market sold in 50 countries Neste 4.1 billion euro polymers and products to approx 310 customers chemicals industries 100% of approved renewable Highly skilled employees Wages and salaries 316 MEUR Contractor TRIF 2.7 Supporting social development and the raw material suppliers - Number of employees Our goal · Other personnel expenses Charity work and screened using social criteria^a services societies provide 75 MEUR, including in countries of operation training costs 4.2 MEUR To become a global leader in Number of Neste employees - Hiring rate of permanent Enhancing competitiveness employees 14.0% 69.8% men and 30.2% women who participated in renewable and circular solutions. of employees in the volunteer work 291 3/8 members of the Board of Leaving rate of permanent labor market Social employees 7.4% Directors and 2/11 members Well-being and safety of - Recorded average training of the Neste Executive Our People employees and suppliers Committee are women hours per FTE® 33.0 Employee safety TRIF 1.1⁴⁹ Reducing transportation-36,947 palm oil smallholders We seek for the best professionals related emissions in cities Safe days 314ⁿ in Neste's supply chain and provide our employees and communities Securing human a safe workplace and opportunities and labor rights to develop their competences. Improving gender equality Material topics • 100% of our palm oil a use · Waste and residue raw · Energy saving · GHG reduction achieved · Replacing fossil oil use with is certified and traceable materials used to refine Resource efficiency measures 16 GWh with Neste's renewable more sustainable alternatives Good corporate to plantations renewables 2.8 Mt, 80% of citizenship and ethics fuels: 9.6 Mt 11) · Safety and incident-· Waste generated 166,600 t Improving air quality the total renewable feed 99% of our PFAD® supply · Low-carbon solutions free operation of which 34% recycled Neste MY Renewable · Reducing deforestation Water intake 9,120,000 m³/a chains mapped to palm oil Wastewater 8,159,000 m²/a Diesel enables up to 50%-· Sustainability of Human rights Supporting circular economy mills and 71% to plantations 90% smaller greenhouse Energy consumption 12.8 TWh raw materials · Fair and equal · Scope 1, direct CO. Mitigating climate change 100% of the new indirect. gas emissions over the Protecting emissions 2.46 Mt CO. employment fuel's life cycle compared Influencing operating supplier contracts, 100% of biodiversity Economic Scope 3 emissions from to fossil diesel 11) environment and regulation the renewable raw material and preventing responsibility downstream value chain volume and 88% of the fossil deforestation 44.2 Mt CO.eq raw material volume covered by the Neste Supplier Code of Conduct or equivalent Scope 2 10 and 3 emissions from unstream value chain: 5.7 Mt CO_eq View Neste's tax footprint report on our website 🔞

10 Includes also natural gas and industrial gas suppliers. 10 Total revenue of Renewable Products segment divided by Group revenue. 10 Deneter suppliers excluded from the figure due to the integration in progress. 10 Annual average number of employees. 10 Full-time equivalent (FTE). Excluding Russia. 10 Total Recordable Injury Frequency 10 A day without a TRI accident, process safety events, fire or ignition, breach of environmental permit, or traffic





Asset and Business Value Impact under Transition Scenarios (Source: Allianz 2019, excerpt)

GLOBAL			2℃					1.5℃					
		2020	2025	2030	2035	2040	2020	2025	2030	2035	2040		
ENERGY	Integrated Oil and Gas	(M)	(M)				(M)				T		
ENERGY	Oil and Gas Storage and Transportation												
ENERGY	Coal and Consumable Fuels				T, P	T, P				T, P	T, P		
MATERIALS	Fertilizers and Agricultural Chemicals	(T)	(T)	(T)	(T)	(T)	(T)	(T)	(T)	Р			
MATERIALS	Aluminium												
MATERIALS	Steel												
INDUSTRIALS	Industrial Conglomerates												
INDUSTRIALS	Airlines	(T)	P				(T)	P					
CONSUMER DISCRETIONARY	Auto Components												
CONSUMER DISCRETIONARY	Automobiles			P	P, T	T		P	P	P, T	P, T		
UTILITIES	Electric Utilities	Р	(M)		P	Р	P	(M)		Р	Р		
UTILITIES	Renewable Electricity				T	T				T	T		
Risk enhancer:	Risk mitigator:	Risk:											
P = policy	(P) = policy	Low											
T = substitution technology	(T) = little substitution technology	Medium											
M = related market forces	(M) = countering market forces	High											
		Very high											

Clear picture of short-, medium- and long-term asset and business value impact (risk) by industry.



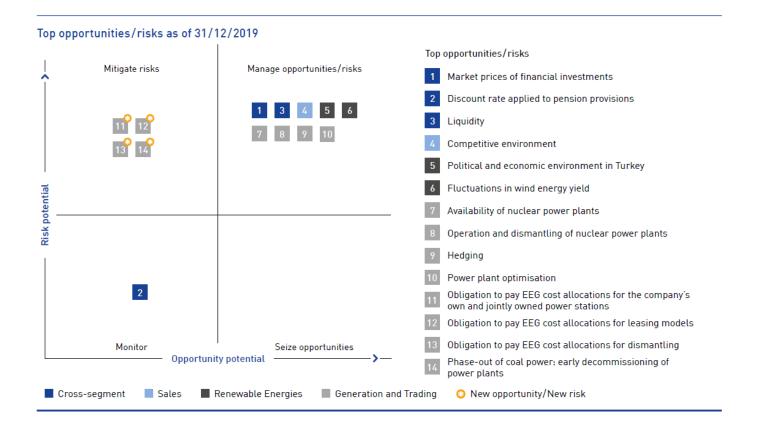
Dependencies and impacts- DSM







Sustainability factors impact on performance (EnBW)





Sustainability factors impact on performance- continued (EnBW)

Linking the top opportunities/risks with the key performance indicators

	Key p	erform	ance	indicat	ors									
	Financial performance indicators		Strategic performance indicators			Non-financial performance indicators								
Top opportunities/risks		В	С	D	E	F	G	Н	1	J	K	L	М	N
1 Market prices of financial investments														
2 Discount rate applied to pension provisions														
3 Liquidity		•	•											
4 Competitive environment	•	•	•	•				0	0	0	0			
5 Political and economic environment in Turkey			•					0						
6 Fluctuations in wind energy yield	•	•	•			•								0
7 Availability of nuclear power plants	•	•	•				•	0						
8 Operation and dismantling of nuclear power plants														
9 Hedging	•	•	•				•							
10 Power plant optimisation	•	•	•				•							0
Obligation to pay EEG cost allocations for the company's		_					_							
own and jointly owned power stations			_				_							
Obligation to pay EEG cost allocations for leasing models			_											
13 Obligation to pay EEG cost allocations for dismantling Phase-out of coal power: early decommissioning of														
power plants	_	0	0				0	0	0					0
Cross-segment	A Ad	ljusted		Total	share	of adjus	sted	H Re	putatio	n Inde	x	L LTI	F for co	om-
Sales	EE	BITDA		EBIT	DA:			I Er	nBW/Y	ello Cu	s-			ntrolled
Renewable Energies		ternal				er proxir	nity"/	1		tisfacti	on		the Gro F overa	
Generation and Trading		ancing pability		F Gr	iles				dex	ectricity	a		talled o	
	C RO					le Ener	niec			e Comn			RE and	
Direct effect	J 110				nevati		gies			ex (ECI)		-	enerati	
O Potential/long-term effect					ading	o.r ana								count-
o i otentiati tong-term enect													for by F intens	
												IN CO	miens	oity

EnBW gives a clear view on interdependencies, opportunities, and risks, linked to strategic financial and non-financial KPIs. EnBW links the top opportunities/risks with the key performance indicators, making distinction between 'Direct effect' and 'Potential/long-term effect'.

Sustainability risks- AB Volvo

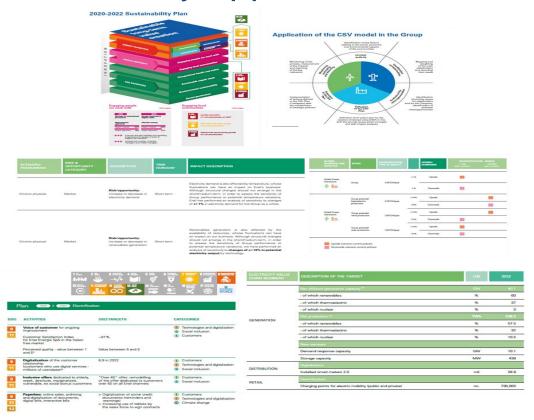


	Policies	Essential risks	Mitigation activities	KPI's		
Policy Volvo Group Code of Conduct Supplier Code of Conduct Supplier Survivonmental Impact by our operations Environmental Impact by our operations Survivonmental Impact by our operations Environmental Impact by our operations Survivonmental Impact by our operations		Product development and new technologies: 20-31, 48-49 Resource efficiency and increased circularity: 62-63 Environmental governance of our own operations: 56-59 Sustainable Purchasing Program: 54-55 Responsible sales: 61 Training: 55, 66 Partnerships: 55	Product emissions: 35, 58 Product recyclability rate: 62 Energy use and sources: 56–58 Energy efficiency: 35, 57–58 CO2 emissions scope 1 and 2: 57–58 Supplier self-assessments and audits: 54–55 ISO Certifications: 54, 56			
Employees & Social Factors	Volvo Group Code of Conduct Health and Safety Policy	Health and Safety Diversity and inclusion Competence development and employment	Employee management: 65–66 Health and Safety: 66–68 Labor Relations: 68 Inclusion and diversity: 69 Grievance mechanisms: 40 Training: 40, 66	Employee turnover: 65 Gender diversity: 69 Lost time accident rate (LTAR): 66 Whistle blower cases: 40		
Human Rights	Health and Safety Policy Supplier Code of Conduct Compliance Policy	Adverse human rights impacts in our own operations Adverse human rights impacts in our supply chain or linked to our business partners Adverse human rights impacts linked to the use of our products	Human rights management: 42–43 Sustainable purchasing Process: 54–55 Sustainable minerals Program: 55 Responsible sales: 61 Grievance mechanisms: 40 Training: 55, 61, 66 Societal engagement and partnerships: 35, 37, 46	Supplier self-assessments and audits: 54–55 Whistle blower cases: 40		
Anti- corruption	Code of Conduct Compliance Policy Anti-Corruption Due Diligence Policy	Corrupt practices in relation to suppliers, business partners cus- tomers and others	Compliance program: 40 Due diligence of business partners: 40 Whistleblower process: 40 Training: 40	Whistle blower cases: 40		

Risks are well detailed, as well as their impact and responses taken. Therefore, the company disclosure and description of its business model in relation to its sustainability-related issues risks. Covers the breadth of ESG risks.



Sustainability opportunities- Enel



Enel provides a detailed description of opportunities and their impact related to climate change. Each opportunity is classified according to a timeframe (short, medium and long term). The link between the business model and sustainability opportunities results clearly defined since the company links its business activities with sustainability opportunities both in terms of operational and financial impact. Moreover, the process of defining Enel's strategies itself is accompanied by an analysis of the risks and opportunities connected with those strategies.



2B. KEY FINDINGS: AGGREGATE FINDINGS PTF-RNFRO REVIEW OF A SAMPLE OF PRACTICES



Key Findings

Business Model

- There are front-runners in this space, however, even leaders do not show a high level of sophistication on all aspects of reporting on their business model.
- Value creating aspects of the business model have found their way into corporate reporting, although in early development stage where focus remains on qualitative disclosures about the business model.
- Destruction of value is also not adequately demonstrated. New methods of "value" and
 "impact" assessment are more inclusive to risks related to social and governance issues
 (factors). Opportunities should be addressed in view of "avoidance of value destruction"
 otherwise it will be difficult to relate with "direct" and "indirect" impacts of decisions either
 these are "taking action" or "ignore issue".

Risks and Opportunities

- Sustainability-related risks are disclosed in various places of corporate reporting and lack coherence. Current practices lack a structured approach where risks are clearly linked to the business model. For example, companies rarely explain if and how their business model and strategy are resilient to climate risk.
- Sustainability opportunities are disclosed as part of material themes identified in sustainability reporting. Hence, opportunities are often difficult to connect to the business model.
- The value of non-financial risks and opportunities related to the business model is in most cases not disclosed.



Key Findings

Performance and Viability

- Poor development of sustainability-related opportunities compared to sustainability-related risks, suggesting that sustainability is seen as restraint on business rather an opportunity for growth.
- The business model is not holistically developed, and itself lacks sufficient information to allow for linkage to sustainability-related risks and opportunities over relevant timelines, necessary for users to assess its longer term viability.

Presentation

- Disclosures are mainly positive; more balance could be brought by also disclosing the negative impact of the company
- Poor linkage of sustainability-related risks and opportunities to the business model..
- Inconsistent use of existing standards, guidance and frameworks was observed by the PTF-RNFRO.
- Variation in the use of terms and definitions this arises from the variation across existing reporting standards, guidance and frameworks.
- Poor development of intangibles-related risks and opportunities



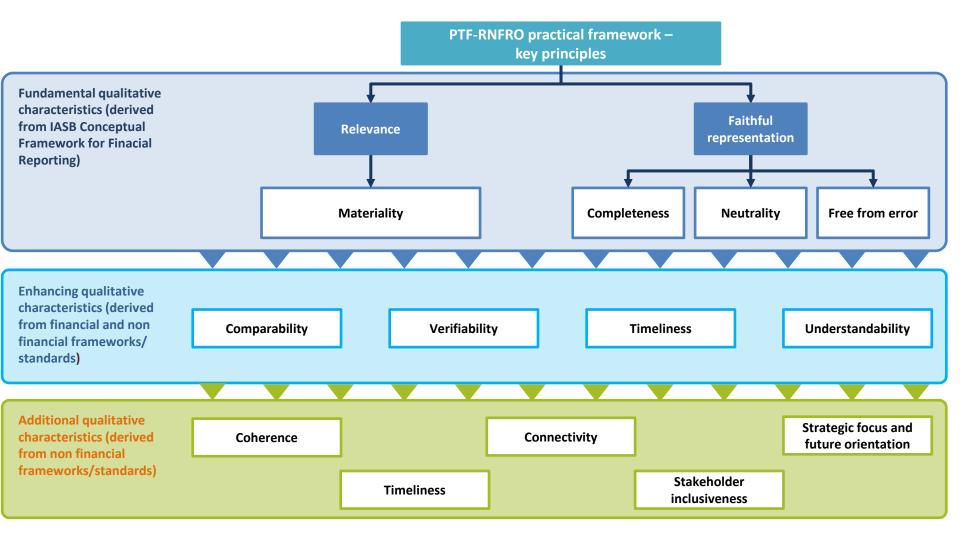
Key Findings

Credibility

- Absence or patchy application of science-based targets when reporting on sustainability outcomes and impacts.
- Inconsistent use of assurance necessary to help ensure that the corporate reporting system value chain is reliable, factual, in line with science-based targets and implemented according to relevant principles as specified by the reporting standards, guidance and frameworks.
- Lack of understanding and insufficient deployment of technology which has the potential to play a significant role in minimizing the reporting burden and issues of data collection and data verification.



Key Findings- Practical Framework





Key Findings- Use of Technology

- Overall, there is limited evidence in corporate disclosures of the description of technological solutions directly applied for reporting.
- This finding suggests that company's deploy technologies in an ad-hoc manner
- These findings indicate a need for transparency on the methodologies and techniques used to prepare the disclosures and ensure they are free from errors or omissions.

Technology and data Disclosure stage Compliance with User need sharing solutions 'policies' and purpose Preparation Comparability I need to identify what / governance - Revised NFRD e.g. NLP are the material ESG - Accounting Directive issues for my Corporate / non-financial business risks and preparer opportunities - Website e.g. XBRL - ESEF Single Access - Pre-contractual I need to create Accessibility disclosures Point user-friendly online Distribution - Periodic reports interfaces for my non-financial - Non-financial stakeholders to risks and explore disclosed opportunities statements Corporate / information in a - Annual (consolidated) customizable way preparer financial statements - Management reports - Key Information Document (website) Consumption e.g. XBRL. - SFDR I need to have access Comparability - EU Taxonomy satellite / governance to underlying - Revised NFRD Investor / methodologies, - Benchmark Reg. imaginary, data non-financial scopes, ... and I need - Capital requirements user management to be informed about risks and Reg. and Directive - Solvency II major discrepancies opportunities

over time

systems

- MiFID II

- IDD



Path to Improvement

- Clearer description of the business model and linkage to risks and opportunities
- More emphasis on opportunities
- Application of evidence-based and science-based targets
- Better connectivity of financial and non-financial information
- Optimising the use of available technologies
- Credibility through third-party independent assurance



2C. KEY FINDINGS: STAKEHOLDER SURVEY

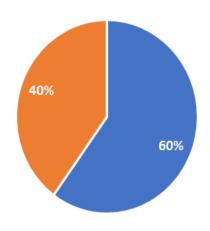


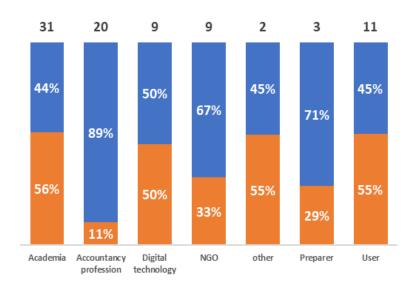
Approach to business model

With regards to describing the business model, have you developed your own approach or are you using existing non-financial reporting framework/standards/methodology/guidance?



Own approach

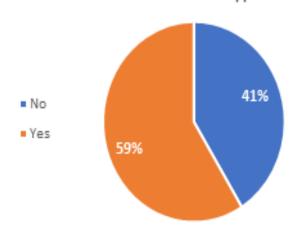


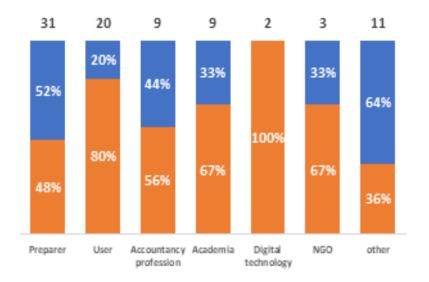




Linkage

Do you connect non-financial and financial information in your disclosure/analysis on business model and non-financial risks and opportunities?

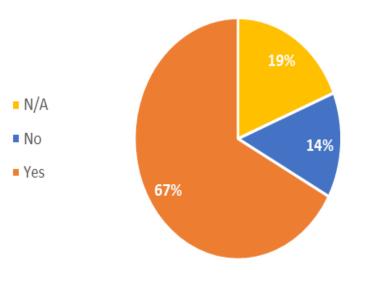


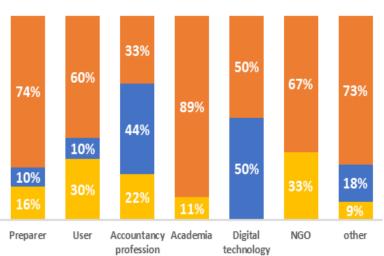




EU Taxonomy impacts

Do you see the application of the EU Taxonomy to environmentally sustainable activities or investments as an opportunity to review/ enhance business models?

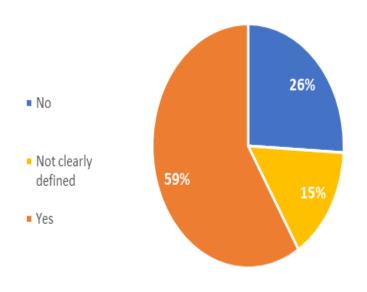


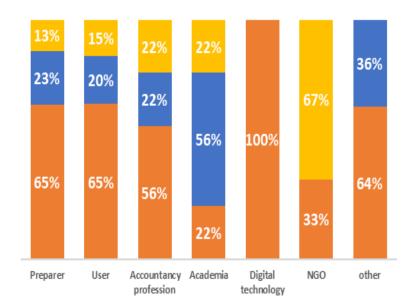




Definitions

Do you have a commonly agreed definition of nonfinancial risks and opportunities that is shared internally to your organization?





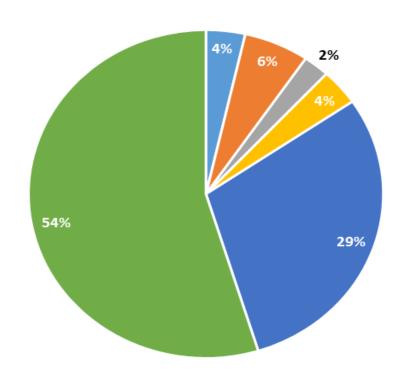


Use of frameworks

Is it aligned with any main frameworks/ standards/ methodologies/ guidance, and if yes, which one(s)?



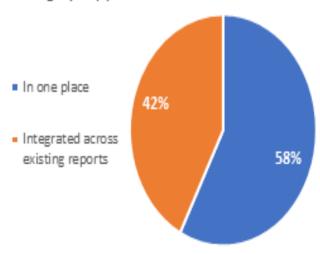
- EU/local regulations
- IFRS
- Internal policies
- Non financial frameworks/Standards/Guidelines
- Not clearly defined

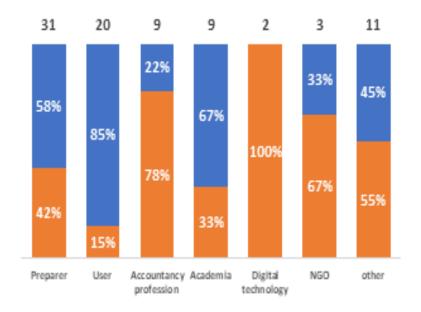




Location

Would you prefer to have all ESG-related information in one place, or integrated across existing report(s)?







Viewpoints from stakeholders...

'Information not balanced, uniquely or mostly oriented towards positive impacts generated by the organization activities'

Biased reporting...

'Qualitative, no leadership, not at a strategic level, not part of the business model, not material, communication exercise'

'Report should be balanced, Green is allowed (even if it is a small initiative) but also then 'Grey' should be mentioned'

Greenwashing...

Statements made that are not supported by other evidence. Statements made without appropriate signoff/buy-in from the senior management of the business'



3. PANEL DISCUSSION

THEMATIC FOCUS OF PANEL DISCUSSION



- 1. BUSINESS MODEL REPORTING
- REPORTING ON SUSTAINABILITY-RELATED RISKS AND OPPORTUNITIES.
- 3. USE OF TECHNOLOGY



APPENDIX- PROJECT DETAILS FOR REFERENCE PURPOSE ONLY

European Reporting Lab

Membership

- •Mario Abela, not-for-profit organisation (Malta)
- Maria Alexiou, preparer (Greece)
- Estelle Aymard-Young, financial institution (France)
- •Emilie Beral, user (France)
- Donato Calace, digital tools (Italy)
- •Daniela Cholakova, preparer (Bulgaria)
- Jean-Philippe Desmartin, user (France)
- •Laura Girella, not-for-profit organisation/ academia (Italy)
- Michael Goebbels, preparer (Germany)
- •Ulrika Hasselgren, user (Denmark)
- Christian Hell, accountancy profession (Germany)

- Marcus Looijenga, accountancy profession (Netherlands)
- •Gloria Mazzocco, preparer (Italy)
- •Giuseppe Milici, accountancy profession (Italy)
- •Tegwen Le Berthe, user (France)
- •Isabel Gavín Pérez, financial institution (Spain)
- Eckhard Plinke, user (Germany)
- •Gunnar Rimmel, academia (Sweden)
- Dawn Slevin, other stakeholder (Ireland)
- •Mirjam Wolfrum, not-for-profit organisation (Germany)



Reporting on Non-Financial Risks and Opportunities and Linkage to the Business Model Project Overview

- Project task force on reporting of non-financial risks and opportunities and linkage to the business model (PTF-RNFRO) is made up of 19 experts with diverse backgrounds (users, preparers, accountancy firms) representing; more details of PTF-RNFRO members are available through this link
- PTF-RNFRO is co-chaired by Mario Abela and Dawn Slevin
- It held its first operational meeting held on 8 September
- It is a 12-month project with completion expected in 2021
- The project seeks to find good reporting practices that allow stakeholders to understand how risks and opportunities that arise from the external operating environment impact companies. But also, how the companies' business and operations may have environmental or social impacts and how companies are mitigating these risks.



Project Workplan

- Workstream 1 (a)- understanding practice: Evaluate relevant existing reporting initiatives & key characteristics relevant to NFRD
- Workstream 1 (b)- assessment framework: Develop a practical framework for assessing the qualities of good non-financial reporting disclosure practices
- Workstream 2- stakeholder outreach: Understand stakeholder needs and expectations on good reporting practices
- Workstream 3- data sharing and technology: Good practice examples (use cases) on how information may be presented at source to maximise technology use



Project Workplan-continued

- ➤ Workstream 4- reporting back on findings: Determine How best to structure the PTF-RNFRO Deliverable
- Workstream 5- due diligence of regulatory landscape: Ensure identified good reporting practices are in alignment with regulatory requirements
- ➤ Workstream 6-good reporting practice: Good reporting practice selection and recommendations based on assessment framework and stakeholder input obtained in other workstreams





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THANK YOU



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