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## LSME ED comparison with Set 1

### Objective

1. The objective of this paper is to provide SRB with a comparison table between the text of i) EC DA (version July 2023) set1 ESRS and ii) ESRS LSME ED.
2. This document is comprised of 5 chapters:
  - 1) ESRS LSME ED Section 1 – General requirements
  - 2) ESRS LSME ED Section 2 – General disclosures and Section 3 – Policies, Actions and Targets
  - 3) ESRS LSME ED Section 4 – Environment
  - 4) ESRS LSME ED Section 5 – Social
  - 5) ESRS LSME ED Section 6 – Business conduct
3. This paper provides a line-by-line comparison of set 1 and LSME. To be noted that due to time constraints, the content included in this version of the document regarding the centralised disclosures in Section 2 General disclosures and Section 3 Policies, Actions and Targets only contains the respective disclosure requirements (topic-agnostic) and not the application requirements which have been centralised in those two sections (topic-specific). These concern the following categories of disclosures:

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- 1) All IRO-1 and SBM-3 topic specific disclosures which were kept in LSME (currently in AR of Section 2),
- 2) All Policies, Actions and Targets from the topical standards of Set 1 (currently in AR of Section 3);
- 3) All disclosures from topical standards in S1, S2, S3 and S4 concerning Processes for engaging with own workforce, value chain workers, affected communities, consumers and end-users, and their representatives about impacts (currently in AR of Section 3)
- 4) All disclosures from topical standards in S1, S2, S3 and S4 concerning Processes to remediate negative impacts and channels for own workers, value chain workers, affected communities, consumers and end-users to raise concerns (currently in AR of Section 3)

## Legend

- Column [draft] LSME:
  - i. With strikethrough “deleted contents” compared to EC DA ESRS Set 1 (version July 2023)
  - ii. Additional changes to Set 1 are in *italic*
- For LSME column:
  - i. Text in **turquoise** correspond to SFDR PAI Table 1 (mandatory)
  - ii. Text in **deep purple** corresponds to SFDR PAI Table2 and 3 (additional)
  - iii. Text in **orange** corresponds to Benchmark Regulation Indicator.
  - iv. Text in **green** corresponds to Pillar 3.

ESRS LSME ED Section 1 – General requirements

SET 1 ESRS 1 (version July 2023)	LSME ESRS ED Section 1
<p><b>Objective</b></p> <p>1. The objective of European Sustainability Reporting Standards (ESRS) is to specify the sustainability information that an undertaking shall disclose in accordance with Directive 2013/34/EU of the European Parliament and of the Council, as amended by Directive (EU) 2022/2464 of the European Parliament and of the Council. Reporting in accordance with ESRS does not exempt undertakings from other obligations laid down in Union law.</p>	<p><b>Objective</b></p> <p>1. The objective of this European Sustainability Reporting Standard for listed SMEs (LSME ESRS) is to specify the sustainability information <i>that the undertakings identified in the next paragraph</i> shall disclose in their individual sustainability statement in accordance with Directive 2013/34/EU of the European Parliament and of the Council, as amended by Directive (EU) 2022/24642 (the “CSRD”), when they elect to present be report in accordance with the sustainability reporting standards for small and medium-sized undertakings. Reporting in accordance with LSME ESRS does not exempt undertakings from other obligations laid down in substantive Union law. <i>In particular, this [draft] Standard sets out General Requirements (Section 1), General Disclosures (Section 2), Policies, actions and targets (Section 3) and Topical Disclosures (Sections 4, 5 and 6) that specify the sustainability information to be disclosed in accordance with Directive 2013/34/EU as amended by Directive EU 2022/2464 Corporate Sustainability Reporting Directive when using the derogation in art. 19a (6) and 29c.</i></p>
	<p>2. The following undertakings are in scope of LSME ESRS , (together and hereafter the “LSME” or “undertaking”):</p> <p>(a) small and medium-sized undertakings, which are public-interest entities according to point (a) of point (1) of article 2 of Directive 2013/34/EU and which are not micro undertakings as defined in Article 3(1) of that Directive. According to Art. 4(5) of the Transparency Directive (as amended by the CSRD), this also includes third country listed SMEs;</p> <p>(b) small non - complex credit institutions defined in point (145) of Article 4(1) of Regulation (EU) No 575/2013;</p> <p>(c) captive insurance undertakings defined in point (2) of Article 13 of Directive 2009/138/EC of the European Parliament and of the Council ; and</p> <p>(d) captive reinsurance undertakings defined in point (5) of Article 13 of that same Directive.</p>
	<p>3. An LSME is allowed to use the derogation in art. 19a (6) and 29c of the CSRD and prepare its individual sustainability statement using this [draft] Standard when it is not a parent of a large group. A large group is a group that, on a consolidated basis, exceeds the limits of at least two of the three following criteria (as defined in art. 3 (7) of Directive 2013/34/EU):</p> <p>(a) balance sheet total - EUR 20,000,000.</p> <p>(b) net turnover - EUR 40,000,000;</p> <p>(c) average number of employees during the financial year – 250.</p>
	<p>4. An LSME, which is a parent undertaking of a large group, is required to present consolidated sustainability reporting to be included in its management report, prepared according to the ESRS for large undertakings (art. 29a and 29b of Directive 2013/34/EU as amended by the CSRD, Commission Delegated Regulation xxxx).</p>
<p>2. Specifically, ESRS specify the information that an undertaking shall disclose about its material impacts, risks and opportunities in relation to environmental, social, and governance</p>	<p>5. Specifically, LSME ESRS specify the information that an undertaking shall disclose about its material impacts and risks and opportunities in relation to environmental, social, and governance sustainability matters. LSME ESRS does not require undertakings to disclose any information on</p>

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sustainability matters. ESRS do not require undertakings to disclose any information on environmental, social and governance topics covered by ESRS when the undertaking has assessed the topic in question as non-material (See Appendix E of this Standard “Flowchart for determining disclosures to be included”).The information disclosed in accordance with ESRS enables users of the sustainability statement to understand the undertaking’s material impacts on people and environment and the material effects of sustainability matters on the undertaking’s development, performance and position.	environmental, social and governance topics covered by this standard, when the undertaking has assessed as non-material (See Appendix E flowchart for determining disclosures under ESRS). The information disclosed in accordance with <i>this standard</i> enables users of the sustainability statement to understand the undertaking’s material impacts on people and environment and the material effects of sustainability matters on the undertaking’s development, performance and position.
3. The objective of this Standard (ESRS 1) is to provide an understanding of the architecture of ESRS, the drafting conventions and fundamental concepts used, and the general requirements for preparing and presenting sustainability information in accordance with Directive 2013/34/EU, as amended by Directive (EU) 2022/2464.	<del>3. The objective of this Standard (ESRS 1) is to provide an understanding of the architecture of ESRS, the drafting conventions and fundamental concepts used, and the general requirements for preparing and presenting sustainability information in accordance with Directive 2013/34/EU, as amended by Directive (EU) 2022/2464.</del>
	<b>Section 1: LSME General Requirements</b>
	6. This section sets out the general requirements that undertakings shall comply with when preparing and presenting individual sustainability statement under article 19a (6) and article 29c of the CSRD. This [draft] Standard establishes sustainability reporting requirements for small and medium sized undertakings that are proportionate and relevant to their capacities and characteristics and to the scale and complexity of their activities.
<b>1. Categories of ESRS Standards, reporting areas and drafting conventions</b>	<b>1. Categories of disclosures</b>
	<b>1.1 Complying with [draft] LSME ESRS</b>
	7. The undertaking shall disclose, in accordance with this [draft] Standard, all the material information regarding negative impacts and risks in relation to environmental, social, and governance matters. The information shall enable the understanding of the undertaking’s negative impacts on those matters and how they affect the undertaking’s development, performance and position.
	8. The undertaking may disclose: (a) the material information regarding positive impacts in relation to environmental, social, and governance matters; (b) sustainability-related financial opportunities that generate or are likely to generate material financial effects in the short-, medium- or long- term.
	9. The undertaking shall present its individual sustainability statement containing material sustainability-related information as part of its management report (see chapter 8Structure of sustainability statements).
<b>1.1 Categories of ESRS standards</b>	<b>1.2 LSME ESRS structure and reporting areas</b>

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<p>4. There are three categories of ESRS: a) cross-cutting standards; b) topical standards (Environmental, Social and Governance standards); and c) sector-specific standards.</p> <p>Cross-cutting standards and topical standards are sector-agnostic, meaning that they apply to all undertakings regardless of which sector or sectors the undertaking operates in.</p>	<p>10. This [Draft] ESRS is composed of the following sections: Section 1 General requirements; Section 2 General disclosures; Section 3 Policies, actions and targets Section 4 Environmental disclosures; Section 5 Social disclosures; Section 6 Business conduct disclosures.</p>
<p>5. The cross-cutting standards ESRS 1 General requirements and ESRS 2 General disclosures apply to the sustainability matters covered by topical standards and sector-specific standards.</p>	<p>11. Section 1, Section 2 and Section 3 are cross-cutting sections of this [draft] standard, while Section 4, Section 5 and Section 6 are topical sections of this [draft] standard (Environmental, Social and Governance disclosures). Cross-cutting sections and topical <del>standards</del> sections are sector-agnostic, meaning that they apply to all undertakings regardless of which sector or sectors the undertaking operates in. The cross-cutting <del>ESRS Section 1 (General requirements) ESRS Section 2 (General disclosures) and Section 3 (Policies, Actions and Targets)</del> apply to the sustainability matters covered by topical <del>standards</del> sections <del>and sector-specific standards</del>. Section 2 of this [draft] ESRS establishes information to be mandatorily provided by the undertaking at a general level, across all sustainability topics.</p>
<p>6. This standard (ESRS 1) describes the architecture of ESRS standards, explains drafting conventions and fundamental concepts, and sets out general requirements for preparing and presenting sustainability-related information.</p>	<p><del>6. This standard (ESRS 1) describes the architecture of ESRS standards, explains drafting conventions and fundamental concepts, and sets out general requirements for preparing and presenting sustainability-related information.</del></p>
<p>7. ESRS 2 establishes Disclosure Requirements on the information that the undertaking shall provide at a general level across all material sustainability matters on the reporting areas governance, strategy, impact, risk and opportunity management, and metrics and targets.</p>	<p><del>7. ESRS 2 establishes Disclosure Requirements on the information that the undertaking shall provide at a general level across all material sustainability matters on the reporting areas governance, strategy, impact, risk and opportunity management, and metrics and targets.</del></p>
<p>8. Topical ESRS cover a sustainability topic and are structured into topics and sub-topics, and where necessary sub-sub-topics. The table in Application Requirement 16 (AR 16) to this standard provides an overview of the sustainability topics, sub-topics and sub-sub-topics (collectively 'sustainability matters') covered by topical ESRS.</p>	<p>12. Topical sections of this [draft] ESRS cover a sustainability topic and are structured into topics and sub-topics, and where necessary sub-sub-topics. Disclosure requirements are organized in accordance with this topical approach. The table in Appendix A Application Requirements of this [draft] Standard, paragraph AR 15, <del>provides presents an overview</del> the list of sustainability topics, sub-topics and sub-sub-topics (collectively 'sustainability matters') covered in <del>by</del> [draft] topical sections <del>ESRS</del>.</p>
<p>9. Topical ESRS can include specific requirements that complement the general level Disclosure Requirements of ESRS 2. ESRS 2 Appendix C Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures provides a list of the additional requirements in topical ESRS that the undertaking shall apply in conjunction with the general level disclosure requirements of ESRS 2.</p>	<p><del>9. Topical ESRS can include specific requirements that complement the general level Disclosure Requirements of ESRS 2. ESRS 2 Appendix C Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures provides a list of the additional requirements in topical ESRS that the undertaking shall apply in conjunction with the general level disclosure requirements of ESRS 2.</del></p>
<p>10. Sector-specific standards are applicable to all undertakings within a sector. They address impacts, risks and opportunities that are likely to be material for all undertakings in a specific sector and that are not covered, or not sufficiently covered, by topical standards. Sector-specific</p>	<p><del>10. Sector-specific standards are applicable to all undertakings within a sector. They address impacts, risks and opportunities that are likely to be material for all undertakings in a specific sector and that are not covered, or not sufficiently covered, by topical standards. Sector-specific</del></p>

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standards are multi-topical and cover the topics that are most relevant to the sector in question. Sector-specific standards achieve a high degree of comparability.	<del>standards are multi-topical and cover the topics that are most relevant to the sector in question. Sector-specific standards achieve a high degree of comparability.</del>
See below PAR 12.	13. The Disclosure Requirements in this [draft] ESRS cover the following reporting areas: (a) Governance (GOV): the governance processes, controls and procedures used to monitor and manage and oversee impacts and risks and opportunities (see <del>ESRS Section 2</del> of this [draft] ESRS, chapter 2 Governance); (b) Strategy (SBM): how the undertaking's strategy and business model interact with its material impacts and risks, and opportunities including how the undertaking addresses those impacts and risks and opportunities (see <del>ESRS Section 2</del> of this [draft] ESRS, chapter 3 Strategy); (c) Impact and risk and opportunities management (IR): the process(es) by which the undertaking: i. identifies impacts and risks and opportunities and assesses their materiality (see <del>ESRS Section 2</del> Disclosure Requirement 9 (IR-1)); ii. manages material sustainability matters through policies and actions (see <del>ESRS Section 3</del> Disclosure Requirement 11 (IR-3)), iii. disclose information about targets if it has set them (see <del>Section 3</del> Disclosure Requirement 12 (IR-4)), iv. engage with own workers, workers in the value chain, affected communities, consumers and end-users, and their representatives about impacts, to the extent that it has stakeholder engagement in place (see <del>Section 3</del> Disclosure Requirement 13 (IR-5)), v. remediate negative impacts and implements channels for own workers, workers in the value chain, affected communities, consumers and end-users to raise concerns, to the extent that it has remediation activities and channels in place (see <del>Section 3</del> Disclosure Requirement 14 (IR-6));and (d) Metrics (M): how the undertaking measures its performance including the targets it has set and progress towards meeting them (see topical section 4, 5 and 6 of this [draft] ESRS).
11. In addition to the disclosure requirements laid down in the three categories of ESRS, when an undertaking concludes that an impact, risk or opportunity is not covered or not covered with sufficient granularity by an ESRS but is material due to its specific facts and circumstances, it shall provide additional entity-specific disclosures to enable users to understand the undertaking's sustainability-related impacts, risks or opportunities. Application requirements AR 1 to AR 5 provide further guidance regarding entity-specific disclosures.	14. In addition to the disclosure requirements laid down in the sections described in <i>paragraph 10</i> when an undertaking concludes that an impact or risk or opportunity is not covered or not covered with sufficient granularity by a <del>ESRS section</del> of this standard but is material due to its specific facts and circumstances, it shall provide additional entity-specific disclosures to enable users to understand the undertaking's sustainability-related impacts and risks or opportunities. Application requirements AR 1 to AR 4 of <i>this section</i> provide further guidance regarding entity-specific disclosures.
<b>1.2 Reporting areas and minimum content disclosure requirements on policies, actions, targets and metrics</b>	
12. The Disclosure Requirements in ESRS 2, in topical ESRS and in sector-specific ESRS are structured into the following reporting areas: (a) Governance (GOV): the governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities (see ESRS 2, chapter 2 Governance); (b) Strategy (SBM): how the undertaking's strategy and business model interact with its	See paragraph 13 above

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<p>material impacts, risks and opportunities, including how the undertaking addresses those impacts, risks and opportunities (see ESRS 2, chapter 3 Strategy);</p> <p>(c) Impact, risk and opportunity management (IRO): the process(es) by which the undertaking:</p> <ul style="list-style-type: none"> <li>i. identifies impacts, risks and opportunities and assesses their materiality (see IRO-1 in section 4.1 of ESRS 2),</li> <li>ii. manages material sustainability matters through policies and actions (see section 4.2 of ESRS 2).</li> </ul> <p>(d) Metrics and targets (MT): the undertaking’s performance, including targets it has set and progress towards meeting them (see ESRS 2, chapter 5 Metrics and targets).</p>	
<p>13. ESRS 2 includes:</p> <ul style="list-style-type: none"> <li>(a) in section 4.2 Minimum Disclosure Requirements regarding policies (MDR-P) and actions (MDR-A);</li> <li>(b) in section 5 Minimum Disclosure Requirements regarding metrics (MDR-M) and targets (MDR-T).</li> </ul> <p>The undertaking shall apply the minimum disclosure requirements regarding policies, actions, metrics and targets together with the corresponding Disclosure Requirements in topical and sector-specific ESRS.</p>	<p><del>13. ESRS 2 includes:</del></p> <ul style="list-style-type: none"> <li><del>(a) in section 4.2 Minimum Disclosure Requirements regarding policies (MDR-P) and actions (MDR-A);</del></li> <li><del>(b) in section 5 Minimum Disclosure Requirements regarding metrics (MDR-M) and targets (MDR-T).</del></li> </ul> <p><del>The undertaking shall apply the minimum disclosure requirements regarding policies, actions, metrics and targets together with the corresponding Disclosure Requirements in topical and sector-specific ESRS.</del></p>
<p><b>1.3 Drafting conventions</b></p>	<p><b>1.3 Drafting conventions</b></p>
<p>14. In all ESRS:</p> <ul style="list-style-type: none"> <li>(a) the term “impacts” refers to positive and negative sustainability-related impacts that are connected with the undertaking’s business, as identified through an impact materiality assessment process (see section 3.4 Impact materiality). It refers both to actual impacts and to potential future impacts.</li> <li>(b) The term “risks and opportunities” refers to the undertaking’s sustainability-related financial risks and opportunities, including those deriving from dependencies on natural, human and social resources, as identified through a financial materiality assessment process (see section 3.5).</li> </ul> <p>Collectively, these are referred to as “impacts, risks and opportunities” (IROs). They reflect the double materiality perspective of ESRS described in section 3.</p>	<p>15. In this ESRS:</p> <ul style="list-style-type: none"> <li>(a) the term “impacts” refers to <del>positive and negative</del> sustainability-related impacts (<i>positive impacts are disclosed on a voluntary basis</i>) that are connected with the undertaking’s business, as identified through an impact materiality assessment process (see section 3.4 Impact materiality). It refers both to actual impacts and to potential future impacts. <i>In this [draft] ESRS the term “impacts” refers only to negative impacts, unless differently specified.</i></li> <li>(b) the term “risks and opportunities” refers to the undertaking’s sustainability-related financial risks <del>and opportunities</del>, including those deriving from dependencies on natural, human and social resources, as identified through a financial materiality assessment process (see section 3.5). Collectively, these are referred to as “impacts and risks <del>and opportunities</del>” (IRs). They reflect the double materiality perspective of ESRS described in section 3 (<i>disclosure on material opportunities is on voluntary basis only, see Section 2 of this [draft] ESRS 41 to 43</i>).</li> </ul>
<p>15. Throughout ESRS terms that are defined in the glossary of definitions (Annex II) are put in bold italic, except when a defined term is used more than once in the same paragraph.</p>	<p>16. Throughout ESRS, terms that are defined in the glossary of definitions (Annex II) are put in bold italic, except when a defined term is used more than once in the same paragraph.</p>
<p>16. ESRS structure the information to be disclosed under Disclosure Requirements. Each Disclosure Requirement consists of one or more distinct datapoints. The term “datapoint” can also refer to a narrative sub-element of a Disclosure Requirement.</p>	<p>17. ESRS structure the information to be disclosed under Disclosure Requirements. Each Disclosure Requirement consists of one or more distinct datapoints. The term “datapoint” can also refer to a narrative sub-element of a Disclosure Requirement.</p>
<p>17. In addition to Disclosure Requirements most ESRS also contain Application Requirements. Application Requirements support the application of Disclosure Requirements and have the same authority as other parts of an ESRS.</p>	<p>18. In addition to Disclosure Requirements most <del>ESRS Sections</del> also contain Application Requirements. Application Requirements support the application of Disclosure Requirements and have the same authority as other parts of this <i>[draft]</i> ESRS.</p>



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<p>18. ESRS use the following terms to distinguish between different degrees of obligation on the undertaking to disclose information:</p> <p>(a) “shall disclose” – indicates that the provision is prescribed by a Disclosure Requirement or datapoint;                      (b) “may disclose” – indicates voluntary disclosure to encourage good practice.</p> <p>In addition, ESRS use the term “shall consider” when referring to issues, resources or methodologies that the undertaking is expected to take into account or to use in the preparation of a given disclosure if applicable.</p>	<p>19. <i>This [draft]</i> ESRS uses the following terms to distinguish between different degrees of obligation on the undertaking to disclose information:</p> <p>(a) “shall disclose” – indicates that the provision is prescribed by a Disclosure Requirement or datapoint;                      (b) “may disclose” – indicates voluntary disclosure to encourage good practice.</p> <p>In addition, this [draft] ESRS uses the term “shall consider” when referring to issues, resources or methodologies that the undertaking is expected to take into account or to use in the preparation of a given disclosure if applicable.</p>
<p><b>2. Qualitative characteristics of information</b></p>	<p><b>2. Qualitative characteristics of information</b></p>
<p>19. When preparing its sustainability statement, the undertaking shall apply:</p> <p>(a) the fundamental qualitative characteristics of information, i.e. relevance and faithful representation; and                      (b) the enhancing qualitative characteristics of information, i.e. comparability, verifiability and understandability.</p>	<p>20. When preparing its sustainability statement, the undertaking shall apply:</p> <p>(a) the fundamental qualitative characteristics of information, i.e., relevance and faithful representation; and                      (b) the enhancing qualitative characteristics of information, i.e., comparability, verifiability and understandability.</p>
<p>20. These qualitative characteristics of information are defined and described in Appendix B of this Standard.</p>	<p>21. These qualitative characteristics of information are defined and described in Appendix B of this Section of this [draft] ESRS.</p>
<p><b>3. Double materiality as the basis for sustainability disclosures</b></p>	<p><b>3. Double materiality as the basis for sustainability disclosures</b></p>
<p>21. The undertaking shall report on sustainability matters based on the double materiality principle as defined and explained in this chapter.</p>	<p>22. The undertaking shall report on sustainability matters based on the double materiality principle as defined and explained in this chapter.</p>
<p><b>3.1 Stakeholders and their relevance to the materiality assessment process</b></p>	<p><b>3.1 Stakeholders and their relevance to the materiality assessment process</b></p>
<p>22. Stakeholders are those who can affect or be affected by the undertaking. There are two main groups of stakeholders:</p> <p>(a) affected stakeholders: individuals or groups whose interests are affected or could be affected – positively or negatively – by the undertaking’s activities and its direct and indirect business relationships across its value chain; and                      (b) users of sustainability statements: primary users of general-purpose financial reporting (existing and potential investors, lenders and other creditors, including asset managers, credit institutions, insurance undertakings), and other users of sustainability statements, including the undertaking’s business partners, trade unions and social partners, civil society and non-governmental organizations, governments, analysts and academics.</p>	<p>23. Stakeholders are those who can affect or be affected by the undertaking. There are two main groups of stakeholders:</p> <p>(a) affected stakeholders: individuals or groups whose interests are affected or could be affected – positively or negatively – by the undertaking’s activities and its direct and indirect business relationships across its value chain; and                      (b) users of sustainability statements: primary users of general-purpose financial reporting (existing and potential investors, lenders and other creditors, including asset managers, credit institutions, insurance undertakings), <i>as well as</i> <del>and</del> other users of sustainability statements, including the undertaking’s business partners, trade unions and social partners, civil society and non-governmental organisations, governments, analysts and academics.</p>
<p>23. Some, but not all, stakeholders may belong to both groups referred to in paragraph 22.</p>	<p>24. Some, but not all, stakeholders may belong to both groups defined in paragraph 24.</p>
<p>24. Engagement with affected stakeholders is central to the undertaking’s on-going due diligence process (see chapter 4 Due diligence) and sustainability materiality assessment. This includes its processes to identify and assess actual and potential negative impacts, which then inform the</p>	<p>25. <del>Engagement with affected stakeholders is central to the undertaking’s on-going due diligence process (see chapter 4 Due diligence) and sustainability materiality assessment.</del> To the extent that an undertaking engages with affected stakeholders, engagement with them supports the undertaking’s sustainability materiality assessment. This includes its processes to identify and</p>



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assessment process to identify the material impacts for the purposes of sustainability reporting (see section 3.4 of this Standard).	assess actual and potential negative impacts, which then inform the assessment process to identify the material impacts for the purposes of sustainability reporting (see chapter 3.4 of this <del>Standard</del> Section).
<b>3.2 Material matters and materiality of information</b>	<b>3.2 Material matters and materiality of information</b>
25. Performing a materiality assessment (see sections 3.4 Impact materiality and 3.5 Financial materiality) is necessary for the undertaking to identify the material impacts, risks and opportunities to be reported.	26. Performing a materiality assessment (see chapters 3.4 and 3.5 of this Section) is necessary for the undertaking to identify the material impacts and risks <del>and opportunities</del> to be reported. <i>If an undertaking reports on its material positive impacts and/or opportunities on a voluntary basis, these are also covered by the materiality assessment.</i>
26. Materiality assessment is the starting point for sustainability reporting under ESRS. IRO-1 in section 4.1 of ESRS 2, includes general disclosure requirements about the undertaking's process to identify impacts, risks and opportunities and assess their materiality. SBM-3 of ESRS 2 provides general disclosure requirements on the material impacts, risks and opportunities resulting from the undertaking's materiality assessment.	27. Materiality assessment is the starting point for sustainability reporting under this <i>[draft]</i> ESRS. <i>Disclosure Requirement 9 (IR-1) in ESRS Section 2</i> of this <i>[draft]</i> ESRS includes general disclosure requirements about the undertaking's process to identify impacts and risks <del>and opportunities</del> and assess their materiality. <i>Disclosure Requirement 7 (SMB-3) of ESRS Section 2</i> provides general disclosures requirements on the material impacts and risks <del>and opportunities</del> resulting from the undertaking's materiality assessment.
27. The Application Requirements in Appendix A of this Standard include a list of sustainability matters covered in topical ESRS, categorized by topics, sub-topics and sub-sub-topics, to support the materiality assessment. Appendix E Flowchart for determining disclosures to be included of this Standard provides an illustration of the materiality assessment described in this section.	28. The Application Requirements in Appendix A of this <del>Standard</del> Section, paragraph ARXX, include <del>a</del> the list of sustainability matters covered in topical <i>sections of this [draft]</i> ESRS, categorized by topics, sub-topics and sub-sub-topics, to support the materiality assessment. Appendix E Flowchart for determining disclosures to be included of this <i>[draft]</i> Standard provides an <del>illustration</del> <i>illustrative example</i> of the materiality assessment <i>process</i> described in this section.
28. A sustainability matter is “material” when it meets the criteria defined for impact materiality (see section 3.4 of this Standard) or financial materiality (see section 3.5 of this Standard), or both.	29. A sustainability matter is “material” when it meets the criteria defined for impact materiality (see section 3.4 of this <del>Standard</del> Section) or financial materiality (see section 3.5 of this <del>Standard</del> Section) or both.
29. Irrespective of the outcome of its materiality assessment, the undertaking shall always disclose the information required by: ESRS 2 General Disclosures (i.e. all the Disclosure Requirements and data points specified in ESRS 2) and the Disclosure Requirements (including their datapoints) in topical ESRS related to the Disclosure Requirement IRO-1 Description of the process to identify and assess material impacts, risks and opportunities, as listed in ESRS 2 Appendix C Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures.	30. Irrespective of the outcome of the materiality assessment, <i>as stated also in paragraph 13 of this section</i> , the undertaking shall always disclose the information required by Section 2 of this <i>[draft]</i> ESRS (i.e., all Disclosure Requirements and data points). <del>Description of the process to identify and assess material impacts, risks and opportunities, as listed in ESRS 2 Appendix C Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures.</del>
30. When the undertaking concludes that a sustainability matter is material as a result of its materiality assessment, on which ESRS 2 IRO-1, IRO-2 and SBM-3 set disclosure requirements, it shall: (a) disclose information according to the Disclosure Requirements (including Application Requirements) related to that specific sustainability matter in the corresponding topical and sector-specific ESRS; and (b) disclose additional entity-specific disclosures (see paragraph 11 and AR 1 to AR 5 of this Standard) when the material sustainability matter is not covered by an ESRS or is covered with insufficient granularity.	31. When the undertaking concludes that a sustainability matter is material as a result of its materiality assessment, <del>on which ESRS 2 IRO-1, IRO-2 and SBM-3 set disclosure requirements</del> , it shall: (a) disclose information according to the Disclosure Requirements (including Application Requirements) related to that specific sustainability matter in the <del>corresponding topical and sector-specific ESRS</del> <i>relevant sections of this [draft] ESRS</i> ; and (b) disclose additional appropriate entity-specific disclosures (see paragraph 15 and AR 1 to AR 4 of this <del>Standard</del> Section) when the material sustainability matter is not covered by <i>this [draft]</i> ESRS or is covered with insufficient granularity.
31. The applicable information prescribed within a Disclosure Requirement, including its datapoints, or an entity-specific disclosure, shall be disclosed when the undertaking assesses, as	32. The applicable information prescribed within a Disclosure Requirement, including its datapoints, or an entity-specific disclosure, shall be disclosed when the undertaking

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<p>part of its assessment of material information, that the information is relevant from one or more of the following perspectives:</p> <p>(a) the significance of the information in relation to the matter it purports to depict or explain; or</p> <p>(b) the capacity of such information to meet the users' decision-making needs, including the needs of primary users of general-purpose financial reporting described in paragraph 48 and/or the needs of users whose principal interest is in information about the undertaking's impacts.</p>	<p>assesses, as part of its assessment of material information, that the information is relevant from one or more of the following perspectives:</p> <p>(a) the significance of the information in relation to the matter it purports to depict or explain; or</p> <p>(b) the capacity of such information to meet the users' decision-making needs, including the needs of primary users of general-purpose financial reporting described in paragraph 50 and/or the needs of users whose principal interest is in information about the undertaking's impacts.</p>
<p>32. If the undertaking concludes that climate change is not material and therefore omits all disclosure requirements in ESRS E1 Climate change, it shall disclose a detailed explanation of the conclusions of its materiality assessment with regard to climate change (see ESRS 2 IRO-2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement), including a forward-looking analysis of the conditions that could lead the undertaking to conclude that climate change is material in the future. If the undertaking concludes that a topic other than climate change is not material and therefore it omits all the Disclosure Requirements in the corresponding topical ESRS, it may briefly explain the conclusions of its materiality assessment for that topic.</p>	<p>33. If the undertaking concludes that climate change is not material and therefore omits all disclosure requirements related to <del>ESRS</del> E1 Climate change, it shall disclose a detailed explanation of the conclusions of its materiality assessment with regard to climate change (see Section 2 Disclosure Requirement 10 (IR-2) Disclosure Requirements in ESRS covered by the undertaking's sustainability statement), including a forward-looking analysis of the conditions that could lead the undertaking to conclude that climate change is material in the future.</p> <p><del>If the undertaking concludes that a topic other than climate change is not material and therefore it omits all the Disclosure Requirements in the corresponding topical ESRS, it may briefly explain the conclusions of its materiality assessment for that topic.</del></p>
<p>33. When disclosing information on policies, actions and targets in relation to a sustainability matter that has been assessed to be material, the undertaking shall include the information prescribed by all the Disclosure Requirements and datapoints in the topical and sector-specific ESRS related to that matter and in the corresponding Minimum Disclosure Requirement on policies, actions, and targets required under ESRS 2. If the undertaking cannot disclose the information prescribed by either the Disclosure Requirements and datapoints in the topical or sector-specific ESRS, or the Minimum Disclosure Requirements in ESRS 2 on policies, actions and targets, because it has not adopted the respective policies, implemented the respective actions or set the respective targets, it shall disclose this to be the case and it may report a timeframe in which it aims to have these in place.</p>	<p><i>34. If the undertaking concludes that a topic other than climate change is not material and therefore it omits all the Disclosure Requirements in Section 3 or/and in the corresponding topical Sections of this [draft] ESRS, it may briefly explain the conclusions of its materiality assessment for that topic.</i></p> <p>35. When reporting on policies, actions and targets in relation to a sustainability matter that has been assessed to be material, the undertaking shall <del>include the information prescribed by all the Disclosure Requirements and datapoints in the topical and sector-specific ESRS related to that matter and in the corresponding Minimum Disclosure Requirement on policies, actions, and targets required under ESRS 2.</del> If the undertaking cannot disclose the information prescribed by either the Disclosure Requirements and datapoints in the topical or sector-specific ESRS, or the Minimum Disclosure Requirements in ESRS 2 on policies, actions and targets, because it has not adopted the respective policies, implemented the respective actions or set the respective targets, it shall <del>disclose this to be the case and it may report a timeframe in which it aims to have these in place.</del> <i>apply the requirements in Section 3 of this [draft] ESRS (see Disclosure Requirement 11 (IR-3) – Policies and actions in relation to sustainability matters, Disclosure Requirement 12 (IR-4) – Targets in relation to sustainability matters).</i></p>
<p>34. When disclosing information on metrics for a material sustainability matter according to the Metrics and Targets section of the relevant topical ESRS, the undertaking:</p> <p>(a) shall include the information prescribed by a Disclosure Requirement if it assesses such information to be material; and</p> <p>(b) may omit the information prescribed by a datapoint of a Disclosure Requirement if it assesses such information to be not material and concludes that such information is not needed to meet the objective of the Disclosure Requirement.</p>	<p>36. When disclosing information on metrics for a material sustainability matter <del>according to the Metrics and Targets section of the relevant topical ESRS,</del> the undertaking shall <i>apply the requirements in Sections 4, 5 and 6 of this [draft] ESRS and it:</i></p> <p>(a) shall include the information prescribed by a Disclosure Requirement if it assesses such information to be material; and</p> <p>(b) may omit the information prescribed by a datapoint of a Disclosure Requirement if it assesses such information to be not material and concludes that such information is not needed to meet the objective of the Disclosure Requirement.</p>

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35. If the undertaking omits the information prescribed by a datapoint that derives from other EU legislation listed in Appendix B of ESRS 2, it shall explicitly state that the information in question is “not material”.	37. If the undertaking omits the information prescribed by a datapoint that derives from other EU legislation listed in Appendix B of <i>Section 2 of this [draft] ESRS</i> , it shall explicitly state that the information in question is “not material”.
36. The undertaking shall establish how it applies criteria, including appropriate thresholds, to determine: (a) the information it discloses on metrics for a material sustainability matter according to the Metrics and Targets section of the relevant topical ESRS, in accordance with paragraph 34; and (b) the information to be disclosed as entity-specific disclosures.	38. The undertaking shall establish how it applies <i>qualitative or quantitative</i> criteria, including appropriate thresholds, to determine: (a) the information it discloses on metrics for a material sustainability matter <del>according to the Metrics and Targets section of the relevant topical ESRS, in accordance with paragraph 34;</del> and (b) the information to be disclosed as entity-specific disclosures.
<b>3.3 Double materiality</b>	<b>3.3 Double materiality</b>
37. Double materiality has two dimensions, namely: impact materiality and financial materiality. Unless specified otherwise, the terms “material” and “materiality” are used throughout ESRS to refer to double materiality.	39. Double materiality has two dimensions, namely: impact materiality and financial materiality. Unless specified otherwise, the terms “material” and “materiality” are used throughout this <i>[draft] ESRS</i> to refer to double materiality.
38. Impact materiality and financial materiality assessments are inter-related and the interdependencies between these two dimensions shall be considered. In general, the starting point is the assessment of impacts, although there may also be material risks and opportunities that are not related to the undertaking’s impacts. A sustainability impact may be financially material from inception or become financially material, when it could reasonably be expected to affect the undertaking’s financial position, financial performance, cash flows, its access to finance or cost of capital over the short-, medium- or long-term. Impacts are captured by the impact materiality perspective irrespective of whether or not they are financially material.	40. Impact materiality and financial materiality assessments are inter-related and the interdependencies between these two dimensions shall be considered. In general, the starting point is the assessment of impacts, although there may also be material risks <i>(and opportunities)</i> that are not related to the undertaking’s impacts. A sustainability impact may be financially material from inception or become financially material, when it could reasonably be expected to affect the undertaking’s financial position, financial performance, cash flows, its access to finance or cost of capital over the short-, medium-or long-term. Impacts are captured by the impact materiality perspective irrespective of whether or not they are financially material.
39. In identifying and assessing the impacts, risks and opportunities in the undertaking’s value chain to determine their materiality, the undertaking shall focus on areas where impacts, risks and opportunities are deemed likely to arise, based on the nature of the activities, business relationships, geographies or other factors concerned.	41. In identifying and assessing the impacts and risks <del>and opportunities</del> in the undertaking’s value chain to determine their materiality, the undertaking shall focus on areas where <del>impacts, risks and opportunities</del> <i>they</i> are deemed likely to arise, based on the nature of the activities, business relationships, geographies or other <i>risk</i> factors concerned.
40. The undertaking shall consider how it is affected by its dependencies on the availability of natural, human and social resources at appropriate prices and quality, irrespective of its potential impacts on those resources.	42. The undertaking shall consider how it is affected by its dependencies (if any) on the availability of natural <del>human</del> and social resources at appropriate prices and quality, independently of its potential impacts on those resources.
41. An undertaking’s principal impacts, risks and opportunities are understood to be the same as the material impacts, risks and opportunities identified under the double materiality principle and therefore reported on in its sustainability statement.	43. An undertaking’s principal impacts and risks <del>and opportunities</del> are understood to be the same as the material impacts and risks <del>and opportunities</del> identified under the double materiality principle and therefore reported in its sustainability statement.
42. The undertaking shall apply the criteria set under sections 3.4 and 3.5 in this Standard, using appropriate quantitative and/or qualitative thresholds. Appropriate thresholds are necessary to determine which impacts, risks and opportunities are identified and addressed by the undertaking as material and to determine which sustainability matters are material for reporting purposes. Some existing standards and frameworks use the term “most significant impacts” when referring to the threshold used to identify the impacts that are described in ESRS as “material impacts.”	44. The undertaking shall apply the criteria set under chapters 3.4 and 3.5 <del>in this Standard</del> <i>in this section of this [draft] ESRS</i> , using appropriate quantitative and/or qualitative thresholds. Appropriate thresholds are necessary to determine which impacts and risks <del>and opportunities</del> are identified and addressed by the undertaking as material and to determine which sustainability matters are material for reporting purposes. Some existing standards and frameworks use the term “most significant impacts” when referring to the threshold used to identify the impacts that are described in <i>this [draft] ESRS</i> as “material impacts.”
<b>3.4 Impact materiality</b>	<b>3.4 Impact materiality</b>
43. A sustainability matter is material from an impact perspective when it pertains to the undertaking’s material actual or potential, positive or negative impacts on people or the	45. A sustainability matter is material from an impact perspective when it pertains to the undertaking’s material actual or potential, <del>positive or negative</del> impacts on people or the

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environment over the short-, medium- or long-term. Impacts include those connected with the undertaking's own operations and upstream and downstream value chain, including through its products and services, as well as through its business relationships. Business relationships include those in the undertaking's upstream and downstream value chain and are not limited to direct contractual relationships.	environment over the short-, medium- or long-term <i>time</i> . Impacts include those connected with the undertaking's own operations and upstream and downstream value chain, including through its products and services, as well as through its business relationships. Business relationships include those in the undertaking's upstream and downstream value chain and are not limited to direct contractual relationships.
44. In this context, impacts on people or the environment include impacts in relation to environmental, social and governance matters.	46. In this context, impacts on people or the environment include impacts in relation to environmental, social and governance matters.
	<i>47. To the extent that the undertaking adopts contents of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises in its impact management processes, its impact materiality assessment is informed by the due diligence process. Due diligence is the process by which undertakings identify, prevent, mitigate and account for how they address the actual and potential impacts on the environment and people connected with their business.</i>
45. The materiality assessment of a negative impact is informed by the due diligence process defined in the international instruments of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. For actual negative impacts, materiality is based on the severity of the impact, while for potential negative impacts it is based on the severity and likelihood of the impact. Severity is based on the following factors: (a) the scale; (b) scope; and (c) irremediable character of the impact. In the case of a potential negative human rights impact, the severity of the impact takes precedence over its likelihood.	<del>48. The materiality assessment of a negative impact is informed by the due diligence process defined in the international instruments of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. For actual negative impacts, materiality is based on the severity of the impact, while for potential negative impacts it is based on the severity and likelihood of the impact. Severity is based on:</del> (a) the scale; (b) scope; and (c) irremediable character of the impact. In the case of a potential negative human rights impact, the severity of the impact takes precedence over its likelihood.
46. For positive impacts, materiality is based on: (a) the scale and scope of the impact for actual impacts; and (b) the scale, scope and likelihood of the impact for potential impacts.	<del>46. For positive impacts, materiality is based on: (a) the scale and scope of the impact for actual impacts; and (b) the scale, scope and likelihood of the impact for potential impacts.</del>
<b>3.5 Financial materiality</b>	<b>3.5 Financial materiality</b>
47. The scope of financial materiality for sustainability reporting is an expansion of the scope of materiality used in the process of determining which information should be included in the undertaking's financial statements.	49. The scope of financial materiality for sustainability reporting is an expansion of the scope of materiality used in the process of determining which information should be included in the undertaking's financial statements.
48. The financial materiality assessment corresponds to the identification of information that is considered material for primary users of general-purpose financial reports in making decisions relating to providing resources to the entity. In particular, information is considered material for primary users of general-purpose financial reports if omitting, misstating or obscuring that information could reasonably be expected to influence decisions that they make on the basis of the undertaking's sustainability statement.	50. The financial materiality assessment corresponds to the identification of information that is considered material for primary users of general-purpose financial <del>reports</del> <i>reports reporting</i> in making decisions relating to providing resources to the entity. In particular, information is considered material for primary users of general-purpose financial <del>reports</del> <i>reports reporting</i> if omitting, misstating or obscuring that information could reasonably be expected to influence decisions that they make on the basis of the undertaking's sustainability statement.
49. A sustainability matter is material from a financial perspective if it triggers or could reasonably be expected to trigger material financial effects on the undertaking. This is the case when a sustainability matter generates risks or opportunities that have a material influence, or could reasonably be expected to have a material influence, on the undertaking's development, financial position, financial performance, cash flows, access to finance or cost of capital over the short-,	51. A sustainability matter is material from a financial perspective if it triggers or could reasonably be expected to trigger material financial effects on the undertaking. This is the case when a sustainability matter generates <i>or may generate</i> <del>risks or opportunities</del> that have a material influence, or could reasonably be expected to have a material influence, on the undertaking's development, financial position, financial performance, cash flows, access to finance or cost of

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medium- or long-term. Risks and opportunities may derive from past events or future events. The financial materiality of a sustainability matter is not constrained to matters that are within the control of the undertaking but includes information on material risks and opportunities attributable to business relationships beyond the scope of consolidation used in the preparation of financial statements.	capital over the short-, medium- or long-term. Risks <del>and opportunities</del> may derive from past events or future events <i>and may derive from dependencies on natural, human and social resources</i> . <del>The financial materiality of a sustainability matter is not constrained to matters that are within the control of the undertaking but includes information on material risks and opportunities attributable to business relationships beyond the scope of consolidation used in the preparation of financial statements.</del>
	52. The financial materiality of a sustainability matter is not constrained to matters that are within the control of the undertaking but includes information on material risks <del>and opportunities</del> attributable to business relationships <i>with other undertakings, including its subsidiaries, or stakeholders</i> beyond the scope of financial control.
50. Dependencies on natural, human and social resources can be sources of financial risks or opportunities. Dependencies may trigger effects in two possible ways: (a) they may influence the undertaking's ability to continue to use or obtain the resources needed in its business processes, as well as the quality and pricing of those resources; and (b) they may affect the undertaking's ability to rely on relationships needed in its business processes on acceptable terms.	52. Dependencies on natural, <del>human</del> and social resources can be sources of financial risks <del>or opportunities</del> . Dependencies may trigger effects in two possible ways: (a) they may influence the undertaking's ability to continue to use or obtain the resources needed in its business processes, as well as the quality and pricing of those resources; and (b) they may affect the undertaking's ability to rely on relationships needed in its business processes on acceptable terms.
51. The materiality of risks and opportunities is assessed based on a combination of the likelihood of occurrence and the potential magnitude of the financial effects.	53. The materiality of risks <del>and opportunities</del> is assessed based on a combination of the likelihood of occurrence and the potential magnitude of the financial effects.
<b>3.6 Material impacts or risks arising from actions to address sustainability matters</b>	<b>3.6 Material impacts or risks arising from actions to address sustainability matters</b>
52. The undertaking's materiality assessment may lead to the identification of situations in which its actions to address certain impacts or risks, or to benefit from certain opportunities in relation to a sustainability matter, might have material negative impacts or cause material risks in relation to one or more other sustainability matters. For example: (a) an action plan to decarbonise production that involves abandoning certain products might have material negative impacts on the undertaking's own workforce and result in material risks due to redundancy payments; or (b) an action plan of an automotive supplier to focus on the supply of e-vehicles might lead to stranded assets for the production of supply parts for conventional vehicles.	54. The undertaking's materiality assessment <i>process</i> may lead to the identification of situations in which its actions to address certain impacts or risks <del>or to benefit from certain opportunities</del> in relation to a sustainability matter, might have material negative impacts or cause material risks in relation to one or several other sustainability matters. For example: (a) an action plan to decarbonise production that involves abandoning certain products might have material negative impacts on the undertaking's own workforce and result in material risks due to redundancy payments; or (b) an action plan of an automotive supplier to focus on the supply of e-vehicles might lead to stranded assets for the production of supply parts for conventional vehicles.
53. In such situations, the undertaking shall: (a) disclose the existence of material negative impacts or material risks together with the actions that generate them, with a cross-reference to the topic to which the impacts or risks relate; and (b) provide a description of how the material negative impacts or material risks are addressed under the topic to which they relate.	55. In such situations, the undertaking shall: (a) <del>disclose</del> <i>mention</i> the existence of material negative impacts or material risks together with the actions that generate them, with a cross-reference to the topic to which the impacts or risks relate; and (b) provide a description of how the material negative impacts or material risks are addressed under the topic to which they relate.
<b>3.7 Level of disaggregation</b>	<b>3.7 Level of disaggregation</b>
54. When needed for a proper understanding of its material impacts, risks and opportunities, the undertaking shall disaggregate the reported information: (a) by country, when there are significant variations of material impacts, risks and opportunities across countries and when presenting the information at a higher level of aggregation would obscure material information about impacts, risks or opportunities; or	56. When needed for a proper understanding of its material impacts and risks <del>and opportunities</del> , the undertaking shall disaggregate the reported information <i>in a way that reflects the appropriate level at which significant variations of material impacts and/or risks materialize, such as in specific countries and/or specific sites</i> .



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(b) by significant site or by significant asset, when material impacts, risks and opportunities are highly dependent on a specific location or asset.	<del>(a) by country, when there are significant variations of material impacts, risks and opportunities across countries and when presenting the information at a higher level of aggregation would obscure material information about impacts, risks or opportunities; or (b) by significant site or by significant asset, when material impacts, risks and opportunities are highly dependent on a specific location or asset.</del>
55. When defining the appropriate level of disaggregation for reporting, the undertaking shall consider the disaggregation adopted in its materiality assessment. Depending on the undertaking's specific facts and circumstances, a disaggregation by subsidiary may be necessary.	<del>55. When defining the appropriate level of disaggregation for reporting, the undertaking shall consider the disaggregation adopted in its materiality assessment. Depending on the undertaking's specific facts and circumstances, a disaggregation by subsidiary may be necessary.</del>
56. Where data from different levels, or multiple locations within a level, is aggregated, the undertaking shall ensure that this aggregation does not obscure the specificity and context necessary to interpret the information. The undertaking shall not aggregate material items that differ in nature.	<del>56. Where data from different levels, or multiple locations within a level, is aggregated, the undertaking shall ensure that this aggregation does not obscure the specificity and context necessary to interpret the information. The undertaking shall not aggregate material items that differ in nature.</del>
57. When the undertaking presents information disaggregated by sectors, it shall adopt the ESRS sector classification to be specified in a delegated act adopted by the Commission pursuant to article 29b(1) third subparagraph, point (ii), of Directive 2013/34/EU. When a topical or sector specific ESRS requires that a specific level of disaggregation is adopted in preparing a specific item of information, the requirement in the topical or sector-specific ESRS shall prevail.	<del>57. When the undertaking presents information disaggregated by sectors, it shall adopt the ESRS sector classification to be specified in a delegated act adopted by the Commission pursuant to article 29b(1) third subparagraph, point (ii), of Directive 2013/34/EU. When a topical or sector specific ESRS requires that a specific level of disaggregation is adopted in preparing a specific item of information, the requirement in the topical or sector specific ESRS shall prevail.</del>
<b>4. Due diligence</b>	<b>4. Due diligence</b>
58. The outcome of the undertaking's sustainability due diligence process (referred to as "due diligence" in the international instruments mentioned below) informs the undertaking's assessment of its material impacts, risks and opportunities. ESRS do not impose any conduct requirements in relation to due diligence; nor do they extend or modify the role of the administrative, management or supervisory bodies of the undertaking with regard to the conduct of due diligence.	<del>58. The outcome of the undertaking's sustainability due diligence process (referred to as "due diligence" in the international instruments mentioned below) informs the undertaking's assessment of its material impacts, risks and opportunities. ESRS do not impose any conduct requirements in relation to due diligence; nor do they extend or modify the role of the administrative, management or supervisory bodies of the undertaking with regard to the conduct of due diligence.</del>
59. Due diligence is the process by which undertakings identify, prevent, mitigate and account for how they address the actual and potential negative impacts on the environment and people connected with their business. These include negative impacts connected with the undertaking's own operations and its upstream and downstream value chain, including through its products or services, as well as through its business relationships. Due diligence is an on-going practice that responds to and may trigger changes in the undertaking's strategy, business model, activities, business relationships, operating, sourcing and selling contexts. This process is described in the international instruments of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.	<del>59. Due diligence is the process by which undertakings identify, prevent, mitigate and account for how they address the actual and potential negative impacts on the environment and people connected with their business. These include negative impacts connected with the undertaking's own operations and its upstream and downstream value chain, including through its products or services, as well as through its business relationships. Due diligence is an on-going practice that responds to and may trigger changes in the undertaking's strategy, business model, activities, business relationships, operating, sourcing and selling contexts. This process is described in the international instruments of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.</del>
60. These international instruments identify a number of steps in the due diligence process, including the identification and assessment of negative impacts connected with the undertaking's own operations and its upstream and downstream value chain, including through its products or services, as well as through its business relationships. Where the undertaking cannot address all impacts at once, the due diligence process allows for action to be prioritized based on the severity and likelihood of the impacts. It is this aspect of the due diligence process that informs the assessment of material impacts (see section 3.4 of this Standard). The identification of material	<del>60. These international instruments identify a number of steps in the due diligence process, including the identification and assessment of negative impacts connected with the undertaking's own operations and its upstream and downstream value chain, including through its products or services, as well as through its business relationships. Where the undertaking cannot address all impacts at once, the due diligence process allows for action to be prioritized based on the severity and likelihood of the impacts. It is this aspect of the due diligence process that informs the assessment of material impacts (see section 3.4 of this Standard). The identification of material</del>

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<p>impacts also supports the identification of material sustainability risks and opportunities, which are often a product of such impacts.</p> <p>61. The core elements of due diligence are reflected directly in Disclosure Requirements set out in ESRS 2 and in the topical ESRS, as illustrated below:</p> <p>(a) embedding due diligence in governance, strategy and business model . This is addressed under:</p> <ul style="list-style-type: none"> <li>i. ESRS 2 GOV-2: Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies;</li> <li>ii. ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes; and</li> <li>iii. ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model.</li> </ul> <p>(b) engaging with affected stakeholders . This is addressed under:</p> <ul style="list-style-type: none"> <li>i. ESRS 2 GOV-2;</li> <li>ii. ESRS 2 SBM-2: Interests and views of stakeholders;</li> <li>iii. ESRS 2 IRO-1;</li> <li>iv. ESRS 2 MDR-P; and</li> <li>v. Topical ESRS: reflecting the different stages and purposes of stakeholder engagement throughout the due diligence process.</li> </ul> <p>(c) identifying and assessing negative impacts on people and the environment . This is addressed under:</p> <ul style="list-style-type: none"> <li>i. ESRS 2 IRO-1 (including Application Requirements related to specific sustainability matters in the relevant ESRS); and</li> <li>ii. ESRS 2 SBM-3;</li> </ul> <p>(d) taking action to address negative impacts on people and the environment . This is addressed under:</p> <ul style="list-style-type: none"> <li>i. ESRS 2 MDR-A; and</li> <li>ii. Topical ESRS: reflecting the range of actions, including transition plans, through which impacts are addressed.</li> </ul> <p>(e) tracking the effectiveness of these efforts . This is addressed under:</p> <ul style="list-style-type: none"> <li>i. ESRS 2 MDR-M; ii. ESRS 2 MDR-T; and iii. Topical ESRS: regarding metrics and targets.</li> </ul>	<p><del>impacts also supports the identification of material sustainability risks and opportunities, which are often a product of such impacts.</del></p> <p><del>61. The core elements of due diligence are reflected directly in Disclosure Requirements set out in ESRS 2 and in the topical ESRS, as illustrated below:</del></p> <p><del>(a) embedding due diligence in governance, strategy and business model . This is addressed under:</del></p> <ul style="list-style-type: none"> <li><del>i. ESRS 2 GOV-2: Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies;</del></li> <li><del>ii. ESRS 2 GOV-3: Integration of sustainability related performance in incentive schemes; and</del></li> <li><del>iii. ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model.</del></li> </ul> <p><del>(b) engaging with affected stakeholders . This is addressed under:</del></p> <ul style="list-style-type: none"> <li><del>i. ESRS 2 GOV-2;</del></li> <li><del>ii. ESRS 2 SBM-2: Interests and views of stakeholders;</del></li> <li><del>iii. ESRS 2 IRO-1;</del></li> <li><del>iv. ESRS 2 MDR-P; and</del></li> <li><del>v. Topical ESRS: reflecting the different stages and purposes of stakeholder engagement throughout the due diligence process.</del></li> </ul> <p><del>(c) identifying and assessing negative impacts on people and the environment . This is addressed under:</del></p> <ul style="list-style-type: none"> <li><del>i. ESRS 2 IRO-1 (including Application Requirements related to specific sustainability matters in the relevant ESRS); and</del></li> <li><del>ii. ESRS 2 SBM-3;</del></li> </ul> <p><del>(d) taking action to address negative impacts on people and the environment . This is addressed under:</del></p> <ul style="list-style-type: none"> <li><del>i. ESRS 2 MDR-A; and</del></li> <li><del>ii. Topical ESRS: reflecting the range of actions, including transition plans, through which impacts are addressed.</del></li> </ul> <p><del>(e) tracking the effectiveness of these efforts . This is addressed under:</del></p> <ul style="list-style-type: none"> <li><del>i. ESRS 2 MDR-M; ii. ESRS 2 MDR-T; and iii. Topical ESRS: regarding metrics and targets.</del></li> </ul>
<p><b>5. Value chain</b></p>	<p><b>4. Value chain</b></p>
<p><b>5.1 Reporting undertaking and value chain</b></p>	<p><b>4.1 Reporting undertaking and value chain</b></p>
<p>62. The sustainability statement shall be for the same reporting undertaking as the financial statements. For example, if the reporting undertaking is a parent company required to prepare consolidated financial statements, the sustainability statement will be for the group. This requirement does not apply where the reporting undertaking is not required to draw-up financial</p>	<p><del>62. The sustainability statement shall be for the same reporting undertaking as the financial statements. For example, if the reporting undertaking is a parent company required to prepare consolidated financial statements, the sustainability statement will be for the group. This requirement does not apply where the reporting undertaking is not required to draw up financial</del></p>



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statements or where the reporting undertaking is preparing consolidated sustainability reporting pursuant to Article 48i of Directive 2013/34/EU.	<del>statements or where the reporting undertaking is preparing consolidated sustainability reporting pursuant to Article 48i of Directive 2013/34/EU.</del>
<p>63. The information about the reporting undertaking provided in the sustainability statement shall be extended to include information on the material impacts, risks and opportunities connected with the undertaking through its direct and indirect business relationships in the upstream and/or downstream value chain (“value chain information”). In extending the information about the reporting undertaking, the undertaking shall include material impacts, risks and opportunities connected with its upstream and downstream value chain:</p> <p>(a) following the outcome of its due diligence process and of its materiality assessment; and (b) in accordance with any specific requirements related to the value chain in other ESRS.</p>	<p>57. The information about the reporting undertaking provided in the sustainability statement shall be extended to include information on the material impacts and risks <del>and opportunities</del> connected <del>with to</del> the undertaking through its <del>direct and indirect</del> business relationships in the upstream and/or downstream value chain (“value chain information”). <i>Investment and other business relationships with subsidiaries of the undertaking are as well sources of material impacts and risks, based on the results of materiality assessment.</i> In extending the information about the reporting undertaking, the undertaking shall include material impacts and risks <del>and opportunities</del> connected with its upstream and downstream value chain(s):</p> <p>(a) following the outcome of its <del>due diligence process and</del> materiality assessment and, <i>if applicable, of its due diligence process</i> ; and (b) in accordance with any specific requirements related to the value chain <i>of topical sections of this [draft] ESRS.</i></p>
<p>64. Paragraph 63 does not require information on each and every actor in the value chain, but only the inclusion of material upstream and downstream value chain information. Different sustainability matters can be material in relation to different parts of the undertaking’s upstream and downstream value chain. The information shall be extended to include value chain information only in relation to the parts of the value chain for which the matter is material.</p>	<p><del>58. Paragraph 63 does not require information on each and every actor in the value chain, but only the inclusion of material upstream and downstream value chain information. Different sustainability matters can be material in relation to different parts of the undertaking’s upstream and downstream value chain. The information shall be extended to include value chain information only in relation to the parts of the value chain for which the matter is material. The extension of the information about the reporting undertaking to include value chain information does not require information on each and every actor in the value chain, but only the inclusion of material value chain information.</del></p>
<p>65. The undertaking shall include material value chain information when this is necessary to:</p> <p>(a) allow users of sustainability statements to understand the undertaking’s material impacts, risks and opportunities; and/or (b) produce a set of information that meets the qualitative characteristics of information (see Appendix B of this Standard).</p>	<p>59. The undertaking shall include material value chain information when this is necessary to:</p> <p>(a) allow users of sustainability statements to understand the undertaking’s material impacts and risks <del>and opportunities</del>; and/or (b) produce a set of information that meets the qualitative characteristics of information (see Appendix B of this <del>Standard</del> <i>[draft] Section</i>).</p>
<p>66. When determining at which level within its own operations and its upstream and downstream value chain a material sustainability matter arises, the undertaking shall use its assessment of impacts, risks and opportunities following the double materiality principle (see chapter 3 of this Standard).</p>	<p>60. When determining at which level within its own operations and its upstream and downstream value chain a material sustainability matter arises, the undertaking shall use its assessment of impacts and risks <del>and opportunities</del> following the double materiality principle (see chapter 3 of this <i>[draft] Standard</i>).</p>
<p>67. When associates or joint ventures, accounted for under the equity method or proportionally consolidated in the financial statements, are part of the undertaking’s value chain, for example as suppliers, the undertaking shall include information related to those associates or joint ventures in accordance with paragraph 63 consistent with the approach adopted for the other business relationships in the value chain. In this case, when determining impact metrics, the data of the associate or joint venture are not limited to the share of equity held, but shall be taken into account on the basis of the impacts that are connected with the undertaking’s products and services through its business relationships.</p>	<p>61. When associates or joint ventures <del>accounted for under the equity method or proportionally consolidated in the financial statements</del> are part of the undertaking’s value chain, for example as suppliers, the undertaking shall include information related to those <del>associates or joint ventures in accordance</del> undertakings, <i>following</i> paragraph 57, consistent with the approach adopted for the other business relationships in the value chain. In this case, when determining impact metrics, the data of the associate or joint venture are not limited to the share of equity held, but <del>shall be</del> taken into account on the basis of the impacts that are connected with the undertaking’s products <del>and</del> services through its business relationships.</p>
<p><b>5.2 Estimation using sector averages and proxies</b></p>	<p><b>4.2 Estimation using sector averages and proxies</b></p>

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68. The undertaking's ability to obtain the necessary upstream and downstream value chain information may vary depending on various factors, such as the undertaking's contractual arrangements, the level of control that it exercises on the operations outside the consolidation scope and its buying power. When the undertaking does not have the ability to control the activities of its upstream and/or downstream value chain and its business relationships, obtaining value chain information may be more challenging.	62. The undertaking's ability to obtain the necessary upstream and downstream value chain information may vary depending on various factors, such as the undertaking's contractual arrangements, the level of control that it exercises on the operations outside the consolidation scope and its buying power. When the undertaking does not have the ability to control the activities of its upstream and/or downstream value chain and its business relationships, obtaining value chain information may be more challenging.
69. There are circumstances where the undertaking cannot collect the information about its upstream and downstream value chain as required by paragraph 63 after making reasonable efforts to do so. In these circumstances, the undertaking shall estimate the information to be reported about its upstream and downstream value chain, by using all reasonable and supportable information, such as sector-average data and other proxies.	63. There are circumstances where the undertaking cannot collect the information about its upstream and downstream value chain as required by paragraph 57 after making reasonable efforts to do so. In these circumstances, the undertaking shall estimate the information to be reported about its upstream and downstream value chain, by using all reasonable and supportable information, such as sector-average data and other proxies.
70. Obtaining value chain information could also be challenging in the case of SMEs and other upstream and/or downstream value chain entities that are not in the scope of the sustainability reporting required by Articles 19a and 29a of Directive 2013/34/EU (see ESRS 2 BP-2 Disclosures in relation to specific circumstances).	64. Obtaining value chain information could also be particularly challenging for an LSME and other in the case of its upstream and/or downstream value chain entities that are not in the scope of the sustainability reporting required by Articles 19a and 29a of Directive 2013/34/EU (see ESRS 2 BP-2 Disclosures in relation to specific circumstances). CSRD, as LSME may have less control over their value chain and fewer resources to collect data.
71. With reference to policies, actions and targets, the undertaking's reporting shall include upstream and/or downstream value chain information to the extent that those policies, actions and targets involve actors in the value chain. With reference to metrics, in many cases, in particular for environmental matters for which proxies are available, the undertaking may be able to comply with the reporting requirements without collecting data from the actors in its upstream and downstream value chain, especially from SMEs, for example, when calculating the undertaking's GHG Scope 3 emissions.	65. With reference to policies and actions and targets, the undertaking's reporting shall include upstream and/or downstream value chain information to the extent that those policies and actions and targets involve actors in the value chain. With reference to metrics, in many cases, in particular for environmental matters for which proxies are available, the undertaking may be able to comply with the reporting requirements without collecting data from the actors in its upstream and downstream value chain, especially from SMEs, for example, when calculating the undertaking's GHG Scope 3 emissions.
	66. [NOTE TO SR TEG/SRB. THE FOLLOWING WILL BE INCLUDED IN THE BASIS FOR CONCLUSIONS]: With reference to metrics, the undertaking's reporting shall include value chain information only for the following disclosures in Section 4 of [draft] LSME ESRS, in addition to entity-specific disclosures that may be necessary reflecting the undertaking's facts and circumstances: (a) Scope 3 GHG emissions (E1-2); (b) GHG removals (E1-3); (c) Substances of concern and substances of very high concern (E2-2); (d) Impact metrics related to biodiversity and ecosystems change (E4-1); and (e) Resource inflows (E5-1) and Resource outflows (E5-2) (only for qualitative information).]
	67. When the undertaking includes value chain information in its metrics, in many cases, in particular for environmental matters for which proxies are available, the undertaking may be able to comply with the reporting requirements without collecting data from the actors in its upstream and downstream value chain, for example, when calculating the undertaking's GHG Scope 3 emissions.
72. The incorporation of estimates made using sector-average data or other proxies shall not result in information that does not meet the qualitative characteristics of information (see chapter 2 and section 7.2 Sources of estimation and outcome uncertainty of this Standard).	68. The incorporation of estimates made using sector-average data or other proxies shall not result in information that does not meet the qualitative characteristics of information (see chapter 2 and section 6.2 Sources of estimation and outcome uncertainty of this Section).

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<b>6. Time horizons</b>	<b>5. Time horizons</b>
<b>6.1 Reporting period</b>	<b>5.1 Reporting period</b>
73. The reporting period for the undertaking's sustainability statement shall be consistent with that of its financial statements.	69. The reporting period for the undertaking's sustainability statement shall be consistent with that of its financial statements.
<b>6.2 Linking past, present and future</b>	<b>5.2 Linking past, present and future</b>
74. The undertaking shall establish appropriate linkages in its sustainability statement between retrospective and forward-looking information, when relevant, to foster a clear understanding of how historical information relates to future-oriented information.	70. The undertaking shall establish appropriate linkages in its sustainability statement between retrospective and forward-looking information, when relevant, to foster a clear understanding of how historical information relates to future-oriented information.
<b>6.3 Reporting progress against the base year</b>	<b>5.3 Reporting progress against the base year</b>
75. A base year is the historical reference date or period for which information is available and against which subsequent information can be compared over time.	71. A base year is the historical reference date or period for which information is available and against which subsequent information can be compared over time.
76. The undertaking shall present comparative information in respect of the base year for amounts reported in the current period when reporting the developments and progress towards a target, unless the relevant Disclosure Requirement already defines how to report progress. The undertaking may also include historical information about achieved milestones between the base year and the reporting period when this is relevant information.	72. The undertaking shall present comparative information in respect of the base year for amounts reported in the current period when reporting the developments and progress towards a target, <i>when they are used</i> , unless the relevant Disclosure Requirement <i>already</i> defines how to report progress. The undertaking may also include historical information about achieved milestones between the base year and the reporting period when this is relevant information.
<b>6.4 Definition of short-, medium- and long-term for reporting purposes</b>	<b>5.4 Definition of short-, medium- and long-term for reporting purposes</b>
77. When preparing its sustainability statement, the undertaking shall adopt the following time intervals as of the end of the reporting period: (a) for the short-term time horizon: the period adopted by the undertaking as the reporting period in its financial statements; (b) for the medium-term time horizon: from the end of the short-term reporting period defined in (a) up to 5 years; and (c) for the long-term time horizon: more than 5 years.	73. When preparing its individual sustainability statement, the undertaking shall adopt the following time intervals as of the end of the reporting period: (a) for the short-term time horizon: the period adopted by the undertaking as the reporting period in its financial statements; (b) for the medium-term time horizon: from the end of the short-term reporting period defined in (a) up to five years; and (c) for the long-term time horizon: more than five years.
78. The undertaking shall use an additional breakdown for the long-term time horizon when impacts or actions are expected in a period longer than 5 years if necessary to provide relevant information to users of sustainability statements.	74. The undertaking shall use an additional breakdown for the long-term time horizon when impacts or actions are expected in a period longer than 5 years if necessary to provide relevant information to users of sustainability statements.
79. If different definitions of medium- or long-term time horizons are required for specific items of disclosure in other ESRS, the definitions in those ESRS shall prevail.	75. If different definitions of medium- or long-term time horizons are required for specific items of disclosure <i>in a topical section of this [draft] ESRS</i> , the definitions <i>in the topical section</i> shall prevail.
80. There may be circumstances where the use of the medium- or long-term time horizons defined in paragraph 77 results in non-relevant information, as the undertaking uses a different definition for (i) its processes of identification and management of material impacts, risks and opportunities or (ii) the definition of its actions and setting targets. These circumstances may be due to industry-specific characteristics, such as cash flow and business cycles, the expected duration of capital investments, the time horizons over which the users of sustainability statements conduct their assessments or the planning horizons typically used in the undertaking's industry for decision-making. In these circumstances, the undertaking may adopt a different definition of medium- and/or long- term time horizons (see ESRS 2 BP-2, paragraph 9).	76. There may be circumstances where the use of the medium- or long-term time horizons in paragraph 72 results in non-relevant information, as the undertaking uses a different definition for (i) its processes of identification and management of material impacts and risks <del>and opportunities</del> or (ii) the definition of its actions <del>and setting targets</del> . These circumstances may be due to industry specific characteristics, such as cash flow and business cycles, the expected duration of capital investments, the time horizons over which the users of sustainability statements conduct their assessments <del>or</del> <i>and</i> the planning horizons typically used in the undertaking's industry for decision-making. In these circumstances, the undertaking may adopt a different definition of medium- and/or long-term time horizons (see <del>[draft]</del> <i>Section 2 Disclosure Requirement 2 (BP-2)</i> paragraph 9)

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81. References to “short-term”, “medium-term”, and “long-term” in ESRS refer to the time horizon as determined by the undertaking according to the provisions in paragraphs 77 to 80.	77. References to “short-term”, “medium-term”, and “long-term” in this <i>[draft] Standard</i> refer to the time horizon as determined by the undertaking according to the provisions in paragraphs xx to xx.
<b>7. Preparation and presentation of sustainability information</b>	<b>6. Preparation and presentation of sustainability information</b>
82. This chapter provides general requirements to be applied when preparing and presenting sustainability information.	78. This chapter provides general requirements to be applied when preparing and presenting sustainability information.
<b>7.1 Presenting comparative information</b>	<b>6.1 Presenting comparative information</b>
83. The undertaking shall disclose comparative information in respect of the previous period for all quantitative metrics and monetary amounts disclosed in the current period. When relevant to an understanding of the current period’s sustainability statement, the undertaking shall also disclose comparative information for narrative disclosures.	79. The undertaking shall disclose comparative information in respect of the previous period for all quantitative metrics and monetary amounts disclosed in the current period. When relevant to an understanding of the current period’s sustainability statement, the undertaking shall also disclose comparative information for narrative <i>sustainability</i> disclosures.
84. When the undertaking reports comparative information that differs from the information reported in the previous period it shall disclose: (a) the difference between the figure reported in the previous period and the revised comparative figure; and (b) the reasons for the revision of the figure.	80. When the undertaking reports comparative information that differs from the information reported in the previous period it shall disclose, <i>with reasonable effort</i> : (a) the difference between the figure reported in the previous period and the revised comparative figure; and (b) the reasons for the revision of the figure.
85. Sometimes, it is impracticable to adjust comparative information for one or more prior periods to achieve comparability with the current period. For example, data might not have been collected in the prior period(s) in a way that allows either retrospective application of a new definition of a metric or target, or retrospective restatement to correct a prior period error, and it may be impracticable to recreate the information (see ESRS 2 BP-2). When it is impracticable to adjust comparative information for one or more prior periods, the undertaking shall disclose this fact.	81. Sometimes, it is <del>impracticable</del> <i>not possible with reasonable effort</i> to adjust comparative information for one or more prior periods to achieve comparability with the current period. For example, data might not have been collected in the prior period(s) in a way that allows either retrospective application of a new definition of a metric or target, or retrospective restatement to correct a prior period error, and it may be impracticable to recreate the information (see Section 2 of this <i>[draft] ESRS BP-2</i> ). When it is <del>impracticable</del> <i>not possible with reasonable effort</i> to adjust comparative information for one or more prior periods, the undertaking shall disclose this fact.
86. When an ESRS requires the undertaking to present more than one comparative period for a metric or datapoint, the requirements of that ESRS shall prevail.	82. When <i>a topical section of this [draft] ESRS</i> requires the undertaking to present more than one comparative period for a metric or datapoint, the requirements of that section shall prevail.
<b>7.2 Sources of estimation and outcome uncertainty</b>	<b>6.2 Sources of estimation and outcome uncertainty</b>
87. When quantitative metrics and monetary amounts, including upstream and downstream value chain information (see chapter 5 of this Standard), cannot be measured directly and can only be estimated, measurement uncertainty may arise.	83. When quantitative metrics and monetary amounts, including upstream and downstream value chain information (see chapter 4 of this Section), cannot be measured directly and can only be estimated, measurement uncertainty may arise.
88. An undertaking shall disclose information to enable users to understand the most significant uncertainties affecting the quantitative metrics and monetary amounts reported in its sustainability statement.	84. An undertaking shall disclose information to enable users to understand the most significant uncertainties affecting the quantitative metrics and monetary amounts reported in its sustainability statement.
89. The use of reasonable assumptions and estimates, including scenario or sensitivity analysis, is an essential part of preparing sustainability-related information and does not undermine the usefulness of that information, provided that the assumptions and estimates are accurately described and explained. Even a high level of measurement uncertainty would not necessarily prevent such an assumption or estimate from providing useful information or meeting the qualitative characteristics of information (see Appendix B of this Standard).	85. The use of reasonable assumptions and estimates, including scenario <del>or sensitivity</del> analysis, is an essential part of preparing sustainability-related information and does not undermine the usefulness of that information, provided that the assumptions and estimates are accurately described and explained. Even a high level of measurement uncertainty would not necessarily prevent such an assumption or estimate from providing useful information or meeting the qualitative characteristics of information (see Appendix B of this <i>[draft] Standard</i> ).

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90. Data and assumptions used in preparing the sustainability statement shall be consistent to the extent possible with the corresponding financial data and assumptions used in the undertaking's financial statements.	86. Data and assumptions used in preparing the sustainability statement shall be consistent to the extent possible with the corresponding financial data and assumptions used in the undertaking's financial statements.
91. Some ESRS require the disclosure of information such as explanations about possible future events that have uncertain outcomes. In judging whether information about such possible future events is material, the undertaking shall refer to the criteria in Chapter 3 of this Standard and consider: (a) the potential financial effects of the events (the possible outcome); (b) the severity and likelihood of the impacts on people or the environment resulting from the possible events, taking account of the factors of severity specified in paragraph 45; and (c) the full range of possible outcomes and the likelihood of the possible outcomes within that range.	87. Some <i>topical section of this [draft] ESRS</i> requires the disclosure of information such as explanations about possible future events that have uncertain outcomes. In judging whether information about such possible future events is material, the undertaking shall refer to the criteria in Chapter 3 of this <del>Standard</del> Section and consider: (a) the potential financial effects of the events (the possible outcome); (b) the severity and likelihood of the impacts on people or the environment resulting from the possible events, taking account of the factors of severity specified in paragraph 48; and (c) the full range of possible outcomes and the likelihood of the possible outcomes within that range.
92. When assessing the possible outcomes, the undertaking shall consider all relevant facts and circumstances, including information about low-probability and high-impact outcomes, which, when aggregated, could become material. For example, the undertaking might be exposed to several impacts or risks, each of which could cause the same type of disruption, such as disruptions to the undertaking's supply chain. Information about an individual source of risk might not be material if disruption from that source is highly unlikely to occur. However, information about the aggregate risk of supply chain disruption from all sources might be material (see ESRS 2 BP-2).	88. When assessing the possible outcomes, the undertaking shall consider all relevant facts and circumstances, including information about low-probability and high-impact outcomes, which, when aggregated, could become material. For example, the undertaking might be exposed to several impacts or risks, each of which could cause the same type of disruption, such as disruptions to the undertaking's supply chain. Information about an individual source of risk might not be material if disruption from that source is highly unlikely to occur. However, information about the aggregate risk of supply chain disruption from all sources might be material (see <i>Section 2 Disclosure Requirement 2 (BP-2)</i> ).
<b>7.3 Updating disclosures about events after the end of the reporting period</b>	<b>6.3 Updating disclosures about events after the end of the reporting period</b>
93. In some cases, the undertaking may receive information after the reporting period but before the management report is approved for issuance. If such information provides evidence or insights about conditions existing at period end, the undertaking shall, where appropriate, update estimates and sustainability disclosures, in the light of the new information.	89. In some cases, the undertaking may receive information after the reporting period but before the management report is approved for issuance. If such information provides evidence or insights about conditions existing at period end, the undertaking shall, where appropriate, update estimates and sustainability disclosures, in the light of the new information.
94. When such information provides evidence or insights about material transactions, other events and conditions that arise after the end of the reporting period, the undertaking shall, where appropriate, provide narrative information indicating the existence, nature and potential consequences of these post-year end events.	90. When such information provides evidence or insights about material transactions, other events and conditions that arise after the end of the reporting period, the undertaking shall, where appropriate, provide narrative information indicating the existence, nature and potential consequences of these post-year end events.
<b>7.4 Changes in preparation or presentation of sustainability</b>	<b>6.4 Changes in preparation or presentation of sustainability</b>
95. The definition and calculation of metrics, including metrics used to set targets and monitor progress towards them, shall be consistent over time. The undertaking shall provide restated comparative figures, unless it is impracticable to do so (see ESRS 2 BP-2), when it has: (a) redefined or replaced a metric or target; (b) identified new information in relation to the estimated figures disclosed in the preceding period and the new information provides evidence of circumstances that existed in that period.	91. The definition and calculation of metrics, including metrics used to set targets and monitor progress towards them ( <i>only in case targets have been specifically set by the undertaking</i> ), shall be consistent over time. The undertaking shall provide restated comparative figures, unless it is <del>impracticable</del> <i>not possible with reasonable effort</i> to do so (see <i>Section 2 Disclosure Requirement 2 (BP-2)</i> ), when it has: (f) redefined or replaced a metric or target; (g) identified new information in relation to the estimated figures disclosed in the preceding period and the new information provides evidence of circumstances that existed in that period.
<b>7.5 Reporting errors in prior periods</b>	<b>6.5 Reporting errors in prior periods</b>
96. The undertaking shall correct material prior period errors by restating the comparative amounts for the prior period(s) disclosed, unless it is impracticable to do so. This requirement	92. The undertaking shall correct material prior period errors by restating the comparative amounts for the prior period(s) disclosed, unless it is <del>impracticable</del> <i>not possible with reasonable</i>



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does not extend to reporting periods before the first year of application of ESRS by the undertaking.	<i>effort</i> to do so. This requirement does not extend to reporting periods before the first year of application of ESRS by the undertaking.
97. Prior period errors are omissions from, and misstatements in, the undertaking's sustainability statement for one or more prior periods. Such errors arise from a failure to use, or misuse of, reliable information that: (a) was available when the management report that includes the sustainability statement for those periods was authorized for issuance; and (b) could reasonably be expected to have been obtained and considered in the preparation of sustainability disclosures included in these reports.	93. Prior period errors are omissions from, and misstatements in, the undertaking's sustainability statement for one or more prior periods. Such errors arise from a failure to use, or misuse of, reliable information that: (a) was available when the management report that includes the sustainability statements for those periods was authorised for issuance; and (b) could reasonably be expected to have been obtained and considered in the preparation of sustainability disclosures included in these reports.
98. Such errors include: the effects of mathematical mistakes, mistakes in applying the definitions for metrics or targets, oversights or misinterpretations of facts, and fraud.	94. Such errors include: the effects of mathematical mistakes, mistakes in applying the definitions for metrics or targets, oversights or misinterpretations of facts, and fraud.
99. Potential errors in the current period discovered in that period are corrected before the management report is authorized for issuance. However, material errors are sometimes only discovered in a subsequent period.	95. Potential errors in the current period discovered in that period are corrected before the management report is authorised for issuance. However, material errors are sometimes only discovered in a subsequent period.
100. When it is impracticable to determine the effect of an error on all prior periods presented, the undertaking shall restate the comparative information to correct the error from the earliest date practicable. When correcting disclosures for a prior period, the undertaking shall not use hindsight either in making assumptions about what the management's intentions would have been in a prior period or in estimating the amounts disclosed in a prior period. This requirement applies to correction of both backward-looking and forward- looking disclosures.	96. When it is <del>impracticable</del> <i>not possible with reasonable effort</i> to determine the effect of an error on all prior periods presented, the undertaking shall restate the comparative information to correct the error from the earliest date practicable. When correcting disclosures for a prior period, the undertaking shall not use hindsight either in making assumptions about what the management's intentions would have been in a prior period or in estimating the amounts disclosed in a prior period. This requirement applies to correction of both backward-looking and forward-looking disclosures.
101. Corrections of errors are distinguished from changes in estimates. Estimates may need to be revised as additional information becomes known (see ESRS 2 BP-2).	97. Corrections of errors are distinguished from changes in estimates. Estimates are to be revised as <i>soon as</i> additional information becomes <del>known</del> <i>available</i> (see Section 2 Disclosure Requirement 2 (BP-2)).
<b>7.6 Consolidated reporting and subsidiary exemption</b>	<b>7.6 Consolidated reporting and subsidiary exemption</b>
102. When the undertaking is reporting at a consolidated level, it shall perform its assessment of material impacts, risks and opportunities for the entire consolidated group, regardless of its group legal structure. It shall ensure that all subsidiaries are covered in a way that allows for the unbiased identification of material impacts, risks and opportunities. Criteria and thresholds for assessing an impact, risk or opportunity as material shall be determined based on chapter 3 of this Standard.	<del>102. When the undertaking is reporting at a consolidated level, it shall perform its assessment of material impacts, risks and opportunities for the entire consolidated group, regardless of its group legal structure. It shall ensure that all subsidiaries are covered in a way that allows for the unbiased identification of material impacts, risks and opportunities. Criteria and thresholds for assessing an impact, risk or opportunity as material shall be determined based on chapter 3 of this Standard.</del>
103. Where the undertaking identifies significant differences between material impacts, risks or opportunities at group level and material impacts, risks or opportunities of one or more of its subsidiaries, the undertaking shall provide an adequate description of the impacts, risks and opportunities, as appropriate, of the subsidiary or subsidiaries concerned.	<del>103. Where the undertaking identifies significant differences between material impacts, risks or opportunities at group level and material impacts, risks or opportunities of one or more of its subsidiaries, the undertaking shall provide an adequate description of the impacts, risks and opportunities, as appropriate, of the subsidiary or subsidiaries concerned.</del>
104. When assessing whether the differences between material impacts, risks or opportunities at group level and material impacts, risks or opportunities of one or more of its subsidiaries are significant, the undertaking may consider different circumstances, such as whether the subsidiary or subsidiaries operate in a different sector than the rest of the group or the circumstances reflected in section 3.7 Level of disaggregation.	<del>104. When assessing whether the differences between material impacts, risks or opportunities at group level and material impacts, risks or opportunities of one or more of its subsidiaries are significant, the undertaking may consider different circumstances, such as whether the subsidiary or subsidiaries operate in a different sector than the rest of the group or the circumstances reflected in section 3.7 Level of disaggregation.</del>

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<b>7.7 Classified and sensitive information, and information on intellectual property, know-how or results of innovation</b>	<b>6.6 Classified and sensitive information, and information on intellectual property, know-how or results of innovation</b>
105. The undertaking is not required to disclose classified information or sensitive information, even if such information is considered material.	98. The undertaking is not required to disclose classified information or sensitive information, even if such information is considered material.
106. When disclosing information about its strategy, plans and actions, where a specific piece of information corresponding to intellectual property, know-how or the results of innovation is relevant to meet the objective of a Disclosure Requirement, the undertaking may nevertheless omit that specific piece of information if it: (a) is secret in the sense that it is not, as a body or in the precise configuration and assembly of its components, generally known among or readily accessible to persons within the circles that normally deal with the kind of information in question; (b) has commercial value because it is secret; and (c) has been subject to reasonable steps by the undertaking to keep it secret.	99. When disclosing information about its strategy, plans and actions, where a specific piece of information corresponding to intellectual property, know-how or the results of innovation is relevant to meet the objective of a Disclosure Requirement, the undertaking may nevertheless omit that specific piece of information if it: (a) is secret in the sense that it is not, as a body or in the precise configuration and assembly of its components, generally known among or readily accessible to persons within the circles that normally deal with the kind of information in question; (b) has commercial value because it is secret; and (c) has been subject to reasonable steps by the undertaking to keep it secret.
107. If the undertaking omits classified information or sensitive information, or a specific piece of information corresponding to intellectual property, know-how or the results of innovation because it meets the criteria established in the previous paragraph, it shall comply with the disclosure requirement in question by disclosing all other required information.	100. If the undertaking omits classified information or sensitive information, or a specific piece of information corresponding to intellectual property, know-how or the results of innovation because it meets the criteria established in the previous paragraph, it shall comply with the disclosure requirement in question by disclosing all other required information.
108. The undertaking shall make every reasonable effort to ensure that beyond the omission of the classified information or sensitive information, or of the specific piece of information corresponding to intellectual property, know-how or the results of innovation, the overall relevance of the disclosure in question is not impaired.	101. The undertaking shall make every reasonable effort to ensure that beyond the omission of the specific classified information <i>or sensitive information</i> , or of the specific piece of information corresponding to intellectual property, know-how or the results of innovation, the overall relevance of the disclosure in question is not impaired.
<b>7.8 Reporting on opportunities</b>	<b>7.8 Reporting on opportunities</b>
109. When reporting on opportunities, the disclosure should consist of descriptive information allowing the reader to understand the opportunity for the undertaking or the entire sector. When reporting on opportunities, the undertaking shall consider the materiality of the information to be disclosed. In this context, it shall consider, among other factors: (a) whether the opportunity is currently being pursued and is incorporated in its general strategy, as opposed to a general opportunity for the undertaking or the sector; and (b) whether the inclusion of quantitative measures of anticipated financial effects is appropriate, taking into account the number of assumptions that it could require and consequential uncertainty.	<del>109. When reporting on opportunities, the disclosure should consist of descriptive information allowing the reader to understand the opportunity for the undertaking or the entire sector. When reporting on opportunities, the undertaking shall consider the materiality of the information to be disclosed. In this context, it shall consider, among other factors: (a) whether the opportunity is currently being pursued and is incorporated in its general strategy, as opposed to a general opportunity for the undertaking or the sector; and (b) whether the inclusion of quantitative measures of anticipated financial effects is appropriate, taking into account the number of assumptions that it could require and consequential uncertainty.</del>
	<b>6.7 Matters in course of negotiation</b>
	102. The undertaking is not required to disclose information relating to impending developments or matters in the course of negotiation, even if such information is considered material.
	103. This exemption could apply, in exceptional cases, where in the duly justified opinion of the members of the administrative, management and supervisory bodies, acting within the competences assigned to them by national law and having collective responsibility for that opinion, the disclosure of such information would be seriously prejudicial to the commercial position of the undertaking, provided that such omission does not prevent a fair and balanced understanding of the undertaking's development, performance, and position, and the impact of its activity.
<b>8. Structure of the sustainability statement</b>	<b>7. Structure of the sustainability statement</b>



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110. This chapter provides the basis for the presentation of the information about sustainability matters prepared in compliance with Articles 19a and 29a of Directive 2013/34/EU (i.e., the sustainability statement) within the undertaking's management report. Such information is presented in a dedicated section of the management report identified as the sustainability statement. Appendix F Example of structure of ESRS sustainability statement of this Standard provides an illustrative example of a sustainability statement structured according to the requirements of this chapter.	104. This chapter provides the basis for the presentation of the information about sustainability matters prepared in compliance with <del>Articles 19a and 29a of Directive 2013/34/EU</del> <i>the CSRD and this [draft] ESRS</i> (i.e., sustainability statement) within the undertaking's management report. Such information is presented in a dedicated section of the management report identified as the sustainability statement. Appendix F Example of structure of ESRS sustainability statements of this <del>Standard</del> <i>Section</i> provides an illustrative example of sustainability <del>statement</del> <i>report</i> structured according to the requirements of this chapter.
<b>8.1 General presentation requirement</b>	<b>7.1 General presentation requirement</b>
111. Sustainability information shall be presented: (a) in a way that allows a distinction between information required by disclosures in ESRS and other information included in the management report; and (b) under a structure that facilitates access to and understanding of the sustainability statement, in a format that is both human-readable and machine-readable.	105. Sustainability information shall be presented: (a) in a way that allows a distinction between information required by disclosures in this [draft] ESRS and other information included in the management report; and (b) under a structure that facilitates access to and understanding of the sustainability statement, <del>in a format that is both in human and machine-readable</del> <i>formats</i> .
<b>8.2 Content and structure of the sustainability statement</b>	<b>7.2 Content and structure of the sustainability statement</b>
112. Except for the possibility to incorporate information by reference in accordance with section 9.1 Incorporation by reference of this Standard, the undertaking shall report all the applicable disclosures required by ESRS in accordance with chapter 1 of this Standard, within a dedicated section of the management report.	106. Except for the possibility to incorporate information by reference in <del>accordance with</del> section 8.1 Incorporation by reference of <i>this section</i> , the undertaking shall report all the applicable disclosures ( <i>sector-agnostic and entity-specific</i> ) required by this [draft] ESRS as per chapter 1 of this <del>Standard</del> <i>Section</i> , within a <del>dedicated</del> <i>single</i> section of the management report.
113. The undertaking shall include in its sustainability statement the disclosures pursuant to Article 8 of Regulation (EU) 2020/852 of the European Parliament and the Council and to the Commission Delegated Regulations that specify the content and other modalities of those disclosures. The undertaking shall ensure that these disclosures are separately identifiable within the sustainability statement. The disclosures relating to each of the environmental objectives defined in the Taxonomy Regulation shall be presented together in a clearly identifiable part of the environmental section of the sustainability statement. These disclosures are not subject to the provisions of ESRS, with the exception of this paragraph and the first sentence of paragraph 115 of this standard.	107. The undertaking shall <del>include</del> <i>report</i> , in its sustainability statement, the disclosures pursuant to Article 8 of Regulation (EU) 2020/852 of the European Parliament and the Council and <del>to the</del> Commission Delegated Regulations that specify the content of those disclosures. The undertaking shall ensure that these disclosures are separately identifiable within the sustainability statement. The disclosures relating to each of the environmental objectives defined in the Taxonomy Regulation shall be presented together in a clearly identifiable part of the environmental section of the sustainability statement. These disclosures are not subject to the provisions of ESRS, with the exception of this paragraph and the first sentence of paragraph 105 of this Standard.
114. When the undertaking includes in its sustainability statement additional disclosures stemming from (i) other legislation which requires the undertaking to disclose sustainability information, or (ii) generally accepted sustainability reporting standards and frameworks, including non-mandatory guidance and sector-specific guidance, published by other standard setting bodies (such as technical material issued by the International Sustainability Standards Board or the Global Reporting Initiative), such disclosures shall: (a) be clearly identified with an appropriate reference to the related legislation, standard or framework (see ESRS 2 BP-2, paragraph 15); (b) meet the requirements for qualitative characteristics of information specified in chapter 2 and Appendix B of this standard.	108. When the undertaking includes in its individual sustainability statement additional disclosures stemming from (i) other legislation which requires the undertaking to disclose sustainability information, or (ii) generally accepted sustainability reporting standards and frameworks, including non-mandatory guidance and sector-specific guidance, published by other standard-setting bodies (such as technical material issued by the International Sustainability Standards Board or the Global Reporting Initiative), such disclosures shall: (a) be clearly identified with an appropriate reference to the related legislation, standard or framework (see <i>Section 2 Disclosure Requirement 2 (BP-2)</i> , paragraph 15); (b) meet the requirements for qualitative characteristics of information specified in chapter 2 and Appendix B of this <del>Standard</del> <i>Section</i> .
115. The undertaking shall structure its sustainability statement in four parts, in the following order: general information, environmental information (including disclosures pursuant to Article 8 of Regulation (EU) 2020/852), social information and governance information. Respecting the provision in section 3.6 Material impacts or risks arising from actions to address sustainability	109. The undertaking shall structure its sustainability statement in four parts, in the following order: general information, environmental information (including disclosures pursuant to Article 8 of Regulation (EU) 2020/852), social information and governance information. Respecting the provision in this Section chapter 3.6 Material impacts or risks arising from actions to address

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<p>matters of this Standard, when information provided in one part contains information to be reported in another part, the undertaking may refer in one part to information presented in another part, avoiding duplications. The undertaking may apply the detailed structure illustrated in Appendix F of this Standard.</p>	<p>sustainability matters of this <i>[draft]</i> Standard, when information provided in one part <del>contains</del> <i>is also covering</i> information to be reported in another part, the undertaking may refer in one part to information presented in another part, avoiding duplications. The undertaking may apply the detailed structure illustrated in Appendix F of this <del>Standard</del> <i>Standard Section</i>.</p>
<p>116. The disclosures required by sector-specific ESRS shall be grouped by reporting area and, where applicable, by sustainability topic. They shall be presented alongside the disclosures required by ESRS 2 and the corresponding topical ESRS.</p>	<p><del>116. The disclosures required by sector-specific ESRS shall be grouped by reporting area and, where applicable, by sustainability topic. They shall be presented alongside the disclosures required by ESRS 2 and the corresponding topical ESRS.</del></p>
<p>117. Where the undertaking develops material entity-specific disclosures in accordance with paragraph 11 it shall report those disclosures alongside the most relevant sector-agnostic and sector-specific disclosures.</p>	<p>110. Where the undertaking develops material entity-specific disclosures in accordance with <del>paragraph 11</del>, it shall report those disclosures alongside the most relevant <del>sector-agnostic and sector-specific disclosure</del> in this <i>[draft]</i> ESRS.</p>
<p><b>9. Linkages with other parts of corporate reporting and connected information</b></p>	<p><b>8. Linkages with other parts of corporate reporting and connected information</b></p>
<p>118. The undertaking shall provide information that enables users of its sustainability statement to understand the connections between different pieces of information in the statement, and the connections between the information in the sustainability statement and other information that the undertaking discloses in other parts of its corporate reporting.</p>	<p>111. The undertaking shall provide information that enables users of its sustainability statement to understand the connections between different pieces of information in the statement, and the connections between the information in the sustainability statement and other information that the undertaking discloses in other parts of its corporate reporting.</p>
<p><b>9.1 Incorporation by reference</b></p>	<p><b>8.1 Incorporation by reference</b></p>
<p>119. Provided that the conditions in paragraph 120 are met, information prescribed by a Disclosure Requirement of an ESRS, including a specific datapoint prescribed by a Disclosure Requirement, may be incorporated in the sustainability statement by reference to:</p> <ul style="list-style-type: none"> <li>(a) another section of the management report;</li> <li>(b) the financial statements;</li> <li>(c) the corporate governance statement (if not part of the management report);</li> <li>(d) the remuneration report required by Directive 2007/36/EC of the European Parliament and of the Council ;</li> <li>(e) the universal registration document, as referred to in Article 9 of Regulation (EU) 2017/1129 ; and</li> <li>(f) public disclosures under Regulation (EU) No 575/2013 of the European Parliament and of the Council (Pillar 3 disclosures) . If the undertaking incorporates by reference information from Pillar 3 disclosures, it shall ensure that the information matches the scope of consolidation used for the sustainability statement by complementing the incorporated information with additional elements as necessary.</li> </ul>	<p>112. Provided that the conditions in paragraph 109 are met, information prescribed by a Disclosure Requirement of this <i>[draft]</i> ESRS, including a specific datapoint prescribed by a Disclosure Requirement, may be incorporated in the sustainability statement by reference to:</p> <ul style="list-style-type: none"> <li>(a) another section of the management report;</li> <li>(b) the financial statements;</li> <li>(c) the corporate governance statement (if not part of the management report);</li> <li>(d) the remuneration report required by Directive 2007/36/EC of the European Parliament and of the Council ;</li> <li>(e) the universal registration document, as referred to in Article 9 of Regulation 2017/1129 6 ; and</li> <li>(f) public disclosures under Regulation 575/2013 of the European Parliament and of the Council (Pillar 3 disclosures) . If the undertaking incorporates by reference information from Pillar 3 disclosures, it shall ensure that the information matches the scope of consolidation used for the sustainability statement by complementing the incorporated information with additional elements as necessary.</li> </ul>
<p>120. The undertaking may incorporate information by reference to the documents, or part of the documents, listed in paragraph 119, provided that the disclosures incorporated by reference:</p> <ul style="list-style-type: none"> <li>(a) constitute a separate element of information and are clearly identified in the document concerned as addressing the relevant Disclosure Requirement, or the relevant specific datapoint prescribed by a Disclosure Requirement;</li> <li>(b) are published before or at the same time as the management report;</li> <li>(c) are in the same language as the sustainability statement;</li> <li>(d) are subject to at least the same level of assurance as the sustainability statement; and</li> <li>(e) meet the same technical digitalisation requirements as the sustainability statement.</li> </ul>	<p>113. The undertaking may incorporate information by reference to the documents, or part of the documents, listed in paragraph 109, provided that the disclosures incorporated by reference:</p> <ul style="list-style-type: none"> <li>(a) constitute a separate element of information and are clearly identified in the document concerned as addressing the relevant Disclosure Requirement, or the relevant specific datapoint prescribed by a Disclosure Requirement;</li> <li>(b) are published before or at the same time as the management report;</li> <li>(c) are in the same language as the sustainability statement;</li> <li>(d) are subject to at least the same level of assurance as the sustainability statement; and</li> <li>(e) meet the same technical digitalisation requirements as the sustainability statement.</li> </ul>

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121. Provided that the conditions established in paragraph 120 are met, information prescribed by a Disclosure Requirement of an ESRS, including a specific datapoint prescribed by a Disclosure Requirement, may be incorporated in the sustainability statement by reference to the undertaking's report prepared according to EU Eco-Management and Audit Scheme (EMAS) Regulation (EU) No 1221/2009 . In this case, the undertaking shall ensure that the information incorporated by reference is produced using the same basis for preparation of ESRS information, including scope of consolidation and treatment of value chain information.	114. Provided that these conditions established in paragraph 109 are met, information prescribed by a Disclosure Requirement of this [draft] ESRS, including a specific datapoint prescribed by a Disclosure Requirement, may be incorporated in the sustainability statement by reference to the undertaking's report prepared according to EU Eco Management and Audit Scheme (EMAS) Regulation (EU) No. 1221/2009. In this case, the undertaking shall ensure that the information incorporated by reference is produced using the same basis for preparation of ESRS information, including scope of consolidation and treatment of value chain information.
122. In the preparation of its sustainability statement using incorporation by reference, the undertaking shall consider the overall cohesiveness of the reported information and ensure that the incorporation by reference does not impair the readability of the sustainability statement. Appendix G Example of incorporation by reference of this Standard is an illustrative example of incorporation by reference (See ESRS 2 BP-2).	115. In the preparation of its sustainability statement using incorporation by reference, the undertaking shall consider the overall cohesiveness of the reported information and ensure that the incorporation by reference does not impair the readability of the sustainability statement. Appendix G Example of incorporation by reference of this [draft] Standard is an illustrative example of incorporation by reference (See Section 2 Disclosure Requirement 2 (BP-2) ).
<b>9.2 Connected information and connectivity with financial statements</b>	<b>8.2 Connected information and connectivity with financial statements</b>
123. The undertaking shall describe the relationships between different pieces of information. Doing so could require connecting narrative information on governance, strategy and risk management to related metrics and targets. For example, in providing connected information, the undertaking may need to explain the effect or likely effect of its strategy on its financial statements or financial plans, or explain how its strategy relates to metrics and targets used to measure progress against performance. Furthermore, the undertaking may need to explain how its use of natural resources and changes within its supply chain could amplify, change or reduce its material impacts, risks and opportunities. It may need to link this information to information about current or anticipated financial effects on its production costs, to its strategic response to mitigate such impacts or risks, and to its related investment in new assets. The undertaking may also need to link narrative information to the related metrics and targets and to information in the financial statements. Information that describes connections shall be clear and concise.	116. The undertaking shall describe the relationships between different pieces of information. Doing so could require connecting narrative information on governance, strategy and risk management to related metrics <del>and targets</del> . For example, in providing connected information, the undertaking may need to explain the effect or likely effect of its strategy on its financial statements or financial plans, or explain how its strategy relates to metrics and targets used to measure <del>progress against</del> performance. Furthermore, the undertaking may need to explain how its use of natural resources and changes within its supply chain could amplify, change or reduce its material impacts and risks <del>and opportunities</del> . It may need to link this information to information about current or anticipated financial effects on its production costs, to its strategic response to mitigate such impacts or risks, and to its related investment in new assets. The undertaking may also need to link narrative information to the related metrics and targets ( <i>when disclosing on targets</i> ) and to information in the financial statements. Information that describes connections shall be clear and concise.
124. When the sustainability statement includes monetary amounts or other quantitative data points that exceed a threshold of materiality and that are presented in the financial statements (direct connectivity between information disclosed in sustainability statement and information disclosed in financial statements), the undertaking shall include a reference to the relevant paragraph of its financial statements where the corresponding information can be found.	117. When the <i>individual</i> sustainability statement includes monetary amounts or other quantitative data points that exceed a threshold of materiality and that are presented in the financial statements (direct connectivity between information disclosed in sustainability statement and information disclosed in financial statements), the undertaking shall include a reference to the relevant paragraph of its financial statements where the corresponding information can be found.
125. The sustainability statement may include monetary amounts or other quantitative datapoints that exceed a threshold of materiality and that are either an aggregation of, or a part of, monetary amounts or quantitative data presented in the undertaking's financial statements (indirect connectivity between information disclosed in sustainability statement and information disclosed in financial statements). If this is the case, the undertaking shall explain how these amounts or datapoints in the sustainability statement relate to the most relevant amounts presented in the financial statements. This disclosure shall include a reference to the line item and/or to the relevant paragraphs of its financial statements where the corresponding information can be found. Where appropriate, a reconciliation may be provided, and it may be presented in a tabular form.	118. The sustainability statement may include monetary amounts or other quantitative datapoints that exceed a threshold of materiality and that are either an aggregation of, or a part of, monetary amounts or quantitative data presented in the undertaking's financial statements (indirect connectivity between information disclosed in sustainability statement and information disclosed in financial statements). If this is the case, the undertaking shall explain how these amounts or datapoints in the sustainability statement relate to the most relevant amounts presented in the financial statements. This disclosure shall include a reference to the line item and/or to the relevant paragraphs of its financial statements where the corresponding information can be found. Where appropriate, a reconciliation may be provided, and it may be presented in a tabular form.

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<p>126. In the case of information not covered by paragraphs 124 and 125, the undertaking shall explain, based on a threshold of materiality, the consistency of significant data, assumptions, and qualitative information included in its sustainability statement with the corresponding data, assumptions and qualitative information included in the financial statements. This may occur when the sustainability statement includes:</p> <p>(a) monetary amounts or other quantitative data linked to monetary amounts or other quantitative data presented in the financial statements; or</p> <p>(b) qualitative information linked to qualitative information presented in the financial statements.</p>	<p>119. In the case of information not covered by paragraphs 113 and 114, the undertaking shall explain, based on a threshold of materiality, the consistency of significant data, assumptions, and qualitative information included in its individual sustainability statement with the corresponding data, assumptions and qualitative information included in the financial statements. This may occur when the sustainability statement includes:</p> <p>(a) monetary amounts or other quantitative data linked to monetary amounts or other quantitative data presented in the financial statements; or</p> <p>(b) qualitative information linked to qualitative information presented in the financial statements.</p>
<p>127. Consistency as required by paragraph 126 shall be at the level of a single datapoint and shall include a reference to the relevant line item or paragraph of notes to the financial statements. When significant data, assumptions and qualitative information are not consistent, the undertaking shall state that fact and explain the reason.</p>	<p>120. Consistency as required by paragraph 115 shall be at the level of a single datapoint and shall include a reference to the relevant line item or paragraph of notes of the financial statements. When significant data, assumptions and qualitative information are not consistent, the undertaking shall state that fact and explain the reason.</p>
<p>128. Examples of items for which the explanation in paragraph 126 is required, are:</p> <p>(a) when the same metric is presented as of the reporting date in financial statements and as a forecast for future periods in the sustainability statement; and</p> <p>(b) when macroeconomic or business projections are used to develop metrics in the sustainability statement and they are also relevant in estimating the recoverable amount of assets, the amount of liabilities or provisions in financial statements.</p>	<p>121. Examples of items for which the statement in paragraph 115 is required, are:</p> <p>(a) when the same metric is presented as of the reporting date in financial statements and as a forecast for future periods in the sustainability statement; and</p> <p>(b) when macroeconomic or business projections are used to develop metrics in the sustainability statement and they are also relevant in estimating the recoverable amount of assets, the amount of liabilities or provisions in financial statements.</p>
<p>129. Topical and sector-specific ESRS may include requirements to include reconciliations or to illustrate consistency of data and assumptions for specific Disclosure Requirements. In such cases, the requirements in those ESRS shall prevail.</p>	<p>122. Topical and sector-specific <i>Sections of this [Draft] ESRS</i> may include define requirements to include reconciliations or to illustrate consistency of data and assumptions for specific Disclosure Requirements. In such cases, the requirements in <i>these Sections</i> shall prevail.</p>
<p><b>10 Transitional provisions</b></p>	<p><b>9. Transitional provisions</b></p>
<p><b>10.1 Transitional provision related to entity-specific disclosures</b></p>	<p><b>9.1. Transitional provision related to <del>entity-specific disclosures</del> section 1.2 LSME ESRS structure and reporting areas</b></p>
<p>130. The extent to which sustainability matters are covered by ESRS is expected to evolve as further Disclosure Requirements are developed. Therefore, the need for entity-specific disclosures is likely to decrease over time, in particular as a result of the future adoption of sector specific standards.</p>	<p>123. The extent to which sustainability matters are covered by this [draft] ESRS is expected to evolve as further Disclosure Requirements are developed. Therefore, the need for entity-specific disclosures is likely to decrease over time, in particular as a result of the future adoption of sector specific standards.</p> <p>[NOTE TO CONSTITUENTS: THIS TRANSITIONAL PROVISION WILL BE INCLUDED IN THE STANDARD IN CASE THE PUBLIC CONSULTATION CONFIRMS THAT EFRAG WILL ISSUE SECTOR-SPECIFIC ANNEXES TO THIS STANDARD AS BY-PRODUCT OF ITS FUTURE WORK ON SECTOR ESRS]</p>
<p>131. When defining its entity-specific disclosures, the undertaking may adopt transitional measures for their preparation in the first three annual sustainability statements under which it may as a priority:</p> <p>(a) introduce in its reporting those entity-specific disclosures that it reported in prior periods, if these disclosures meet or are adapted to meet the qualitative characteristics of information referred to under chapter 2 of this Standard; and</p> <p>(b) complement its disclosures prepared on the basis of the topical ESRS with an appropriate set of additional disclosures to cover sustainability matters that are material for the undertaking in its</p>	<p>124. When defining its entity-specific disclosures, the undertaking may adopt transitional measures for their preparation in the first three annual sustainability statements under which it <del>may</del> shall as a priority:</p> <p>(a) introduce in its reporting those entity-specific disclosures that it reported in prior periods, if these disclosures meet or are adapted to meet the qualitative characteristics of information referred to under chapter 2 of this Section; and</p> <p>(b) complement its disclosures, prepared on the basis of the topical Sections of this [draft] ESRS, with an appropriate set of additional disclosures to cover sustainability matters that are material</p>

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sector(s), using available best practice and/or available frameworks or reporting standards, such as IFRS industry-based guidance and GRI Sector Standards.	for the undertaking in its sector(s), using <i>the</i> available best practice and/or available frameworks or reporting standards /such as IFRS industry—based guidance and GRI Sector Standards/.
<b>10.2 Transitional provision related to chapter 5 Value chain</b>	<b>9.2 Transitional provision related to chapter 4 Value chain</b>
132. For the first 3 years of the undertaking's sustainability reporting under the ESRS, in the event that not all the necessary information regarding its upstream and downstream value chain is available, the undertaking shall explain the efforts made to obtain the necessary information about its upstream and downstream value chain, the reasons why not all of the necessary information could be obtained, and its plans to obtain the necessary information in the future.	125. For the first 3 years of the undertaking's sustainability reporting under <i>the [draft] ESRS</i> , in the event that not all the necessary information regarding its upstream and downstream value chain is available, the undertaking shall explain the efforts made to obtain the necessary information about its upstream and downstream value chain, the reasons why not all of the necessary information could not be obtained, and its plans of the undertaking to obtain such information in the future.
133. For the first 3 years of its sustainability reporting under the ESRS, in order to take account of the difficulties that undertakings may encounter in gathering information from actors throughout their value chain and in order to limit the burden for SMEs in the value chain: (a) when disclosing information on policies, actions and targets in accordance with ESRS2 and other ESRS, the undertaking may limit upstream and downstream value chain information to information available in-house, such as data already available to the undertaking and publicly available information; and (b) when disclosing metrics, the undertaking is not required to include upstream and downstream value chain information, except for datapoints derived from other EU legislation, as listed in ESRS 2 Appendix B.	126. For the first 3 years of its sustainability reporting under this [draft] ESRS, in order to take account of the difficulties that undertakings may encounter in gathering information from actors throughout their value chain <del>and in order to limit the burden for SMEs in the value chain:</del> (a) when disclosing information on policies, actions and targets in accordance with Section 3 of this [draft] ESRS, the undertaking may limit upstream and downstream value chain information to information available in-house, such as data already available to the undertaking and publicly available information; <del>and</del> (b) when disclosing metrics, the undertaking is not required to include upstream and downstream value chain information, except for datapoints derived from other EU legislation, as listed in Section 2 Appendix B.
134. Paragraphs 132 and 133 apply irrespective of whether or not the relevant actor in the value chain is an SME.	134. Paragraphs 132 and 133 apply irrespective of whether or not the relevant actor in the value chain is an SME.
135. Starting from the fourth year of its reporting under the ESRS, the undertaking shall include upstream and/or downstream value chain information according to paragraph 63. In this context, the information required by ESRS to be obtained from SME undertakings in the undertaking's upstream and/or downstream value chain will not exceed the content of the future ESRS for listed SMEs.	135. Starting from the fourth year of its reporting under the ESRS, the undertaking shall include upstream and/or downstream value chain information according to paragraph 63. In this context, the information required by ESRS to be obtained from SME undertakings in the undertaking's upstream and/or downstream value chain will not exceed the content of the future ESRS for listed SMEs.
<b>10.3 Transitional provision related to section 7.1 Presenting comparative information</b>	<b>9.3 Transitional provision related to section 6.1 Presenting comparative information</b>
136. To ease the first-time application of this Standard, the undertaking is not required to disclose the comparative information required by section 7.1 Presenting comparative information in the first year of preparation of the sustainability statement under the ESRS. For disclosure requirements listed in Appendix C List of phased-in Disclosure Requirements, this transitional provision applies with reference to the first year of mandatory application of the phased-in disclosure requirement.	127. To ease the first-time application of this <del>Standard</del> <i>[draft] ESRS</i> , the undertaking is not required to disclose the comparative information required by <i>this Section chapter 6.1 Presenting comparative information</i> in the first year of preparation of the sustainability statement under this [draft] ESRS. For disclosure requirements listed in Appendix C List of phased-in Disclosure Requirements, this transitional provision applies with reference to the first year of mandatory application of the phased-in disclosure requirement.
<b>10.4 Transitional provision: List of Disclosure Requirements that are phased-in</b>	<b>9.4 Transitional provision: List of Disclosure Requirements that are phased-in for [draft] ESRS to year 2 or subsequent years</b>
137. Appendix C List of phased-in Disclosure Requirements in this Standard sets phase-in provisions for the Disclosure Requirements or datapoints of Disclosure Requirements in ESRS that may be omitted or that are not applicable in the first year(s) of preparation of the sustainability statement under the ESRS.	128. Appendix C List of phased-in Disclosure Requirements in this <i>Section</i> sets phase-in provisions for the Disclosure Requirements or datapoints of Disclosure Requirements in <i>in this [draft] ESRS</i> that may be omitted or that are not applicable in the first year(s) of preparation of the sustainability statement under this <i>[draft] ESRS</i> . <i>The phased-in provisions are only applicable to LSME that do not opt-out or cannot opt-out according to art.19 a (7) of Directive (EU) 2022/2464.</i>
<b>Appendix A: Application Requirements</b>	<b>Appendix A: Application Requirements</b>



LSME ED comparison with Set 1

SET 1 ESRS 1 (version July 2023)	LSME ESRS ED Section 1
This appendix is an integral part of ESRS 1 and has the same authority as the other parts of the Standard.	This appendix is an integral part of <i>this [draft] ESRS</i> and has the same authority as the other parts of the <i>[draft]</i> Standard.
<b>Entity specific disclosures</b>	<b>Entity specific disclosures</b>
AR 1. The entity-specific disclosures shall enable users to understand the undertaking's impacts, risks and opportunities in relation to environmental, social or governance matters.	AR 1. The entity-specific disclosures shall enable users to understand the undertaking's impacts and risks <del>and opportunities</del> in relation to environmental, social or governance matters.
AR 2. When developing entity-specific disclosures, the undertaking shall ensure that: (a) the disclosures meet the qualitative characteristics of information as set out in chapter 2 Qualitative characteristics of information; and (b) its disclosures include, where applicable, all material information related to the reporting areas of governance; strategy; impact, risk and opportunity management; and metrics and targets (see ESRS 2 chapters 2 to 5).	AR 2. When developing entity-specific disclosures, the undertaking shall ensure that: (a) the disclosures meet the qualitative characteristics of information as set out in chapter 2 Qualitative characteristics of information; and (b) its disclosures include, where applicable, all material information related to the reporting areas of governance; strategy; impact and risk <del>and opportunity</del> management and metrics and targets ( <i>see Section 2 chapters 2 to 4, Section 3 DR 11 and DR 12 and topical Sections of this [draft] ESRS</i> ).
AR 3. When determining the usefulness of metrics for inclusion in its entity-specific disclosures, the undertaking shall consider whether: (a) its chosen performance metrics provide insight into: i. how effective its practices are in reducing negative outcomes and/or increasing positive outcomes for people and the environment (for impacts); and/or ii. the likelihood that its practices result in financial effects on the undertaking (for risks and opportunities); (b) the measured outcomes are sufficiently reliable, meaning that they do not involve an excessive number of assumptions and unknowns that would render the metrics too arbitrary to provide a faithful representation; and (c) it has provided sufficient contextual information to interpret performance metrics appropriately, and whether variations in such contextual information may impact the comparability of the metrics over time.	AR 3. When determining the usefulness of metrics for inclusion in its entity-specific disclosures, the undertaking shall consider whether: (a) its chosen performance metrics provide insight into: i. how effective its practices are in reducing negative outcomes <del>and/or increasing positive</del> for people and the environment (for impacts); and/or ii. the likelihood that its practices result in financial effects on the undertaking (for risks <del>and opportunities</del> ); (b) the measured outcomes are sufficiently reliable, meaning that they do not involve an excessive number of assumptions and unknowns that would render the metrics too arbitrary to provide a faithful representation; and (c) it has provided sufficient contextual information to interpret performance metrics appropriately, <del>and whether variations in such contextual information may impact the comparability of the metrics over time.</del>
AR 4. When developing its entity-specific disclosures, the undertaking shall carefully consider: (a) comparability between undertakings, while still ensuring relevance of the information provided, recognising that comparability may be limited for entity- specific disclosures. The undertaking shall consider whether the available and relevant frameworks, initiatives, reporting standards and benchmarks (such as technical material issued by the International Sustainability Standards Board or the Global Reporting Initiative) provide elements that can support comparability to the maximum extent possible; and (b) comparability over time: consistency of methodologies and disclosures is a key factor for achieving comparability over time.	AR 4. When developing its entity-specific disclosures, the undertaking shall carefully consider: (a) comparability between undertakings, while still ensuring relevance of the information provided, recognising that comparability may be limited for entity- specific disclosures; <del>The undertaking shall consider whether the available and relevant frameworks, initiatives, reporting standards and benchmarks (such as technical material issued by the International Sustainability Standards Board or the Global Reporting Initiative) provide elements that can support comparability to the maximum extent possible-</del> and (b) comparability over time: consistency of methodologies and disclosures is a key factor for achieving comparability over time.
AR 5. Further guidance for developing entity-specific disclosures can be found by considering the information required under topical ESRS that addresses similar sustainability matters.	<del>AR 5. Further guidance for developing entity-specific disclosures can be found by considering the information required under topical ESRS that addresses similar sustainability matters.</del>
<b>Double materiality</b>	<b>Double materiality</b>
<b>Stakeholders and their relevance to the materiality assessment process</b>	<b>Stakeholders and their relevance to the materiality assessment process</b>
AR. 6 In addition to the categories of stakeholder listed in paragraph 22, common categories of stakeholders are: employees and other workers, suppliers, consumers, customers, end- users, local communities and persons in vulnerable situations, and public authorities, including regulators, supervisors and central banks.	AR 5. In addition to the categories of stakeholder listed in paragraph 23, common categories of stakeholders are: employees and other workers, suppliers, consumers, customers, end-users, local communities and persons in vulnerable situations, and public authorities including regulators, supervisors and central banks.

LSME ED comparison with Set 1

SET 1 ESRS 1 (version July 2023)	LSME ESRS ED Section 1
AR 7. Nature may be considered as a silent stakeholder. In this case, ecological data and data on the conservation of species may support the undertaking's materiality assessment.	AR 6. Nature may be considered as a silent stakeholder. In this case, ecological data and data on the conservation of species may support the undertaking's materiality assessment.
AR 8. Materiality assessment is informed by dialogue with affected stakeholders. The undertaking may engage with affected stakeholders or their representatives (such as employees or trade unions), along with users of sustainability reporting and other experts, to provide inputs or feedback on its conclusions regarding its material impacts, risks and opportunities.	AR 7. <i>When the undertaking has engaged with affected stakeholders</i> , materiality assessment is informed by the dialogue with <del>affected stakeholders</del> <i>them</i> . The undertaking may engage with affected stakeholders or their representatives (such as employees or trade unions), along with users of sustainability reporting and other experts, to provide inputs or feedback on its conclusions regarding its material impacts and risks and <del>opportunities</del> .
<b>Assessment of impact materiality</b>	<b>Assessment of impact materiality</b>
AR 9. In assessing impact materiality and determining the material matters to be reported, the undertaking shall consider the following three steps: (a) understanding of the context in relation to its impacts including its activities, business relationships, and stakeholders; (b) identification of actual and potential impacts (both negative and positive), including through engaging with stakeholders and experts. In this step, the undertaking may rely on scientific and analytical research on impacts on sustainability matters; (c) assessment of the materiality of its actual and potential impacts and determination of the material matters. In this step, the undertaking shall adopt thresholds to determine which of the impacts will be covered in its sustainability statement.	AR 8. In assessing impact materiality and determining the material matters to be reported, the undertaking shall consider the following three steps: (a) understanding of the context in relation to its impacts including its activities, business relationships, and stakeholders; (b) identification of actual and potential impacts ( <del>both negative and positive</del> ), <del>including</del> , through engaging with <i>relevant</i> stakeholders and experts. In this step, the undertaking may rely on scientific and analytical research on impacts on sustainability matters; (c) assessment of the materiality of its actual and potential impacts and determination of the material matters. In this step, the undertaking shall adopt thresholds to determine which of the impacts will be covered in its sustainability statement.
<b>Characteristics of severity</b>	<b>Characteristics of severity</b>
AR 10. The severity is determined by the following factors: (a) scale: how grave the negative impact is or how beneficial the positive impact is for people or the environment; (b) scope: how widespread the negative or positive impacts are. In the case of environmental impacts, the scope may be understood as the extent of environmental damage or a geographical perimeter. In the case of impacts on people, the scope may be understood as the number of people adversely affected; and (c) irremediable character: whether and to what extent the negative impacts could be remediated, i.e., restoring the environment or affected people to their prior state.	AR 9. The severity is determined by the following factors: (a) scale: how grave the negative impact is <del>or how beneficial the positive impact is</del> for people or the environment; (b) scope: how widespread the negative <del>or positive</del> impacts are. In the case of environmental impacts, the scope may be understood as the extent of environmental damage or a geographical perimeter. In the case of impacts on people, the scope may be understood as the number of people adversely affected; and (c) irremediable character: whether and to what extent the negative impacts could be remediated, i.e., restoring the environment or affected people to their prior state.
AR 11. Any of the three characteristics (scale, scope, and irremediable character) can make a negative impact severe. In the case of a potential negative human rights impact, the severity of the impact takes precedence over its likelihood.	AR 10. Any of the three characteristics (scale, scope, and irremediable character) can make a negative impact severe. In the case of a potential negative human rights impact, the severity of the impact takes precedence over its likelihood.
<b>Impacts connected with the undertaking</b>	<b>Impacts connected with the undertaking</b>
AR 12. As an illustration: (a) if the undertaking uses cobalt in its products that is mined using child labour, the negative impact (i.e., child labour) is connected with the undertaking's products through the tiers of business relationships in its upstream value chain. These relationships include the smelter and minerals trader and the mining enterprise that uses child labour; and (b) if the undertaking provides financial loans to an enterprise for business activities that, in breach of agreed standards, result in the contamination of water and land surrounding the	AR 11. As an illustration: (a) if the undertaking uses cobalt in its products that is mined using child labour, the negative impact (i.e., child labour) is connected with the undertaking's products through the tiers of business relationships in its upstream value chain. These relationships include the smelter and minerals trader and the mining enterprise that uses child labour; and (b) if the undertaking provides financial loans to an enterprise for business activities that, in breach of agreed standards, result in the contamination of water and land surrounding the operations, this negative impact is connected with the undertaking through its relationship with the enterprise it provides the loans to.



LSME ED comparison with Set 1

SET 1 ESRS 1 (version July 2023)	LSME ESRS ED Section 1
operations, this negative impact is connected with the undertaking through its relationship with the enterprise it provides the loans to.	
<b>Assessment of financial materiality</b>	<b>Assessment of financial materiality</b>
<p>AR 13. The following are examples of how impacts and dependencies are sources of risks or opportunities:</p> <p>(a) when the undertaking’s business model depends on a natural resource – for example water – it is likely to be affected by changes in the quality, availability and pricing of that resource;</p> <p>(b) when the undertaking’s activities result in negative impacts, e.g., on local communities, the activities could become subject to stricter government regulation and/or the impact could trigger consequences of a reputational nature. These might have negative effects on the undertaking’s brand and higher recruitment costs might arise; and</p> <p>(c) when the undertaking’s business partners face material sustainability-related risks, the undertaking could be exposed to related consequences as well.</p>	<p>AR 12. The following are examples of how impacts and dependencies are sources of risks <del>or opportunities</del>:</p> <p>(a) when the undertaking’s business model depends, on a natural resource – for example water – it is likely to be affected by changes in the quality, availability and pricing of that resource;</p> <p>(b) when the undertaking’s activities result in negative impacts, e.g., on local communities, the activities could become subject to stricter government regulation and/or the impact could trigger consequences of a reputational nature. These <del>might</del> have negative effects on the undertaking’s brand and higher recruitment costs might arise; and</p> <p>(c) when the undertaking’s business partners face material sustainability-related risks, the undertaking could be exposed to related consequences as well.</p>
<p>AR 14. The identification of risks and opportunities that affect or could reasonably be expected to affect the undertaking’s financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium- or long-term is the starting point for financial materiality assessment. In this context, the undertaking shall consider:</p> <p>(a) the existence of dependencies on natural and social resources as sources of financial effects (see paragraph 50);</p> <p>(b) their classification as sources of:</p> <p>i. risks (contributing to negative deviation in future expected cash inflows or increase in deviation in future expected cash outflows and/or negative deviation from an expected change in capitals not recognised in the financial statements); or</p> <p>ii. opportunities (contributing to positive deviation in future expected cash inflows or decrease in deviation in future cash outflows and/or positive deviation from expected change in capitals not recognised in financial statements).</p>	<p>AR 13. The identification of risks <del>and opportunities</del> that affect, or could reasonably be expected to affect the undertaking’s financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium- or long-term is the starting point for financial materiality assessment. In this context, the undertaking shall consider:</p> <p>(a) the existence of dependencies <del>on</del> <i>from</i> natural and social resources as sources of financial effects (see paragraph <i>51 of this section</i>);</p> <p>(b) their classification as sources of risks (contributing to negative deviation in future expected cash inflows or increase in deviation in future expected cash outflows and/or negative deviation from an expected change in capitals not recognised in the financial statements). <del>ii. opportunities (contributing to positive deviation in future expected cash inflows or decrease in deviation in future cash outflows and/or positive deviation from expected change in capitals not recognised in financial statements).</del></p>
<p>AR 15. Once the undertaking has identified its risks and opportunities, it shall determine which of them are material for reporting. This shall be based on a combination of (i) the likelihood of occurrence and (ii) the potential magnitude of financial effects determined on the basis of appropriate thresholds. In this step it shall consider the contribution of those risks and opportunities to financial effects in the short-, medium- and long-term based on:</p> <p>(a) scenarios/forecasts that are deemed likely to materialise; and</p> <p>(b) potential financial effects related to sustainability matters deriving either from situations with a below the “more likely than not” threshold or assets/liabilities not, or not yet, reflected in financial statements. This includes:</p> <p>i. potential situations that following the occurrence of future events may affect cash flow generation potential;</p> <p>ii. capitals that are not recognised as assets from an accounting and financial reporting perspective but have a significant influence on financial performance, such as natural, intellectual (organisational), human, social and relationship capitals; and</p> <p>iii. possible future events that may have an influence on the evolution of such capitals.</p>	<p>AR 14. Once the undertaking has identified its risks <del>and opportunities</del>, it shall determine which of them are material for reporting. This shall be based on a combination of (i) the likelihood of occurrence and (ii) the potential <del>magnitude</del> <i>size</i> of financial effects determined on the basis of appropriate thresholds. In this step it shall consider the contribution of those risks <del>and opportunities</del> to financial effects in the short-, medium- and long-term <i>time</i> based on:</p> <p>(a) scenarios/forecasts that are deemed likely to materialise; and (b) potential financial effects related to sustainability matters deriving either from situations with a below the “more likely than not” threshold or assets/liabilities not <i>(or not yet)</i> reflected in financial statements. This includes:</p> <p>i. potential situations that following the occurrence of future events may affect cash flow generation potential;</p> <p>ii. capitals that are not recognised as assets from an accounting and financial reporting perspective but have a significant influence on financial performance, such as natural, intellectual (organisational), human, social and relationship capitals; and</p> <p>iii. possible future events that may have an influence on the evolution of such capitals.</p>

LSME ED comparison with Set 1

SET 1 ESRS 1 (version July 2023)	LSME ESRS ED Section 1
<p><b>Sustainability matters to be included in the materiality assessment</b></p> <p>AR 16. When performing its materiality assessment, the undertaking shall consider the following list of sustainability matters covered in the topical ESRS. When, as a result of the undertaking's materiality assessment (see ESRS 2 IRO-1), a given sustainability matter in this list is assessed to be material, the undertaking shall report according to the corresponding Disclosure Requirements of the relevant topical ESRS. Using this list is not a substitute for the process of determining material matters. This list is a tool to support the undertaking's materiality assessment. The undertaking still needs to consider its own specific circumstances when determining its material matters. The undertaking, where necessary, also shall develop entity-specific disclosures on material impacts, risks and opportunities not covered by ESRS as described in paragraph 11 of this Standard.</p> <p>TABLE</p>	<p><b>Sustainability matters to be included in the materiality assessment</b></p> <p>AR 15. When performing its materiality assessment, the undertaking shall consider the following list of sustainability matters covered in the topical <i>sections of this [draft] ESRS</i>. When, as a result of the undertaking's materiality assessment (see Section 2 Disclosure Requirement 9 (IR-1) ), a given sustainability matter in this list is assessed to be material, the undertaking shall report according to the corresponding Disclosure Requirements of the relevant topical sections. Using this list is not a substitute for the process of determining material matters. This list is a tool to support the undertaking's materiality assessment. The undertaking still needs to consider its own specific circumstances when determining its material matters. The undertaking, where necessary <i>according to paragraph 14 above</i>, shall also develop entity-specific disclosures on material impacts and risks <del>and opportunities</del> not covered by this [draft] ESRS as described in paragraph 15 of this Section.</p> <p>SAME TABLE AS SET 1</p>
<p><b>Estimation using sector averages and proxies</b></p> <p>AR 17. When the undertaking cannot collect upstream and downstream value chain information as required by paragraph 63 after making reasonable efforts to do so, it shall estimate the information to be reported using all reasonable and supportable information that is available to the undertaking at the reporting date without undue cost or effort. This includes, but is not limited to, internal and external information, such as data from indirect sources, sector average data, sample analyses, market and peer groups data, other proxies or spend-based data.</p>	<p><b>Estimation using sector averages and proxies</b></p> <p>AR 16. <i>When collecting value chain information as required by paragraph 57 of this Section is impracticable</i>, the undertaking shall estimate the information to be reported using all reasonable and supportable information <del>that is available to the undertaking at the reporting date without undue cost or effort</del>. This includes, but is not limited to, internal and external information, such as data from indirect sources, sector-average data, sample analyses, market and peer groups data, other proxies or spend-based data.</p>
	<p>AR 17. <i>When extending the information about the reporting undertaking to include value chain information in accordance with paragraph xx the elements of the value chain with material impacts, risks or opportunities are reported on. For instance, the undertaking may - based on the materiality assessment - consider the matters working conditions and affected communities to be material for a group of farmers, while the CO2-emissions are material in other parts of the value chain.</i></p>
<p><b>Content and structure of the sustainability statement</b></p> <p>AR 18. As an illustration for paragraph 115 in section 8.2 Content and structure of the sustainability statement of this Standard, the undertaking that covers environmental and social matters in the same policy may cross-refer. That means that the undertaking may report on the policy in its environmental disclosures and cross-refer to it from the relevant social disclosures or vice versa. Consolidated presentation of policies across topics is allowed.</p>	<p><b>Content and structure of the sustainability statement</b></p> <p><del>AR 18. As an illustration for paragraph 115 in section 8.2 Content and structure of the sustainability statement of this Standard, the undertaking that covers environmental and social matters in the same policy may cross refer. That means that the undertaking may report on the policy in its environmental disclosures and cross refer to it from the relevant social disclosures or vice versa. Consolidated presentation of policies across topics is allowed.</del></p>

ESRS LSME ED Section 2 – General disclosures and Section 3 – Policies, Actions and Targets

SET 1 ESRS 2 (version July 2023)	LSME ESRS ED Section 2 and 3
ESRS 2 GENERAL DISCLOSURES	SECTION 2 - GENERAL DISCLOSURES
<p><b>Objective</b> 1. This ESRS sets out the disclosure requirements that apply to all undertakings regardless of their sector of activity (i.e., sector agnostic) and apply across sustainability topics (i.e., cross-cutting). This ESRS covers the reporting areas defined in ESRS 1 <i>General requirements</i> section 1.2 <i>Cross-cutting Standards and reporting areas</i>.</p>	<p><b>Objective</b> 1. <i>This Section covers governance and strategy areas defined in Section 1 General requirements of this [draft] ESRS, chapter 1.2 Reporting areas and minimum content disclosure requirements on policies, actions, targets and metrics and it is applicable in conjunction with Section 3 “Policies, actions and targets” and the topical sections of this [draft] ESRS.</i></p>
<p>2. In the preparation of disclosures under this Standard, the undertaking shall apply the Disclosure Requirements (including their datapoints) set in topical ESRS, as listed in Appendix C of this Standard Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures. The undertaking shall apply the requirements listed in Appendix C: (a) in all instances for the requirements in topical standards related to Disclosure Requirement IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities; and (b) for all other requirements listed in appendix C, only if the sustainability topic is material based on the undertaking’s materiality assessment (see ESRS 1 chapter 3 Double materiality as the basis for sustainability disclosures).</p>	<p><del>2. In the preparation of disclosures under this Standard, the undertaking shall apply the Disclosure Requirements (including their datapoints) set in topical ESRS, as listed in Appendix C of this Standard Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures. The undertaking shall apply the requirements listed in Appendix C: (a) in all instances for the requirements in topical standards related to Disclosure Requirement IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities; and (b) for all other requirements listed in appendix C, only if the sustainability topic is material based on the undertaking’s materiality assessment (see ESRS 1 chapter 3 Double materiality as the basis for sustainability disclosures).</del></p>
<p><b>BP-1 – General basis for preparation of the sustainability statements</b></p> <p><b>3. The undertaking shall disclose the general basis for preparation of its sustainability statement.</b></p>	<p><b>Disclosure requirement 1 (BP-1) – General basis for preparation of the sustainability statements</b></p> <p><b>2. The undertaking shall disclose the general basis for preparation of its sustainability statement.</b></p>
<p>4. The objective of this Disclosure Requirement is to provide an understanding of how the undertaking prepares its sustainability statement, including the scope of consolidation, the upstream and downstream value chain information and, where relevant, whether the undertaking has used any of the options for omitting information referred to in points d) and e) in the following paragraph.</p>	<p>3. The objective of this Disclosure Requirement is to provide an understanding of how the undertaking prepares its sustainability statement, <i>on an individual basis, under art. 19a (6) of the Directive 2013/34/EU of the European Parliament and of the Council.</i>, including <del>the scope of consolidation,</del> the upstream and downstream value chain information and, where relevant, whether the undertaking has used any of the options for omitting information referred to in points c) <del>and e)</del> in the following paragraph.</p>
<p>5. The undertaking shall disclose the following information: (a) whether the sustainability statement has been prepared on a consolidated or individual basis;</p>	<p>5. The undertaking shall disclose the following information; <del>(a) whether the sustainability statement have been prepared on a consolidated or individual basis;</del></p>

LSME ED comparison with Set 1

SET 1 ESRS 2 (version July 2023)	LSME ESRS ED Section 2 and 3
<p>(b) for consolidated sustainability statement:                      i) a confirmation that the scope of consolidation is the same as for the financial statements, or, where applicable, a declaration that the reporting undertaking is not required to draw-up financial statements or that the reporting undertaking is preparing consolidated sustainability reporting pursuant to Article 48i of Directive 2013/34/EU; and                      ii) where applicable, an indication of which subsidiary undertakings included in the consolidation are exempted from annual or consolidated sustainability reporting pursuant to Articles 19a(9) or 29a(8) of Directive 2013/34/EU;</p> <p>(c) to what extent the sustainability statements cover the undertaking's upstream and downstream value chain (see ESRS 1 section 5.1 Reporting undertaking and value chain);</p> <p>d) whether the undertaking has used the option to omit a specific piece of information corresponding to intellectual property, know-how or the results of innovation (see [draft] ESRS 1 section 7.7 Information on intellectual property, know-how or results of innovation); and</p> <p><del>(e) for undertakings based in an EU member state that allows for the exemption from disclosure of impending developments or matters in the course of negotiation, as provided for in articles 19a(3) and 29a(3) of Directive 2013/34/EU, whether the undertaking has used that exemption.</del></p>	<p><del>(b) for consolidated sustainability statement,                      i) a confirmation that the scope of consolidation is the same as for the financial statement; and                      ii) where applicable, an indication of which subsidiary undertakings included in the consolidation are exempted from annual or consolidated sustainability reporting;</del></p> <p>(a) to what extent the sustainability statement covers the undertaking's upstream and downstream value chain, <i>including the extent of coverage of information about its subsidiaries, based on the results of the undertaking's materiality assessment, specifying, if applicable, the related reporting scope (see [draft] Section 1 section 4.1 Reporting undertaking and value chain);</i></p> <p>(b) whether the undertaking has used the option to omit a specific piece of information corresponding to intellectual property, know-how or the results of innovation (see [draft] Section 1 paragraph 6.6 Information on intellectual property, know-how or results of innovation); and</p> <p><del>(c) for undertakings based in an EU member state that allows for the exemption from disclosure of impending developments or matters in the course of negotiation, as provided for in articles 19a(3) and 29a(3) of Directive 2013/34/EU, whether the undertaking has used that exemption.</del></p> <p><i>(c) whether the undertaking has used the exemption to not disclose information relating to impending developments or matters in the course of negotiation (see [draft] Section 1 6.7 Matters in course of negotiation).</i></p>
<p><b>BP-2 – Disclosures in relation to specific circumstances</b></p>	<p><b>Disclosure requirement 2 (BP-2) – Disclosures in relation to specific circumstances</b></p>
<p>6. The undertaking shall provide disclosures in relation to specific circumstances.</p>	<p>5. The undertaking shall provide disclosures in relation to specific circumstances.</p>
<p>7. The objective of this Disclosure Requirement is to provide an understanding of the effect of these specific circumstances on the preparation of the sustainability statement.</p>	<p>6. The objective of this Disclosure Requirement is to provide an understanding of the effect of these specific circumstances on the preparation of the sustainability statement.</p>
<p>8. The undertaking may report this information alongside the disclosures to which they refer.</p>	<p>7. The undertaking may report this information alongside the disclosures to which they refer.</p>
<p><b>Time horizons</b></p>	<p><b>Time horizons</b></p>

LSME ED comparison with Set 1

SET 1 ESRS 2 (version July 2023)	LSME ESRS ED Section 2 and 3
<p>9. When the undertaking has deviated from the medium- or long-term time horizons defined by ESRS 1 section 6.4 Definition of short-, medium- and long-term for reporting purposes, it shall describe:</p> <p>(a) its definitions of medium- or long-term time horizons; and</p> <p>(b) the reasons for applying those definitions.</p>	<p>8. When <del>the undertaking</del> <i>it</i> has deviated from the medium- or long-term time horizons defined by <del>the undertaking</del> <i>[draft] Section 1</i> chapter 5.4 Definition of short-, medium- and long-term for reporting purposes, <del>the undertaking</del> shall describe <i>its definitions of medium- or long-term time horizons</i>.</p> <p><del>(a) its definitions of medium- or long-term time horizons; and</del></p> <p><del>(b) the reasons for applying those definitions.</del></p>
<p><b>Value chain estimation</b></p> <p>10. When metrics include upstream and/or downstream value chain data estimated using indirect sources, such as sector-average data or other proxies, the undertaking shall:</p> <p>a) identify the metrics; and</p> <p>b) describe the basis for preparation;</p> <p>c) describe the resulting level of accuracy; and</p> <p>d) where applicable, the planned actions to improve the accuracy in the future (see [draft] ESRS 1 chapter 5 Value chain).</p>	<p><b>Value chain estimation</b></p> <p>9. When metrics include upstream and/or downstream value chain data, <i>including data of the subsidiaries</i>, estimated using indirect sources, such as sector-average data or other proxies, the undertaking shall:</p> <p>a) identify the metrics; <i>and</i></p> <p>b) describe the basis for preparation, <i>including how data of the subsidiaries have been considered</i>.</p> <p><del>c) describe the resulting level of accuracy; and</del></p> <p><del>d) where applicable, the planned actions to improve the accuracy in the future (see [draft] ESRS 1 chapter 5 Value chain).</del></p>
<p><b>Sources of estimation and outcome uncertainty</b></p> <p>11. In accordance with ESRS 1 section 7.2 Sources of estimation and outcome uncertainty, the undertaking shall:</p> <p>(a) identify the quantitative metrics and monetary amounts it has disclosed that are subject to a high level of measurement uncertainty;</p> <p>(b) in relation to each quantitative metric and monetary amount identified:</p> <p>i. disclose information about the sources of measurement uncertainty (for example, the dependence of the amount on the outcome of a future event, on a measurement technique or on the availability and quality of data from the entity's upstream and/or downstream value chain); and</p> <p>ii. disclose the assumptions, approximations and judgements the entity has made in measuring it.</p>	<p><b>Sources of estimation and outcome uncertainty</b></p> <p>10. In accordance with ESRS 1 <i>[draft] Section 1</i> chapter 6.2 Sources of estimation and outcome uncertainty, the undertaking shall identify the quantitative metrics and monetary amounts it has disclosed that are subject to a high level of measurement uncertainty. <i>It may also disclose additional information to enable users to understand the most significant uncertainties.</i></p> <p><del>(b) In relation to each quantitative metric and monetary amount identified:</del></p> <p><del>i. Disclose information about the sources of measurement uncertainty (for example, the dependence of the amount of the outcome of a future event, on a measurement technique or on the availability and quality of data from the entity's upstream and/or downstream value chain); and</del></p> <p><del>ii. Disclose the assumptions, approximations and judgements the entity has made in measuring it.</del></p>
<p>12. When disclosing forward-looking information, the undertaking may indicate that it considers such information to be uncertain.</p>	<p>11. When disclosing forward-looking information, the undertaking may indicate that it considers such information to be uncertain.</p>
<p><b>Changes in preparation or presentation of sustainability information</b></p> <p>13. When changes in the preparation and presentation of sustainability information occur compared to the previous reporting period(s), (see ESRS 1 section 7.4 Changes in preparation or presentation in sustainability information), the undertaking shall:</p> <p>a) explain the changes and explain the reasons for those changes, including why the replaced metric provides more useful information; and</p>	<p><b>Changes in preparation or presentation of sustainability information</b></p> <p>12. When changes in the preparation and presentation of sustainability information occur compared to the previous reporting period(s), (see <i>[draft] Section 1</i> chapter 6.4 Changes in preparation or presentation in sustainability information), the undertaking shall:</p> <p>a) explain the changes; <del>and explain the reasons for those changes, including why the replaced metric provides more useful information; and</del></p>

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<p>b) disclose revised comparative figures, unless it is impracticable to do so. When it is impracticable to adjust comparative information for one or more prior periods, the undertaking shall disclose that fact; and</p> <p>(c) disclose the difference between the figure disclosed in the preceding period and the revised comparative figure.</p>	<p>b) where possible with reasonable effort, provide restated comparative figures <del>disclose revised comparative figures, unless it is impracticable to do so. When it is impracticable to adjust comparative information for one or more prior periods, the undertaking shall disclose that fact;</del> and</p> <p>(c) <i>where possible with reasonable effort</i>, disclose the difference between the figure disclosed in the preceding period and the revised comparative figure.</p>
<p><b>Reporting errors in prior periods</b> 14. When the undertaking identifies material prior period errors (see ESRS 1 section 7.5 Reporting errors in prior periods), it shall disclose: (a) the nature of the prior period material error; (b) to the extent practicable, the correction for each prior period included in the sustainability statement; and (c) if correction of the error is not practicable, the circumstances that led to the existence of that condition.</p>	<p><b>Reporting errors in prior periods</b> 13. When the undertaking identifies material prior period errors (see ESRS 1 section 6.5 Reporting errors in prior periods), it shall disclose: (a) the nature of the prior period material error; (b) <del>to the extent where possible practicable</del> <i>where possible practicable with reasonable effort</i>, the correction for each prior period disclosed; and (c) if correction of the error is not <i>possible with reasonable effort</i>, <del>practicable</del>, the circumstances that led to the existence of that condition.</p>
<p><b>Disclosures stemming from local legislations or generally accepted sustainability reporting pronouncements</b> 15. When the undertaking includes in its sustainability statement information stemming from other legislation which requires the undertaking to disclose the sustainability information or from generally accepted sustainability reporting standards and frameworks (see ESRS 1 section 8.2 Content and structure of the sustainability statements), in addition to the information prescribed by ESRS, it shall disclose this fact. In case of partial application of other reporting standards or frameworks, the undertaking shall provide a precise reference to the paragraphs of the standard or framework applied.</p>	<p><b>Disclosures stemming from local legislations or generally accepted sustainability reporting pronouncements</b> 14. When the undertaking includes in its <i>individual</i> sustainability statement information stemming from other legislation which requires the undertaking to disclose the sustainability information or from generally accepted sustainability reporting standards and frameworks (see <i>[draft] Section 1</i> chapter 7.2 Content and structure of the sustainability statements), in addition to the information prescribed by <i>[draft]</i> ESRS, it shall disclose this fact. In case of partial application of other reporting pronouncements, the undertaking shall provide a precise reference to the paragraphs of the standard applied.</p>
<p><b>Incorporation by reference</b> 16. When the undertaking incorporates information by reference (see ESRS 1 section 9.1 Incorporation by reference), it shall disclose a list of the disclosure requirements of ESRS, or the specific datapoints mandated by a Disclosure Requirement, that have been incorporated by reference.</p>	<p><b>Incorporation by reference</b> 15. When the undertaking incorporates information by reference (see <i>[draft] Section 1</i> chapter 9.1 Incorporation by reference), it shall disclose a list of the disclosure requirements of <i>this [draft]</i> ESRS, or the specific datapoints mandated by a Disclosure Requirement, that have been incorporated by reference.</p>
<p><b>Use of phase-In provisions in accordance with Appendix C of ESRS 1</b> 17. If an undertaking or group not exceeding on its balance sheet date the average number of 750 employees during the financial year decides to omit the information required by ESRS E4, ESRS S1,</p>	<p><b>Use of phase-In provisions in accordance with Appendix C of <del>ESRS</del> Section 1</b> <del>17. If an undertaking or group not exceeding on its balance sheet date the average number of 750 employees during the financial year decides to omit the information required by ESRS E4, ESRS S1,</del></p>

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SET 1 ESRS 2 (version July 2023)	LSME ESRS ED Section 2 and 3
<p>ESRS S2, ESRS S3 or ESRS S4 in accordance with Appendix C of ESRS 1, it shall nevertheless disclose whether the sustainability topics covered respectively by ESRS E4, ESRS S1, ESRS S2, ESRS S3 and ESRS S4 have been assessed to be material as a result of the undertaking's materiality assessment. In addition, if one or more of these topics has been assessed to be material, the undertaking shall, for each material topic:</p> <p>a) disclose the list of matters (i.e., topic, sub-topic or sub-sub-topic) in AR 16 ESRS 1 Appendix A that are assessed to be material and how the undertaking's business model and strategy take account of the impacts of the undertaking related to those matters. The undertaking may identify the matter at the level of topic, sub-topic or sub-sub-topic;</p> <p>b) briefly describe any time-bound targets it has set related to the matters in question, the progress it has made towards achieving those targets, and whether its targets related to biodiversity and ecosystems are based on conclusive scientific evidence;</p> <p>c) briefly describe its policies in relation to the matters in question;</p> <p>d) briefly describe actions it has taken to identify, monitor, prevent, mitigate, remediate or bring an end to actual or potential adverse impacts related to the matters in question, and the result of such actions; and</p> <p>e) disclose metrics relevant to the matters in question.</p>	<p><del>ESRS S2, ESRS S3 or ESRS S4 in accordance with Appendix C of ESRS 1, it shall nevertheless disclose whether the sustainability topics covered respectively by ESRS E4, ESRS S1, ESRS S2, ESRS S3 and ESRS S4 have been assessed to be material as a result of the undertaking's materiality assessment. In addition, if one or more of these topics has been assessed to be material, the undertaking shall, for each material topic:</del></p> <p><i>16. If an undertaking decides to apply phased-in provisions according to Section 1 Appendix C in relation to the topics biodiversity, own workforce, value chain workers, affected communities, consumers and end-users, it shall nevertheless disclose whether the aforementioned sustainability topics have been assessed to be material as a result of the undertaking's materiality assessment. In addition, if one or more of these topics has been assessed to be material, the undertaking shall, for each material topic:</i></p> <p>(a) disclose the list of matters (i.e., topic, sub-topic or sub-sub-topic) in AR 16 Section 1 Appendix A that are assessed to be material and how the undertaking's business model and strategy take account of the impacts of the undertaking related to those matters. The undertaking may identify the matter at the level of topic, sub-topic or sub-sub-topic;</p> <p><del>(b) briefly describe any time-bound targets it has set related to the matters in question. If the undertaking has set sustainability-related targets in relation to the matters in question, it shall disclose the progress it has made towards achieving those targets, and whether its targets related to biodiversity and ecosystems are based on conclusive scientific evidence;</del></p> <p>(c) briefly describe its policies in relation to the matters in question;</p> <p>(d) briefly describe actions it has taken to identify, monitor, prevent, mitigate, remediate or bring an end to actual or potential adverse impacts related to the matters in question, and the result of such actions; and</p> <p>(e) disclose metrics relevant to the matters in question.</p>
<p><b>2. Governance</b></p> <p>18. The objective of this chapter is to set disclosure requirements that enable an understanding of the governance processes, controls and procedures put in place to monitor, manage and oversee sustainability matters.</p>	<p><b>2. Governance</b></p> <p>17. The objective of this chapter is to set disclosure requirements that enable an understanding of the governance processes, controls and procedures put in place to monitor, manage and oversee sustainability matters.</p>



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SET 1 ESRS 2 (version July 2023)	LSME ESRS ED Section 2 and 3
<p><b>GOV-1 – The role of the administrative, management and supervisory bodies</b></p> <p>19. The undertaking shall disclose the composition of the administrative, management and supervisory bodies, their roles and responsibilities and access to expertise and skills with regard to sustainability matters.</p>	<p><b>Disclosure requirement 3 (GOV-1) – The role of the administrative, management and supervisory bodies</b></p> <p>18. The undertaking shall disclose the composition of the administrative, management and supervisory bodies, their roles and responsibilities and access to expertise and skills with regard to sustainability matters.</p>
<p>20. The objective of this Disclosure Requirement is to provide an understanding of:</p> <p>(a) the composition and diversity of the administrative, management and supervisory bodies;</p> <p>(b) the roles and responsibilities of the administrative, management and supervisory bodies in exercising oversight of the process to manage material impacts, risks and opportunities, including management’s role in these processes; and</p> <p>(c) the expertise and skills of its administrative, management and supervisory bodies on sustainability matters or access to such expertise and skills.</p>	<p>19. The objective of this Disclosure Requirement is to provide an understanding of:</p> <p>(a) the composition and diversity of the administrative, management and supervisory bodies;</p> <p>(b) the roles and responsibilities of the administrative, management and supervisory bodies in exercising oversight of the process to manage material impacts <i>and</i> risks <del>and opportunities</del>, including management’s role in these processes; and</p> <p>(c) the expertise <del>and skills</del> of its administrative, management and supervisory bodies on sustainability matters or access to such expertise and skills.</p>
<p>21. The undertaking shall disclose the following information about the composition and diversity of the members of the undertaking’s administrative, management and supervisory bodies:</p> <p>(a) the number of executive and non-executive members;</p> <p>(b) representation of employees and other workers;</p> <p>(c) experience relevant to the sectors, products and geographic locations of the undertaking;</p> <p>(d) percentage by gender and other aspects of diversity that the undertaking considers. The board’s gender diversity shall be calculated as an average ratio of female to male board members; and</p> <p>(e) the percentage of independent board members. For undertakings with a unitary board, this corresponds to the percentage of independent non-executive board members. For undertakings with a dual board, it corresponds to the percentage of independent members of the supervisory body.</p>	<p>20. The undertaking shall <del>describe</del> <i>disclose</i> the following information about the composition and diversity of the members of <del>the undertaking’s</del> <i>its</i> administrative, management and supervisory bodies, including, if applicable, the number of executive and non-executive members and the representation of employees and other workers.</p> <p>21. The undertaking shall also disclose the following information about the composition and diversity of the members of its administrative, management and supervisory bodies:</p> <p><del>(c) experience relevant to the sectors, products and geographic locations of the undertaking;</del></p> <p>(a) the percentage by gender and other aspects of diversity that the undertaking considers. <b>The board’s gender diversity</b> shall be calculated as an average ratio of female to male board members; and</p> <p>(b) the <b>percentage of independent board members</b>.</p> <p><b>-(The deleted content of point e on the unitary board has been moved as Application requirement in Section 2)</b></p>
<p>22. The undertaking shall disclose the following information about the roles and responsibilities of the administrative, management and supervisory bodies:</p> <p>(a) the identity of the administrative, management and supervisory bodies (such as a board committee or similar) or individual(s) within a body responsible for oversight of impacts, risks and opportunities;</p>	<p>22. The undertaking shall disclose <del>the following information about the roles and responsibilities of the administrative, management and supervisory bodies:</del></p> <p>(a) <i>whether a governance body (administrative, management or supervisory bodies), or an individual in the undertaking’s organisation (such as management level or another employee) is responsible for oversight of sustainability impacts and risks</i> <del>the identity of the administrative, management and supervisory bodies (such as a board committee or similar) or individual(s) within a body responsible for oversight of impacts, risks and opportunities;</del></p>

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SET 1 ESRS 2 (version July 2023)	LSME ESRS ED Section 2 and 3
<p>(b) how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in the undertaking's terms of reference, board mandates and other related policies;</p> <p>(c) a description of management's role in the governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities, including:</p> <p>i) whether that role is delegated to a specific management-level position or committee and how oversight is exercised over that position or committee;</p> <p>ii) information about the reporting lines to the administrative, management and supervisory bodies;</p> <p>iii) whether dedicated controls and procedures are applied to the management of impacts, risks and opportunities and, if so, how they are integrated with other internal functions; and</p> <p>(d) how the administrative, management and supervisory bodies and senior executive management oversee the setting of targets related to material impacts, risks and opportunities, and how they monitor progress towards them.</p>	<p><del>(b) how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in the undertaking's terms of reference, board mandates and other related policies;</del></p> <p><i>(b) if applicable, a brief description of the process for oversight of sustainability impacts and risks a description of management's role in the governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities, including:</i></p> <p><del>i) whether that role is delegated to a specific management level position or committee and how oversight is exercised over that position or committee;</del></p> <p><del>ii) information about the reporting lines to the administrative, management and supervisory bodies;</del></p> <p><del>iii) whether dedicated controls and procedures are applied to the management of impacts, risks and opportunities and, if so, how they are integrated with other internal functions; and</del></p> <p><del>(d) how the administrative, management and supervisory bodies and senior executive management oversee the setting of targets related to material impacts, risks and opportunities, and how they monitor progress towards them.</del></p> <p><i>(c) If applicable, a brief description of how the administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to oversee sustainability matters.</i></p>
<p>23. The disclosure shall include a description of how the administrative, management and supervisory bodies ensure the availability of the appropriate skills and expertise to oversee sustainability matters, including:</p> <p>(a) the sustainability-related expertise that the bodies, as a whole, either directly possess or can leverage, for example through access to experts or training; and</p> <p>(b) how those skills and expertise relate to the undertaking's material impacts, risks and opportunities.</p>	<p>23. The disclosure shall include a <b>(the non-deleted parts of paragraph 23 of set 1 were included in point c) above)</b> description of how the administrative, management and supervisory bodies ensure the availability of the appropriate skills and expertise to oversee sustainability matters, including:</p> <p><del>(a) the sustainability related expertise that the bodies, as a whole, either directly possess or can leverage, for example through access to experts or training; and</del></p> <p><del>(b) how those skills and expertise relate to the undertaking's material impacts, risks and opportunities.</del></p>
<p><b>GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies</b></p>	<p><del><b>GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies</b></del></p>
<p><b>GOV-3 Integration of sustainability-related performance in incentive schemes</b></p>	<p><del><b>GOV-3 Integration of sustainability-related performance in incentive schemes</b></del></p>
<p><b>GOV-4 - Statement on due diligence</b></p> <p>30. The undertaking shall disclose a mapping of the information provided in its sustainability statement about the due diligence process.</p>	<p><del><b>Disclosure Requirement 4 (GOV-2) - Due diligence</b></del> <del><b>("report if you have" plugged in component)</b></del></p>

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SET 1 ESRS 2 (version July 2023)	LSME ESRS ED Section 2 and 3
	22. The undertaking shall disclose <i>whether it has adopted a mapping of the information provided in its sustainability statement about the a due diligence process with regard to sustainability matters.</i>
31. The objective of this Disclosure Requirement is to facilitate an understanding of the undertaking's due diligence process with regard to sustainability matters.	23. The objective of this Disclosure Requirement is to facilitate an understanding of the undertaking's due diligence process with regard to sustainability matters.
32. The main aspects and steps of due diligence referred to under ESRS 1 chapter 4 Due diligence are related to a number of cross-cutting and topical Disclosure Requirements under the ESRS. The undertaking shall provide a mapping that explains how and where its application of the main aspects and steps of the due diligence process are reflected in its sustainability statement, to allow a depiction of the actual practices of the undertaking with regard to due diligence.	24. <del>The main aspects and steps of due diligence referred to under ESRS 1 chapter 4 Due diligence are related to a number of cross-cutting and topical Disclosure Requirements under the ESRS. The undertaking shall provide a mapping that explains how and where its application of the main aspects and steps of the due diligence process are reflected in its sustainability statement, to allow a depiction of the actual practices of the undertaking with regard to due diligence.</del> <i>The undertaking shall disclose whether it has adopted due diligence process(es) or not.</i>  25. <i>If the undertaking has implemented such processes, it shall briefly illustrate how and where the due diligence process(es) are reflected in its sustainability statements.</i>
33. This disclosure requirement does not mandate any specific behavioural requirements with regard to due diligence actions and does not extend or modify the role of administrative, management and supervisory bodies as mandated by other legislation or regulation.	26. This disclosure requirement does not mandate any specific behavioural requirements with regard to due diligence actions and does not extend to or modify the role of administrative, management and supervisory bodies as mandated by other legislation or regulation.
<b>Disclosure Requirement GOV-5 - Risk management and internal controls over sustainability reporting</b>	<b>Disclosure Requirement GOV-5 – Risk management and internal controls over sustainability reporting</b>
<b>3. Strategy</b> 37. This chapter sets disclosure requirements that enable an understanding of: a) the elements of the undertaking's strategy that relate to or affect sustainability matters, its business model and its value chain; b) how the interests and views of the undertaking's stakeholders are taken into account by the undertaking's strategy and business model; and c) the outcome of the undertaking's assessment of material impacts, risks and opportunities, including how they inform its strategy and business model.	<b>3. Strategy</b> 27. <i>This chapter sets disclosure requirements that enable an understanding of:</i> <i>a) the elements of the undertaking's strategy that relate to or affect sustainability matters, its business model and its value chain;</i> <i>b) how the interests and views of the undertaking's stakeholders are taken into account by the undertaking's strategy and business model; and</i> <i>b) the outcome of the undertaking's assessment of material impacts and risks and opportunities including how they inform its strategy and business model.</i>
<b>Disclosure Requirement SBM-1 - Strategy, business model and value chain</b> 38. The undertaking shall disclose the elements of its strategy that relate to or impact sustainability matters, its business model and its value chain.	<b>Disclosure Requirement 5 (SBM-1) - Strategy, business model and value chain</b> 28. The undertaking shall disclose the elements of its strategy that relate to or impact sustainability matters, its business model and its value chain.
39. The objective of this Disclosure Requirement is to describe the key elements of the undertaking's general strategy that relate to or affect sustainability matters, and the key elements of the undertaking's business model and value chain, in order to provide an understanding its exposure to impacts, risks and opportunities and where they originate.	29. The objective of this Disclosure Requirement is to describe the key elements of the undertaking's general strategy that relate to or affect sustainability matters, and the key elements of the undertaking's business model and value chain, in order to provide an understanding its exposure to impacts <i>and risks and opportunities</i> and where they originate.

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SET 1 ESRS 2 (version July 2023)	LSME ESRS ED Section 2 and 3
<p>40. The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect sustainability matters:</p> <p>(a) a description of:</p> <ul style="list-style-type: none"> <li>i. significant groups of products and/or services offered, including changes in the reporting period (new/removed products and/or services);</li> <li>ii. significant markets and/or customer groups served, including changes in the reporting period (new/removed markets and/or customer groups);</li> <li>iii. headcount of employees by geographical areas; and</li> </ul> <p>iv. where applicable and material, products and services that are banned in certain markets;</p> <p>(b) a breakdown of total revenue, as included in its financial statements, by significant ESRS sectors. When the undertaking provides segment reporting as required by IFRS 8 Operating segments in its financial statements, this sector revenue information shall be, as far as possible, reconciled with IFRS 8 information;</p> <p>(c) a list of the additional ESRS sectors beyond the ones reflected under paragraph 40(b), such as activities that give rise to intercompany revenues, in which the undertaking develops significant activities, or in which it is or may be connected to material impacts. The identification of these additional ESRS sectors shall be consistent with the way these have been considered by the undertaking when performing its materiality assessment and with the way it discloses material sector-specific information;</p> <p>(d) where applicable, a statement indicating, together with the related revenues, that the undertaking is active in:</p> <ul style="list-style-type: none"> <li>i. the fossil fuel (coal, oil and gas) sector, (i.e., it derives revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council, including a disaggregation of revenues derived from coal, from oil and from gas, as well as the revenues derived from Taxonomy-aligned economic activities related to fossil gas as required under Article 8(7)(a) of Commission Delegated Regulation 2021/2178;</li> </ul>	<p>30. The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect sustainability matters:</p> <p>(a) a description of:</p> <ul style="list-style-type: none"> <li>i. significant groups of products and/or services offered, including changes in the reporting period (new/removed products and/or services);</li> <li>ii. significant markets and/or customer groups served, including changes in the reporting period (new/removed markets and/or customer groups);</li> <li><del>iii. headcount of employees by geographical areas; and</del></li> <li><i>iii. main countries of operation of the parent undertaking and of the subsidiaries that are connected with material impacts or risks; and</i></li> </ul> <p>iv. where applicable and material, products and services that are banned in certain markets.</p> <p><del>(b) a breakdown of total revenue, as included in its financial statements, by significant ESRS sectors. When the undertaking provides segment reporting as required by IFRS 8 Operating segments in its financial statements, this sector revenue information shall be, as far as possible, reconciled with IFRS 8 information;</del></p> <p><del>(b) a the list of significant ESRS sectors beyond the ones reflected under paragraph 40(b), such as activities that give rise to intercompany revenues, in which the undertaking develops significant activities, or in which it is or may be connected to material impacts. The identification of these additional ESRS sectors shall be consistent with the way these have been considered by the undertaking when performing its materiality assessment and with the way it discloses material sector specific information; in which the undertaking and, where appropriate based on the outcome of the materiality assessment, its subsidiaries are active. The list of sectors shall be consistent with the way sectors have been considered by the undertaking when performing its materiality assessment (which as part of the value chain also includes its subsidiaries) and with the way it discloses material sector information;</del></p> <p>(d) where applicable, a statement indicating, together with the related revenues, that the undertaking is active in:</p> <ul style="list-style-type: none"> <li><i>i. the fossil fuel (coal, oil and gas) sector, (i.e., it derives revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council, including a disaggregation of revenues derived from coal, from oil and from gas, as well as the revenues derived from Taxonomy-aligned economic activities related to fossil gas as required under Article 8(7)(a) of Commission Delegated Regulation 2021/2178;</i></li> </ul>

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<p>ii. chemicals production, i.e., its activities fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006;</p> <p>iii. controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons); and/or</p> <p>iv. the cultivation and production of tobacco;</p> <p>(e) its sustainability-related goals in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders;</p> <p>(f) an assessment of its current significant products and/or services, and significant markets and customer groups, in relation to its sustainability-related goals; and</p> <p>(g) the elements of the undertaking's strategy that relate to or impact sustainability matters, including the main challenges ahead, critical solutions or projects to be put in place, when relevant for sustainability reporting.</p>	<p>ii. chemicals production, i.e., its activities fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006;</p> <p>iii. controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons); and/or</p> <p>iv. the cultivation and production of tobacco;</p> <p>(d) its sustainability-related goals, <i>if applicable</i>, in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders.</p> <p><del>(f) an assessment of its current significant products and/or services, and significant markets and customer groups, in relation to its sustainability-related goals; and</del></p> <p><del>(g) the elements of the undertaking's strategy that relate to or impact sustainability matters, including the main challenges ahead, critical solutions or projects to be put in place, when relevant for sustainability reporting.</del></p>
<p>41. If the undertaking is based in an EU Member State that allows for an exemption from the disclosure of the information referred to in Article 18, paragraph 1, sub-point (a) of Directive 2013/34/EU22, and if the undertaking has made use of that exemption, it may omit the breakdown of revenue by significant ESRS sector required by paragraph 40(b). In this case the undertaking shall nevertheless disclose the list of ESRS sectors that are significant for the undertaking.</p>	<p>41. If the undertaking is based in an EU Member State that allows for an exemption from the disclosure of the information referred to in Article 18, paragraph 1, sub-point (a) of Directive 2013/34/EU22, and if the undertaking has made use of that exemption, it may omit the breakdown of revenue by significant ESRS sector required by paragraph 40(b). In this case the undertaking shall nevertheless disclose the list of ESRS sectors that are significant for the undertaking.</p>
<p>42. The undertaking shall disclose a description of its business model and value chain, including:</p> <p>(a) its inputs and its approach to gathering, developing and securing those inputs;</p> <p>(b) its outputs and outcomes in terms of current and expected benefits for customers, investors and other stakeholders; and</p> <p>(c) the main features of its upstream and downstream value chain and the undertaking's position in its value chain, including a description of the main business actors (such as key suppliers, customers, distribution channels and end-users) and their relationship to the undertaking. When the undertaking has multiple value chains, the disclosure shall cover the key value chains.</p>	<p>31. The undertaking shall disclose a description of its business model and value chain, including:</p> <p>(a) its inputs and its approach to gathering, developing and securing those inputs;</p> <p>(b) its outputs and outcomes in terms of current and expected benefits for customers, investors and other stakeholders; <del>and</del></p> <p>(c) the main features of its upstream and downstream value chain and the undertaking's position in its value chain, including a description of the main business actors (such as key suppliers, customers distribution channels and end-users) and their relationship to the undertaking; <i>and</i> When the undertaking has multiple value chains, the disclosure shall cover the key value chains. <i>(d) if applicable, the subsidiaries that are connected with material impacts and risks.</i></p>
<p><b>Disclosure Requirement SBM-2 – Interests and views of stakeholders</b></p> <p>43. The undertaking shall disclose how the interests and views of its stakeholders are taken into account by the undertaking's strategy and business model.</p>	<p><b>Disclosure Requirement 6 (SBM-2) – Interests and views of stakeholders ("report if you have" plugged in component)</b></p> <p>32. <i>If the undertaking engages with stakeholders, it shall disclose how their</i> <del>The undertaking shall disclose how the</del> interests and views of its stakeholders are taken into account <del>by in the</del> <i>undertaking's</i> strategy and business model.</p>
<p>44. The objective of this Disclosure Requirement is to provide an understanding of how stakeholders' interests and views inform the undertaking's strategy and business model.</p>	<p>33. The objective of this Disclosure Requirement is to <i>understand the extent to which</i> <del>provide an understanding of how</del> stakeholders' interests and views inform the undertaking's strategy and business model.</p>
<p>45. The undertaking shall disclose a summarised description of:</p> <p>(a) its stakeholders engagement, including:</p>	<p>34. <i>If the undertaking engages with its key stakeholders</i> <del>The undertaking</del> it shall disclose a summarised description of:</p> <p>(a) its stakeholders engagement, including:</p>

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<p>i) the undertaking's key stakeholders;                      ii) whether engagement with them occurs and for which categories of stakeholders;                      iii) how it is organised;                      iv) its purpose; and                      v) how its outcome is taken into account by the undertaking;</p> <p>(b) the undertaking's understanding of the interests and views of its key stakeholders as they relate to the undertaking's strategy and business model, to the extent that these were analysed during the undertaking's sustainability due diligence process and/or materiality assessment process (see Disclosure Requirement IRO-1 of this Standard);</p> <p>(c) where applicable, amendments to its strategy and/or business model, including:                      i) how the undertaking has amended or expects to amend its strategy and/or business model to address the interests and views of its stakeholders;                      ii) any further steps that are being planned and in what timeline; and                      iii) whether these steps are likely to modify the relationship with and views of stakeholders; and</p> <p>(d) whether and how the administrative, management and supervisory bodies are informed about the views and interests of affected stakeholders with regard to the undertaking's sustainability-related impacts.</p>	<p>i) the undertaking's key stakeholders;                      ii) whether engagement with them occurs and for which categories of stakeholders;  <del>iii) how it is organised;</del>  <del>iv) its purpose; and</del>                      iii) how its outcome is taken into account by the undertaking, <i>where applicable, in amending its strategy and / or its business model</i>;</p> <p>(b) the undertaking's understanding of the interests and views of its key stakeholders as they relate to the undertaking's strategy and business model, to the extent that these were analysed during the <del>undertaking's sustainability due diligence process(es) and/or</del> materiality assessment process (see Disclosure Requirement IRO-1 of this [draft] ESRS); <del>and</del></p> <p>(c) where applicable, amendments to its strategy and/or business model <b>(included in point iii) above), including:</b>                      i) <del>how the undertaking has amended or expects to amend its strategy and/or business model to address the interests and views of its stakeholders;</del>                      ii) <del>any further steps that are being planned and in what timeline; and</del>                      iii) <del>whether these steps are likely to modify the relationship with and views of stakeholders.</del></p> <p><del>(d) whether and how the administrative, management and supervisory bodies are informed about the views and interests of affected stakeholders with regard to the undertaking's sustainability-related impacts.</del></p>
<p><b>Disclosure Requirement SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model</b></p>	<p><b>Disclosure Requirement 7 (SBM-3) - Material impacts and risks <del>and opportunities</del> and their interaction with strategy and business model</b></p>
<p>46. The undertaking shall disclose its material impacts, risks and opportunities and how they interact with its strategy and business model.</p>	<p>35. The undertaking shall disclose its material <i>negative</i> impacts <i>and</i> risks <del>and opportunities</del> and how they interact with its strategy and business model.</p>
<p>47. The objective of this Disclosure Requirement is to provide an understanding of the material impacts, risks and opportunities as they result from the undertaking's materiality assessment and how they originate from and trigger adaptation of the undertaking's strategy and business model including its resources allocation. The information to be disclosed about the management of the undertaking's material impacts, risks and opportunities is prescribed in topical ESRS and in sector-specific standards, which shall be applied in conjunction with the Minimum Disclosure Requirements on policies, actions and targets established in this Standard.</p>	<p>36. The objective of this Disclosure Requirement is to provide an understanding of the material <i>negative</i> impacts <i>and</i> risks <del>and opportunities</del> as they result from the undertaking's materiality assessment and how they originate from and trigger adaptation of the undertaking's strategy and business model including its resources allocation. The information to be disclosed about the management of the undertaking's material impacts and risks <del>and opportunities</del> is prescribed <i>in Section 2 of this [draft] ESRS. and in sector-specific standards, which shall be applied in conjunction with the Minimum Disclosure Requirements on policies, actions and targets established in this Standard.</i></p>
<p>48. The undertaking shall disclose:                      (a) a brief description of its material impacts, risks and opportunities resulting from its materiality assessment (see Disclosure Requirement IRO-1 of this standard), including a description of where</p>	<p>37. The undertaking shall disclose <del>(a) a brief description of its material impacts, risks and opportunities resulting from its materiality assessment (see Disclosure Requirement IRO-1 of this standard), including a description of where</del> <i>in its business model, its own operations and its</i></p>



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<p>in its business model, its own operations and its upstream and downstream value chain these material impacts, risks and opportunities are concentrated;</p> <p>(b) the current and anticipated effects of its material impacts, risks and opportunities on its business model, value chain, strategy and decision-making, and how it has responded or plans to respond to these effects, including any changes it has made or plans to make to its strategy or business model as part of its actions to address particular material impacts or risks, or to pursue particular material opportunities;</p> <p>(c) with reference to the undertaking's material impacts:</p> <ul style="list-style-type: none"> <li>i. how the undertaking's material negative and positive impacts affect (or, in the case of potential impacts, are likely to affect) people or the environment;</li> <li>ii. whether and how the impacts originate from or are connected to the undertaking's strategy and business model;</li> <li>iii. the reasonably expected time horizons of the impacts; and</li> <li>iv. whether the undertaking is involved with the material impacts through its activities or because of its business relationships, describing the nature of the activities or business relationships concerned;</li> </ul> <p>(d) the current financial effects of the undertaking's material risks and opportunities on its financial position, financial performance and cash flows and the material risks and opportunities for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements;</p> <p>(e) the anticipated financial effects of the undertaking's material risks and opportunities on its financial position, financial performance and cash flows over the short-, medium- and long-term, including the reasonably expected time horizons for those effects. This shall include how the undertaking expects its financial position, financial performance and cash flows to change over the short, medium- and long-term, given its strategy to manage risks and opportunities, taking into consideration:</p> <ul style="list-style-type: none"> <li>i. its investment and disposal plans (for example, capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas and asset retirements), including plans the undertaking is not contractually committed to; and</li> <li>ii. its planned sources of funding to implement its strategy.</li> </ul>	<p><del>upstream and downstream value chain these material impacts, risks and opportunities are concentrated; its material negative impacts and risks resulting from its materiality assessment (see Disclosure Requirement IR-1 of this [draft] ESRS). The disclosure shall include the following:</del></p> <p><del>(b) the current and anticipated effects of its material impacts, risks and opportunities on its business model, value chain, strategy and decision-making, and how it has responded or plans to respond to these effects, including any changes it has made or plans to make to its strategy or business model as part of its actions to address particular material impacts or risks, or to pursue particular material opportunities;</del>  <i>if the undertaking has adjusted or plans to adjust its strategy and/or business model to address a material sustainability matter, it shall describe the current or planned changes to its strategy or business model(s);</i></p> <p><i>(a) the undertaking's material negative impacts, including:</i></p> <ul style="list-style-type: none"> <li><i>i. a brief description of how its material <del>negative and positive</del> impacts affect (or, in the case of potential impacts, are likely to affect) people or the environment;</i></li> <li><i>ii. whether and how its material impacts originate from or are connected to the undertaking's strategy and business model;</i></li> <li><i>iii. the reasonably expected time horizons of the impacts; and</i></li> <li><i>iv. whether the undertaking is involved with the material impacts through its activities or because of its business relationships (including its subsidiaries), <del>describing the nature of the activities or business relationships concerned;</del></i></li> </ul> <p><del>(c) the current financial effects of the undertaking's material risks and opportunities on its financial position, financial performance and cash flows and the material risks and opportunities for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements;</del></p> <p><del>(d) the anticipated financial effects of the undertaking's material risks and opportunities on its financial position, financial performance and cash flows over the short-, medium- and long-term, including the reasonably expected time horizons for those effects. This shall <del>include</del> <i>may</i> include how the undertaking expects its financial position, financial performance and cash flows to change over the short, medium- and long-term, given its strategy to manage risks and opportunities, taking into consideration:</del></p> <ul style="list-style-type: none"> <li><i>i. its investment and disposal plans (for example, capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas and asset retirements), including plans the undertaking is not contractually committed to; and</i></li> <li><i>ii. its planned sources of funding to implement its strategy.</i></li> </ul>

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<p>(f) information about the resilience of the undertaking's strategy and business model regarding its capacity to address its material impacts and risks and to take advantage of its material opportunities. The undertaking shall disclose a qualitative and, when applicable, a quantitative analysis of the resilience, including how the analysis was conducted and the time horizons that were applied as defined in ESRS 1 (see ESRS 1 chapter 6 Time horizons). When providing quantitative information, the undertaking may disclose single amounts or ranges;</p> <p>(g) changes to the material impacts, risks and opportunities compared to the previous reporting period; and</p> <p>(h) a specification of those impacts, risks and opportunities that are covered by ESRS Disclosure Requirements as opposed to those covered by the undertaking using additional entity-specific disclosures.</p>	<p><del>(f) information about the resilience of the undertaking's strategy and business model regarding its capacity to address its material impacts and risks and to take advantage of its material opportunities. The undertaking shall disclose a qualitative and, when applicable, a quantitative analysis of the resilience, including how the analysis was conducted and the time horizons that were applied as defined in ESRS 1 (see ESRS 1 chapter 6 Time horizons). When providing quantitative information, the undertaking may disclose single amounts or ranges;</del></p> <p>(e) changes to the material impacts, <del>and risks and opportunities</del> compared to the previous reporting period; and</p> <p>(f) specification of those <i>negative</i> impacts, <del>and risks and opportunities</del> that are covered by Disclosure Requirements included in this [draft] ESRS as opposed to those covered by the undertaking using additional entity-specific disclosure.</p>
<p>49. The undertaking may disclose the descriptive information required in paragraph 46 alongside the disclosures provided under the corresponding topical ESRS, in which case it shall still present a statement of its material impacts, risks and opportunities alongside its disclosures prepared under this chapter of ESRS 2.</p>	<p>38. The undertaking may disclose the descriptive information required in paragraph 35 alongside the disclosures provided under the corresponding topical Sections of this [draft] ESRS, <del>in which case</del> <i>If the undertaking decides to do so</i>, it shall still present a statement of its material <i>negative</i> impacts, <del>and risks and opportunities</del> alongside its disclosures prepared under this chapter of ESRS 2.</p> <p>39. <i>When disclosing information on material impacts and risks resulting from its materiality assessment, the undertaking shall apply the topic specific information in Application Requirements SBM-3, for the topics that are material.</i></p> <p>40. <i>In particular some information (summarised in Table of AR 16 of this Section) are related to Appendix B of this Section List of datapoints in cross-cutting and topical sections that are required by EU law.</i></p>
	<p><b>Voluntary Disclosure 8 (SBM-4) – Material opportunities (LSME optional component)</b></p> <p>41. <i>The undertaking may disclose its material sustainability related positive impacts and/or its material sustainability related financial opportunities.</i></p> <p>42. <i>Regarding opportunities, the undertaking shall not report on those for which the undertaking has not put in place or does not plan to put in place concrete actions to pursue them, accompanied by the necessary resources.</i></p> <p>43. <i>When disclosing on its material positive impacts and/or material opportunities, the undertaking shall include:</i></p> <p><i>(a) a description of them, how they originates, the sustainability matter to which they are linked and their expected time horizon;</i></p> <p><i>(b) how it results in financial effects for the undertaking; and</i></p> <p><i>(c) the actions that the undertaking has put or plans to put in place to pursue the opportunity, including the resources that have been mobilised.</i></p>

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	<p>44. Quantitative financial effects deriving from opportunities may be disclosed only when they meet the qualitative characteristics of information, including reliability and shall be accompanied by an illustration of the methodology for calculation and main assumptions used.</p>
<p><b>4. Impact, risk and opportunity management</b> <b>4.1 Disclosures on the materiality assessment process</b></p> <p>50. This chapter sets disclosure requirements that enable an understanding of: (a) the process to identify material impacts, risks and opportunities; and (b) the information that, as a result of its materiality assessment, the undertaking has included in its sustainability statement.</p>	<p><b>4. Impact and risk management</b></p> <p>45. This chapter sets disclosure requirements that enable an understanding of: (a) the processes to identify material impacts; <del>and risks and opportunities</del>; and (b) the information that, as a result of its materiality assessment, the undertaking has included in its sustainability statement.</p> <p><b>4.1 Disclosures on the materiality assessment process</b></p>
<p><b>Disclosure Requirement IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities</b></p>	<p><b>Disclosure Requirement 9 (IR-1) - Description of the processes to identify and assess material impacts and risks</b></p>
<p>51. The undertaking shall disclose its process to identify its impacts, risks and opportunities and to assess which ones are material.</p>	<p>46. The undertaking shall provide a description of its processes to identify its impacts; <del>and risks and opportunities</del> and to assess which ones are material.</p>
<p>52. The objective of this Disclosure Requirement is to provide an understanding of the process through which the undertaking identifies impacts, risks and opportunities and assesses their materiality, as the basis for determining the disclosures in its sustainability statement (see ESRS 1 chapter 3 and its related Application Requirements, which set out requirements and principles regarding the process to identify and assess material impacts, risks and opportunities based on the principle of double materiality).</p>	<p>47. The objective of this Disclosure Requirement is to provide an understanding of the process through which the undertaking identifies impacts; <del>and risks and opportunities</del> and assesses their materiality, as the basis for determining the disclosures in its sustainability <del>statement</del> <i>reporting</i> (see <i>Section 1 of this [draft]</i> ESRS chapter 3 and its related Application Requirements, which set out requirements and principles regarding the process to identify and assess material impacts and risks based on the principle of double materiality). <i>If the undertaking discloses on a voluntary basis positive impacts or opportunities, it shall disclose the process through which it identifies them and assesses their materiality.</i></p>
<p>53. The undertaking shall disclose the following information: (a) a description of the methodologies and assumptions applied in the described process;  (b) an overview of the process to identify, assess, prioritise and monitor the undertaking's potential and actual impacts on people and the environment, informed by the undertaking's due diligence process, including an explanation of whether and how the process:</p>	<p>48. The undertaking shall disclose the following information: <del>(a) a description of the methodologies and assumptions applied in the described process</del>  (a) an overview of the process to identify, assess; <del>and monitor</del> <i>and monitor</i> the undertaking's potential and actual <i>negative impacts in relation to sustainability matters (a list of sustainability matters is defined in Section 1 AR 15) based on their relative severity and, for potential impacts, also likelihood (see [draft] section 1, chapter 3.4 Impact materiality); on people and the environment, informed by the undertaking's due diligence process, including an explanation of whether and how the process:</i></p> <p>51. <i>Regarding the process of assessing impacts, the undertaking may include an explanation of whether and how the process:</i></p>

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<p>i. focusses on specific activities, business relationships, geographies or other factors that give rise to heightened risk of adverse impacts;</p> <p>ii. considers the impacts with which the undertaking is involved through its own operations or as a result of its business relationships;</p> <p>iii. includes consultation with affected stakeholders to understand how they may be impacted and with external experts;</p> <p>iv. prioritises negative impacts based on their relative severity and likelihood, (see ESRS 1 section 3.4 Impact materiality) and, if applicable, positive impacts on their relative scale, scope and likelihood, and determines which sustainability matters are material for reporting purposes, including the qualitative or quantitative thresholds and other criteria used as prescribed by ESRS 1 section 3.4 Impact materiality;</p> <p>(c) an overview of the process used to identify, assess, prioritise and monitor risks and opportunities that have or may have financial effects. The disclosure shall include:</p> <p>i. how the undertaking has considered the connections of its impacts and dependencies with the risks and opportunities that may arise from those impacts and dependencies;</p> <p>ii. how the undertaking assesses the likelihood, magnitude, and nature of effects of the identified risk and opportunities (such as the qualitative or quantitative thresholds and other criteria used as prescribed by ESRS 1 section 3.3 Financial materiality);</p> <p>iii. how the undertaking prioritises sustainability-related risks relative to other types of risks, including its use of risk-assessment tools;</p> <p>(d) a description of the decision-making process and the related internal control procedures;</p> <p>(e) the extent to which and how the process to identify, assess and manage impacts and risks is integrated into the undertaking's overall risk management process and used to evaluate the undertaking's overall risk profile and risk management processes;</p> <p>(f) the extent to which and how the process to identify, assess and manage opportunities is integrated into the undertaking's overall management process where applicable;</p> <p>(g) the input parameters it uses (for example, data sources, the scope of operations covered and the detail used in assumptions); and</p> <p>(h) whether and how the process has changed compared to the prior reporting period, when the process was modified for the last time and future revision dates of the materiality assessment.</p>	<p><del>i. focusses on specific <i>areas</i> activities, business relationships, geographies or other factors that give rise due to heightened risk of adverse impacts;</del></p> <p>ii. considers the impacts with which the undertaking is involved through its own operations or as a result of its business relationships, <i>including its subsidiaries</i>;</p> <p>iii. includes consultation with affected stakeholders to understand how they may be impacted and with external experts;</p> <p>iv. prioritises negative impacts based on their relative severity and likelihood, (see <i>[draft] Section 1 chapter 3.4 Impact materiality</i>) and, if applicable, positive impacts on their relative scale, scope and likelihood, and determines which sustainability matters are material for reporting purposes, including the qualitative or quantitative thresholds and other criteria used as prescribed by Section 1 chapter 3.4 Impact materiality;</p> <p>(b) an overview of the process used to identify, assess, <i>and</i> prioritise <del>and monitor</del> risks and opportunities that have or may have financial effects (<i>see draft Section 1 chapter 3.5 Financial materiality</i>); <del>The disclosure shall include:</del></p> <p><del>i. how the undertaking has considered the connections of its impacts and dependencies with the risks and opportunities that may arise from those impacts and dependencies;</del></p> <p><i>52. Regarding the process of assessing risks, the undertaking may include a description of:</i></p> <p><i>i. how the undertaking assesses the likelihood, magnitude, and nature of effects of the identified risk and opportunities (such as the qualitative or quantitative thresholds and other criteria used as prescribed by Section 1 chapter 3.5 Financial materiality);</i></p> <p><i>ii. how the undertaking prioritises sustainability-related risks relative to other types of risks, including its use of risk-assessment tools;</i></p> <p><del>(d) a description of the decision-making process and the related internal control procedures;</del></p> <p><del>(e) the extent to which and how the process to identify, assess and manage impacts and risks is integrated into the undertaking's overall risk management process and used to evaluate the undertaking's overall risk profile and risk management processes;</del></p> <p><del>(f) the extent to which and how the process to identify, assess and manage opportunities is integrated into the undertaking's overall management process where applicable;</del></p> <p>(c) the input parameters it uses (for example, data sources, the scope of operations covered and the detail used in assumptions); and</p> <p>(d) whether and how the process has changed compared to the prior reporting period, when the process was modified for the last time and future revision dates of the materiality assessment.</p> <p><i>53. The undertaking may address all sustainability matters in the same location or present the relevant information separately in the topical sections of the sustainability statement.</i></p>
<p><b>Disclosure Requirement IRO-2 – Disclosure Requirements in ESRS covered by the undertaking's sustainability statement</b></p>	<p><b>Disclosure Requirement 10 (IR-2) – Disclosure Requirements in ESRS LSME covered by the undertaking's sustainability statement</b></p>

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54. The undertaking shall report on the Disclosure Requirements complied with in its sustainability statements.	54. The undertaking shall report on the Disclosure Requirements complied with in its sustainability statement.
55. The objective of this Disclosure Requirement is to provide an understanding of the Disclosure Requirements included in the undertaking's sustainability statement and of the topics that have been omitted as not material, as a result of the materiality assessment.	55. The objective of this Disclosure Requirement is to provide an understanding of the Disclosure Requirements included in the undertaking's sustainability reporting and of the topics that have been omitted as not material, as a result of the materiality assessment.
56. The undertaking shall include a list of the Disclosure Requirements complied with in preparing the sustainability statement, following the outcome of the materiality assessment (see ESRs 1 chapter 3), including the page numbers and/or paragraphs where the related disclosures are located in the sustainability statement. This may be presented as a content index. The undertaking shall also include a table of all the datapoints that derive from other EU legislation as listed in Appendix B of this standard, indicating where they can be found in the sustainability statement and including those that the undertaking has assessed as not material, in which case the undertaking shall indicate "Not material" in the table in accordance with ESRs 1 paragraph 35.	56. The undertaking shall include a list of the Disclosure Requirements complied with in preparing the sustainability statement, following the outcome of the materiality assessment (see <i>Section 1 of this [draft] ESRs</i> , chapter 3 Double materiality as the basis for sustainability disclosures), including the page numbers and/or paragraphs where the related disclosures are located in the sustainability statement. This may be presented as a content index. The undertaking shall also include a table of all the datapoints that derive from other EU legislation as listed in Appendix B of this standard, indicating where they can be found in the sustainability statement and including those that the undertaking has assessed as not material, in which case the undertaking shall indicate "Not material" in the table in accordance with <i>Section 1</i> paragraph 38.
57. If the undertaking concludes that climate change is not material and therefore omits all disclosure requirements in ESRs E1 Climate change, it shall disclose a detailed explanation of the conclusions of its materiality assessment with regard to climate change (see ESRs 2 IRO-2 Disclosure Requirements in ESRs covered by the undertaking's sustainability statement), including a forward-looking analysis of the conditions that could lead the undertaking to conclude that climate change is material in the future.	57. If the undertaking concludes that climate change is not material and therefore omits all disclosure requirements in ESRs E1 Climate change, it shall disclose a detailed explanation of the conclusions of its materiality assessment with regard to climate change (see <del>ESRS 2 IRO-2 Disclosure Requirements in ESRs covered by the undertaking's sustainability statement</del> see <i>Section 1 paragraph 34</i> ) including a forward-looking analysis of the conditions that could lead the undertaking to conclude that climate change is material in the future.
58. If the undertaking concludes that a topic other than climate change is not material and therefore omits all the Disclosure Requirements in the corresponding topical ESRs, it may provide a brief explanation of the conclusions of its materiality assessment for that topic.	58. If the undertaking concludes that a topic other than climate change is not material and therefore omits all the Disclosure Requirements in <del>the corresponding topical ESRs</del> <i>the Sections 3, 4, 5 and 6 of this [draft] ESRs</i> , it may provide a brief explanation of the conclusions of its materiality assessment for that topic.
59. The undertaking shall provide an explanation of how it has determined the material information to be disclosed in relation to the impacts, risks and opportunities that it has assessed to be material, including the use of thresholds and/or how it has implemented the criteria in ESRs 1 section 3.2 Material matters and materiality of information.	59. The undertaking shall provide an explanation of how it has determined the material information to be disclosed in relation to the impacts, <del>and risks and opportunities</del> that it has assessed to be material, including the use of thresholds and/or how it has implemented the criteria in <i>Section 1</i> chapter 3.2 Material matters and materiality of information.
<p><b>4.2 Minimum disclosure requirements on policies and actions</b></p> <p>60. This section sets out minimum disclosure requirements to be included when the undertaking discloses information on its policies and actions to prevent, mitigate and remediate actual and potential material impacts, to address material risks and/or to pursue material opportunities (collectively, to "manage material sustainability matters"). They shall be applied together with the Disclosure Requirements, including Application Requirements, provided in the relevant topical and</p>	<p><del><b>4.2 Minimum disclosure requirements on policies and actions</b></del>  <b>SECTION 3 - POLICIES, ACTIONS AND TARGETS</b>  <b>Objective</b>  <b>(new objective due to the centralised disclosures on policies, actions and targets)</b></p> <p>1. This <del>[draft] Section sets out minimum disclosure requirements to be included when the undertaking discloses information on its</del> the information required:  <i>(a) in relation to policies, actions and targets to prevent, mitigate and remediate actual and potential material negative impacts and to address material risks and/or to pursue material opportunities</i> (collectively, to "manage material sustainability matters") <i>for a material matter, either as this is required by Disclosure Requirements in the topical Sections of this Standard, or on an entity-specific basis;</i></p>

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sector specific ESRS. They shall also be applied when the undertaking prepares entity-specific disclosures.	<p><i>(b) about the undertaking's processes for engaging with own workers, workers in the value chain, affected communities, consumers and end-users, and their representatives about impacts and, if the undertaking has in place those processes;</i></p> <p><i>(c) about the undertaking's processes to remediate negative impacts and channels for own workforce, value chain workers, affected communities, consumers and end-users to raise concerns, if the undertaking has in place those processes.</i></p> <p><i>2. This [draft] Section covers impact and risk management and policies, actions and targets areas defined in Section 1 General requirements of this [draft] ESRS, and it is applicable in conjunction with Section 2 "General disclosures" and the topical Sections of this [draft] ESRS.</i></p> <p><i>3. The requirements in this Section shall be considered when the undertaking reports on a voluntary basis on material positive impacts and/or opportunities.</i></p>
61. The corresponding disclosures shall be located alongside disclosures prescribed by the relevant ESRS. When a single policy or same actions address several interconnected sustainability matters, the undertaking may disclose the required information in its reporting under one topical ESRS and cross reference to it in its reporting under other topical ESRS.	<p><i>10. The corresponding disclosures related to policies and actions shall be located alongside disclosures prescribed by the relevant topical sections ESRS. When a single policy or same actions address several interconnected sustainability matters, the undertaking may disclose the required information in its reporting under one topical section ESRS and cross reference to it in its reporting under other topical section ESRS.</i></p> <p><i>11. When disclosing information on policies and actions in relation to a material sustainability, subject to paragraphs 33 and 34 of Section 1 of this [draft] ESRS, the undertaking shall apply the additional topical requirements set in Application Requirements IR-3 (AR XX to AR XX).</i></p> <p><i>12. In particular, for policies and actions in relation to a material matter, the undertaking shall include the datapoints derived from EU legislation (summarised in Table of AR 51).</i></p>
62. If the undertaking cannot disclose the information on policies and actions required under relevant ESRS, because it has not adopted policies and/or actions with reference to the specific sustainability matter concerned, it shall disclose this to be the case, and provide reasons for not having adopted policies and/or actions. The undertaking may disclose a timeframe in which it aims to adopt them.	<p><del>13. If the undertaking cannot disclose the information on policies and actions required under relevant ESRS, because it has not adopted policies and/or actions with reference to the specific material sustainability matter concerned, it shall disclose state this to be the case and provide reasons for not having adopted policies and/or actions. It The undertaking may also disclose the timeline for implementing them, if it has such plans a timeframe in which it aims to adopt them.</del></p>
<p><b>Minimum Disclosure Requirement – Policies MDR-P – Policies adopted to manage material sustainability matters</b></p> <p>63. The undertaking shall apply the minimum disclosure requirements defined in this provision when it discloses the policies it has in place with regard to each sustainability matter identified as material.</p>	<p><b>Disclosure Requirement 11 (IR-3) – Policies and actions in relation to sustainability matters (New centralised disclosures on policies and actions)</b></p> <p><del>4. The undertaking shall apply the minimum disclosure requirements defined in this provision when it discloses the policies it has in place with regard to each sustainability matter identified as material.</del> <i>disclose information on its policies adopted and actions that have been taken or that are planned to manage material sustainability matters.</i></p>
64. The objective of this Minimum Disclosure Requirement is to provide an understanding of the policies that the undertaking has in place to prevent, mitigate and remediate actual and potential impacts, to address risks and to pursue opportunities.	<p><del>5. The objective of this Minimum Disclosure Requirement is to provide an understanding of the policies that the undertaking has in place to prevent, mitigate and remediate actual and potential impacts, to address risks and to pursue opportunities</del> <i>set the information that shall be provided when reporting on policies and actions in relation to a material matter.</i></p>



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	<p>6. For each sustainability matter that it considers material, the undertaking shall disclose:</p> <p>(a) Policies that it has in place to prevent, mitigate and remediate actual and potential impacts and to address risks;</p> <p>(b) Key actions taken and/or planned to address material impacts and risks, and where applicable achieve the objectives of related policies.</p>
<p>65. The undertaking shall disclose information about policies adopted to manage material sustainability matters. The disclosure shall include the following information:</p> <p>(a) a description of the key contents of the policy, including its general objectives and which material impacts, risks or opportunities the policy relates to and the process for monitoring;</p> <p>(b) a description of the scope of the policy, or of its exclusions, in terms of activities, upstream and/or downstream value chain, geographies and if relevant, affected stakeholder groups;</p> <p>(c) the most senior level in the undertaking’s organisation that is accountable for the implementation of the policy;</p> <p>(d) a reference, if relevant, to the third-party standards or initiatives the undertaking commits to respect through the implementation of the policy;</p> <p>(e) if relevant, a description of the consideration given to the interests of key stakeholders in setting the policy; and</p> <p>(f) if relevant, whether and how the undertaking makes the policy available to potentially affected stakeholders, and stakeholders who need to help implement it.</p>	<p>7. <del>The undertaking shall disclose information about policies adopted to manage material sustainability matters. The disclosure</del> When providing disclosures on policies, the undertaking shall include the following information:</p> <p>a) A description of the key contents of the policy, including its general objectives and which material impacts, <del>or risks or opportunities</del> the policy is relating to;</p> <p>b) A description of the scope of the policy, <del>or of its exclusions,</del> in terms of activities, upstream and/or downstream value chain, geographies and, if relevant, affected stakeholder groups;</p> <p>c) The most senior level in the undertaking’s organisation that is accountable for the implementation of the policy;</p> <p>d) A reference, if relevant, to the third-party standards or initiatives the undertaking commits to respect through the implementation of the policy;</p> <p>e) If relevant, a description of the consideration given to the interest of key stakeholders in setting the policy; and</p> <p>f) If relevant, whether and how the undertaking makes the policy available to potentially affected stakeholders, and stakeholders who need to help implement it.</p>
<p><b>Minimum Disclosure Requirement – Actions MDR-A – Actions and resources in relation to material sustainability matters</b></p> <p>66. The undertaking shall apply the requirements for the content of disclosures in this provision when it describes the actions through which it manages each material sustainability matter including action plans and resources allocated and/or planned.</p>	<p><b>Disclosure Requirement 11 (IR-3) – Policies and actions in relation to sustainability matters (New centralised disclosures on policies and actions)</b></p> <p>4. <del>The undertaking shall apply the requirements for the content of disclosures in this provision when it describes the actions through which it manages each material sustainability matter including action plans and resources allocated and/or planned</del> disclose information on its policies adopted and actions that have been taken or that are planned to manage material sustainability matters.</p>
<p>67. The objective of this Minimum Disclosure Requirement is to provide an understanding of the key actions taken and/or planned to prevent, mitigate and remediate actual and potential impacts, and to address risks and opportunities, and where applicable achieve the objectives and targets of related policies.</p>	<p>5. The objective of this <del>Minimum</del> Disclosure Requirement is to <del>provide an understanding of the key actions taken and/or planned to prevent, mitigate and remediate actual and potential impacts, and to address risks and opportunities, and where applicable achieve the objectives and targets of related policies</del> set the information that shall be provided when reporting on policies and actions in relation to a material matter.</p>
<p>68. Where the implementation of a policy requires actions, or a comprehensive action plan, to achieve its objectives, as well as when actions are implemented without a specific policy, the undertaking shall disclose the following information:</p>	<p>8. <del>Where the implementation of a policy requires actions, or a comprehensive action plan, to achieve its objectives, as well as when actions are implemented without a specific policy</del> When providing disclosures on actions, the undertaking shall disclose the following information:</p>

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<p>(a) the list of key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets;</p> <p>(b) the scope of the key actions (i.e., coverage in terms of activities, upstream and/or downstream value chain, geographies and, where applicable, affected stakeholder groups);</p> <p>(c) the time horizons under which the undertaking intends to complete each key action;</p> <p>(d) if applicable, key actions taken (along with results) to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts;</p> <p>(e) if applicable, quantitative and qualitative information regarding the progress of actions or action plans disclosed in prior periods.</p>	<p>a) the list of key actions taken in the reporting year and planned for the future, and their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets;</p> <p>b) the scope of the key actions (i.e., coverage in terms of activities, upstream and/or downstream value chain geographies and, where applicable, affected stakeholder groups);</p> <p>c) the time horizons under which the undertaking intends to complete each key action;</p> <p>d) if applicable, key actions taken (along with results) to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts;</p> <p>e) if applicable, quantitative and qualitative information regarding the progress of actions or action plans disclosed in prior periods.</p>
<p>69. Where the implementation of an action plan requires significant operational expenditures (Opex) and/or capital expenditures (Capex) the undertaking shall:</p> <p>(a) describe the type of current and future financial and other resources allocated to the action plan, including if applicable, the relevant terms of sustainable finance instruments, such as green bonds, social bonds and green loans, the environmental or social objectives, and whether the ability to implement the actions or action plan depends on specific preconditions, e.g., granting of financial support or public policy and market developments;</p> <p>(b) provide the amount of current financial resources and explain how they relate to the most relevant amounts presented in the financial statements; and</p> <p>(c) provide the amount of future financial resources.</p>	<p>9. Where the implementation of an action plan requires significant operational expenditures (Opex) and/or capital expenditures (Capex) the undertaking shall:</p> <p>a) describe the type of current and future financial and other resources allocated to the action plan, including if applicable, the relevant terms of sustainable finance instruments, such as green bonds, social bonds and green loans, the environmental or social objectives, and whether the ability to implement the actions or action plan depends on specific preconditions, e.g., granting of financial support or public policy and market developments;</p> <p>b) provide the amount of current financial resources and explain how they relate to the most relevant amounts presented in the financial statements; and</p> <p>c) provide the amount of future financial resources.</p>
<p><b>5. Metrics and targets</b></p> <p>70. This chapter sets out Minimum Disclosure Requirements that shall be included when the undertaking discloses information on its metrics and targets related to each material sustainability matter. They shall be applied together with the Disclosure Requirements, including Application Requirements, provided in the relevant topical ESRS. They shall also be applied when the undertaking prepares entity-specific disclosures.</p>	
<p>71. The corresponding disclosures shall be located alongside disclosures prescribed by the topical ESRS.</p>	
<p>72. If the undertaking cannot disclose the information on targets required under the relevant topical ESRS, because it has not set targets with reference to the specific sustainability matter concerned, it shall disclose this to be the case, and provide reasons for not having adopted targets. The undertaking may disclose a timeframe in which it aims to adopt them.</p>	
<p><b>Minimum disclosure requirement – Metrics MDR-M – Metrics in relation to material sustainability matters</b></p>	<p><del><b>Minimum disclosure requirement – Metrics MDR-M – Metrics in relation to material sustainability matters</b></del></p>
<p><b>Minimum Disclosure Requirement – Targets MDR-T – Tracking effectiveness of policies and actions through targets</b></p>	<p><b>Disclosure Requirement 12 (IR-4) – Targets in relation to sustainability matters (New centralised disclosures on targets) (LSME “report if you have” pugged in component)</b></p> <p>78. The undertaking shall apply the requirements for the content of disclosures in this provision when it discloses information about the targets it has set with regard to each material</p>

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78. The undertaking shall apply the requirements for the content of disclosures in this provision when it discloses information about the targets it has set with regard to each material sustainability matter.	<del>sustainability matter.</del> 14. <i>If the undertaking has set sustainability-related targets, it shall disclose information about these targets.</i>
79. The objective of this Minimum Disclosure Requirement is to provide for each material sustainability matter an understanding of: (a) whether and how the undertaking tracks the effectiveness of its actions to address material impacts, risks and opportunities, including the metrics it uses to do so; (b) measurable time-bound outcome-oriented targets set by the undertaking to meet the policy's objectives, defined in terms of expected results for people, the environment or the undertaking regarding material impacts, risks and opportunities; (c) the overall progress towards the adopted targets over time; (d) in the case that the undertaking has not set measurable time-bound outcome-oriented targets, whether and how it nevertheless tracks the effectiveness of its actions to address material impacts, risks and opportunities and measures the progress in achieving its policy objectives; and (e) whether and how stakeholders have been involved in target setting for each material sustainability matter.	79. The objective of this Minimum Disclosure Requirement is to provide for each material sustainability matter an understanding of: <del>(a) whether and how the undertaking tracks the effectiveness of its actions to address material impacts, risks and opportunities, including the metrics it uses to do so;</del> <del>(b) measurable time-bound outcome-oriented targets set by the undertaking to meet the policy's objectives, defined in terms of expected results for people, the environment or the undertaking regarding material impacts, risks and opportunities;</del> <del>(c) the overall progress towards the adopted targets over time;</del> <del>(d) in the case that the undertaking has not set measurable time-bound outcome-oriented targets, whether and how it nevertheless tracks the effectiveness of its actions to address material impacts, risks and opportunities and measures the progress in achieving its policy objectives; and</del> <del>(e) whether and how stakeholders have been involved in target setting for each material sustainability matter.</del> 15. <i>The objective of this Disclosure Requirement is to provide an understanding on how the undertaking has set measurable time-oriented targets to monitor progresses overtime and track effectiveness of its actions in relation to material sustainability impacts and risks, if such targets have been implemented.</i>
80. The undertaking shall disclose the measurable, outcome-oriented and time-bound targets on material sustainability matters it has set to assess progress. For each target, the disclosure shall include the following information:  (a) a description of the relationship of the target to the policy objectives; (b) the defined target level to be achieved, including, where applicable, whether the target is absolute or relative and in which unit it is measured;  (c) the scope of the target, including the undertaking's activities and/or its upstream and/or downstream value chain where applicable and geographical boundaries; (d) the baseline value and base year from which progress is measured; (e) the period to which the target applies and if applicable, any milestones or interim targets;  (f) the methodologies and significant assumptions used to define targets, including where applicable, the selected scenario, data sources, alignment with national, EU or international policy goals and how the targets consider the wider context of sustainable development and/or local situation in which impacts take place; (g) whether the undertaking's targets related to environmental matters are based on conclusive scientific evidence;	<del>The undertaking shall disclose the measurable, outcome-oriented and time-bound targets on material sustainability matters it has set to assess progress. For each target, the disclosure shall include the following information:</del> 16. <i>If the undertaking has implemented targets with regards to each material sustainability matter, it shall disclose the following:</i> a) a description of the relationship of the target to the relevant policy objectives; b) the defined target level of ambition ( <i>quantitative and qualitative depending on the nature of the target</i> ) to be achieved, including, where applicable, whether the target is absolute or relative and in which unit it is measured;  c) the scope of the target ( <i>operations, upstream and/or downstream value chain, subsidiaries, geographical boundaries or activities</i> ); d) <i>if applicable</i> , the baseline value and base year from which progress is measured; e) <del>the period to which the target applies and if applicable, any milestones or interim targets;</del> <i>the timeframe to achieve the target</i> ; f) the methodologies and significant assumptions used to define targets, including where applicable, the selected scenario, data sources, alignment with <i>science-based methodologies</i> , and national, EU or international policy goals <del>and how the targets consider the wider context of sustainable development and/or local situation in which impacts take place;</del>

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<p>(h) whether and how stakeholders have been involved in target setting for each material sustainability matter;</p> <p>(i) any changes in targets and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and processes to collect data adopted within the defined time horizon. This includes an explanation of the rationale for those changes and their effect on comparability (see Disclosure Requirement BP-2 Disclosures in relation to specific circumstances of this Standard); and</p> <p>(j) the performance against its disclosed targets, including information on how the target is monitored and reviewed and the metrics used, whether the progress is in line with what had been initially planned, and an analysis of trends or significant changes in the performance of the undertaking towards achieving the target.</p>	<p><del>g) any changes in targets and corresponding metrics or underlying measurement methodologies; and significant assumptions limitations, sources and processes to collect data adopted within the defined time horizon. This includes together with an explanation of the rationale for those changes and their effect on comparability (see Disclosure Requirement BP-2 Disclosures in relation to specific circumstances of this Standard);</del></p> <p><del>h) (j) the performance against its disclosed targets, including information on how the target is monitored and reviewed and the metrics used, whether the progress is in line with what had been initially planned, and an analysis of trends or significant changes in the performance of the undertaking towards achieving the target. the overall progress towards the defined target.</del></p> <p>17. When disclosing the information according to paragraph 66, the undertaking shall consider publicly claimed targets, or targets communicated to investors or lenders.</p> <p>18. The targets may cover the undertaking's own operations and/or the value chain.</p> <p>19. When disclosing the information required by paragraph 67, the undertaking shall apply the requirements set in the topic-specific Application Requirements IR 4.</p> <p>20. In particular, the undertaking shall include the datapoint deriving from EU legislation specified in AR 87.</p>
<p>81. If the undertaking has not set any measurable outcome-oriented targets:</p> <p>(a) it may disclose whether such targets will be set and the timeframe for setting them, or the reasons why the undertaking does not plan to set such targets;</p> <p>(b) it shall disclose whether it nevertheless tracks the effectiveness of its policies and actions in relation to the material sustainability-related impact, risk and opportunity, and if so:</p> <p>i. any processes through which it does so;</p> <p>ii. the defined level of ambition to be achieved and any qualitative or quantitative indicators it uses to evaluate progress, including the base period from which progress is measured.</p>	<p><del>81. If the undertaking has not set any measurable outcome-oriented targets:</del></p> <p><del>(a) it may disclose whether such targets will be set and the timeframe for setting them, or the reasons why the undertaking does not plan to set such targets;</del></p> <p><del>(b) it shall disclose whether it nevertheless tracks the effectiveness of its policies and actions in relation to the material sustainability-related impact, risk and opportunity, and if so:</del></p> <p><del>i. any processes through which it does so;</del></p> <p><del>ii. the defined level of ambition to be achieved and any qualitative or quantitative indicators it uses to evaluate progress, including the base period from which progress is measured.</del></p>
<p><b>Appendix A: Application Requirements</b></p>	<p><b>Appendix A: Application Requirements – Section 2 General disclosures</b></p>
<p><b>1. Basis for preparation</b></p> <p><b>Disclosure Requirement BP-1 – General basis for preparation of sustainability statements</b></p> <p>AR 1. When describing to what extent the sustainability statement covers the undertaking's upstream and downstream value chain (see ESRS 1 section 5.1 Reporting undertaking and value chain), the undertaking may distinguish between:</p> <p>(a) the extent to which its materiality assessment of impacts, risks and opportunities extends to its upstream and/or downstream value chain;</p>	<p><b>1. Basis for preparation</b></p> <p><b>Disclosure Requirement 1 (BP-1) – General basis for preparation of the sustainability statements</b></p> <p>AR 1. When describing to what extent the sustainability statement covers the undertaking's upstream and downstream value chain (see [draft] Section 1 section 4.1 Reporting undertaking and value chain), the undertaking may distinguish between:</p> <p>(a) the extent to which its materiality assessment of impacts, <del>and risks and opportunities</del> extends to its upstream and/or downstream value chain, <i>with separate identification of how subsidiaries are treated</i>;</p>

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<p>(b) the extent to which its policies, actions and targets extend to its value chain; and</p> <p>(c) the extent to which it includes upstream and/or downstream value chain data when disclosing on metrics.</p>	<p>(b) the extent to which its policies, <del>and actions and targets</del> extend to its value chain, <i>with separate identification of how subsidiaries are treated</i>; and</p> <p>(c) the extent to which it includes upstream and/or downstream value chain data in disclosing on metrics, <i>with separate identification of how subsidiaries are treated</i>.</p>
<p><b>Disclosure Requirement BP-2 – Disclosures in relation to specific circumstances</b></p> <p>AR 2. The undertaking may disclose whether it relies on any European standards approved by the European Standardisation System (ISO/IEC or CEN/CENELEC standards), as well as the extent to which data and processes that are used for sustainability reporting purposes have been verified by an external assurance provider and found to conform to the corresponding ISO/IEC or CEN/CENELEC standard.</p>	<p><b>Disclosure Requirement 2 (BP-2) – Disclosures in relation to specific circumstances</b></p> <p>AR 2. The undertaking may disclose whether it relies on any European standards approved by the European Standardisation System (ISO/IEC or CEN/CENELEC standards), as well as the extent to which data and processes that are used for sustainability reporting purposes have been verified by an external assurance provider and found to conform to the corresponding ISO/IEC or CEN/CENELEC standard.</p>
<p><b>2. Governance</b></p>	<p><b>2. Governance</b></p>
<p><b>Disclosure Requirement GOV-1 – The role of the administrative, management and supervisory bodies</b></p> <p>AR 3. In describing the role and responsibilities of the administrative, management and supervisory bodies with regard to sustainability matters, the undertaking may specify:</p> <p>(a) the aspects of sustainability over which oversight is exercised with regard to the environmental, social and governance matters the undertaking may be facing, including:</p> <ol style="list-style-type: none"> <li>i. any assessment of and changes to sustainability-related aspects of the undertaking’s strategy and business model;</li> <li>ii. the identification and assessment of material risks, opportunities and impacts;</li> <li>iii. related policies and targets, action plans and dedicated resources; and</li> <li>iv. sustainability reporting;</li> </ol> <p>(b) the form such oversight takes for each of the above aspects: i.e., information, consultation or decision-making; and</p> <p>(c) the way such oversight is organised and formalised, i.e., processes by which the administrative, management and supervisory bodies engage with these aspects of sustainability.</p>	<p><b>Disclosure Requirement 3 (GOV-1) – The role of the administrative, management and supervisory bodies</b></p> <p><i>(AR 3 corresponds with paragraph 21 e) from ESRS 2 General disclosures)</i></p> <p>AR 3. For undertakings with a unitary board, the percentage of independent board members corresponds to the percentage of independent non-executive board members and for undertakings with a dual board, it corresponds to the percentage of independent members of the supervisory body.</p> <p>AR 4. In describing the roles and responsibilities of the administrative, management and supervisory bodies with regard to sustainability matters, the undertaking may specify:</p> <p>(a) the aspects of sustainability over which oversight is exercised, with regard to environmental, social and governance matters the undertaking may be facing, including:</p> <ol style="list-style-type: none"> <li>i. any assessment of and changes to sustainability-related aspects of the undertaking’s strategy and business model;</li> <li>ii. the identification and assessment of material risks, <del>opportunities</del> and impacts;</li> <li>iii. related policies <i>(and targets)</i>, action plans and dedicated resources; and</li> <li>iv. sustainability reporting;</li> </ol> <p>(b) the form such oversight takes for each of the above aspects: i.e., information, consultation or decision-making; and</p> <p>(c) the way such oversight is organised and formalised, i.e., processes by which the administrative, management and supervisory bodies engage with these aspects of sustainability.</p>
<p>AR 4. In describing the undertaking’s organisation of governance regarding sustainability matters, a description of complex governance structure may be complemented by their presentation in the form of a diagram.</p>	<p><del>AR 4. In describing the undertaking’s organisation of governance regarding sustainability matters, a description of complex governance structure may be complemented by their presentation in the form of a diagram.</del></p>
<p>AR 5. The description of the level of expertise or access to expertise of the administrative, management and supervisory bodies may be substantiated by illustrating the composition of the</p>	<p>AR 5. The description of the level of expertise or access to expertise of the administrative, management and supervisory bodies may be substantiated by illustrating the composition</p>

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bodies, including members on whom these bodies rely for expertise to oversee sustainability matters, and how they leverage that expertise as a body. In the description, the undertaking shall consider how the expertise and skills are relevant to the undertaking's material impacts, risks and opportunities and whether the bodies and/or its members have access to other sources of expertise, such as specific experts and training and other educational initiatives to update and develop sustainability-related expertise within these bodies.	of the bodies, including members on whom these bodies rely for expertise to oversee sustainability matters, and how they leverage that expertise as a body. In the description, the undertaking shall consider how the expertise and skills are relevant to the undertaking's material impacts, risks and opportunities and whether the bodies and/or its members have access to other sources of expertise, such as specific experts and training and other educational initiatives to update and develop sustainability-related expertise within these bodies.
<b>Disclosure Requirement GOV-2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies</b>	<b>Disclosure Requirement GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies</b>
<b>Disclosure Requirement GOV-3 - Integration of sustainability-related performance in incentive schemes</b>	<b>Disclosure Requirement GOV-3 – Integration of sustainability-related performance in incentive schemes</b>
<b>Disclosure Requirement GOV-4 - Statement on due diligence</b>	<b>Disclosure Requirement GOV-4 – Statement on due diligence</b>
<b>Disclosure Requirement GOV-5 - Risk management and internal controls over sustainability reporting</b>	<b>Disclosure Requirement GOV-5 – Risk management and internal controls over sustainability reporting</b>
<b>3. Strategy</b>	<b>3. Strategy</b>
<b>Disclosure Requirement SBM-1 Strategy, business model and value chain</b>	<b>Disclosure Requirement 5 (SBM-1) - Strategy, business model and value chain</b>
AR 12. To provide the information on sectors required by paragraph 40, the undertaking shall map its significant activities in accordance with ESRS sectors. If a code for a sub-sector does not exist, the caption "others" shall be used.	AR 6. To provide the information on sectors required by paragraph 30, the undertaking shall map its significant activities in accordance with ESRS sectors. If a code for a sub-sector does not exist, the caption "others" shall be used.
AR 13. For the purposes of the disclosures required in paragraph 40, a group of products and/or services offered, a group of markets and/or customer groups served, or an ESRS sector, is significant for the undertaking if it meets one or both of the following criteria: (a) it accounts for more than 10 per cent of the undertaking's revenue; (b) it is connected with material actual impacts or material potential negative impacts of the undertaking.	AR 7. For the purposes of disclosures required in paragraph 30, a group of products and/or services offered, a group of markets and/or customer groups served, or an ESRS sector, is significant for the undertaking if it meets one or both of the following criteria: (a) It accounts for more than 10 per cent of the undertaking's revenue; (b) it is connected with material actual impacts or material potential negative impacts of the undertaking.
AR 14. In preparing disclosures relating to its business model and value chain, the undertaking shall consider: (a) its key activities, resources, distribution channels and customer segments; (b) its key business relationships and their key characteristics, including relationships with customers and suppliers; (c) the cost structure and revenue of its business segments, in line with IFRS 8 disclosure requirements in the financial statement, where applicable; (d) the potential impacts, risks and opportunities in its significant sector(s) and their possible relationship to its own business model or value chain.	AR 8. In preparing disclosures relating to its business model and value chain, the undertaking shall consider: (a) its key business relationships, including with customers, and their key characteristics, its key activities, key suppliers, key resources, key distribution channels, and key customer segments <b>(a) and b) from Set 1 merged</b> ; (b) the cost structure and revenue of its business segments, in line with IFRS 8 disclosure requirements in the financial statements, where applicable; (c) the potential impacts, risks and ( <i>opportunities</i> ) in its significant sector(s) and their possible relationship to its own business model(s) or value chain.
AR 15. Contextual information may be particularly relevant for users of the undertaking's sustainability statement, to understand to what extent the disclosures include upstream and/or downstream value chain information. The description of the main features of the upstream and/or downstream value chain and where applicable the identification of key value chains should support an understanding of how the undertaking applies the requirements of ESRS 1 chapter 5 and the materiality assessment performed by the undertaking in line with ESRS 1 chapter 3. The	AR 9. Contextual information may be particularly relevant for users of the undertaking's sustainability statement, to understand to what extent the reported disclosures include upstream and/or downstream value chain information. The description of the main features of the upstream and/or downstream value chain and where applicable the identification of key value chains should support an understanding of how the undertaking applies the requirements of <i>[draft] Section 1</i> chapter 4 and the materiality assessment performed by the undertaking in line with <i>[draft] Section</i>



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description may provide a high-level overview of the key features of upstream and/or downstream value chain entities indicating their relative contribution to the undertaking's performance and position and explaining how they contribute to the value creation of the undertaking.	1 chapter 3. The description may provide a high-level overview of the key features of upstream and/or downstream value chain entities indicating their relative contribution to the undertaking's performance and position and explaining how they contribute to the value creation of the undertaking.																
<p><b>Disclosure Requirement SBM-2 – Interests and views of stakeholders</b></p> <p>AR 16. The views and interests of stakeholders that are expressed as part of the undertaking's engagement with stakeholders through its due diligence process may be relevant to one or more aspects of its strategy or business model. As such, they may affect the undertaking's decisions regarding the future direction of the strategy or business model.</p>	<p><b>Disclosure Requirement 6 (SBM-2) – Interests and views of stakeholders</b></p> <p>AR 10. <i>If the undertaking engages with stakeholders, their views and interests that are expressed as part of the undertaking's engagement with stakeholders activities, also through its due diligence process if the undertaking has adopted it, may be relevant to one or more aspects of its strategy or business model. As such, they may affect the undertaking's decisions regarding the future direction of the strategy or business model.</i></p>																
<p><b>Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model</b></p> <p>AR 17. When describing where in its upstream and/or downstream value chain material impacts, risks and opportunities are concentrated, the undertaking shall consider: geographical areas, facilities or types of assets, inputs, outputs and distribution channels.</p>	<p><b>Disclosure Requirement 7 (SMB-3) - Material impacts and risks and their interaction with strategy and business model</b></p> <p>AR 11. When describing where in its upstream and/or downstream value chain, <i>including its subsidiaries, material impacts, and risks and opportunities</i> are concentrated, the undertaking shall consider: geographical areas, facilities or types of assets, inputs, outputs and distribution channels.</p>																
<p>AR 18. This disclosure may be expressed in terms of a single impact, risk or opportunity or by aggregating groups of material impacts, risks and opportunities, when this provides more relevant information and does not obscure material information.</p>	<p>AR 12. This disclosure may be expressed in terms of a single impact <i>or</i> risk (or opportunity) or by aggregating groups of material impacts, <i>and risks and opportunities</i>, when this provides more relevant information and does not obscure material information.</p>																
	<p><b>CENTRALISED DISCLOSURES OF SBM-3</b></p> <p><b>EU LAW Table with all SBM-3 topical related EU Law related Disclosure Requirements</b></p> <p>AR 13. <i>When disclosing the information required under paragraph 37 of this Section on its material impacts and risks, the undertaking shall disclose the topic specific information reported in the table below.</i></p> <p><i>In particular, specifying:</i></p> <table border="1" data-bbox="1131 986 2094 1337"> <thead> <tr> <th data-bbox="1131 986 1182 1070">ID</th> <th data-bbox="1184 986 1709 1070">Application Requirement</th> <th data-bbox="1711 986 1883 1070">Sustainability topic</th> <th data-bbox="1886 986 2094 1070">EU related Data Points</th> </tr> </thead> <tbody> <tr> <td data-bbox="1131 1072 1182 1157">1</td> <td data-bbox="1184 1072 1709 1157">whether or not it has sites located in or near biodiversity-sensitive areas and whether activities related to these sites negatively affect these areas</td> <td data-bbox="1711 1072 1883 1157">Biodiversity</td> <td data-bbox="1886 1072 2094 1157">SFDR Tab. 1 KPI 7</td> </tr> <tr> <td data-bbox="1131 1158 1182 1244">2</td> <td data-bbox="1184 1158 1709 1244">whether it has identified material negative impacts with regards to land degradation, desertification or soil sealing</td> <td data-bbox="1711 1158 1883 1244">Biodiversity</td> <td data-bbox="1886 1158 2094 1244">SFDR Tab. 2 KPI 10</td> </tr> <tr> <td data-bbox="1131 1246 1182 1337">3</td> <td data-bbox="1184 1246 1709 1337">whether it has operations that affect threatened species</td> <td data-bbox="1711 1246 1883 1337">Biodiversity</td> <td data-bbox="1886 1246 2094 1337">SFDR Tab. 2 KPI 14</td> </tr> </tbody> </table>	ID	Application Requirement	Sustainability topic	EU related Data Points	1	whether or not it has sites located in or near biodiversity-sensitive areas and whether activities related to these sites negatively affect these areas	Biodiversity	SFDR Tab. 1 KPI 7	2	whether it has identified material negative impacts with regards to land degradation, desertification or soil sealing	Biodiversity	SFDR Tab. 2 KPI 10	3	whether it has operations that affect threatened species	Biodiversity	SFDR Tab. 2 KPI 14
ID	Application Requirement	Sustainability topic	EU related Data Points														
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3	whether it has operations that affect threatened species	Biodiversity	SFDR Tab. 2 KPI 14														

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SET 1 ESRS 2 (version July 2023)	LSME ESRS ED Section 2 and 3			
	4	operations at significant risk of <b>incidents of forced labour</b> or compulsory labour either in terms of type of operation (such as manufacturing plant) or countries or geographic areas with operations considered at risk;	Own workforce	SFDR Tab. 3 KPI 13
	5	operations at significant risk of incidents of child labour either in terms of type of operation (such as manufacturing plant) or countries or geographic areas with operations considered at risk	Own workforce	SFDR Tab. 3 KPI 12
	6	any geographies (at country level or other levels) or commodities for which there is a significant risk of <b>child labour</b> , or of <b>forced labour</b> or compulsory labour, among workers in the undertaking's value chain	Workers in the value chain	SFDR Tab. 3 KPI 12 and 13
	<p><i>AR 14. In addition, when disclosing its material impacts and risks, the undertaking shall disclose the additional topic specific information defined in the following paragraphs:</i></p> <p><b>ENVIRONMENT</b> <b>Climate change</b></p> <p>AR 15. When disclosing the information on material impacts and risks related to climate change, the undertaking shall explain for each climate-related risk it has identified, whether it considers the risk to be a climate-related physical risk or climate-related transition risk.</p>			

ESRS LSME ED Section 4 – Environment

<p>SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)</p>	<p>LSME ESRS ED Section 4</p>
<p><b>DISCLOSURE REQUIREMENTS</b></p>	
<p><b>ESRS E1 - CLIMATE CHANGE</b></p> <p><b>Objective</b></p> <p>1. The objective of this Standard is to specify Disclosure Requirements which will enable users of sustainability statements to understand:</p> <p>(a) how the undertaking affects climate change, in terms of material positive and negative actual and potential impacts;</p>	<p><del>ESRS E1 – CLIMATE CHANGE</del> <b>LSME ESRS SECTION 4 ENVIRONMENTAL DISCLOSURES</b> (E1, E2, E3, E4, and E5 in one section)</p> <p><b>Objective (Centralised for all E standards)</b></p> <p>1. <i>The objective of the Environmental Disclosures in this [draft] Standard is to enable users of sustainability statements to understand:</i></p> <p><i>(a) how the undertaking, actually or potentially, negatively impacts the following environmental topics:</i></p> <p><i>i. climate change (E1),</i></p> <p><i>ii. pollution of air, water and soil (E2),</i></p> <p><i>iii. water and marine resources (E3),</i></p> <p><i>iv. biodiversity and ecosystems (E4)</i></p> <p><i>v. resource use and circular economy (E5);</i></p>
<p>(b) the undertaking’s past, current, and future mitigation efforts in line with the Paris Agreement (or an updated international agreement on climate change) and compatible with limiting global warming to 1.5°C;</p> <p>(c) the plans and capacity of the undertaking to adapt its strategy and business model, in line with the transition to a sustainable economy and to contribute to limiting global warming to 1.5°C;</p>	<p><i>(b) the plans and capacity of the undertaking to adapt its strategy and business model(s) in line with the transition to a sustainable economy and international environmental agreements, goals and initiatives, including, but not limited to:</i></p> <p><i>i. the Paris Agreement (or an updated international agreement on climate change) and the objective of limiting global warming to 1.5°C (E1);</i></p> <p><i>ii. the alignment with the European Green Deal’s ambitions for prevention, control and elimination of pollution and the objective of creating a toxic-free environment with zero pollution in support of the EU Action Plan “Towards a Zero Pollution for Air, Water and Soil” (E2);</i></p> <p><i>iii. the alignment with the European Green Deal’s ambitions for clean water and the sustainability of the blue economy and fisheries sectors considering the EU Water Framework Directive and the EU Marine Strategy Framework Directive and the EU Maritime Spatial Planning Directive (E3);</i></p> <p><i>iv. the Kunming-Montreal Global Biodiversity Framework and its goals and targets, the EU Biodiversity Strategy for 2030, the Directive 2009/147/EC of the European Parliament and of the Council and Council Directive 92/43/EEC (EU Birds and Habitats Directives), the Directive 2008/56/EC of the European Parliament and of the Council (Marine Strategy Framework Directive) (E4);</i></p> <p><i>v. the alignment with circular economy principles, including but not limited to minimising waste, maintaining the value of products, materials and other resources at their highest value and enhancing</i></p>

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SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
	<i>their efficient use in production and consumption, based on the EU Circular Economy Action Plan, the Waste Framework directive and the EU industrial strategy (E5).</i>
(d) any other actions taken by the undertaking, and the result of such actions to prevent, mitigate or remediate actual or potential negative impacts, and to address risks and opportunities;	(c) any actions taken by the undertaking, and the result of such actions to prevent, mitigate or remediate potential negative impacts <i>on the environmental topics, including:</i> <i>i. to reduce GHG emissions and increase energy efficiency (E1);</i> <i>ii. to prevent, control and reduce pollution of air, water and soil (E2);</i> <i>iii. to reduce water consumption and to protect water and marine resources (E3);</i> <i>iv. to protect and restore biodiversity and ecosystems (E4); and</i> <i>v. to prevent and decrease resource depletion, increase resource efficiency and help decoupling the economic growth from the use of materials (E5).</i>
(e) the nature, type and extent of the undertaking’s material risks and opportunities arising from the undertaking’s impacts and dependencies on climate change, and how the undertaking manages them; and	(d) the nature, type and extent of the undertaking’s material risks arising from the undertaking’s impacts and dependencies <i>on the environmental topics</i> , and how the undertaking manages them; and
(f) the financial effects on the undertaking over the short-, medium- and long-term of risks and opportunities arising from the undertaking’s impacts and dependencies on climate change.	(e) the financial effects on the undertaking over the short-, medium- and long-term of material risks arising from the undertaking’s impacts and dependencies <i>on the environment</i> .
2. The Disclosure Requirements of this Standard take into account the requirements of related EU legislation and regulation (i.e., EU Climate Law[1], Climate Benchmark Standards Regulation[2], Sustainable Finance Disclosure Regulation (SFDR)[3], EU Taxonomy33, and EBA Pillar 3 disclosure requirements34).	<del>2. The Disclosure Requirements of this Standard take into account the requirements of related EU legislation and regulation (i.e., EU Climate Law[1], Climate Benchmark Standards Regulation[2], Sustainable Finance Disclosure Regulation (SFDR)[3], EU Taxonomy33, and EBA Pillar 3 disclosure requirements34).</del>
3. This Standard covers Disclosure Requirements related to the following sustainability matters: “Climate change mitigation” and “Climate change adaptation”. It also covers energy-related matters, to the extent that they are relevant to climate change.	2. <i>This [draft] Section 4 covers Disclosure Requirements related to the following sustainability matters as per AR15, Appendix A, Section 1 of this standard.</i>
4. Climate change mitigation relates to the undertaking’s endeavours to the general process of limiting the increase in the global average temperature to 1,5 °C above pre-industrial levels in line with the Paris Agreement. This Standard covers disclosure requirements related but not limited to the seven Greenhouse gases (GHG) carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF6) and nitrogen trifluoride (NF3). It also covers Disclosure Requirements on how the undertaking addresses its GHG emissions as well as the associated transition risks.	<del>4. Climate change mitigation relates to the undertaking’s endeavours to the general process of limiting the increase in the global average temperature to 1,5 °C above pre-industrial levels in line with the Paris Agreement. This Standard covers disclosure requirements related but not limited to the seven Greenhouse gases (GHG) carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF6) and nitrogen trifluoride (NF3). It also covers Disclosure Requirements on how the undertaking addresses its GHG emissions as well as the associated transition risks.</del>
5. Climate change adaptation relates to the undertaking’s process of adjustment to actual and expected climate change.	5. <del>Climate change adaptation relates to the undertaking’s process of adjustment to actual and expected climate change.</del>
6. This Standard covers Disclosure Requirements regarding climate-related hazards that can lead to physical climate risks for the undertaking and its adaptation solutions to reduce these risks. It also covers transition risks arising from the needed adaptation to climate-related hazards.	<del>6. This Standard covers Disclosure Requirements regarding climate-related hazards that can lead to physical climate risks for the undertaking and its adaptation solutions to reduce these risks. It also covers transition risks arising from the needed adaptation to climate-related hazards.</del>
7. The Disclosure Requirements related to “Energy” cover all types of energy production and consumption.	<del>7. The Disclosure Requirements related to “Energy” cover all types of energy production and consumption.</del>
	3. <i>The objectives in par. 1 and the metrics disclosure requirements under section 4 E1 to E5 shall be read in conjunction with Section 2 and 3 of this [draft], General Disclosures.</i>
<b>Interactions with other ESRS</b>	<b>Interactions with other ESRS</b>

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SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
8. Ozone-depleting substances (ODS), nitrogen oxides (NOX) and sulphur oxides (SOX), among other air emissions, are connected to climate change but are covered under the reporting requirements in ESRS E2.	<del>8. Ozone-depleting substances (ODS), nitrogen oxides (NOX) and sulphur oxides (SOX), among other air emissions, are connected to climate change but are covered under the reporting requirements in ESRS E2.</del>
9. Impacts on people that may arise from the transition to a climate-neutral economy are covered under the ESRS S1 Own workforce, ESRS S2 Workers in the value chain, ESRS S3 Affected communities and ESRS S4 Consumers and end-users.	<del>9. Impacts on people that may arise from the transition to a climate-neutral economy are covered under the ESRS S1 Own workforce, ESRS S2 Workers in the value chain, ESRS S3 Affected communities and ESRS S4 Consumers and end-users.</del>
10. Climate change mitigation and adaptation are closely related to topics addressed in particular in ESRS E3 Water and marine resources and ESRS E4 Biodiversity and ecosystems. With regard to water and as illustrated in the table of climate-related hazards in AR 11, this standard addresses acute and chronic physical risks which arise from the water and ocean-related hazards. Biodiversity loss and ecosystem degradation that may be caused by climate change are addressed in ESRS E4 Biodiversity and ecosystems.	<del>10. Climate change mitigation and adaptation are closely related to topics addressed in particular in ESRS E3 Water and marine resources and ESRS E4 Biodiversity and ecosystems. With regard to water and as illustrated in the table of climate-related hazards in AR 11, this standard addresses acute and chronic physical risks which arise from the water and ocean-related hazards. Biodiversity loss and ecosystem degradation that may be caused by climate change are addressed in ESRS E4 Biodiversity and ecosystems.</del>
11. This Standard should be read and applied in conjunction with ESRS 1 General requirements and ESRS 2 General disclosures.	<del>11. This Standard should be read and applied in conjunction with ESRS 1 General requirements and ESRS 2 General disclosures.</del>
<p><b>Disclosure Requirements</b></p> <p><b>ESRS 2 General disclosures</b></p>	<p><del><b>Disclosure Requirements</b></del></p> <p><del><b>ESRS 2 General disclosures</b></del></p>
12. The requirements of this section should be read and applied in conjunction with the disclosures required by ESRS 2 on Chapter 2 Governance, Chapter 3 Strategy and Chapter 4 Impact, risk and opportunity management. The resulting disclosures shall be presented in the sustainability statement alongside the disclosures required by ESRS 2, except for ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model, for which the undertaking may, in accordance with ESRS2 paragraph 46, present the disclosures alongside the other disclosures required in this topical standard.	<del>12. The requirements of this section should be read and applied in conjunction with the disclosures required by ESRS 2 on Chapter 2 Governance, Chapter 3 Strategy and Chapter 4 Impact, risk and opportunity management. The resulting disclosures shall be presented in the sustainability statement alongside the disclosures required by ESRS 2, except for ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model, for which the undertaking may, in accordance with ESRS2 paragraph 46, present the disclosures alongside the other disclosures required in this topical standard.</del>
<p><b>Governance</b></p> <p><b>Disclosure requirement related to ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes</b></p>	<p><del><b>Governance</b></del></p> <p><del><b>Disclosure requirement related to ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes</b></del></p>
<p><b>Strategy</b></p> <p><b>Disclosure Requirement E1-1 – Transition plan for climate change mitigation</b></p>	<p><del>13. The undertaking shall disclose whether and how climate-related considerations are factored into the remuneration of members of the administrative, management and supervisory bodies, including if their performance has been assessed against the GHG emission reduction targets reported under Disclosure Requirement E1-4 and the percentage of the remuneration recognised in the current period that is linked to climate related considerations, with an explanation of what the climate considerations are.</del></p> <p>(Centralised Section 3 AR)</p>
14. The undertaking shall disclose its transition plan for climate change mitigation.	

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SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
<p>15. The objective of this Disclosure Requirement is to enable an understanding of the undertaking's past, current, and future mitigation efforts to ensure that its strategy and business model are compatible with the transition to a sustainable economy, and with the limiting of global warming to 1.5 °C in line with the Paris Agreement and with the objective of achieving climate neutrality by 2050 and, where relevant, the undertaking's exposure to coal, oil and gas-related activities.</p> <p>16. The information required by paragraph 14 shall include:</p> <p>(a) by reference to GHG emission reduction targets (as required by Disclosure Requirement E1-4), an explanation of how the undertaking's targets are compatible with the limiting of global warming to 1.5°C in line with the Paris Agreement;</p> <p>(b) by reference to GHG emission reduction targets (as required by Disclosure Requirement E1-4) and the climate change mitigation actions (as required by Disclosure Requirement E1-3), an explanation of the decarbonisation levers identified, and key actions planned, including changes in the undertaking's product and service portfolio and the adoption of new technologies in its own operations, or the upstream and/or downstream value chain;</p> <p>(c) by reference to the climate change mitigation actions (as required by Disclosure Requirement E1-3), an explanation and quantification of the undertaking's investments and funding supporting the implementation of its transition plan, with a reference to the key performance indicators of taxonomy-aligned CapEx, and where relevant the CapEx plans, that the undertaking discloses in accordance with Commission Delegated Regulation (EU) 2021/2178;</p> <p>(d) a qualitative assessment of the potential locked-in GHG emissions from the undertaking's key assets and products. This shall include an explanation of if and how these emissions may jeopardise the achievement of the undertaking's GHG emission reduction targets and drive transition risk, and if applicable, an explanation of the undertaking's plans to manage its GHG-intensive and energyintensive assets and products;</p> <p>(e) for undertakings with economic activities that are covered by delegated regulations on climate adaptation or mitigation under the Taxonomy Regulation, an explanation of any objective or plans (CapEX, CapEx plans, OpEX) that the undertaking has for aligning its economic activities (revenues, CapEx, OpEx) with the criteria established in Commission Delegated Regulation 2021/213936;</p> <p>(f) if applicable, a disclosure of significant CapEx amounts invested during the reporting period related to coal, oil and gas-related economic activities;<sup>37</sup></p> <p>(g) a disclosure on whether or not the undertaking is excluded from the EU Paris-aligned Benchmarks;<sup>38</sup></p> <p>(h) an explanation of how the transition plan is embedded in and aligned with the undertaking's overall business strategy and financial planning;</p> <p>(i) whether the transition plan is approved by the administrative, management and supervisory bodies; and</p> <p>(j) an explanation of the undertaking's progress in implementing the transition plan.</p> <p>17. In case the undertaking does not have a transition plan in place, it shall indicate whether and, if so, when it will adopt a transition plan.</p>	



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SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
<p><b>Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model</b></p> <p>18. The undertaking shall explain for each material climate-related risk it has identified, whether the entity considers the risk to be a climate-related <u>physical risk</u> or <u>climate-related transition risk</u>.</p> <p>19. The undertaking shall describe the resilience of its strategy and business model in relation to climate change. This description shall include:</p> <ul style="list-style-type: none"> <li>(a) the scope of the resilience analysis;</li> <li>(b) how and when the resilience analysis has been conducted, including the use of climate scenario analysis as referenced in the Disclosure Requirement related to ESRS 2 IRO-1 and the related application requirement paragraphs; and</li> <li>(c) the results of the resilience analysis including the results from the use of scenario analysis.</li> </ul>	(Centralised Section 2 AR)
<p><b>Impact, risk and opportunity management</b></p> <p><b>Disclosure requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities</b></p> <p>20. The undertaking shall describe the process to identify and assess climate-related impacts, risks and opportunities. This description shall include its process in relation to:</p> <ul style="list-style-type: none"> <li>(a) impacts on climate change, in particular, the undertaking’s GHG emissions (as required by Disclosure Requirement ESRS E1-6);</li> <li>(b) climate-related physical risks in own operations and along the upstream and downstream value chain, in particular: <ul style="list-style-type: none"> <li>i. the identification of climate-related hazards, considering at least high emission climate scenarios; and</li> <li>ii. the assessment of how its assets and business activities may be exposed and are sensitive to these climate-related hazards, creating gross physical risks for the undertaking.</li> </ul> </li> <li>(c) climate-related transition risks and opportunities in own operations and along the upstream and downstream value chain, in particular: <ul style="list-style-type: none"> <li>i. the identification of climate-related transition events, considering at least a climate scenario in line with limiting global warming to 1.5°C with no or limited overshoot; and</li> <li>ii. the assessment of how its assets and business activities may be exposed to these climate-related transition events, creating gross transition risks or opportunities for the undertaking.</li> </ul> </li> </ul> <p>21. When disclosing the information required under paragraphs 20 (b) and 20 (c) the undertaking shall explain how it has used climate-related scenario analysis, including a range of climate scenarios, to inform the identification and assessment of physical risks and transition risks and opportunities over the short-, medium- and long-term.</p>	(Centralised Section 2 AR)
<p><b>Disclosure Requirement E1-2 – Policies related to climate change mitigation and adaptation</b></p>	<p><del><b>Disclosure Requirement E1-2 – Policies related to climate change mitigation and adaptation</b></del>  <b>Disclosure Requirement 11 (IR-3) – Policies and actions in relation to sustainability matters</b></p>

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SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
22. The undertaking shall describe its policies adopted to manage its material impacts, risks and opportunities related to climate change mitigation and adaptation.	(Centralised Section 3 AR)
23. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of its material climate change mitigation and adaptation impacts, risks and opportunities.	
24. The disclosure required by paragraph 22 shall contain the information on the policies the undertaking has in place to manage its material impacts, risks and opportunities related to climate change mitigation and adaptation in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters.	
25. The undertaking shall indicate whether and how its policies address the following areas: (a) climate change mitigation; (b) climate change adaptation; (c) energy efficiency; (d) renewable energy deployment; and (e) other	
<b>Disclosure Requirement E1-3 – Actions and resources in relation to climate change policies</b>	<b>Disclosure Requirement E1-3 – Actions and resources in relation to climate change policies</b> <b>Disclosure Requirement 11 (IR-3) – Policies and actions in relation to sustainability matters</b>
26. The undertaking shall disclose its climate change mitigation and adaptation actions and the resources allocated for their implementation.	(Centralised Section 3 AR)
27. The objective of this Disclosure Requirement is to provide an understanding of the key actions taken and planned to achieve climate-related policy objectives and targets.	
28. The description of the actions and resources related to climate change mitigation and adaptation shall follow the principles stated in ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.	
29. In addition to ESRS 2 MDR-A, the undertaking shall: (a) when listing key actions taken in the reporting year and planned for the future, present the climate change mitigation actions by decarbonisation lever including the nature- based solutions; (b) when describing the outcome of the actions for climate change mitigation, include the achieved and expected GHG emission reductions; and (c) relate significant monetary amounts of CapEx and OpEx required to implement the actions taken or planned to:  i. the relevant line items or notes in the financial statements; ii. the key performance indicators required under Commission Delegated Regulation (EU) 2021/2178; and iii. if applicable, the CapEx plan required by Commission Delegated Regulation (EU) 2021/2178.	
<b>Metrics and targets</b>	
<b>Disclosure Requirement E1-4 – Targets related to climate change mitigation and adaptation</b>	<b>Metrics and targets</b> <b>Disclosure Requirement E1-4 – Targets related to climate change mitigation and adaptation</b> <b>Disclosure Requirement 11 (IR-4) – Targets in relation to sustainability matters</b>

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SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
30. The undertaking shall disclose the climate-related targets it has set.	(Centralised Section 3 AR)
31. The objective of this Disclosure Requirement is to enable an understanding of the targets the undertaking has set to support its climate change mitigation and adaptation policies and address its material climate-related impacts, risks and opportunities.	
32. The disclosure of the targets required in paragraph 30 shall contain the information required in ESRS 2 MDR-T Tracking effectiveness of policies and actions through targets.	
33. For the disclosure required by paragraph 30, the undertaking shall disclose whether and how it has set GHG emissions reduction targets and/or any other targets to manage material climate-related impacts, risks and opportunities, for example, renewable energy deployment, energy efficiency, climate change adaptation, and physical or transition risk mitigation.	
34. If the undertaking has set GHG emission reduction targets[4], ESRS 2 MDR-T and the following requirements shall apply:	
<p>(a) GHG emission reduction targets shall be disclosed in absolute value (either in tonnes of CO<sub>2</sub>eq or as a percentage of the emissions of a base year) and, where relevant, in intensity value;</p> <p>(b) GHG emission reduction targets shall be disclosed for Scope 1, 2, and 3 GHG emissions, either separately or combined. The undertaking shall specify, in case of combined GHG emission reduction targets, which GHG emission Scopes (1, 2 and/or 3) are covered by the target, the share related to each respective GHG emission Scope and which GHGs are covered. The undertaking shall explain how the consistency of these targets with its GHG inventory boundaries is ensured (as required by Disclosure Requirement E1-6). The GHG emission reduction targets shall be gross targets, meaning that the undertaking shall not include GHG removals, carbon credits or avoided emissions as a means of achieving the GHG emission reduction targets;</p> <p>(c) the undertaking shall disclose its current base year and baseline value, and from 2030 onwards, update the base year for its GHG emission reduction targets after every fiveyear period thereafter. The undertaking may disclose the past progress made in meeting its targets before its current base year provided that this information is consistent with the requirements of this Standard;</p> <p>(d) GHG emission reduction targets shall at least include target values for the year 2030 and, if available, for the year 2050. From 2030, target values shall be set after every 5year period thereafter;</p> <p>(e) the undertaking shall state whether the GHG emission reduction targets are science- based and compatible with limiting global warming to 1.5°C. The undertaking shall state which framework and methodology has been used to determine these targets including whether they are derived using a sectoral decarbonisation pathway and what the underlying climate and policy scenarios are and whether the targets have been externally assured. As part of the critical assumptions for setting GHG emission reduction targets, the undertaking shall briefly explain how it has considered future developments (e.g., changes in sales volumes, shifts in customer preferences and demand, regulatory factors, and new technologies) and how these will potentially impact both its GHG emissions and emissions reductions; and</p> <p>(f) the undertaking shall describe the expected decarbonisation levers and their overall quantitative contributions to achieve the GHG emission reduction targets (e.g., energy or material</p>	

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SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
efficiency and consumption reduction, fuel switching, use of renewable energy, phase out or substitution of product and process).	
<b>Disclosure Requirement E1-5 – Energy consumption and mix</b>	<b>Disclosure Requirement E1-1– Energy consumption and mix</b>
35. The undertaking shall provide information on its energy consumption and mix.	5. The undertaking shall provide information on its energy consumption and mix.
36. The objective of this Disclosure Requirement is to provide an understanding of the undertaking's total energy consumption in absolute value, improvement in energy efficiency, exposure to coal, oil and gas-related activities, and the share of renewable energy in its overall energy mix.	6. The objective of this Disclosure Requirement is to provide an understanding of the undertaking's total energy consumption in absolute value, improvement in energy efficiency, exposure to coal, oil and gas-related activities, and the share of renewable energy in its overall energy mix.
37. The disclosure required by paragraph 35 shall include the total energy consumption in MWh related to own operations disaggregated by: (a) total energy consumption from fossil sources[5]; (b) total energy consumption from nuclear sources; (c) total energy consumption from renewable sources disaggregated by:  i. fuel consumption for renewable sources including biomass (also comprising industrial and municipal waste of biologic origin), biofuels, biogas, hydrogen from renewable sources[6], etc.; ii. consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources; and iii. consumption of self-generated non-fuel renewable energy.	7. The disclosure required by paragraph 5 shall include the total energy consumption in MWh related to own operations disaggregated by: (a) <b>Total energy consumption from fossil sources;</b> (b) Total energy consumption from nuclear sources; (c) total energy consumption from renewable sources <del>disaggregated by:</del>  <del>i. fuel consumption for renewable sources including biomass (also comprising industrial and municipal waste of biologic origin), biofuels, biogas, hydrogen from renewable sources[6], etc.;</del> <del>ii. consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources; and</del> <del>iii. consumption of self-generated non-fuel renewable energy.</del> <del>; and</del>
38. The undertaking with operations in high climate impact sectors[7] shall further disaggregate their total energy consumption from fossil sources by: (a) fuel consumption from coal and coal products; (b) fuel consumption from crude oil and petroleum products; (c) fuel consumption from natural gas; (d) fuel consumption from other fossil sources; (e) consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources;	<del>38. The undertaking with operations in high climate impact sectors[7] shall further disaggregate their total energy consumption from fossil sources by: (a) fuel consumption from coal and coal products; (b) fuel consumption from crude oil and petroleum products; (c) fuel consumption from natural gas; (d) fuel consumption from other fossil sources; (e) consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources;</del>
39. In addition, where applicable, the undertaking shall disaggregate and disclose separately its non-renewable energy production and renewable energy production in MWh.[8]	(d) <b>In addition, where applicable, the undertaking shall disaggregate and disclose separately its non-renewable energy production and renewable energy production in MWh.</b>
<b>Energy intensity based on net revenue[9]</b>	<b>Energy intensity based on net revenue</b>
40. The undertaking shall provide information on the energy intensity (total energy consumption per net revenue) associated with activities in high climate impact sectors.	8. The undertaking shall provide information on the energy intensity (total energy consumption per net revenue) associated with activities in high climate impact sectors. The disclosure on energy intensity <del>required by paragraph 40</del> shall only be derived from the total energy consumption and net revenue from activities in high climate impact sectors.
41. The disclosure on energy intensity required by paragraph 40 shall only be derived from the total energy consumption and net revenue from activities in high climate impact sectors.	

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42. The undertaking shall specify the high climate impact sectors that are used to determine the energy intensity required by paragraph 40.	9. The undertaking shall specify the high climate impact sectors that are used to determine the energy intensity required by paragraph 8.
43. The undertaking shall disclose the reconciliation to the relevant line item or notes in the financial statements of the net revenue amount from activities in high climate impact sectors (the denominator in the calculation of the energy intensity required by paragraph 40).	10. The undertaking shall disclose the reconciliation to the relevant line item or notes in the financial statements of the net revenue amount from activities in high climate impact sectors (the denominator in the calculation of the energy intensity required by paragraph 8). <i>If it is not possible to provide a reconciliation after making reasonable efforts to do so, the undertaking shall provide an explanation of where in the financial statements the net revenue amount from activities in high climate impact sectors can be found.</i>
<p><b>Disclosure Requirement E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions</b></p> <p>44. The undertaking shall disclose in metric tonnes of CO<sub>2</sub>e q its<sup>45</sup>:</p> <p>(a) gross Scope 1 GHG emissions;            (b) gross Scope 2 GHG emissions;            (c) gross Scope 3 GHG emissions; and            (d) total GHG emissions.</p>	<p><b>Disclosure Requirement E1-2– Gross Scopes 1, 2, 3 and Total GHG emissions</b></p> <p>11. <i>The undertaking shall disclose in metric tonnes of Cq its:</i></p> <p>(a) gross Scope 1 GHG emissions;            (b) gross Scope 2 GHG emissions;            (c) gross Scope 3 GHG emissions; and            (d) total GHG emissions.</p>
<p>45. The objective of the Disclosure Requirement in paragraph 44 in respect of:</p> <p>(a) gross Scope 1 GHG emissions as required by paragraph 44 (a) is to provide an understanding of the direct impacts of the undertaking on climate change and the proportion of its total GHG emissions that are regulated under emission trading schemes.</p> <p>(b) gross Scope 2 GHG emissions as required by paragraph 44 (b) is to provide an understanding of the indirect impacts on climate change caused by the undertaking’s consumed energy whether externally purchased or acquired.</p> <p>(c) gross Scope 3 GHG emissions as required by paragraph 44 (c) is to provide an understanding of the GHG emissions that occur in the undertaking’s upstream and downstream value chain beyond its Scope 1 and 2 GHG emissions. For many undertakings, Scope 3 GHG emissions may be the main component of their GHG inventory and are an important driver of the undertaking’s transition risks.</p> <p>(d) total GHG emissions as required by paragraph 44 (d) is to provide an overall understanding of the undertaking’s GHG emissions and whether they occur from its own operations or the upstream and downstream value chain. This disclosure is a prerequisite for measuring progress towards reducing GHG emissions in accordance with the undertaking’s climate-related targets and EU policy goals.</p> <p>The information from this Disclosure Requirement is also needed to understand the undertaking’s climate-related transition risks.</p>	<p>12. The objective of the Disclosure Requirement in paragraph 12 in respect of:</p> <p>(a) gross Scope 1 GHG emissions as required by paragraph 12 (a) is to provide an understanding of the direct impacts of the undertaking on climate change and the proportion of its total GHG emissions that are regulated under emission trading schemes.</p> <p>(b) gross Scope 2 GHG emissions as required by paragraph 12(b) is to provide an understanding of the indirect impacts on climate change caused by the undertaking’s consumed energy whether externally purchased or acquired.</p> <p>(c) gross Scope 3 GHG emissions as required by paragraph 12(c) is to provide an understanding of the GHG emissions that occur in the undertaking’s upstream and downstream value chain beyond its Scope 1 and 2 GHG emissions. For many undertakings, Scope 3 GHG emissions may be the main component of the GHG inventory and are an important driver of the undertaking’s transition risks.</p> <p>(d) total GHG emissions as required by paragraph 12(d) is to provide an overall understanding of the undertaking’s GHG emissions and whether they occur from its own operations or the upstream and downstream value chain. This disclosure is a prerequisite for measuring progress towards reducing GHG emissions in accordance with the undertaking’s climate-related targets and EU policy goals.</p> <p>13. The information from this Disclosure Requirement is also needed to understand the undertaking’s climate-related transition risks.</p>
46. When disclosing the information on GHG emissions required under paragraph 44, the undertaking shall refer to ESRS 1 paragraphs from 62 to 67. In principle, the data on GHG emissions of its associates or joint ventures that are part of the undertaking’s upstream and downstream value chain (ESRS 1 Paragraph 67) are not limited to the share of equity held. For its associates, joint ventures, unconsolidated subsidiaries (investment entities) and contractual arrangements that are joint arrangements not structured through an entity (i.e., jointly controlled operations and	14. When disclosing the information on GHG emissions required under paragraph 12, the undertaking shall refer to <i>[draft] LSME ESRS section 1 Reporting undertaking and value chain. In principle, the data on GHG emissions of its associates or joint ventures that are part of the undertaking’s upstream and downstream value chain (Section 1 par. XX)</i> are not limited to the share of equity held. For its associates, joint ventures, unconsolidated subsidiaries (investment entities) and contractual arrangements that are joint arrangements not structured through an entity (i.e.,

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assets), the undertaking shall include the GHG emissions in accordance with the extent of the undertaking's operational control over them.	jointly controlled operations and assets), the undertaking shall include the GHG emissions <del>in accordance with</del> reflecting the extent of the undertaking's operational control over them.
47. In case of significant changes in the definition of what constitutes the reporting undertaking and its upstream and downstream value chain, the undertaking shall disclose these changes and explain their effect on the year-to-year comparability of its reported GHG emissions (i.e., the effect on the comparability of current versus previous reporting period GHG emissions).	15. In case of significant changes in the definition of what constitutes the reporting undertaking and <del>its upstream and downstream</del> <i>its value chain</i> , the undertaking shall disclose these changes and explain their effect on the year-to-year comparability of its reported GHG emissions (i.e., the effect on the comparability of current versus previous reporting period GHG emissions).
48. The disclosure on gross Scope 1 GHG emissions required by paragraph 44 (a) shall include: (a) the gross Scope 1 GHG emissions in metric tonnes of CO <sub>2</sub> eq; and (b) the percentage of Scope 1 GHG emissions from regulated emission trading schemes.	16. The disclosure on gross Scope 1 GHG emissions required by paragraph 12 (a) shall include: (a) the gross Scope 1 GHG emissions in metric tonnes of CO <sub>2</sub> eq; and (b) the percentage of Scope 1 GHG emissions from regulated emission trading schemes, <i>if applicable</i> .
49. The disclosure on gross Scope 2 GHG emissions required by paragraph 44 (b) shall include: (a) the gross location-based Scope 2 GHG emissions in metric tonnes of CO <sub>2</sub> eq; and (b) the gross market-based Scope 2 GHG emissions in metric tonnes of CO <sub>2</sub> eq.	17. The disclosure on gross Scope 2 GHG emissions required by paragraph 12 (b) shall include: (a) the gross location-based Scope 2 GHG emissions in metric tonnes of CO <sub>2</sub> eq; and (b) <i>where applicable</i> , the gross market-based Scope 2 GHG emissions in metric tonnes of CO <sub>2</sub> eq.
50. For Scope 1 and Scope 2 emissions disclosed as required by paragraphs 44 (a) and (b) the undertaking shall disaggregate the information, separately disclosing emissions from: (a) the consolidated accounting group (the parent and subsidiaries); and (b) investees such as associates, joint ventures, or unconsolidated subsidiaries that are not fully consolidated in the financial statements of the consolidated accounting group, as well as contractual arrangements that are joint arrangements not structured through an entity (i.e., jointly controlled operations and assets), for which it has operational control.	<del>50. For Scope 1 and Scope 2 emissions disclosed as required by paragraphs 44 (a) and (b) the undertaking shall disaggregate the information, separately disclosing emissions from: (a) the consolidated accounting group (the parent and subsidiaries); and (b) investees such as associates, joint ventures, or unconsolidated subsidiaries that are not fully consolidated in the financial statements of the consolidated accounting group, as well as contractual arrangements that are joint arrangements not structured through an entity (i.e., jointly controlled operations and assets), for which it has operational control.</del>
51. The disclosure of gross Scope 3 GHG emissions required by paragraph 44 (c) shall include GHG emissions in metric tonnes of CO <sub>2</sub> eq from each significant Scope 3 category (i.e. each Scope 3 category that is a priority for the undertaking).	18. The disclosure of gross Scope 3 GHG emissions required by paragraph 12(c) shall include GHG emissions in metric tonnes of CO <sub>2</sub> eq from each significant Scope 3 category (i.e., each Scope 3 category that is a priority for the undertaking).
52. The disclosure of total GHG emissions required by paragraph 44 (d) shall be the sum of Scope 1, 2 and 3 GHG emissions required by paragraphs 44 (a) to (c). The total GHG emissions shall be disclosed with a disaggregation that makes a distinction of: (a) the total GHG emissions derived from the underlying Scope 2 GHG emissions being measured using the location-based method; and (b) the total GHG emissions derived from the underlying Scope 2 GHG emissions being measured using the market-based method.	19. The disclosure of total GHG emissions required by paragraph 12(d) shall be the sum of Scope 1, 2 and 3 GHG emissions required by paragraphs 12(a) to 12(c). The total GHG emissions shall be disclosed with a disaggregation that makes a distinction of: (a) the total GHG emissions derived from the underlying Scope 2 GHG emissions being measured using the location-based method; and (b) the total GHG emissions derived from the underlying Scope 2 GHG emissions being measured using the market-based method.
<b>GHG Intensity based on net revenue[11]</b>  53. The undertaking shall disclose its GHG emissions intensity (total GHG emissions per net revenue).  54. The disclosure on GHG intensity required by paragraph 53 shall provide the total GHG emissions in metric tonnes of CO <sub>2</sub> eq (required by paragraph 44 (d)) per net revenue.	<b>GHG Intensity based on net revenue</b>  20. The undertaking shall disclose its GHG emissions intensity ( <del>total GHG emissions per net revenue</del> ). <del>The disclosure on GHG intensity required by paragraph 53</del> It shall provide the total GHG emissions in metric tonnes of CO <sub>2</sub> eq (required by paragraph 12(d)) per net revenue.



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55. The undertaking shall disclose the reconciliation to the relevant line item or notes in the financial statements of the net revenue amounts (the denominator in the calculation of the GHG emissions intensity required by paragraph 53).	21. The undertaking shall disclose the reconciliation to the relevant line item or notes in the financial statements of the net revenue amounts (the denominator in the calculation of the GHG emissions intensity required by paragraph 21). <i>If it is not possible to provide a reconciliation after making reasonable efforts to do so, the undertaking shall provide an explanation of where in the financial statements net revenue amounts can be found.</i>
<p><b>Disclosure Requirement E1-7 – GHG removals and GHG mitigation projects financed through carbon credits</b></p> <p>56. The undertaking shall disclose:</p> <p>(a) GHG removals and storage in metric tonnes of CO<sub>2</sub>eq resulting from projects it may have developed in its own operations, or contributed to in its upstream and downstream value chain; and</p> <p>(b) the amount of GHG emission reductions or removals from climate change mitigation projects outside its value chain it has financed or intends to finance through any purchase of carbon credits.</p>	<p><b>Disclosure Requirement E1-3 – GHG removals and GHG mitigation projects financed through carbon credits</b></p> <p>22. The undertaking shall disclose:</p> <p>(a) GHG removals and storage in metric tonnes of CO<sub>2</sub>eq resulting from projects it may have developed in its own operations, <del>or contributed to in its upstream and downstream value chain;</del> and</p> <p>(b) the amount of GHG emission reductions or removals from climate change mitigation projects outside its value chain it has financed <del>or intends to finance</del> through any purchase of carbon credits.</p>
<p>57. The objective of this Disclosure Requirement is:</p> <p>(a) to provide an understanding of the undertaking’s actions to permanently remove or actively support the removal of GHG from the atmosphere, potentially for achieving net-zero targets (as stated in paragraph 60).</p> <p>(b) to provide an understanding of the extent and quality of carbon credits the undertaking has purchased or intends to purchase from the voluntary market, potentially for supporting its GHG neutrality claims (as stated in paragraph 61).</p>	<p>23. The objective of this Disclosure Requirement is:</p> <p>(a) to provide an understanding of the undertaking’s actions to permanently remove <del>or actively support the removal of</del> GHG from the atmosphere, <del>potentially for achieving net zero targets (as stated in paragraph 60).</del></p> <p>(b) to provide an understanding of the extent and quality of carbon credits the undertaking has purchased or intends to purchase from the voluntary market, potentially for supporting its GHG neutrality claims (as stated in paragraph 26).</p>
<p>58. The disclosure on GHG removals and storage required by paragraph 56 (a) shall include, if applicable:</p> <p>(a) the total amount of GHG removals and storage in metric tonnes of CO<sub>2</sub>eq disaggregated and separately disclosed for the amount related to the undertaking’s own operations and its upstream and downstream value chain, and broken down by removal activity; and</p> <p>(b) the calculation assumptions, methodologies and frameworks applied by the undertaking.</p>	<p>24. The disclosure on GHG removals and storage required by paragraph 22 (a) shall include, if applicable:</p> <p>(a) the total amount of GHG removals and storage in metric tonnes of CO<sub>2</sub>eq, <del>disaggregated and separately disclosed for the amount related to the undertaking’s own operations and its upstream and downstream value chain,</del> broken down by removal activity; and</p> <p>(b) the calculation assumptions, methodologies and frameworks applied by the undertaking.</p>
<p>59. The disclosure on carbon credits required by paragraph 56 (b) shall include, if applicable:</p> <p>(a) the total amount of carbon credits outside the undertaking’s value chain in metric tonnes of CO<sub>2</sub>eq that are verified against recognised quality standards and cancelled in the reporting period; and</p> <p>(b) the total amount of carbon credits outside the undertaking’s value chain in metric tonnes of CO<sub>2</sub>eq planned to be cancelled in the future and whether they are based on existing contractual agreements or not.</p>	<p>25. The disclosure on carbon credits required by paragraph 22 (b) shall include, if applicable, the total amount of carbon credits outside the undertaking’s value chain in metric tonnes of CO<sub>2</sub>eq that are verified against recognised quality standards and cancelled in the reporting period.</p> <p><del>(b) the total amount of carbon credits outside the undertaking’s value chain in metric tonnes of CO<sub>2</sub>eq planned to be cancelled in the future and whether they are based on existing contractual agreements or not.</del></p>
<p>60. In the case where the undertaking discloses a net-zero target in addition to the gross GHG emission reduction targets in accordance with Disclosure Requirement E1-4, paragraph 30, it shall explain the scope, methodologies and frameworks applied and how the residual GHG emissions (after approximately 90-95% of GHG emission reduction with the possibility for justified sectoral variations in line with a recognised sectoral decarbonisation pathway) are intended to be</p>	<p><del>60. In the case where the undertaking discloses a net-zero target in addition to the gross GHG emission reduction targets in accordance with Disclosure Requirement E1-4, paragraph 30, it shall explain the scope, methodologies and frameworks applied and how the residual GHG emissions (after approximately 90-95% of GHG emission reduction with the possibility for justified sectoral variations in line with a recognised sectoral decarbonisation pathway) are intended to be</del></p>

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neutralised by, for example, GHG removals in its own operations and upstream and downstream value chain.	<del>neutralised by, for example, GHG removals in its own operations and upstream and downstream value chain.</del>
<p>61. In the case where the undertaking may have made public claims of GHG neutrality that involve the use of carbon credits, it shall explain:</p> <p>(a) whether and how these claims are accompanied by GHG emission reduction targets as required by Disclosure requirement ESRS E1-4;</p> <p>(b) whether and how these claims and the reliance on carbon credits neither impede nor reduce the achievement of its GHG emission reduction targets[12], or, if applicable, its net zero target; and</p> <p>(c) the credibility and integrity of the carbon credits used, including by reference to recognised quality standards.</p>	<p>26. In the case where the undertaking may have made public claims of GHG neutrality that involve the use of carbon credits, it shall explain:</p> <p>(a) Whether and how these claims are accompanied by GHG emission reduction targets as required by <i>Section 2 DR 12 (IR-4)</i>;</p> <p>(b) Whether and how these claims and the reliance on carbon credits neither impede nor reduce the achievement of its GHG emission reduction targets, or, if applicable, its net zero target; and</p> <p>(c) The credibility and integrity of the carbon credits used, including by reference to recognised quality standards.</p>
<p><b>Disclosure Requirement E1-8 – Internal carbon pricing</b></p>	<p><b><del>Disclosure Requirement E1-8 – Internal carbon pricing</del></b></p>
<p>62. The undertaking shall disclose whether it applies internal carbon pricing schemes, and if so, how they support its decision making and incentivise the implementation of climate-related policies and targets.</p>	<p><del>62. The undertaking shall disclose whether it applies internal carbon pricing schemes, and if so, how they support its decision making and incentivise the implementation of climate-related policies and targets.</del></p>
<p>63. The information required in paragraph 62 shall include:</p> <p>(a) the type of internal carbon pricing scheme, for example, the shadow prices applied for CapEX or research and development (R&amp;D) investment decision making, internal carbon fees or internal carbon funds;</p> <p>(b) the specific scope of application of the carbon pricing schemes (activities, geographies, entities, etc.);</p> <p>(c) the carbon prices applied according to the type of scheme and critical assumptions made to determine the prices, including the source of the applied carbon prices and why these are deemed relevant for their chosen application. The undertaking may disclose the calculation methodology of the carbon prices including the extent to which these have been set using scientific guidance and how their future development is related to science-based carbon pricing trajectories; and</p> <p>(d) the current year approximate gross GHG emission volumes by Scopes 1, 2 and, where applicable, Scope 3 in metric tonnes of CO<sub>2</sub>eq covered by these schemes, as well as their share of the undertaking's overall GHG emissions for each respective Scope.</p>	<p><del>63. The information required in paragraph 62 shall include:</del></p> <p><del>(a) the type of internal carbon pricing scheme, for example, the shadow prices applied for CapEX or research and development (R&amp;D) investment decision making, internal carbon fees or internal carbon funds;</del></p> <p><del>(b) the specific scope of application of the carbon pricing schemes (activities, geographies, entities, etc.);</del></p> <p><del>(c) the carbon prices applied according to the type of scheme and critical assumptions made to determine the prices, including the source of the applied carbon prices and why these are deemed relevant for their chosen application. The undertaking may disclose the calculation methodology of the carbon prices including the extent to which these have been set using scientific guidance and how their future development is related to science-based carbon pricing trajectories; and</del></p> <p><del>(d) the current year approximate gross GHG emission volumes by Scopes 1, 2 and, where applicable, Scope 3 in metric tonnes of CO<sub>2</sub>eq covered by these schemes, as well as their share of the undertaking's overall GHG emissions for each respective Scope.</del></p>
<p><b>Disclosure Requirement E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities</b></p>	<p><b><del>Disclosure Requirement E1-4– Anticipated financial effects from material physical and transition risks and potential climate-related opportunities</del></b></p>
<p>64. The undertaking shall disclose its:</p> <p>(a) anticipated financial effects from material physical risks;</p> <p>(b) anticipated financial effects from material transition risks; and</p> <p>(c) potential to benefit from material climate-related opportunities.</p>	<p>27. The undertaking shall disclose its:</p> <p>(a) anticipated financial effects from material physical risks;</p> <p>(b) anticipated financial effects from material transition risks.</p> <p><del>and</del></p> <p><del>(c) potential to benefit from material climate-related opportunities.</del></p>
<p>65. The information required by paragraph 64 is in addition to the information on current financial effects required under ESRS 2 SBM-3 para 48 (d). The objective of this Disclosure Requirement related to:</p>	<p>28. The information required by paragraph 27 is in addition to the information on the current financial effects required under [draft] ESRS <i>Section 2 SBM-3</i> para 37 (d). The objective of this Disclosure Requirement related to anticipated financial effects due to material physical risks and</p>

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<p>(a) anticipated financial effects due to material physical risks and transition risks is to provide an understanding of how these risks have (or could reasonably be expected to have) a material influence on the undertaking's financial position, financial performance and cash flows, over the short-, medium- and long- term. The results of scenario analysis used to conduct resilience analysis as required under paragraphs AR 10 to AR 13 should inform the assessment of anticipated financial effects from material physical and transition risks.</p> <p>(b) potential to pursue material climate-related opportunities is to enable an understanding of how the undertaking may financially benefit from material climate- related opportunities. This disclosure is complementary to the key performance indicators to be disclosed in accordance with Commission Delegated Regulation (EU) 2021/2178.</p>	<p>transition risks is to provide an understanding of how these risks have (or could reasonably be expected to have) a material influence on the undertaking's financial position, financial performance and cash flows, over the short-, medium- and long-term. If the undertaking uses scenario analysis to conduct resilience analysis, the results of such analysis <del>as required under paragraphs AR 10 to AR 13</del> should inform the assessment of anticipated financial effects from material physical and transition risks.</p> <p><del>(b) potential to pursue material climate-related opportunities is to enable an understanding of how the undertaking may financially benefit from material climate- related opportunities. This disclosure is complementary to the key performance indicators to be disclosed in accordance with Commission Delegated Regulation (EU) 2021/2178.</del></p>
<p>66. The disclosure of anticipated financial effects from material physical risks required by paragraph 64 (a) shall include<sup>[13]</sup>:</p> <p>(a) the monetary amount and proportion (percentage) of assets at material physical risk over the short-, medium- and long-term before considering climate change adaptation actions; with the monetary amounts of these assets disaggregated by acute and chronic physical risk<sup>49</sup>;</p> <p>(b) the proportion of assets at material physical risk addressed by the climate change adaptation actions;</p> <p>(c) the location of significant assets at material physical risk<sup>[14]</sup>; and</p> <p>(d) the monetary amount and proportion (percentage) of net revenue from its business activities at material physical risk over the short-, medium- and long-term.</p>	<p>29. <del>The disclosure of anticipated financial effects from material physical risks required by paragraph 27 (a) shall include:</del></p> <p>(a) the monetary amount and proportion (percentage) of assets at material physical risk over the short-, medium- and long-term before considering climate change adaptation actions; with the monetary amounts of these assets disaggregated by acute and chronic physical risk;</p> <p>(b) the proportion of assets at material physical risk addressed by the climate change adaptation actions;</p> <p>(c) the location of significant assets at material physical risk; and</p> <p>(d) the monetary amount and proportion (percentage) of net revenue from its business activities at material physical risk over the short-, medium- and long-term.</p>
<p>67. The disclosure of anticipated financial effects from material transition risks required by paragraph 64 (b) shall include:</p> <p>(a) the monetary amount and proportion (percentage) of assets at material transition risk over the short-, medium- and long-term before considering climate mitigation actions;</p> <p>(b) the proportion of assets at material transition risk addressed by the climate change mitigation actions;</p> <p>(c) a breakdown of the carrying value of the undertaking's real estate assets by energyefficiency classes<sup>[15]</sup>;</p> <p>(d) liabilities that may have to be recognised in financial statements over the short-, medium- and long-term; and</p> <p>(e) the monetary amount and proportion (percentage) of net revenue from its business activities at material transition risk over the short-, medium- and long-term including, where relevant, the net revenue from the undertaking's customers operating in coal, oil and gas-related activities.</p>	<p>30. The disclosure of anticipated financial effects from material transition risks required by paragraph 27 (b) shall include:</p> <p>(a) the monetary amount and proportion (percentage) of assets at material transition risk over the short-, medium- and long-term before considering climate mitigation actions;</p> <p>(b) the proportion of assets at material transition risk addressed by the climate change mitigation actions;</p> <p>(c) a breakdown of the carrying value of the undertaking's real estate assets by energyefficiency classes;</p> <p>(d) liabilities that may have to be recognised in financial statements over the short-, medium- and long-term; and</p> <p>(e) the monetary amount and proportion (percentage) of net revenue from its business activities at material transition risk over the short-, medium- and long-term including, where relevant, the net revenue from the undertaking's customers operating in coal, oil and gas-related activities.</p>
<p>68. The undertaking shall disclose reconciliations to the relevant line items or notes in the financial statements of the following:</p> <p>(a) significant amounts of the assets and net revenue at material physical risk (as required by paragraph 66);</p> <p>(b) significant amounts of the assets, liabilities, and net revenue at material transition risk (as required by paragraph 67).</p>	<p>31. The undertaking shall disclose reconciliations to the relevant line items or notes in the financial statements of the following:</p> <p>(a) significant amounts of the assets and net revenue at material physical risk (as required by paragraph 29).</p> <p>(b) significant amounts of the assets, liabilities, and net revenue at material transition risk (as required by paragraph 30).</p>

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<p>69. For the disclosure of the potential to pursue climate-related opportunities required by paragraph 64 (c) the undertaking shall consider<sup>[16]</sup>:</p> <p>(a) its expected cost savings from climate change mitigation and adaptation actions; and</p> <p>(b) the potential market size or expected changes to net revenue from low-carbon products and services or adaptation solutions to which the undertaking has or may have access.</p>	<p>32. <i>The undertaking may disclose its potential to pursue material climate-related opportunities, to enable an understanding of how the undertaking may financially benefit from material climate-related opportunities. This disclosure is complementary to the key performance indicators to be disclosed in accordance with Commission Delegated Regulation (EU) 2021/2178.</i></p> <p>33. <i>For the disclosure of potential to pursue climate-related opportunities required by paragraph 64 (c), the undertaking may consider:</i></p> <p>(a) <i>its expected cost savings from climate change mitigation and adaptation actions; and</i></p> <p>(b) <i>the potential market size or expected changes to net revenue from low-carbon products and services or adaptation solutions to which the undertaking has or may have access.</i></p>
<p>70. A quantification of the financial effects that arise from opportunities is not required if such a disclosure does not meet the qualitative characteristics of useful information included under ESRS 1 Appendix B Qualitative characteristics of information.</p>	<p><del>70. A quantification of the financial effects that arise from opportunities is not required if such a disclosure does not meet the qualitative characteristics of useful information included under ESRS 1 Appendix B Qualitative characteristics of information.</del></p>
<p><b>ESRS E2 – POLLUTION</b></p>	
<p><b>Objective</b></p>	<p><b>Objective</b></p> <p>(Merged and simplified with rest of Environmental Objectives)</p>
<p><b>Interaction with other ESRS</b></p>	<p><b>Interaction with other ESRS</b></p>
<p><b>ESRS 2 General disclosures</b></p>	<p><b>ESRS 2 General disclosures</b></p>
<p><b>Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material pollution-related impacts, risks and opportunities</b></p> <p>11. The undertaking shall describe the process to identify material impacts, risks and opportunities and shall provide information on:</p> <p>(a) whether the undertaking has screened its site locations and business activities in order to identify its actual and potential pollution-related impacts, risks and opportunities in its own operations and upstream and downstream value chain, and if so, the methodologies, assumptions and tools used in the screening;</p> <p>(b) whether and how the undertaking has conducted consultations, in particular with affected communities.</p>	<p><del><b>Disclosure requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material pollution-related impacts, risks and opportunities</b></del></p> <p><i><b>Disclosure Requirement 9 (IR-1) – Description of the processes to identify and assess material impacts and risks</b></i></p> <p>(Centralised Section 2 AR)</p>
<p><b>Disclosure Requirement E2-1 – Policies related to pollution</b></p> <p>12. The undertaking shall describe its policies adopted to manage its material impacts, risks and opportunities related to pollution prevention and control.</p> <p>13. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of material pollution-related impacts, risks and opportunities.</p>	<p><del><b>Disclosure Requirement E1-2 – Policies related to pollution</b></del></p> <p><i><b>Disclosure Requirement 11 (IR-3) – Policies and actions in relation to sustainability matters</b></i></p> <p>(Centralised Section 3 AR)</p>

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SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
14. The disclosure required by paragraph 12 shall contain the information on the policies the undertaking has in place to manage its material impacts, risks and opportunities related to pollution in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters.	
15. The undertaking shall indicate, with regard to its own operations and its upstream and downstream value chain, whether and how its policies address the following areas where material: (a) mitigating negative impacts related to pollution of air, water and soil including prevention and control; (b) substituting and minimising the use of substances of concern, and phasing out substances of very high concern, in particular for non-essential societal use and in consumer products; and (c) avoiding incidents and emergency situations, and if and when they occur, controlling and limiting their impact on people and the environment.	
<b>Disclosure Requirement E2-2 – Actions and resources related to pollution</b>  16. The undertaking shall disclose its pollution-related actions and the resources allocated to their implementation.	<p><b>Disclosure Requirement E2-2 – Actions and resources related to Pollution</b> <i>Disclosure Requirement 11 (IR-3) – Policies and actions in relation to sustainability matters</i></p> <p>(Centralised Section 3 AR)</p>
17. The objective of this Disclosure Requirement is to enable an understanding of the key actions taken and planned to achieve the pollution-related policy objectives and targets.	
18. The description of the pollution-related action plans and resources shall contain the information prescribed in ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.	
19. In addition to ESRS 2 MDR-A, the undertaking may specify to which layer in the following mitigation hierarchy an action and resources can be allocated: (a) avoid pollution including any phase out of materials or compounds that have a negative impact (prevention of pollution at source); (b) reduce pollution, including: any phase-out of materials or compounds; meeting enforcement requirements such as Best Available Techniques (BAT) requirements; or meeting the Do No Significant Harm criteria for pollution prevention and control according to the EU Taxonomy Regulation and its Delegated Acts (minimisation of pollution); and (c) restore, regenerate and transform ecosystems where pollution has occurred (control of the impacts both from regular activities and incidents).	
<p><b>Metrics and targets</b></p> <p><b>Disclosure Requirement E2-3 – Targets related to pollution</b></p> <p>20. The undertaking shall disclose the pollution-related targets it has set.</p> <p>21. The objective of this Disclosure Requirement is to enable an understanding of the targets the undertaking has set to support its pollution-related policies and to address its material pollution-related impacts, risks and opportunities.</p>	<p><b>Metrics and targets</b> <b>Disclosure Requirement E1-4 – Targets related to pollution</b> <i>Disclosure Requirement 12 (IR-4) – Targets in relation to sustainability matters</i></p> <p>(Centralised Section 3 AR)</p>

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SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
22. The description of targets shall contain the information requirements defined in ESRS 2 MDR-T Tracking effectiveness of policies and actions through targets.	
23. The disclosure required by paragraph 20 shall indicate whether and how its targets relate to the prevention and control of: (a) air pollutants and respective specific loads; (b) emissions to water and respective specific loads; (c) pollution to soil and respective specific loads; and (d) substances of concern and substances of very high concern.	
24. In addition to ESRS 2 MDR-T, the undertaking may specify whether ecological thresholds (e.g., the biosphere integrity, stratospheric ozone-depletion, atmospheric aerosol loading, soil depletion, ocean acidification) and entity-specific allocations were taken into consideration when setting targets. If so, the undertaking may specify: (a) the ecological thresholds identified, and the methodology used to identify such thresholds; (b) whether or not the thresholds are entity-specific and if so, how they were determined; and (c) how responsibility for respecting identified ecological thresholds is allocated in the undertaking.	
25. The undertaking shall specify as part of the contextual information, whether the targets that it has set and presented are mandatory (required by legislation) or voluntary.	
<b>Disclosure Requirement E2-4 – Pollution of air, water and soil</b>	<b>Disclosure Requirement E2-1- Pollution of air, water and soil</b>
26. The undertaking shall disclose the pollutants that it emits through its own operations, as well as the microplastics it generates or uses.	34. The undertaking shall disclose the pollutants that it emits through its own operations, as well as the microplastics it generates or uses.
27. The objective of this Disclosure Requirement is to provide an understanding of the emissions that the undertaking generates to air, water and soil in its own operations, and of its generation and use of microplastics.	35. The objective of this Disclosure Requirement is to provide an understanding of <del>the emissions that the undertaking generates</del> <i>the undertaking's emissions</i> to air, water and soil in its own operations and of its generation and use of microplastics.
28. The undertaking shall disclose the amounts of: (a) each pollutant listed in Annex II of Regulation (EC) No 166/2006 of the European Parliament and of the Council <sup>64</sup> (European Pollutant Release and Transfer Register “EPRTR Regulation”) emitted to air, water and soil, with the exception of emissions of GHGs which are disclosed in accordance with ESRS E1 Climate Change <sup>65</sup> ; (b) microplastics generated or used by the undertaking.	36. <i>The undertaking shall disclose the amounts of:</i> (a) each pollutant listed in Annex II of Regulation (EC) No 166/2006 of the European Parliament and of the Council <sup>13</sup> (European Pollutant Release and Transfer Register “E-PRTR Regulation” emitted to air, water and soil, with the exception of emissions of GHGs which are disclosed in accordance with [draft] LSME ESRS E1 Climate Change; (b) microplastics generated or used by the undertaking.
29. The amounts referred in paragraph 28 shall be consolidated amounts including the emissions from those facilities over which the undertaking has financial control and those over which it has operational control. The consolidation shall include only the emissions from facilities for which the applicable threshold value specified in Annex II of Regulation (EC) No 166/2006 is exceeded.	Centralized in AR54
30. The undertaking shall put its disclosure into context and describe: (a) the changes over time, (b) the measurement methodologies; and (c) the process(es) to collect data for pollution-related accounting and reporting, including the type of data needed and the information sources.	37. The undertaking shall put its disclosure into context and describe: (a) the changes over time, (b) the measurement methodologies; and (c) the process(es) to collect data for pollution-related accounting and reporting, including the type of data needed and the information sources.



LSME ED comparison with Set 1

SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
31. When an inferior methodology compared to direct measurement of emissions is chosen to quantify emissions, the reasons for choosing this inferior methodology shall be outlined by the undertaking. If the undertaking uses estimates, it shall disclose the standard, sectoral study or sources which form the basis of its estimates, as well as the possible degree of uncertainty and the range of estimates reflecting the measurement uncertainty.	Centralized in AR55
<p><b>Disclosure Requirement E2-5 – Substances of concern and substances of very high concern</b></p> <p>32. The undertaking shall disclose information on the production, use, distribution, commercialisation and import/export of substances of concern and substances of very high concern, on their own, in mixtures or in articles.</p>	<p><b>Disclosure Requirement E2-2 – Substances of concern and substances of very high concern</b></p> <p>38. The undertaking shall disclose information on the production, use, distribution, commercialisation and import/export of substances of concern and substances of very high concern on their own, in mixtures or in articles.</p>
33. The objective of this Disclosure Requirement is to enable an understanding of the impact of the undertaking on health and the environment through substances of concern and through substances of very high concern on their own. It is also to enable an understanding of the undertaking's material risks and opportunities, including exposure to those substances and risks arising from changes in regulations.	39. The objective of this Disclosure Requirement is to enable an understanding of the impact of the undertaking on health and the environment through substances of concern and through substances of very high concern on their own. It is also to enable an understanding of the undertaking's material risks and opportunities ( <i>voluntary</i> ), including exposure to those substances and risks arising from changes in regulations.
34. The disclosure required by paragraph 32 shall include the total amounts of substances of concern that are generated or used during the production or that are procured, and the total amounts of substances of concern that leave its facilities as emissions, as products, or as part of products or services split into main hazard classes of substances of concern.	40. The disclosure required by paragraph 40 shall include the total amounts of substances of concern that are generated or used during the production or that are procured, and the total amounts of substances of concern that leave its facilities as emissions, as products, or as part of products or services split into main hazard classes of substances of concern
35. The undertaking shall present separately the information for substances of very high concern.	41. The undertaking shall present separately the information for the total amount of substances of very high concern.
<p><b>Disclosure Requirement E2-6 – Anticipated financial effects from material pollution-related risks and opportunities</b></p> <p>36. The undertaking shall disclose the anticipated financial effects of material pollution related risks and opportunities.</p>	<p><del><b>Disclosure Requirement E2-6 – Anticipated financial effects from material pollution-related risks and opportunities</b></del>  <b>Anticipated financial effects from material environmental-related matters other than climate (E6)</b></p> <p>(Merged and simplified with rest of the Anticipated financial effect other than climate page 19)</p> <p>65. The undertaking shall disclose <del>the</del> its anticipated financial effects of material impacts and risks related to pollution <del>related risks and opportunities</del>, <i>water and marine resources, biodiversity and ecosystems and circular economy, when the respective matter is material</i></p>
37. The information required by paragraph 36 is in addition to the information on current financial effects on the undertaking's, financial position, financial performance and cash flows for the reporting period required under ESRS 2 SBM-3 para 48 (d).	66. The information required by paragraph 63 is in addition to the information on current financial effects on the <del>undertaking's</del> <i>entity's</i> financial position, financial performance and cash flows for the reporting period required under <i>Section 2 SBM-3 paragraph 37 (d)</i> .
38. The objective of this Disclosure Requirement is to provide an understanding of: (a) anticipated financial effects due to material risks arising from pollution-related impacts and dependencies and how these risks have (or could reasonably be expected to have) a material influence on the undertaking's, financial position financial performance and cash flows, over the short-, medium- and long-term.	67. The objective of this Disclosure Requirement is to provide an understanding of: (a) anticipated financial effects due to material risks arising from <del>pollution-related</del> impacts and dependencies <i>related to pollution, water and marine resources, biodiversity and ecosystems and circular economy</i> , and how these risks have (or could reasonably

LSME ED comparison with Set 1

SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
(b) anticipated financial effects due to material opportunities related to pollution prevention and control.	be expected to have) a material influence on the undertaking's financial position, financial performance and cash flows over the short-, medium- and long-term; and (b) <i>on a voluntary basis</i> , anticipated financial effects due to material opportunities related to pollution <del>prevention and control</del> , <i>water and marine resources, biodiversity and ecosystems and circular economy</i> .
39. The disclosure shall include: (a) a quantification of the anticipated financial effects in monetary terms before considering pollution-related actions, or where not possible without undue cost or effort, qualitative information. For financial effects arising from opportunities, a quantification is not required if it would result in disclosure that does not meet the qualitative characteristics of information (see ESRS 1 Appendix B Qualitative characteristics of information); (b) a description of the effects considered, the related impacts and the time horizons in which they are likely to materialise; and (c) the critical assumptions used to quantify the anticipated financial effects, as well as the sources and level of uncertainty of those assumptions.	68. The disclosure <i>required by paragraph 63</i> shall include: (a) a quantification of the anticipated financial effects in monetary terms <del>before considering pollution related actions</del> , or where not possible without undue cost or effort qualitative information ( <i>for opportunities, such quantification is not required</i> ). <i>The quantification of the anticipated financial effects in monetary terms may be a single amount or a range</i> ; (b) a description of the effects considered, the related impacts <i>and dependencies to which they relate</i> and the time horizons in which they are likely to materialise; and (c) the critical assumptions used to quantify the anticipated financial effects, as well as the sources and level of uncertainty attached to those assumptions.
40. The information provided under paragraph 38(a) shall include: (a) the share of net revenue made with products and services that are or that contain substances of concern, and the share of net revenue made with products and services that are or that contain substances of very high concern; (b) the operating and capital expenditures incurred in the reporting period in conjunction with major incidents and deposits; (c) the provisions for environmental protection and remediation costs, e.g., for rehabilitating contaminated sites, recultivating landfills, removal of environmental contamination at existing production or storage sites and similar measures.	<del>40. The information provided under paragraph 38(a) shall include: (a) the share of net revenue made with products and services that are or that contain substances of concern, and the share of net revenue made with products and services that are or that contain substances of very high concern; (b) the operating and capital expenditures incurred in the reporting period in conjunction with major incidents and deposits; (c) the provisions for environmental protection and remediation costs, e.g., for rehabilitating contaminated sites, recultivating landfills, removal of environmental contamination at existing production or storage sites and similar measures.</del>
41. The undertaking shall disclose any relevant contextual information including a description of material incidents and deposits whereby pollution had negative impacts on the environment and/or is expected to have negative effects on the undertaking's financial cash flows, financial position and financial performance with short-, medium- and long-term time horizons.	<del>41. The undertaking shall disclose any relevant contextual information including a description of material incidents and deposits whereby pollution had negative impacts on the environment and/or is expected to have negative effects on the undertaking's financial cash flows, financial position and financial performance with short-, medium- and long-term time horizons.</del>
	69. For anticipated financial effects arising from material physical and transition risks, the undertaking shall refer to Disclosure Requirement E1-4 of this section.
	70. For anticipated financial effects arising from material climate-related opportunities, the undertaking shall refer to Disclosure Requirement E1-4 of this section.
<b>ESRS E3 - WATER AND MARINE RESOURCES</b>	
<b>Objective</b>	<b>Objective</b>  (Merged and simplified with rest of Environmental Objectives)
<b>Interaction with other ESRS</b>	<b>Interaction with other ESRS</b>
<b>ESRS 2 General disclosures</b>	<b>ESRS 2 General disclosures</b>
<b>Impact, risk and opportunity management</b>	<b>Impact, risk and opportunity management</b>  <b>Disclosure Requirement related to ESRS 2 IRO 1 – Description of</b>

LSME ED comparison with Set 1

SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
<p><b>Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities</b></p> <p>8. The undertaking shall describe the process to identify material impacts, risks and opportunities and shall provide information on:            (a) whether and how the undertaking it has screened its assets and activities in order to identify its actual and potential water and marine resources-related impacts, risks and opportunities in its own operations and its upstream and downstream value chain, and if so the methodologies, assumptions and tools used in the screening;            (b) whether and how it has conducted consultations, in, with affected communities[1].</p>	<p><del>the processes to identify and assess material water and marine resources-related impacts, risks and opportunities</del>  <b>Disclosure Requirement 9 (IR-1) – Description of the processes to identify and assess material impacts and risks</b></p> <p>(Centralised Section 2 AR)</p>
<p><b>Disclosure Requirement E3-1 – Policies related to water and marine resources</b></p> <p>9. The undertaking shall describe its policies adopted to manage its material impacts, risks and opportunities related to water and marine resources[32].</p>	<p><del>Disclosure Requirement E3-1 – Policies related to water and marine resources</del>  <b>Disclosure Requirement 11 (IR-3) – Policies and actions in relation to sustainability matters</b></p> <p>(Centralised Section 3 AR)</p>
<p>10. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of its material water and marine resources-related impacts, risks and opportunities.</p>	
<p>11. The disclosure required by paragraph 9 shall contain the information on the policies the undertaking has in place to manage its material impacts, risks and opportunities related to water and marine resources in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters.</p>	
<p>12. The Disclosure Requirements in ESRS 2, in topical ESRS and in sector-specific ESRS are structured into the following reporting areas:            (a) Governance (GOV): the governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities (see ESRS 2, chapter 2 Governance);            (b) Strategy (SBM): how the undertaking’s strategy and business model interact with its material impacts, risks and opportunities, including how the undertaking addresses those impacts, risks and opportunities (see ESRS 2, chapter 3 Strategy);            (c) Impact, risk and opportunity management (IRO): the process(es) by which the undertaking:</p>	

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SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
<p>i. identifies impacts, risks and opportunities and assesses their materiality (see IRO-1 in section 4.1 of ESRS 2),</p> <p>ii. manages material sustainability matters through policies and actions (see section 4.2 of ESRS 2).</p> <p>(d) Metrics and targets (MT): the undertaking's performance, including targets it has set and progress towards meeting them (see ESRS 2, chapter 5 Metrics and targets).</p>	
<p>13. If at least one of the sites of the undertaking is located in an area of high-water stress and it is not covered by a policy, the undertaking shall state this to be the case and provide reasons for not having adopted such a policy. The undertaking may disclose a timeframe in which it aims to adopt such a policy.[33]</p>	
<p>14. The undertaking shall specify whether it has adopted policies or practices related to sustainable oceans and seas[34].</p>	
<p><b>Disclosure Requirement E3-2 - Actions and resources related to water and marine resources</b></p>	<p><del><b>Disclosure Requirement E3-2 - Actions and resources related to water and marine resources</b></del>  <b>Disclosure Requirement 11 (IR-3) - Policies and actions in relation to sustainability matters</b></p>
<p>15. The undertaking shall disclose its water and marine resources-related actions and the resources allocated to their implementation.</p>	<p>(Centralised Section 3 AR)</p>
<p>16. The objective of this Disclosure Requirement is to enable an understanding of the key actions taken and planned to achieve the water and marine resources-related policy objectives and targets.</p>	
<p>17. The description of the actions and resources shall follow the principles defined in ESRS 2 MDR-A Actions and resources in relation to material sustainability matters. In addition to ESRS 2 MDR-A, the undertaking may specify to which layer in the mitigation hierarchy an action and</p>	
<p>18. Resources can be allocated to:</p> <p>(a) avoid the use of water and marine resources;</p> <p>(b) reduce the use of water and marine resources such as through efficiency measures;</p> <p>(c) reclaiming and reuse of water; or</p> <p>(d) restoration and regeneration of aquatic ecosystem and water bodies.</p> <p>19. The undertaking shall specify actions and resources in relation to areas at water risk, including areas of high-water stress.</p>	
<p><b>Metrics and targets</b></p> <p><b>Disclosure Requirement E3-3 - Targets related to water and marine resources</b></p>	<p><del><b>Metrics and targets</b></del>  <del><b>Disclosure Requirement E3-3 - Targets related to water and marine resources</b></del>  <b>Disclosure Requirement 12 (IR-4) - Targets in relation to sustainability matters</b></p>
<p>20. The undertaking shall disclose the water and marine resources-related targets it has set.</p>	<p>(Centralised Section 3 AR)</p>

LSME ED comparison with Set 1

SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
21. The objective of this Disclosure Requirement is to enable an understanding of the targets the undertaking has adopted to support its water and marine resources-related policies and address its material water and marine resources-related impacts, risks and opportunities.	
22. The description of the targets shall contain the information requirements defined in ESRS 2 MDR-T Tracking effectiveness of policies and actions through targets.	
23. The disclosure required by paragraph 20 shall indicate whether and how its targets relate to: (a) the management of material impacts, risks and opportunities related to areas at water risk, including improvement of the water quality; (b) the responsible management of marine resources impacts, risks and opportunities including the nature and quantity of marine resources-related commodities (such as gravels, deep-sea minerals, seafood) used by the undertaking; and (c) the reduction of water consumption, including an explanation of how those targets relate to areas at water risk, including areas of high water-stress.	
24. In addition to ESRS 2 MDR-T, the undertaking may specify whether ecological thresholds and entity-specific allocations were taken into consideration when setting targets. If so, the undertaking may specify: (a) the ecological thresholds identified, and the methodology used to identify such thresholds; (b) whether or not the thresholds are entity-specific and if so, how they were determined; and (c) how responsibility for respecting identified ecological thresholds is allocated in the undertaking.	
25. The undertaking shall specify as part of the contextual information, whether the targets it has set and presented are mandatory (required by legislation) or voluntary.	
<b>Disclosure Requirement E3-4 – Water consumption</b>	<b>Disclosure Requirement E3-1 – Water consumption</b>
26. The undertaking shall disclose information on its water consumption performance related to its material impacts, risks and opportunities.	42. The undertaking shall disclose information on its water consumption performance related to its material impacts, risks, and opportunities <i>(if the undertaking reports on opportunities on a voluntary basis)</i> .
27. The objective of this Disclosure Requirement is to provide an understanding of the undertaking's water consumption and any progress by the undertaking in relation to its targets.	43. The objective of this Disclosure Requirement is to provide an understanding of the undertaking's water consumption <del>and any progress by the undertaking in relation to its targets.</del>
28. The disclosure required by paragraph 26 relates to own operations and shall include: (a) total water consumption in m3; (b) total water consumption in m3 in areas at water risk, including areas of high-water stress; (c) total water recycled and reused in m3; <sup>[35]</sup> (d) total water stored and changes in storage in m3; and (e) any contextual information necessary regarding points (a) to (d), including the water basins' water quality and quantity, how the data have been compiled, such as any standards, methodologies, and assumptions used, including whether the information is calculated, estimated, modelled, or sourced from direct measurements, and the approach taken for this, such as the use of any sector-specific factors.	44. The disclosure required by paragraph 45 relates to own operations and shall include: (a) total water consumption in m3; (b) total water consumption in m3 in areas at material water risk, including areas of high-water stress; (c) <b>total water recycled and reused in m3;</b> (d) total water stored and changes in storage in m3; (e) any contextual information necessary regarding points (a) and (d), including the water basins' water quality and quantity, how the data have been compiled, such as any standards, methodologies, and assumptions used, including whether the information is calculated, estimated, modelled, or sourced from direct measurements, and the approach taken for this, such as of the use of any sector-specific sectors.

LSME ED comparison with Set 1

SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
29. The undertaking shall provide information on its water intensity: total water consumption in its own operations in m3 per million EUR net revenue <sup>76</sup> .	45. The undertaking shall provide information on its water intensity: total water consumption in its own operations in m3 per million EUR net revenue.
<b>Disclosure Requirement E3-5 – Anticipated financial effects from material water and marine resources-related risks and opportunities</b>	<b>Disclosure Requirement E2-6 – Anticipated financial effects from material pollution-related risks and opportunities</b>
30. The undertaking shall disclose the anticipated financial effects of material water and marine resources-related risks and opportunities.	<b>Anticipated financial effects from material environmental-related matters other than climate (E6)</b>
31. The information required by paragraph 30 is in addition to the information on current financial effects on the entity’s financial position, financial performance and cash flows for the reporting period required under ESRS 2 SBM-3 para 48 (d).	(Merged and simplified with rest of Anticipated financial effect other than climate page 19)
32. The objective of this Disclosure Requirement is to provide an understanding of: (a) anticipated financial effects due to material risks arising from water and marine resources-related impacts and dependencies and how these risks have (or could reasonably be expected to have) a material influence on the undertaking’s financial position, financial performance and cash flows, over the short-, medium- and long-term; and (b) anticipated financial effects due to material opportunities related to water and marine resources.	
33. The disclosure shall include: (a) a quantification of the anticipated financial effects in monetary terms before considering water and marine resources-related actions or where not possible without undue cost or effort, qualitative information. For financial effects arising from opportunities, a quantification is not required if it would result in disclosure that does not meet the qualitative characteristics of information (see ESRS 1 Appendix B Qualitative characteristics of information); (b) a description of the effects considered, the impacts and dependencies to which they relate, and the time horizons in which they are likely to materialise; and (c) the critical assumptions used to quantify the anticipated financial effects, as well as the sources and level of uncertainty of those assumptions.	
<b>ESRS E4 - BIODIVERSITY AND ECOSYSTEMS</b>	
<b>Objective</b>	<b>Objective</b>  (Merged and simplified with rest of Environmental Objectives)
<b>Interaction with other ESRS</b>	<b>Interaction with other ESRS</b>
<b>ESRS 2 General disclosures</b>	<b>ESRS 2 General disclosures</b>
<b>Strategy</b>  <b>Disclosure Requirement E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model</b>  11. The undertaking shall disclose how its biodiversity and ecosystem impacts, dependencies, risks and opportunities originate from and trigger adaptation of its strategy and business model. 12. The objective of this Disclosure Requirement is to enable an understanding of the resilience of the undertaking’s strategy and business model in relation to biodiversity and ecosystems, and of	<b>Strategy</b>  <b>Disclosure Requirement E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model</b>



LSME ED comparison with Set 1

SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
<p>the compatibility of the undertaking's strategy and business model with regard to relevant local, national and global public policy targets related to biodiversity and ecosystems.</p>	
<p>13. The undertaking shall describe the resilience of its strategy and business model in relation to biodiversity and ecosystems. The description shall include:</p> <ul style="list-style-type: none"> <li>(a) an assessment of the resilience of the current business model and strategy to biodiversity and ecosystems-related physical, transition and systemic risks;</li> <li>(b) the scope of the resilience analysis in relation to the undertaking's own operations and its upstream and downstream value chain and in relation to the risks considered in that analysis;</li> <li>(c) the key assumptions made;</li> <li>(d) the time horizons used;</li> <li>(e) the results of the resilience analysis; and</li> <li>(f) the involvement of stakeholders, including, where appropriate, holders of indigenous and local knowledge.</li> </ul>	
<p>14. If information specified in this disclosure requirement is disclosed by the undertaking as part of the information required under ESRS 2 SBM-3, the undertaking may refer to the information it has disclosed under ESRS 2 SBM-3.</p>	
<p>15. The undertaking may disclose its transition plan to improve and, ultimately, achieve alignment of its business model and strategy with the vision of the Kunming-Montreal Global Biodiversity Framework and its relevant goals and targets, the EU Biodiversity Strategy for 2030, and with respecting planetary boundaries related to biosphere integrity and land-system change.</p>	
<p><b>Disclosure Requirement SBM 3 – Material impacts, risks and opportunities and their interaction with strategy and business model</b></p> <p>16. The undertaking shall disclose:</p> <ul style="list-style-type: none"> <li>(a) a list of material sites in its own operations, including sites under its operational control, based on the results of paragraph 17(a). The undertaking shall disclose these locations by: <ul style="list-style-type: none"> <li>i. specifying the activities negatively affecting biodiversity sensitive areas<sup>80</sup>;</li> <li>ii. providing a breakdown of sites according to the impacts and dependencies identified, and to the ecological status of the areas (with reference to the specific ecosystem baseline level) where they are located; and</li> <li>iii. specifying the biodiversity-sensitive areas impacted, for users to be able to determine the location and the responsible competent authority with regards to the activities specified in paragraph 16(a) i.</li> </ul> </li> <li>(b) whether it has identified material negative impacts with regards to land degradation, desertification or soil sealing<sup>81</sup>; and</li> <li>(c) whether it has operations that affect threatened species<sup>82</sup>.</li> </ul> <p>Impact, risk and opportunity management</p>	<p><b>Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts <i>and</i> risks <i>and</i> opportunities and their interaction with strategy and business model(s)</b></p> <p>(Centralised Section 2 AR)</p> <p><b>Disclosure Requirement related to ESRS 2 IRO 1 – Description of</b></p>

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<p><b>Disclosure Requirement related to ESRS 2 IRO-1 Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities</b></p> <p>17. The undertaking shall describe its process to identify material impacts, risks, dependencies and opportunities. The description of the process shall include whether and how the undertaking:</p> <ul style="list-style-type: none"> <li>(a) identified and assessed actual and potential impacts on biodiversity and ecosystems at own site locations and in the upstream and downstream value chain, including assessment criteria applied;</li> <li>(b) identified and assessed dependencies on biodiversity and ecosystems and their services at own site locations and in the upstream and downstream value chain, including assessment criteria applied, and, if this assessment includes ecosystem services that are disrupted or likely to be;</li> <li>(c) identified and assessed transition and physical risks and opportunities related to biodiversity and ecosystems, including assessment criteria applied based on its impacts and dependencies;</li> <li>(d) considered systemic risks;</li> <li>(e) conducted consultations with affected communities on sustainability assessments of shared biological resources and ecosystems and, in particular: <ul style="list-style-type: none"> <li>i. when a site, a raw material production or sourcing is likely to negatively impact biodiversity and ecosystems, the identification of the specific sites, raw materials production or sourcing with negative or potentially negative impacts on affected communities;</li> <li>ii. when affected communities are likely to be impacted, the undertaking, shall disclose how these communities were involved in the materiality assessment; and</li> <li>iii. with respect to impacts on ecosystem services of relevance to affected communities in its own operations, the undertaking shall indicate how negative impacts may be avoided. If these impacts are unavoidable, the undertaking may indicate its plans to minimise them and implement mitigation measures that aim to maintain the value and functionality of priority services.</li> </ul> </li> </ul> <p>18. The undertaking may disclose whether and how it has used biodiversity and ecosystems scenario analysis to inform the identification and assessment of material risks and opportunities over short-, medium- and long-term time horizons. If the undertaking has used such scenario analysis, it may disclose the following information:</p> <ul style="list-style-type: none"> <li>(a) why the considered scenarios were selected;</li> <li>(b) how the considered scenarios are updated according to evolving conditions and emerging trends; and</li> <li>(c) whether the scenarios are informed by expectations published by authoritative intergovernmental bodies, such as the Convention for Biological Diversity and, where relevant, by scientific consensus, such as that expressed by the Intergovernmental Science-policy Platform on Biodiversity and Ecosystem Services (IPBES).</li> </ul> <p>19. The undertaking shall specifically disclose:</p>	<p><del>the processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities</del></p> <p><b>Disclosure Requirement 9 (IR-1) – Description of the processes to identify and assess material impacts and risks</b></p> <p>(Centralised Section 2 AR)</p>

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<p>(a) whether or not it has sites located in or near biodiversity-sensitive areas and whether activities related to these sites negatively affect these areas by leading to the deterioration of natural habitats and the habitats of species and to the disturbance of the species for which a protected area has been designated; and</p> <p>(b) whether it has been concluded that it is necessary to implement biodiversity mitigation measures, such as those identified in: Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds; Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora; an Environmental Impact Assessment (EIA) as defined in Article 1(2), point (g), of Directive 2011/92/EU of the European Parliament and of the Council[42] on the assessment of the effects of certain public and private projects on the environment; and for activities located in third countries, in accordance with equivalent national provisions or international standards, such as the International Finance Corporation (IFC) Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources.</p>	
<p><b>Disclosure Requirement E4-2 – Policies related to biodiversity and ecosystems</b></p> <p>20. The undertaking shall describe its adopted policies to manage its material impacts, risks, dependencies, and opportunities related to biodiversity and ecosystems.</p>	<p><del><b>Disclosure Requirement E4-2 – Policies related to biodiversity and ecosystems</b></del>  <b>Disclosure Requirement 11 (IR-3) – Policies and actions in relation to sustainability matters</b></p> <p>(Centralised Section 3 AR)</p>
<p>21. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of its material biodiversity and ecosystem- related impacts, dependencies, risks and opportunities.</p>	
<p>22. The disclosure required by paragraph 20 shall contain the information on the policies the undertaking has in place to manage its material impacts, risks, dependencies and opportunities related to biodiversity and ecosystems in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters).</p>	
<p>23. In addition to the provisions of ESRS 2 MDR-P the undertaking shall describe whether and how its biodiversity and ecosystems-related policies:</p> <p>(a) relate to the matters specified in ESRS E4 AR 4;</p> <p>(b) relate to its material biodiversity and ecosystems-related impacts;</p> <p>(c) relate to material dependencies and material physical and transition risks and opportunities;</p> <p>(d) support traceability of products, components and raw materials with material actual or potential impacts on biodiversity and ecosystems along the value chain;</p> <p>(e) address production, sourcing or consumption from ecosystems that are managed to maintain or enhance conditions for biodiversity, as demonstrated by regular monitoring and reporting of biodiversity status and gains or losses; and</p> <p>(f) address social consequences of biodiversity and ecosystems-related impacts.</p>	
<p>24. The undertaking shall specifically disclose whether it has adopted:</p> <p>(a) biodiversity and ecosystem protection policy covering operational sites owned,</p>	

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<p>leased, or managed in or near a biodiversity sensitive area;                      (b) sustainable land / agriculture practices or policies<sup>84</sup>;                      (c) sustainable oceans / seas practices or policies<sup>85</sup>; and                      (d) policies to address deforestation<sup>86</sup>.</p>	
<p><b>Disclosure Requirement E4-3 – Actions and resources related to biodiversity and ecosystems</b></p>	<p><b>Disclosure Requirement E4-2 – Actions and resources related to biodiversity and ecosystems</b>  <b>Disclosure Requirement 11 (IR-3) – Policies and actions in relation to sustainability matters</b></p>
<p>25. The undertaking shall disclose its biodiversity and ecosystems-related actions and the resources allocated to their implementation.</p>	
<p>26. The objective of this Disclosure Requirement is to enable an understanding of the key actions taken and planned that significantly contribute to the achievement of biodiversity and ecosystems-related policy objectives and targets.</p>	(Centralised Section 3 AR)
<p>27. The description of key actions and resources shall follow the mandatory content defined in ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.</p>	
<p>28. In addition, the undertaking :</p> <p>(a) may disclose how it has applied the mitigation hierarchy with regard to its actions (avoidance, minimisation, restoration/rehabilitation, and compensation or offsets);                      (b) shall disclose whether it used biodiversity offsets in its action plans. If the actions contain biodiversity offsets, the undertaking shall include the following information:                      i. the aim of the offset and key performance indicators used;                      ii. the financing effects (direct and indirect costs) of biodiversity offsets in monetary terms; and;                      iii. a description of offsets including area, type, the quality criteria applied and the standards that the biodiversity offsets comply with;                      (c) shall describe whether and how it has incorporated local and indigenous knowledge and nature- based solutions into biodiversity and ecosystems-related actions.</p>	
<p><b>Metrics and targets</b></p>	<p><b>Disclosure Requirement E3-3 – Targets related to biodiversity and ecosystems</b>  <b>Disclosure Requirement 12 (IR-4) – Targets in relation to sustainability matters</b></p>
<p><b>Disclosure Requirement E4-4 – Targets related to biodiversity and ecosystems</b></p>	(Centralised Section 3 AR)
<p>29. The undertaking shall disclose the biodiversity and ecosystem-related targets it has set.</p>	
<p>30. The objective of this Disclosure Requirement is to allow an understanding of the targets the undertaking has adopted to support its biodiversity and ecosystems policies and address its material related impacts, dependencies, risks and opportunities.</p>	
<p>31. The description of the targets shall follow the mandatory content defined in ESRS 2 MDR-T Tracking effectiveness of policies and actions through targets.</p>	
<p>32. The disclosure required by paragraph 29 shall include the following information:                      (a) whether ecological thresholds and allocations of impacts to the undertaking were applied when setting targets. If so, the undertaking shall specify:</p>	

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<p>i. the ecological thresholds identified and the methodology used to identify such thresholds;</p> <p>ii. whether or not the thresholds are entity-specific and if so, how they were determined; and</p> <p>iii. how responsibility for respecting identified ecological thresholds is allocated in the undertaking;</p> <p>(b) whether the targets are informed by, and/or aligned with the Kunming-Montreal Global Biodiversity Framework, relevant aspects of the EU Biodiversity Strategy for 2030 and other biodiversity and ecosystem-related national policies and legislation;</p> <p>(c) how the targets relate to the biodiversity and ecosystem impacts, dependencies, risks and opportunities identified by the undertaking in relation to its own operations and its upstream and downstream value chain;</p> <p>(d) the geographical scope of the targets, if relevant;</p> <p>(e) whether or not the undertaking used biodiversity offsets in setting its targets; and</p> <p>(f) to which of the layers of the mitigation hierarchy the target can be allocated (i.e., avoidance, minimisation, restoration and rehabilitation, compensation or offsets).</p>	
<p><b>Disclosure Requirement E4-5 – Impact metrics related to biodiversity and ecosystems</b></p> <p>33. The undertaking shall report metrics related to its material impacts on biodiversity and ecosystems.</p>	<p><b>Disclosure Requirement E4-1 – Impact metrics related to biodiversity and ecosystems change</b></p> <p>46. The undertaking shall report metrics related to its material impacts on biodiversity and ecosystems.</p>
<p>34. The objective of this Disclosure Requirement is to enable an understanding of the performance of the undertaking against impacts identified as material in the materiality assessment on biodiversity and ecosystems change.</p>	<p>47. The objective of this Disclosure Requirement is to enable an understanding of the performance of the undertaking against impacts identified as material in the materiality assessment on biodiversity and ecosystems change.</p>
<p>35. If the undertaking identified sites located in or near biodiversity-sensitive areas that it is negatively affecting (see paragraph 19(a)), the undertaking shall disclose the number and area (in hectares) of sites owned, leased or managed in or near these protected areas or key biodiversity areas.</p>	<p>48. If the undertaking has identified <i>owned, leased or managed</i> sites located in or near biodiversity-sensitive areas <i>which are negatively affected</i> (see [draft] Section 2 AR 27) by the activity of those sites, the undertaking shall disclose the number and area (in hectares) of sites in or near these protected areas or key biodiversity areas.</p>
<p>36. If the undertaking has identified material impacts with regards to land-use change, or impacts on the extent and condition of ecosystems, it may also disclose their land-use based on a Life Cycle Assessment.</p>	<p>49. If the undertaking has identified material impacts with regards to land-use change, or impacts on the extent and condition of ecosystems, it may also disclose their land-use based on a Life Cycle Assessment.</p>
<p>37. For datapoints specified in paragraphs 38 to 41, the undertaking shall consider its own operations.</p>	<p><del>37. For datapoints specified in paragraphs 38 to 41, the undertaking shall consider its own operations.</del></p>
<p>38. If the undertaking has concluded that it directly contributes to the impact drivers of land-use change, freshwater-use change and/or sea-use change, it shall report relevant metrics. The undertaking may disclose metrics that measure:</p> <p>(a) the conversion over time (e.g. 1 or 5 years) of land cover (e.g. deforestation or mining);</p> <p>(b) changes over time (e.g. 1 or 5 years) in the management of the ecosystem (e.g., through the intensification of agricultural management, or the application of better management practices or forestry harvesting);</p> <p>(c) changes in the spatial configuration of the landscape (e.g. fragmentation of habitats, changes in ecosystem connectivity);</p>	<p>50. If the undertaking has concluded that it directly contributes to the impact drivers of land-use change, water-use change <del>freshwater-use change</del> and/ or sea-use change, the undertaking shall report relevant metrics. The undertaking <i>shall consider its own operations and</i> may disclose metrics that measure:</p> <p>(a) the conversion over time (e.g., 1 or 5 years) of land cover (e.g., deforestation or mining);</p> <p>(b) changes over time (e.g., 1 or 5 years) in the management of the ecosystem (e.g., through the intensification of agricultural management, or the application of better management practices or forestry harvesting);</p>

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<p>(d) changes in ecosystem structural connectivity (e.g. habitat permeability based on physical features and arrangements of habitat patches); and</p> <p>(e) the functional connectivity (e.g. how well genes or individuals move through land, freshwater and seascape).</p>	<p>(c) changes in the spatial configuration of the landscape (e.g., fragmentation of habitats, changes in ecosystem connectivity);</p> <p>(d) changes in ecosystem structural connectivity (e.g., habitat permeability based on physical features and arrangements of habitat patches); and</p> <p>(e) the functional connectivity (e.g., how well genes or individuals move through land, freshwater and seascape).</p>
<p>39. If the undertaking concluded that it directly contributes to the accidental or voluntary introduction of invasive alien species, the undertaking may disclose the metrics it uses to manage pathways of introduction and spread of invasive alien species and the risks posed by invasive alien species.</p>	<p><del>39. If the undertaking concluded that it directly contributes to the accidental or voluntary introduction of invasive alien species, the undertaking may disclose the metrics it uses to manage pathways of introduction and spread of invasive alien species and the risks posed by invasive alien species.</del></p> <p>51. The undertaking may disclose additional metrics related to the introduction of invasive or alien species or the ecosystem condition and extent.</p>
<p>40. If the undertaking identified material impacts related to the state of species, the undertaking may report metrics it considers relevant. The undertaking may:</p> <p>(a) refer to relevant disclosure requirements in ESRS E1, ESRS E2, ESRS E3, and ESRS E5;</p> <p>(b) consider population size, range within specific ecosystems as well as extinction risk. These aspects provide insight on the health of a single species' population and its relative resilience to human induced and naturally occurring change;</p> <p>(c) disclose metrics that measure changes in the number of individuals of a species within a specific area;</p> <p>(d) disclose metrics on species at extinction risk<sup>[46]</sup> that measure:</p> <p>i. the threat status of species and how activities/pressures may affect the threat status; or</p> <p>ii. changes in the relevant habitat for a threatened species as a proxy for the undertaking's impact on the local population's extinction risk.</p>	<p><del>40. If the undertaking identified material impacts related to the state of species, the undertaking may report metrics it considers relevant. The undertaking may:</del></p> <p><del>(a) refer to relevant disclosure requirements in ESRS E1, ESRS E2, ESRS E3, and ESRS E5;</del></p> <p><del>(b) consider population size, range within specific ecosystems as well as extinction risk. These aspects provide insight on the health of a single species' population and its relative resilience to human induced and naturally occurring change;</del></p> <p><del>(c) disclose metrics that measure changes in the number of individuals of a species within a specific area;</del></p> <p><del>(d) disclose metrics on species at extinction risk<sup>[46]</sup> that measure:</del></p> <p><del>i. the threat status of species and how activities/pressures may affect the threat status; or</del></p> <p><del>ii. changes in the relevant habitat for a threatened species as a proxy for the undertaking's impact on the local population's extinction risk.</del></p>
<p>41. If the undertaking identified material impacts related to ecosystems, it may disclose:</p> <p>(a) with regard to ecosystems extent, metrics that measure area coverage of a particular ecosystem without necessarily considering the quality of the area being assessed, such as habitat cover. For example, forest cover is a measure of the extent of a particular ecosystem type, without factoring in the condition of the ecosystem (e.g., provides the area without describing the species diversity within the forest).</p> <p>(b) with regard to ecosystems condition:</p> <p>i. metrics that measure the quality of ecosystems relative to a pre-determined reference state;</p> <p>ii. metrics that measure multiple species within an ecosystem rather than the number of individuals within a single species within an ecosystem (for example: scientifically established species richness and abundance indicators that measure the development of (native) species composition within an ecosystem against the reference state at the beginning of the first reporting period as well as the targeted state outlined in the Kunming-Montreal Global Biodiversity Framework, or an aggregation of species' conservation status if relevant); or iii. metrics that reflect</p>	<p><del>41. If the undertaking identified material impacts related to ecosystems, it may disclose:</del></p> <p><del>(a) with regard to ecosystems extent, metrics that measure area coverage of a particular ecosystem without necessarily considering the quality of the area being assessed, such as habitat cover. For example, forest cover is a measure of the extent of a particular ecosystem type, without factoring in the condition of the ecosystem (e.g., provides the area without describing the species diversity within the forest).</del></p> <p><del>(b) with regard to ecosystems condition:</del></p> <p><del>i. metrics that measure the quality of ecosystems relative to a pre-determined reference state;</del></p> <p><del>ii. metrics that measure multiple species within an ecosystem rather than the number of individuals within a single species within an ecosystem (for example: scientifically established species richness and abundance indicators that measure the development of (native) species composition within an ecosystem against the reference state at the beginning of the first reporting period as well as the targeted state outlined in the Kunming-Montreal Global Biodiversity Framework, or an aggregation of species' conservation status if relevant); or iii. metrics that reflect</del></p>



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structural components of condition such as habitat connectivity (i.e., how linked habitats are to each other).	<del>structural components of condition such as habitat connectivity (i.e., how linked habitats are to each other).</del>
<b>Disclosure Requirement E4-6 – Anticipated financial effects from material biodiversity and ecosystem-related risks and opportunities</b>	<b><del>Disclosure Requirement E2-6 – Anticipated financial effects from material pollution-related risks and opportunities</del></b>
42. The undertaking shall disclose its anticipated financial effects of material biodiversity- and ecosystem-related risks and opportunities.	<b><i>Anticipated financial effects from material environmental-related matters other than climate (E6)</i></b>  (Merged and simplified with rest of Anticipated financial effect other than climate page 19)
43. The information required by paragraph 42 is in addition to the information on current financial effects on the entity’s financial position, financial performance and cash flows for the reporting period required under ESRS 2 SBM-3 para 48 (d).	
44. The objective of this Disclosure Requirement is to provide an understanding of: (a) anticipated financial effects due to material risks arising from biodiversity- and ecosystem-related impacts and dependencies and how these risks have (or could reasonably be expected to have) a material influence on the undertaking’s financial position, financial performance and cash flows over the short-, medium- and long-term; and (b) anticipated financial effects due to material opportunities related to biodiversity- and ecosystem.	
45. The disclosure shall include: (a) a quantification of the anticipated financial effects in monetary terms before considering biodiversity and ecosystems-related actions or where not possible without undue cost or effort, qualitative information. For financial effects arising from material opportunities, a quantification is not required if it would result in disclosure that does not meet the qualitative characteristics of information (see ESRS 1 Appendix B Qualitative characteristics of information). The quantification of the anticipated financial effects in monetary terms may be a single amount or a range; (b) a description of the effects considered, the impacts and dependencies to which they relate and the time horizons in which they are likely to materialise; and (c) the critical assumptions used to quantify the anticipated financial effects as well as the sources and the level of uncertainty of those assumptions.	
<b>ESRS E5 - RESOURCE USE AND CIRCULAR ECONOMY</b>	
<b>Objective</b>	<b>Objective</b>  (Merged and simplified with rest of Environmental Objectives)
<b>Interactions with other ESRS</b>	<b><del>Interactions with other ESRS</del></b>
<b>ESRS 2 General disclosures</b>	<b><del>ESRS 2 General disclosures</del></b>
<b>Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities</b>	<b><del>Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities</del></b> <b><i>Disclosure Requirement 9 (IR-1) – Description of the processes to identify and assess material impacts and risks</i></b>

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<p>11. The undertaking shall describe the process to identify material impacts, risks and opportunities related to resource use and circular economy, in particular regarding resource inflows, resource outflows and waste, and shall provide information on:</p> <p>(a) whether the undertaking has screened its assets and activities in order to identify its actual and potential impacts, risks and opportunities in its own operations and its upstream and downstream value chain, and if so, the methodologies, assumptions and tools used in the screening;</p> <p>(b) whether and how the undertaking has conducted consultations, in particular, with affected communities.</p>	<p>(Centralised Section 2 AR)</p>
<p><b>Disclosure Requirement E5-1 – Policies related to resource use and circular economy</b></p> <p>12. The undertaking shall describe its policies adopted to manage its material impacts, risks and opportunities related to resource use and circular economy.</p> <p>13. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of its material impacts, risks and opportunities related to resource use and circular economy.</p> <p>14. The disclosure required by paragraph 12 shall contain the information on the policies the undertaking has in place to manage its material impacts, risks and opportunities related to resource use and circular economy in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters.</p> <p>15. In the summary, the undertaking shall indicate whether and how its policies address the following matters where material:</p> <p>(a) transitioning away from use of virgin resources, including relative increases in use of secondary (recycled) resources;</p> <p>(b) sustainable sourcing and use of renewable resources.</p> <p>16. Policies shall address material impacts, risks and opportunities in its own operations and along its upstream and downstream value chain.</p>	<p><del><b>Disclosure Requirement E5-2 – Actions and resources related to resource use and circular economy</b></del> <b>Disclosure Requirement 11 (IR-3) – Policies and actions in relation to sustainability matters</b></p> <p>(Centralised Section 3 AR)</p>
<p><b>Disclosure Requirement E5-2 – Actions and resources related to resource use and circular economy</b></p> <p>17. The undertaking shall disclose its resource use and circular economy actions and the resources allocated to their implementation.</p> <p>18. The objective of this Disclosure Requirement is to enable an understanding of the key actions taken and planned to achieve the resource use and circular economy-related policy objectives and targets.</p> <p>19. The description of the resource use and circular economy-related actions and resources allocated shall follow the principles defined in ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.</p>	<p><del><b>Disclosure Requirement E5-2 – Actions and resources related to resource use and circular economy</b></del> <b>Disclosure Requirement 11 (IR-3) – Policies and actions in relation to sustainability matters</b></p> <p>(Centralised Section 3 AR)</p>

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<p>20. In addition to ESRS 2 MDR-A, the undertaking may specify whether and how an action and resources cover:</p> <p>(a) higher levels of resource efficiency in use of technical and biological materials and water, particularly in relation to critical raw materials and rare earths as listed in the Raw Materials Information System;</p> <p>(b) higher rates of use of secondary raw materials (recyclates);</p> <p>(c) application of circular design, leading to increased product durability and optimisation of use, and higher rates of: Reuse, Repair, Refurbishing, Remanufacture, Repurposing and Recycling.</p> <p>(d) application of circular business practices such as (i) value retention actions (maintenance, repair, refurbishing, remanufacturing, component harvesting, upgrading and reverse logistics, closed loop systems, second-hand retailing), (ii) value maximisation actions (product-service systems, collaborative and sharing economy business models), (iii) end-of-life actions (recycling, upcycling, extended producer responsibility), and (iv) systems efficiency actions (industrial symbiosis);</p> <p>(e) actions taken to prevent waste generation in the undertaking's upstream and downstream value chain; and</p> <p>(f) optimisation of waste management in line with the waste hierarchy.</p>	
<p><b>Metrics and targets</b></p> <p><b>Disclosure Requirement E5-3 – Targets related to resource use and circular economy</b></p> <p>21. The undertaking shall disclose the resource use and circular economy-related targets it has set.</p> <p>22. The objective of this Disclosure Requirement is to enable an understanding of the targets the undertaking has adopted to support its resource use and circular economy policy and to address its material impacts, risks and opportunities.</p> <p>23. The description of the targets shall contain the information requirements defined in ESRS 2 MDR-T Tracking effectiveness of policies and actions through targets.</p> <p>24. The disclosure required by paragraph 21 shall indicate whether and how the undertaking's targets relate to resource inflows and resource outflows, including waste and products and materials, and, more specifically to:</p> <p>(a) the increase of circular product design (including for instance design for durability, dismantling, reparability, recyclability etc);</p> <p>(b) the increase of circular material use rate;</p> <p>(c) the minimisation of primary raw material;</p> <p>(d) sustainable sourcing and use (in line with the cascading principle) of renewable resources;</p> <p>(e) the waste management, including preparation for proper treatment; and</p> <p>(f) other matters related to resource use or circular economy.</p> <p>25. The undertaking shall specify to which layer of the waste hierarchy the target relates.</p>	<p><b>Disclosure Requirement E5-3 – Targets related to resource use and circular economy</b> <b>Disclosure Requirement 12 (IR-4) – Targets in relation to sustainability matters</b></p> <p>(Centralised Section 3 AR)</p>

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<p>26. In addition to ESRS 2 MDR-T, the undertaking may specify whether ecological thresholds and entity-specific allocations were taken into consideration when setting targets. If so, the undertaking may specify:</p> <p>(a) the ecological thresholds identified, and the methodology used to identify such thresholds;</p> <p>(b) whether or not the thresholds are entity-specific and if so, how they were determined; and</p> <p>(c) how responsibility for respecting identified ecological thresholds is allocated in the undertaking.</p>	
<p>27. The undertaking shall specify as part of the contextual information, whether the targets it has set and presented are mandatory (required by legislation) or voluntary.</p>	
<p><b>Disclosure Requirement E5-4 – Resource inflows</b></p>	<p><b>Disclosure Requirement E5-1 – Resource inflows</b></p>
<p>28. The undertaking shall disclose information on its resource inflows related to its material impacts, risks and opportunities.</p>	<p>52. The undertaking shall disclose information on its resource inflows related to its material impacts, risks and opportunities (<i>opportunities are voluntary</i>) in the undertaking's own operations and along the value chain.</p>
<p>29. The objective of this Disclosure Requirement is to enable an understanding of the resource use in the undertaking's own operations and its upstream value chain.</p>	<p>53. The objective of this Disclosure Requirement is to enable an understanding of <i>the impacts and risks originating from</i> the resource use in the undertaking's own operations <del>and its upstream</del> value chain.</p>
<p>30. see Below</p>	
<p>31. When an undertaking assesses that resource inflows is a material sustainability matter, it shall disclose the following information about the materials used to manufacture the undertaking's products and services during the reporting period, in tonnes or kilogrammes:</p> <p>(a) the overall total weight of products and technical and biological materials used during the reporting period;</p> <p>(b) the percentage of biological materials (and biofuels used for non-energy purposes) used to manufacture the undertaking's products and services (including packaging) that is sustainably sourced, with the information on the certification scheme used and on the application of the cascading principle; and</p> <p>(c) the weight in both absolute value and percentage, of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture the undertaking's products and services (including packaging).</p>	<p>54. When an undertaking assesses that resource inflows is a material sustainability matter, it shall disclose the following information about the materials used <i>in its own operations</i> to manufacture the undertaking's products and services during the reporting period, in tonnes or kilogrammes::</p> <p>(a) the overall total weight of products and technical and biological materials used during the reporting period;</p> <p>(b) the percentage of biological materials <del>(and biofuels used for non-energy purposes)</del> used to manufacture the undertaking's products and services (including packaging) that are sustainability sourced <del>certified</del>, with the <i>as well as</i> information on the certification scheme, <del>used and on the application of the cascading principle</del> and;</p> <p>(c) <del>the weight in both absolute value and</del> the percentage of <i>secondary materials (recycled or reused) used as inflow</i>, <del>secondary intermediary products and secondary materials used to manufacture the undertaking's products and services (including packaging)</del>.</p>
<p>32. The undertaking shall provide information on the methodologies used to calculate the data. It shall specify whether the data is sourced from direct measurement or estimations, and disclose the key assumptions used.</p>	<p>55. The undertaking shall provide information on the methodologies used to calculate the data. It shall specify whether the data is sourced from direct measurement or estimations, and disclose the key assumptions used.</p>
<p>30. The disclosure required by paragraph 28 shall include a description of its resource inflows where material: products (including packaging) and materials (specifying critical raw materials and rare earths), water and property, plant and equipment used in the undertaking's own operations and along its upstream value chain.</p>	<p>56. The disclosure required by paragraph 52 shall include a description of its resource inflows where material: products (including packaging) and materials (specifying critical raw materials and rare earths), water and property, plant and equipment used in the undertaking's own operations and along its upstream value chain.</p>
<p><b>Disclosure Requirement E5-5 – Resource outflows</b></p>	<p><b>Disclosure Requirement E5-2 – Resource outflows</b></p>
<p>33. The undertaking shall disclose information on its resource outflows, including waste, related to its material impacts, risks and opportunities.</p>	

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	57. The undertaking shall disclose information on its material resource outflows, including waste, related to its material impacts, risks and opportunities ( <i>opportunities are voluntary</i> ).
34. The objective of this Disclosure Requirement is to provide an understanding of: (a) how the undertaking contributes to the circular economy by i) designing products and materials in line with circular economy principles and ii) increasing or maximising the extent to which products, materials and waste processing are recirculated in practice after first use; and (b) the undertaking's waste reduction and waste management strategy, the extent to which the undertaking knows how its pre-consumer waste is managed in its own activities.	58. The objective of this Disclosure Requirements is to understand of how the undertaking contributes to circular economy by i) <del>designing</del> <i>designing through its product and material design</i> in line with circular economy principles, and ii) <del>increasing or maximising the extent to which products, materials and waste processing are recirculated in practice after first use; and</del> <i>as well as the undertaking's waste reduction and waste management strategy.</i>
<b>Products and materials</b>  35. The undertaking shall provide a description of the key products and materials that come out of the undertaking's production process and that are designed along circular principles, including durability, reusability, repairability, disassembly, remanufacturing, refurbishment, recycling, recirculation by the biological cycle, or optimisation of the use of the product or material through other circular business models.	<b>Products and materials</b>  59. The undertaking shall provide a description of the key products and materials that come out of the undertaking's production process that are designed along circular economy principles. <del>including durability, reusability, repairability, disassembly, remanufacturing, refurbishment, recycling, recirculation by the biological cycle, or optimisation of the use of the product or material through other circular business models.</del>
36. Undertakings for which outflows are material shall disclose: (a) The expected durability of the products placed on the market by the undertaking, in relation to the industry average for each product group; (b) The reparability products, using an established rating system, where possible; (c) The rates of recyclable content in products and their packaging.	60. <del>Undertakings for which outflows are material shall disclose:</del> <i>The undertaking shall disclose the percentage of its products and services that are designed to be:</i> (a) <del>The expected durability of the products placed on the market by the undertaking, in relation to the industry average for each product group</del> (a) <del>The reparability products, using an established rating system, where possible; repairable and reused;</del> (b) <del>The rates of recyclable content in products and their packaging.</del> <i>recycled.</i>
<b>Waste</b>  37. The undertaking shall disclose the following information on its total amount of waste from its own operations, in tonnes or kilogrammes:  (a) the total amount of waste generated ; (b) the total amount by weight diverted from disposal, with a breakdown between hazardous waste and non-hazardous waste and a breakdown by the following recovery operation types: i. preparation for reuse; ii. recycling; and iii. other recovery operations (c) the amount by weight directed to disposal by waste treatment type and the total amount summing all three types, with a breakdown between hazardous waste and non-hazardous waste. The waste treatment types to be disclosed are:  i. incineration;	<b>Waste</b>  61. The undertaking shall disclose <del>disclose the following information on its</del> the total amount of waste generated in its own operations, as well as <del>the total amount and</del> <i>the percentage of non-recycled waste (by weight and on a wet basis).</i>  (b) <del>the total amount by weight diverted from disposal, with a breakdown between hazardous waste and non-hazardous waste and a breakdown by the following recovery operation types:</del> i. <del>preparation for reuse;</del> ii. <del>recycling; and</del> iii. <del>other recovery operations</del>  62. <del>the amount by weight directed to disposal by waste treatment type and the total amount summing all three types, with a breakdown between hazardous waste and non-hazardous waste. The waste treatment types to be disclosed are:</del> <i>The undertaking shall disclose the total amount of hazardous waste by:</i> (a) <i>type of hazardous, waste; and</i>

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<p>ii. landfill; and</p> <p>iii. other disposal operations;</p> <p>(d) the total amount and percentage of non-recycled waste[50].</p>	<p>(b) waste treatment type, <i>in particular</i>:</p> <p>i. incineration;</p> <p>ii. landfilling; and</p> <p>iii. other disposal operations.</p>
<p>38. When disclosing the composition of the waste, the undertaking shall specify:</p> <p>(a) the waste streams relevant to its sector or activities (e.g. tailings for the undertaking in the mining sector, electronic waste for the undertaking in the consumer electronics sector, or food waste for the undertaking in the agriculture or in the hospitality sector); and;</p> <p>(b) the materials that are present in the waste (e.g. biomass, metals, non-metallic minerals, plastics, textiles, critical raw materials and rare earths).</p>	<p><del>38. When disclosing the composition of the waste, the undertaking shall specify:</del></p> <p><del>(a) the waste streams relevant to its sector or activities (e.g. tailings for the undertaking in the mining sector, electronic waste for the undertaking in the consumer electronics sector, or food waste for the undertaking in the agriculture or in the hospitality sector); and;</del></p> <p><del>(b) the materials that are present in the waste (e.g. biomass, metals, non-metallic minerals, plastics, textiles, critical raw materials and rare earths).</del></p>
<p>39. The undertaking shall also disclose the total amount of hazardous waste and radioactive waste generated by the undertaking, where radioactive waste is defined in Article 3(7) of Council Directive 2011/70/Euratom[51].</p>	<p>63. The undertaking shall also disclose the total amount of radioactive waste generated by the undertaking, where radioactive waste is defined in Article 3(7) of Council Directive 2011/70/Euratom.</p>
<p>40. The undertaking shall provide contextual information on the methodologies used to calculate the data and in particular the criteria and assumptions used to determine and classify products designed along circular principles under paragraph 35. It shall specify whether the data is sourced from direct measurement or estimations; and disclose the key assumptions used.</p>	<p>64. The undertaking shall provide contextual information, including information on the methodologies used to calculate the data and in particular the criteria and assumptions used to determine and classify products designed along circular principles. <del>principles under paragraph 35. It shall specify whether the data is sourced from direct measurement or estimations; and disclose the key assumptions used.</del></p>
<p><b>Disclosure Requirement E5-6 – Anticipated financial effects from material resource use and circular economy-related risks and opportunities</b></p> <p>41. The undertaking shall disclose the anticipated financial effects of material risks and opportunities arising from resource use and circular economy-related impacts.</p>	<p><del><b>Disclosure Requirement E2-6 – Anticipated financial effects from material pollution-related risks and opportunities</b></del></p> <p><del><i>Anticipated financial effects from material environmental-related matters other than climate (E6)</i></del></p> <p>(Merged and simplified with rest of Anticipated financial effect other than climate page 19)</p>
<p>42. The information required by paragraph 41 is in addition the information on current financial effects on the entity’s financial position, financial performance and cash flows for the reporting period required under ESRS 2 SBM-3 para 48 (d). The objective of this Disclosure Requirement is to provide an understanding of:</p> <p>(a) anticipated financial effects due to material risks arising from material resource use and circular economy-related impacts and dependencies and how these risks have or could reasonably be expected to have) a material influence on the undertaking’s financial position, financial performance performance, and cash flows over the short-, medium- and long-term; and</p> <p>(b) anticipated financial effects due to material opportunities related to resource use and circular economy.</p>	
<p>43. The disclosure shall include:</p> <p>(a) a quantification of the anticipated financial effects in monetary terms before considering resource use and circular economy-related actions, or where not possible without undue cost or effort, qualitative information. For financial effects arising from material opportunities, a</p>	



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quantification is not required if it would result in disclosure that does not meet the qualitative characteristics of information (see ESRS 1 Appendix B Qualitative characteristics of information); (b) a description of the effects considered, the impacts and dependencies to which they relate and the time horizons in which they are likely to materialise; (c) the critical assumptions used to quantify the anticipated financial effects, as well as the sources and level of uncertainty of those assumptions.	
<b>APPLICATION REQUIREMENTS</b>	
<b>ESRS E1 - CLIMATE CHANGE</b>	
<b>Strategy</b> <b>Disclosure Requirement E1-1 - Transition plan for climate change mitigation</b>	<b>Strategy</b> <del><b>Disclosure Requirement E1-1 - Transition plan for climate change mitigation</b></del>  Centralized in Section 2 and 3
<b>Disclosure Requirement related to ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model</b>	<del><b>Disclosure Requirement related to ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model</b></del>  Centralized in Section 2 and 3
<b>Impact, risk and opportunity management</b>  <b>Disclosure Requirement related to ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities</b>	<del><b>Impact, risk and opportunity management</b></del>  <del><b>Disclosure Requirement related to ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities</b></del>  Centralized in Section 2 and 3
<b>Disclosure Requirement E1-2 - Policies related to climate change mitigation and adaptation</b>	<del><b>Disclosure Requirement E1-2 - Policies related to climate change mitigation and adaptation</b></del>  Centralized in Section 2 and 3
<b>Disclosure Requirements E1-3 - Actions and resources in relation to climate change policies</b>	<del><b>Disclosure Requirements E1-3 - Actions and resources in relation to climate change policies</b></del>  Centralized in Section 2 and 3
<b>Metrics and targets</b>  <b>Disclosure Requirement E1-4 - Targets related to climate change mitigation and adaptation</b>	<del><b>Metrics and targets</b></del>  <del><b>Disclosure Requirement E1-4 - Targets related to climate change mitigation and adaptation</b></del>  Centralized in Section 2 and 3

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<p><b>Disclosure Requirement E1-5 – Energy consumption and mix</b></p> <p>Calculation guidance AR 32. When preparing the information on energy consumption required under paragraph 35, the undertaking shall:</p> <ul style="list-style-type: none"> <li>(a) only report energy consumed from processes owned or controlled by the undertaking applying the same perimeter applied for reporting GHG Scopes 1 and 2 emissions;</li> <li>(b) exclude feedstocks and fuels that are not combusted for energy purposes. The undertaking that consumes fuel as feedstocks can disclose information on this consumption separately from the required disclosures;</li> <li>(c) ensure all quantitative energy-related information is reported in either Mega-Watt- hours (MWh) in Lower Heating Value or net calorific value. If raw data of energy- related information is only available in energy units other than MWh (such as GigaJoules (GJ) or British Thermal Units (Btu)), in volume units (such as cubic feet or gallons) or in mass units (such as kilograms or pounds), they shall be converted to MWh using suitable conversion factors (see for example Annex II of the Fifth Assessment IPCC report). Conversion factors for fuels shall be made transparent and applied in a consistent manner;</li> <li>(d) ensure all quantitative energy-related information is reported as final energy consumption, referring to the amount of energy the undertaking actually consumes using for example the table in Annex IV of Directive 2012/27 of the European Parliament and of the Council on energy efficiency;</li> <li>(e) avoid double counting fuel consumption when disclosing self-generated energy consumption. If the undertaking generates electricity from either a non-renewable or renewable fuel source and then consumes the generated electricity, the energy consumption shall be counted only once under fuel consumption;</li> <li>(f) not offset energy consumption even if onsite generated energy is sold to and used by a third party;</li> <li>(g) not count energy that is sourced from within the organisational boundary under “purchased or acquired” energy;</li> <li>(h) account for steam, heat or cooling received as “waste energy” from a third party’s industrial processes under “purchased or acquired” energy;</li> <li>(i) account for renewable hydrogen<sup>56</sup> as a renewable fuel. Hydrogen that is not completely derived from renewable sources shall be included under “fuel consumption from other non-renewable sources”; and</li> <li>(j) adopt a conservative approach when splitting the electricity, steam, heat or cooling between renewable and non-renewable sources based on the approach applied to calculate market-based Scope 2 GHG emissions. The undertaking shall only consider these energy consumptions as deriving from renewable sources if the origin of the purchased energy is clearly defined in the contractual arrangements with its suppliers (renewable power purchasing agreement, standardised green electricity tariff, market instruments like Guarantee of Origin from renewable sources in Europe or similar instruments like Renewable Energy Certificates in the US and Canada, etc.).</li> </ul>	<p><b>Disclosure Requirement E1-1 – Energy consumption and mix</b></p> <p>Calculation guidance AR 1. When preparing the information on energy consumption required under paragraph <b>XX</b>, the undertaking shall:</p> <ul style="list-style-type: none"> <li>(a) only report energy consumed from processes owned or controlled by the undertaking applying the same perimeter applied for reporting GHG Scopes 1 and 2 emissions;</li> <li>(b) exclude feedstocks and fuels that are not combusted for energy purposes. The undertaking that consumes fuel as feedstocks can disclose information on this consumption separately from the required disclosures;</li> <li>(c) ensure all quantitative energy-related information is reported in either Mega-Watt- hours (MWh) in Lower Heating Value or net calorific value. If raw data of energy- related information is only available in energy units other than MWh (such as GigaJoules (GJ) or British Thermal Units (Btu)), in volume units (such as cubic feet or gallons) or in mass units (such as kilograms or pounds), they shall be converted to MWh using suitable conversion factors (see for example Annex II of the Fifth Assessment IPCC report). Conversion factors for fuels shall be made transparent and applied in a consistent manner;</li> <li>(d) ensure all quantitative energy-related information is reported as final energy consumption, referring to the amount of energy the undertaking actually consumes using for example the table in Annex IV of Directive 2012/27 of the European Parliament and of the Council on energy efficiency;</li> <li>(e) avoid double counting fuel consumption when disclosing self-generated energy consumption. If the undertaking generates electricity from either a non-renewable or renewable fuel source and then consumes the generated electricity, the energy consumption shall be counted only once under fuel consumption;</li> <li>(f) not offset energy consumption even if onsite generated energy is sold to and used by a third party;</li> <li>(g) not count energy that is sourced from within the organisational boundary under “purchased or acquired” energy;</li> <li>(h) account for steam, heat or cooling received as “waste energy” from a third party’s industrial processes under “purchased or acquired” energy;</li> <li>(i) account for renewable hydrogen as a renewable fuel. 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<p>AR 33. The information required under paragraph 37 (a) is applicable if the undertaking is operating in at least one <b>high climate impact sector</b>. The information required under paragraph 38 (a) to (e). shall also include energy from fossil sources consumed in operations that are not in high climate impact sectors.</p>	<p><del>AR 33. The information required under paragraph 37 (a) is applicable if the undertaking is operating in at least one <b>high climate impact sector</b>. The information required under paragraph 38 (a) to (e). shall also include energy from fossil sources consumed in operations that are not in high climate impact sectors.</del></p>																																																															
<p>AR 34. The information on Energy consumption and mix may be presented using the following tabular format for <b>high climate impact sectors</b> and for all other sector by omitting rows (1) to ((5)</p> <table border="1" data-bbox="91 363 568 914"> <thead> <tr> <th>Energy consumption and mix</th> <th>Comparative</th> <th>Year N</th> </tr> </thead> <tbody> <tr><td>(1) Fuel consumption from coal and coal products (MWh)</td><td></td><td></td></tr> <tr><td>(2) Fuel consumption from crude oil and petroleum products (MWh)</td><td></td><td></td></tr> <tr><td>(3) Fuel consumption from natural gas (MWh)</td><td></td><td></td></tr> <tr><td>(4) Fuel consumption from other fossil sources (MWh)</td><td></td><td></td></tr> <tr><td>(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)</td><td></td><td></td></tr> <tr><td>(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)</td><td></td><td></td></tr> <tr><td>Share of fossil sources in total energy consumption (%)</td><td></td><td></td></tr> <tr><td>(7) Consumption from nuclear sources (MWh)</td><td></td><td></td></tr> <tr><td>Share of consumption from nuclear sources in total energy consumption (%)</td><td></td><td></td></tr> <tr><td>(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)</td><td></td><td></td></tr> <tr><td>(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)</td><td></td><td></td></tr> <tr><td>(10) The consumption of self-generated non-fuel renewable energy (MWh)</td><td></td><td></td></tr> <tr><td>(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)</td><td></td><td></td></tr> <tr><td>Share of renewable sources in total energy consumption (%)</td><td></td><td></td></tr> <tr><td>Total energy consumption (MWh) (calculated as the sum of lines 6, and 11)</td><td></td><td></td></tr> </tbody> </table>	Energy consumption and mix	Comparative	Year N	(1) Fuel consumption from coal and coal products (MWh)			(2) Fuel consumption from crude oil and petroleum products (MWh)			(3) Fuel consumption from natural gas (MWh)			(4) Fuel consumption from other fossil sources (MWh)			(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)			(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)			Share of fossil sources in total energy consumption (%)			(7) Consumption from nuclear sources (MWh)			Share of consumption from nuclear sources in total energy consumption (%)			(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)			(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)			(10) The consumption of self-generated non-fuel renewable energy (MWh)			(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)			Share of renewable sources in total energy consumption (%)			Total energy consumption (MWh) (calculated as the sum of lines 6, and 11)			<p>AR 2. The information on Energy consumption and mix may be presented using the following tabular format. <del>for <b>high climate impact sectors</b> and for all other sector by omitting rows (1) to ((5)</del></p> <table border="1" data-bbox="1133 419 1756 667"> <thead> <tr> <th>Energy consumption and mix</th> <th>Comparative</th> <th>Year N</th> </tr> </thead> <tbody> <tr><td>(1) Fossil energy consumption (MWh)</td><td></td><td></td></tr> <tr><td>(2) Consumption from nuclear sources (MWh)</td><td></td><td></td></tr> <tr><td>(3) Consumption from renewable sources (MWh)</td><td></td><td></td></tr> <tr><td>Total energy consumption (MWh) (calculated as the sum of lines 1, 2 and 3)</td><td></td><td></td></tr> </tbody> </table>	Energy consumption and mix	Comparative	Year N	(1) Fossil energy consumption (MWh)			(2) Consumption from nuclear sources (MWh)			(3) Consumption from renewable sources (MWh)			Total energy consumption (MWh) (calculated as the sum of lines 1, 2 and 3)		
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<p>AR 35. The total energy consumption with a distinction between fossil, nuclear and renewable energy consumption may be presented graphically in the sustainability statement showing developments over time (e.g., through a pie or bar chart).</p>	<p>AR 3. The total energy consumption with a distinction between fossil, nuclear and renewable energy consumption may be presented graphically in the sustainability statement showing developments over time (e.g., through a pie or bar chart).</p>																																																															
<p><b>Energy intensity based on net revenue</b> Calculation guidance AR 36. When preparing the information on energy intensity required under paragraph 40, the undertaking shall: (a) calculate the energy intensity ratio using the following formula <i>Total energy consumption from activities in high climate impact sectors (MWh) / Net revenue from activities in high climate impact sectors (Monetary unit)</i>; (b) express the total energy consumption in MWh and the net revenue in monetary units (e.g., Euros); (c) the numerator and denominator shall only consist of the proportion of the total final energy consumption (in the numerator) and net revenue (in the denominator) that are attributable</p>	<p><b>Energy intensity based on net revenue</b> Calculation guidance AR 4. When preparing the information on energy intensity required under paragraph 37, the undertaking shall: (a) calculate the energy intensity ratio using the following formula: <i>Total energy consumption from activities in high climate impact sectors (MWh) / Net revenue from activities in high climate impact sectors (Monetary unit)</i>; (b) express the total energy consumption in MWh and the net revenue in monetary units (e.g., Euros); (c) the numerator and denominator shall only consist of the proportion of the total final energy consumption (in the numerator) and net revenue (in the denominator) that are attributable</p>																																																															

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<p>to activities in high climate impact sectors. In effect, there should be consistency in the scope of both the numerator and denominator;</p> <p>(d) calculate the total energy consumption in line with the requirement in paragraph 10;</p> <p>(e) calculate the net revenue in line with the accounting standards requirements applicable for the financial statements, i.e., IFRS 15 Revenue from Contracts with Customers or local GAAP requirements.</p>	<p>to activities in high climate impact sectors. In effect, there should be consistency in the scope of both the numerator and denominator;</p> <p>(d) calculate the total energy consumption in line with the requirement in paragraph 10;</p> <p>(e) calculate the net revenue in line with the accounting standards requirements applicable for the financial statements, i.e., IFRS 15 Revenue from Contracts with Customers or local GAAP requirements.</p>																
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Energy intensity per net revenue	Comparative	N	% N / N-1														
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<p><i>Connectivity of energy intensity based on net revenue with financial reporting information</i></p> <p>AR 38. The reconciliation of net revenue from activities in high climate impact sectors to the relevant financial statements line item or disclosure (as required by paragraph 40) may be presented either:</p> <p>(a) by a cross-reference to the related line item or disclosure in the financial statements;</p> <p>or</p> <p>(b) If the net revenue cannot be directly cross-referenced to a line item or disclosure in the financial statements, by a quantitative reconciliation using the below tabular format</p> <table border="1" data-bbox="91 743 734 823"> <tbody> <tr> <td>Net revenue from activities in high climate impact sectors used to calculate energy intensity</td> <td></td> </tr> <tr> <td>Net revenue (other)</td> <td></td> </tr> <tr> <td>Total net revenue (Financial statements)</td> <td></td> </tr> </tbody> </table>	Net revenue from activities in high climate impact sectors used to calculate energy intensity		Net revenue (other)		Total net revenue (Financial statements)		<p><i>Connectivity of energy intensity based on net revenue with financial reporting information</i></p> <p>AR 6. The reconciliation of net revenue from activities in high climate impact sectors to the relevant financial statements line item or disclosure (as required by paragraph 40) may be presented either:</p> <p>(a) by a cross-reference to the related line item or disclosure in the financial statements;</p> <p>or</p> <p>(b) If the net revenue cannot be directly cross-referenced to a line item or disclosure in the financial statements, by a quantitative reconciliation using the below tabular format</p> <table border="1" data-bbox="1137 715 1780 794"> <tbody> <tr> <td>Net revenue from activities in high climate impact sectors used to calculate energy intensity</td> <td></td> </tr> <tr> <td>Net revenue (other)</td> <td></td> </tr> <tr> <td>Total net revenue (Financial statements)</td> <td></td> </tr> </tbody> </table>	Net revenue from activities in high climate impact sectors used to calculate energy intensity		Net revenue (other)		Total net revenue (Financial statements)					
Net revenue from activities in high climate impact sectors used to calculate energy intensity																	
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Net revenue (other)																	
Total net revenue (Financial statements)																	
<p><b>Disclosure Requirements E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions</b></p> <p>Calculation guidance</p> <p>AR 39. When preparing the information for reporting GHG emissions as required by paragraph 41, the undertaking shall:</p> <p>(a) consider the principles, requirements and guidance provided by the GHG Protocol Corporate Standard (version 2004). The undertaking may consider Commission Recommendation (EU) 2021/227924 or the requirements stipulated by ISO 14064- 1:2018. If the undertaking already applies the GHG accounting methodology of ISO1:2018, it shall nevertheless comply with the requirements of this standard (e.g.,regarding reporting boundaries and the disclosure of market-based Scope 2 GHG emissions);</p> <p>(b) disclose the methodologies, significant assumptions and emissions factors used to calculate or measure GHG emissions accompanied by the reasons why they were chosen, and provide a reference or link to any calculation tools used;</p> <p>(c) include emissions of CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, and NF<sub>3</sub>. Additional GHG may be considered when significant; and</p> <p>(d) use the most recent Global Warming Potential (GWP) values published by the IPCC based on a 100-year time horizon to calculate CO<sub>2</sub>eq emissions of non-CO<sub>2</sub> gases.</p>	<p><b>Disclosure Requirements E1-2 – Gross Scopes 1, 2, 3 and Total GHG emissions</b></p> <p>Calculation guidance</p> <p>AR 7. When preparing the information for reporting GHG emissions as required by paragraph 41, the undertaking shall:</p> <p>(a) consider the principles, requirements and guidance provided by the GHG Protocol Corporate Standard (version 2004). The undertaking may consider Commission Recommendation (EU) 2021/227924 or the requirements stipulated by ISO 14064- 1:2018. If the undertaking already applies the GHG accounting methodology of ISO1:2018, it shall nevertheless comply with the requirements of this standard (e.g.,regarding reporting boundaries and the disclosure of market-based Scope 2 GHG emissions);</p> <p>(b) disclose the methodologies, significant assumptions and emissions factors used to calculate or measure GHG emissions accompanied by the reasons why they were chosen, and provide a reference or link to any calculation tools used;</p> <p>(c) include emissions of CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, and NF<sub>3</sub>. Additional GHG may be considered when significant; and</p> <p>(d) use the most recent Global Warming Potential (GWP) values published by the IPCC based on a 100-year time horizon to calculate CO<sub>2</sub>eq emissions of non-CO<sub>2</sub> gases.</p>																

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<p>AR 40. When preparing the information for reporting GHG emissions from its associates, joint ventures, unconsolidated subsidiaries (investment entities) and contractual arrangements as required by paragraph 50, the undertaking shall consolidate 100% of the GHG emissions of the entities it operationally controls. In practice, this happens when the undertakings holds the license - or permit - to operate the assets from these associates, joint ventures, unconsolidated subsidiaries (investment entities) and contractual arrangements. When the undertaking has a contractually defined part-time operational control, it shall consolidate 100% the GHG emitted during the time of its operational control.</p>	<p><del>AR 40. When preparing the information for reporting GHG emissions from its associates, joint ventures, unconsolidated subsidiaries (investment entities) and contractual arrangements as required by paragraph 50, the undertaking shall consolidate 100% of the GHG emissions of the entities it operationally controls. In practice, this happens when the undertakings holds the license - or permit - to operate the assets from these associates, joint ventures, unconsolidated subsidiaries (investment entities) and contractual arrangements. When the undertaking has a contractually defined part-time operational control, it shall consolidate 100% the GHG emitted during the time of its operational control.</del></p>
<p>AR 41. In line with ESRS 1 chapter 3.7, the undertaking shall disaggregate information on its GHG emissions as appropriate. For example, the undertaking may disaggregate its Scope 1, 2, 3, or total GHG emissions by country, operating segments, economic activity, subsidiary, GHG category (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, and other GHG considered by the undertaking) or source type (stationary combustion, mobile combustion, process emissions and fugitive emissions).</p>	<p>AR 8. In line with <i>Section 1</i> chapter 3.7, the undertaking shall disaggregate information on its GHG emissions as appropriate. For example, the undertaking may disaggregate its Scope 1, 2, 3, or total GHG emissions by country, operating segments, economic activity, subsidiary, GHG category (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, and other GHG considered by the undertaking) or source type (stationary combustion, mobile combustion, process emissions and fugitive emissions).</p>
<p>AR 42. An undertaking might have a different reporting period from some or all of the entities in its value chain. In such circumstances, the undertaking is permitted to measure its GHG emissions in accordance with paragraph 44 using information for reporting periods that are different from its own reporting period if that information is obtained from entities in its value chain with reporting periods that are different from the undertaking's reporting period, on the condition that:</p> <ul style="list-style-type: none"> <li>(a) the undertaking uses the most recent data available from those entities in its value chain to measure and disclose its greenhouse gas emissions;</li> <li>(b) the length of the reporting periods is the same; and</li> <li>(c) the undertaking discloses the effects of significant events and changes in circumstances (relevant to its GHG emissions) that occur between the reporting dates of the entities in its value chain and the date of the undertaking's general purpose financial statements.</li> </ul>	<p>AR 9. An undertaking might have a different reporting period from some or all of the entities in its value chain. In such circumstances, the undertaking is permitted to measure its GHG emissions in accordance with paragraph XX using information for reporting periods that are different from its own reporting period if that information is obtained from entities in its value chain with reporting periods that are different from the undertaking's reporting period, on the condition that:</p> <ul style="list-style-type: none"> <li>(a) the undertaking uses the most recent data available from those entities in its value chain to measure and disclose its greenhouse gas emissions;</li> <li>(b) the length of the reporting periods is the same; and</li> <li>(c) the undertaking discloses the effects of significant events and changes in circumstances (relevant to its GHG emissions) that occur between the reporting dates of the entities in its value chain and the date of the undertaking's general purpose financial statements.</li> </ul>
<p>AR 43. When preparing the information on gross Scope 1 GHG emissions required under paragraph 48 (a), the undertaking shall:</p> <ul style="list-style-type: none"> <li>(a) calculate or measure GHG emissions from stationary combustion, mobile combustion, process emissions and fugitive emissions; and use suitable activity data that include the non-renewable fuel consumption;</li> <li>(b) use suitable and consistent emission factors;</li> <li>(c) disclose biogenic emissions of CO<sub>2</sub> from the combustion or bio-degradation of biomass separately from the Scope 1 GHG emissions, but include emissions of other types of GHG (in particular CH<sub>4</sub> and N<sub>2</sub>O);</li> <li>(d) not include any removals, or any purchased, sold or transferred carbon credits or GHG allowances in the calculation of Scope 1 GHG emissions; and</li> <li>(e) for activities reporting under the EU ETS, report on Scope 1 emissions following the EU ETS methodology. The EU ETS methodology may also be applied to activities in geographies and sectors that are not covered by the EU ETS.</li> </ul>	<p>AR 10. When preparing the information on gross Scope 1 GHG emissions required under paragraph 26 (a), the undertaking shall:</p> <ul style="list-style-type: none"> <li>(a) calculate or measure GHG emissions from stationary combustion, mobile combustion, process emissions and fugitive emissions; and use suitable activity data that include the non-renewable fuel consumption;</li> <li>(b) use suitable and consistent emission factors;</li> <li>(c) disclose biogenic emissions of CO<sub>2</sub> from the combustion or bio-degradation of biomass separately from the Scope 1 GHG emissions, but include emissions of other types of GHG (in particular CH<sub>4</sub> and N<sub>2</sub>O);</li> <li>(d) not include any removals, or any purchased, sold or transferred carbon credits or GHG allowances in the calculation of Scope 1 GHG emissions; and</li> <li>(e) for activities reporting under the EU ETS, report on Scope 1 emissions following the EU ETS methodology. The EU ETS methodology may also be applied to activities in geographies and sectors that are not covered by the EU ETS.</li> </ul>
<p>AR 44. When preparing the information on the percentage of Scope 1 GHG emissions from regulated emission trading schemes required under paragraph 48 (b), the undertaking shall:</p>	<p>AR 11. When preparing the information on the percentage of Scope 1 GHG emissions from regulated emission trading schemes required under paragraph 26 (b), the undertaking shall:</p>

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<p>(a) consider GHG emissions from the installations it operates that are subject to regulated Emission Trading Schemes (ETS), including the EU-ETS, national ETS and non-EU ETS, if applicable;</p> <p>(b) only include emissions of CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, and NF<sub>3</sub>;</p> <p>(c) ensure the same accounting period for gross Scope 1 GHG emissions and GHG emissions regulated under the ETS; and</p> <p>(d) calculate the share by using the following formula:</p> $\frac{\text{GHG Emissions in (t CO}_2\text{eq) from EU ETS installations + national ETS installations + nonEU ETS installations}}{\text{Scope 1 GHG emissions (t CO}_2\text{eq)}}$	<p>(a) consider GHG emissions from the installations it operates that are subject to regulated Emission Trading Schemes (ETS), including the EU-ETS, national ETS and non-EU ETS, if applicable;</p> <p>(b) only include emissions of CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, and NF<sub>3</sub>;</p> <p>(c) ensure the same accounting period for gross Scope 1 GHG emissions and GHG emissions regulated under the ETS; and</p> <p>(d) calculate the share by using the following formula:</p> $\frac{\text{GHG Emissions in (t CO}_2\text{eq) from EU ETS installations + national ETS installations + nonEU ETS installations}}{\text{Scope 1 GHG emissions (t CO}_2\text{eq)}}$
<p>AR 45. When preparing the information on gross Scope 2 GHG emissions required under paragraph 49, the undertaking shall:</p> <p>(a) consider the principles and requirements of the GHG Protocol Scope 2 Guidance (version 2015, in particular the Scope 2 quality criteria in chapter 7.1 relating to contractual instruments); it may also consider Commission Recommendation (EU) 2021/2279 or the relevant requirements for the quantification of indirect GHG emissions from imported energy in EN ISO 14064-1:2018;</p> <p>(b) include purchased or acquired electricity, steam, heat, and cooling consumed by the undertaking;</p> <p>(c) avoid double counting of GHG emissions reported under Scope 1 or 3;</p> <p>(d) apply the location-based and market-based methods to calculate Scope 2 GHG emissions and provide information on the share and types of contractual instruments. Location-based method quantifies Scope 2 GHG emissions based on average energy generation emission factors for defined locations, including local, subnational, or national boundaries (GHG Protocol, "Scope 2 Guidance", Glossary, 2015). Market-based method quantifies Scope 2 GHG emissions based on GHG emissions emitted by the generators from which the reporting entity contractually purchases electricity bundled with instruments, or unbundled instruments on their own (GHG Protocol, "Scope 2 Guidance", Glossary, 2015); in this case, the undertaking may disclose the share of market-based scope 2 GHG emissions linked to purchased electricity bundled with instruments such as Guarantee of Origins or Renewable Energy Certificates. The undertaking shall provide information about the share and types of contractual instruments used for the sale and purchase of energy bundled with attributes about the energy generation or for unbundled energy attribute claims.</p> <p>(e) disclose biogenic emissions of CO<sub>2</sub> carbon from the combustion or biodegradation of biomass separately from the Scope 2 GHG emissions but include emissions of other types of GHG (in particular CH<sub>4</sub> and N<sub>2</sub>O). In case the emission factors applied do not separate the percentage of biomass or biogenic CO<sub>2</sub>, the undertaking shall disclose this. In case GHG emissions other than CO<sub>2</sub> (particularly CH<sub>4</sub> and N<sub>2</sub>O) are not available for, or excluded from, location-based grid average emissions factors or with the market-based method information, the undertaking shall disclose this.</p> <p>(f) not include any removals, or any purchased, sold or transferred carbon credits or GHG allowances in the calculation of Scope 2 GHG emissions.</p>	<p>AR 12. When preparing the information on gross Scope 2 GHG emissions required under paragraph 27, the undertaking shall:</p> <p>(a) consider the principles and requirements of the GHG Protocol Scope 2 Guidance (version 2015, in particular the Scope 2 quality criteria in chapter 7.1 relating to contractual instruments); it may also consider Commission Recommendation (EU) 2021/2279 or the relevant requirements for the quantification of indirect GHG emissions from imported energy in EN ISO 14064-1:2018;</p> <p>(b) include purchased or acquired electricity, steam, heat, and cooling consumed by the undertaking;</p> <p>(c) avoid double counting of GHG emissions reported under Scope 1 or 3;</p> <p>(d) apply the location-based and market-based, <i>where applicable</i>, methods to calculate Scope 2 GHG emissions and provide information on the share and types of contractual instruments. Location-based method quantifies Scope 2 GHG emissions based on average energy generation emission factors for defined locations, including local, subnational, or national boundaries (GHG Protocol, "Scope 2 Guidance", Glossary, 2015). Market-based method quantifies Scope 2 GHG emissions based on GHG emissions emitted by the generators from which the reporting entity contractually purchases electricity bundled with instruments, or unbundled instruments on their own (GHG Protocol, "Scope 2 Guidance", Glossary, 2015); in this case, the undertaking may disclose the share of market-based scope 2 GHG emissions linked to purchased electricity bundled with instruments such as Guarantee of Origins or Renewable Energy Certificates. The undertaking shall provide information about the share and types of contractual instruments used for the sale and purchase of energy bundled with attributes about the energy generation or for unbundled energy attribute claims.</p> <p>(e) disclose biogenic emissions of CO<sub>2</sub> carbon from the combustion or biodegradation of biomass separately from the Scope 2 GHG emissions but include emissions of other types of GHG (in particular CH<sub>4</sub> and N<sub>2</sub>O). In case the emission factors applied do not separate the percentage of biomass or biogenic CO<sub>2</sub>, the undertaking shall disclose this. In case GHG emissions other than CO<sub>2</sub> (particularly CH<sub>4</sub> and N<sub>2</sub>O) are not available for, or excluded from, location-based grid average emissions factors or with the market-based method information, the undertaking shall disclose this.</p> <p>(f) not include any removals, or any purchased, sold or transferred carbon credits or GHG allowances in the calculation of Scope 2 GHG emissions.</p>



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<p>AR 46. When preparing the information on gross Scope 3 GHG emissions required under paragraph 51, the undertaking shall:</p> <p>(a) consider the principles and provisions of the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011); and it may consider Commission Recommendation (EU) 2021/2279 or the relevant requirements for the quantification of indirect GHG emissions from EN ISO 14064-1:2018;</p> <p>(b) if it is a financial institution, consider the GHG Accounting and Reporting Standard for the Financial Industry from the Partnership for Carbon Accounting Financial (PCAF), specifically part A “Financed Emissions” (version December 2022);</p> <p>(c) screen its total Scope 3 GHG emissions based on the 15 Scope 3 categories identified by the GHG Protocol Corporate Standard and GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011) using appropriate estimates. Alternatively, it may screen its indirect GHG emissions based on the categories provided by EN ISO 14064-1:2018 clause 5.2.4 (excluding indirect GHG emissions from imported energy);</p> <p>(d) identify and disclose its significant Scope 3 categories based on the magnitude of their estimated GHG emissions and other criteria provided by GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011, p. 61 and 65-68) or EN ISO 14064-1:2018 Annex H.3.2, such as financial spend, influence, related transition risks and opportunities or stakeholder views;</p> <p>(e) calculate or estimate GHG emissions in significant Scope 3 categories using suitable emissions factors;</p> <p>(f) update Scope 3 GHG emissions in each significant category every year on the basis of current activity data; update the full Scope 3 GHG inventory at least every 3 years or on the occurrence of a significant event or a significant change in circumstances (a significant event or significant change in circumstances can, for example, relate to changes in the undertaking’s activities or structure, changes in the activities or structure of its upstream and downstream value chain(s), a change in calculation methodology or in the discovery of errors);”);</p> <p>(g) disclose the extent to which the undertaking’s Scope 3 GHG emissions are measured using inputs from specific activities within the entity’s upstream and downstream value chain, and disclose the percentage of emissions calculated using primary data obtained from suppliers or other value chain partners.</p> <p>(h) for each significant Scope 3 GHG category, disclose the reporting boundaries considered, the calculation methods for estimating the GHG emissions as well as if and which calculation tools were applied. The Scope 3 categories should be consistent with the GHGP and include:</p> <ol style="list-style-type: none"> <li>i. indirect Scope 3 GHG emissions from the consolidated accounting group (the parent and its subsidiaries),</li> <li>ii. indirect Scope 3 GHG emissions from associates, joint ventures, and unconsolidated subsidiaries for which the undertaking has the ability to control the operational activities and relationships (i.e., operational control),</li> <li>iii. Scope 1, 2 and 3 GHG emissions from associates, joint ventures, unconsolidated subsidiaries (investment entities) and joint arrangements for which the undertaking does not have</li> </ol>	<p>AR 13. When preparing the information on gross Scope 3 GHG emissions required under paragraph 30, the undertaking shall:</p> <p>(a) consider the principles and provisions of the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011); and it may consider Commission Recommendation (EU) 2021/2279 or the relevant requirements for the quantification of indirect GHG emissions from EN ISO 14064-1:2018;</p> <p>(b) if it is a financial institution, consider the GHG Accounting and Reporting Standard for the Financial Industry from the Partnership for Carbon Accounting Financial (PCAF), specifically part A “Financed Emissions” (version December 2022);</p> <p>(c) screen its total Scope 3 GHG emissions based on the Scope 3 categories identified by the GHG Protocol Corporate Standard and GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011) using appropriate estimates. Alternatively, it may screen its indirect GHG emissions based on the categories provided by EN ISO 14064-1:2018 clause 5.2.4 (excluding indirect GHG emissions from imported energy);</p> <p>(d) identify and disclose its significant Scope 3 categories based on the magnitude of their estimated GHG emissions and other criteria provided by GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011, p. 61 and 65-68) or EN ISO 14064-1:2018 Annex H.3.2, such as financial spend, influence, related transition risks and opportunities or stakeholder views;</p> <p>(e) calculate or estimate GHG emissions in significant Scope 3 categories using suitable emissions factors;</p> <p>(f) update Scope 3 GHG emissions in each significant category every year on the basis of current activity data; update the full Scope 3 GHG inventory at least every 3 years or on the occurrence of a significant event or a significant change in circumstances (a significant event or significant change in circumstances can, for example, relate to changes in the undertaking’s activities or structure, changes in the activities or structure of its upstream and downstream value chain(s), a change in calculation methodology or in the discovery of errors);”);</p> <p>(g) disclose the extent to which the undertaking’s Scope 3 GHG emissions are measured using inputs from specific activities within the entity’s upstream and downstream value chain, and disclose the percentage of emissions calculated using primary data obtained from suppliers or other value chain partners.</p> <p>(h) for each significant Scope 3 GHG category, disclose the reporting boundaries considered, the calculation methods for estimating the GHG emissions as well as if and which calculation tools were applied. The Scope 3 categories should be consistent with the GHGP and include:</p> <ol style="list-style-type: none"> <li>i. indirect Scope 3 GHG emissions from the consolidated accounting group (the parent and its subsidiaries),</li> <li>ii. indirect Scope 3 GHG emissions from associates, joint ventures, and unconsolidated subsidiaries for which the undertaking has the ability to control the operational activities and relationships (i.e., operational control),</li> <li>iii. Scope 1, 2 and 3 GHG emissions from associates, joint ventures, unconsolidated subsidiaries (investment entities) and joint arrangements for which the undertaking does not have</li> </ol>

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<p>operational control and when these entities are part of the undertaking's upstream and downstream value chain.</p> <p>(i) disclose a list of Scope 3 GHG emissions categories included in and excluded from the inventory with a justification for excluded Scope 3 categories;</p> <p>(j) disclose biogenic emissions of CO<sub>2</sub> from the combustion or biodegradation of biomass that occur in its upstream and downstream value chain separately from the gross Scope 3 GHG emissions, and include emissions of other types of GHG (such as CH<sub>4</sub> and N<sub>2</sub>O), and emissions of CO<sub>2</sub> that occur in the life cycle of biomass other than from combustion or biodegradation (such as GHG emissions from processing or transporting biomass) in the calculation of Scope 3 GHG emissions;</p> <p>(k) not include any removals, or any purchased, sold or transferred carbon credits or GHG allowances in the calculation of Scope 3 GHG emissions;</p>	<p>operational control and when these entities are part of the undertaking's upstream and downstream value chain.</p> <p>(i) disclose a list of Scope 3 GHG emissions categories included in and excluded from the inventory with a justification for excluded Scope 3 categories;</p> <p>(j) disclose biogenic emissions of CO<sub>2</sub> from the combustion or biodegradation of biomass that occur in its upstream and downstream value chain separately from the gross Scope 3 GHG emissions, and include emissions of other types of GHG (such as CH<sub>4</sub> and N<sub>2</sub>O), and emissions of CO<sub>2</sub> that occur in the life cycle of biomass other than from combustion or biodegradation (such as GHG emissions from processing or transporting biomass) in the calculation of Scope 3 GHG emissions;</p> <p>(k) not include any removals, or any purchased, sold or transferred carbon credits or GHG allowances in the calculation of Scope 3 GHG emissions;</p>
<p>AR 47. When preparing the information on the total GHG emissions required under paragraph 52, the undertaking shall:</p> <p>(a) apply the following formulas to calculate the total GHG emissions:</p> $\begin{aligned} & \text{Total GHG emissions}_{\text{location-based}} \text{ (t CO}_2\text{eq)} \\ & = \text{Gross Scope 1} + \text{Gross Scope 2}_{\text{location-based}} + \text{Gross Scope 3 Total} \end{aligned}$ $\begin{aligned} & \text{GHG emissions}_{\text{market-based}} \text{ (t CO}_2\text{eq)} \\ & = \text{Gross Scope 1} + \text{Gross Scope 2}_{\text{market-based}} + \text{Gross Scope 3} \end{aligned}$ <p>(b) disclose total GHG emissions with a distinction between emissions derived from the location-based and market-based methods applied while measuring the underlying Scope 2 GHG emissions.</p>	<p>AR 14. When preparing the information on the total GHG emissions required under paragraph 49, the undertaking shall:</p> <p>(a) apply the following formulas to calculate the total GHG emissions:</p> $\begin{aligned} & \text{Total GHG emissions}_{\text{location-based}} \text{ (t CO}_2\text{eq)} \\ & = \text{Gross Scope 1} + \text{Gross Scope 2}_{\text{location-based}} + \text{Gross Scope 3 Total} \end{aligned}$ $\begin{aligned} & \text{GHG emissions}_{\text{market-based}} \text{ (t CO}_2\text{eq)} \\ & = \text{Gross Scope 1} + \text{Gross Scope 2}_{\text{market-based}} + \text{Gross Scope 3} \end{aligned}$ <p>(b) disclose total GHG emissions with a distinction between emissions derived from the location-based and market-based methods applied while measuring the underlying Scope 2 GHG emissions.</p>
<p>AR 48. The undertaking shall disclose its total GHG emissions disaggregated by Scopes 1 and 2 and significant Scope 3 in accordance with the table below.</p>	<p>AR 15. The undertaking shall disclose its total GHG emissions disaggregated by Scopes 1 and 2 and significant Scope 3 in accordance with the table below.</p>

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	Retrospective				Milestones and target years			
	Base year	Compa-rative	N	% N / N-1	2025	2030	(2050)	Annual % target / Base year
<b>Scope 1 GHG emissions</b>								
Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)								
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)								
<b>Scope 2 GHG emissions</b>								
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)								
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)								
<b>Significant scope 3 GHG emissions</b>								
Total Gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> eq)								
1 Purchased goods and services								
[Optional sub-category: Cloud computing and data centre services]								
2 Capital goods								
3 Fuel and energy-related Activities (not included in Scope 1 or Scope 2)								
4 Upstream transportation and distribution								
5 Waste generated in operations								
6 Business traveling								
7 Employee commuting								
8 Upstream leased assets								
9 Downstream transportation								
10 Processing of sold products								
11 Use of sold products								
12 End-of-life treatment of sold products								
13 Downstream leased assets								
14 Franchises								
15 Investments								
<b>Total GHG emissions</b>								
Total GHG emissions (location-based) (tCO <sub>2</sub> eq)								
Total GHG emissions (market-based) (tCO <sub>2</sub> eq)								

	Retrospective				Milestones and target years			
	Base year	Compa-rative	N	% N / N-1	2025	2030	(2050)	Annual % target / Base year
<b>Scope 1 GHG emissions</b>								
Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)								
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)								
<b>Scope 2 GHG emissions</b>								
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)								
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)								
<b>Significant scope 3 GHG emissions</b>								
Total Gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> eq)								
1 Purchased goods and services								
[Optional sub-category: Cloud computing and data centre services]								
2 Capital goods								
3 Fuel and energy-related Activities (not included in Scope 1 or Scope 2)								
4 Upstream transportation and distribution								
5 Waste generated in operations								
6 Business traveling								
7 Employee commuting								
8 Upstream leased assets								
9 Downstream transportation								
10 Processing of sold products								
11 Use of sold products								
12 End-of-life treatment of sold products								
13 Downstream leased assets								
14 Franchises								
15 Investments								
<b>Total GHG emissions</b>								
Total GHG emissions (location-based) (tCO <sub>2</sub> eq)								
Total GHG emissions (market-based) (tCO <sub>2</sub> eq)								

AR 49. To highlight potential **transition risks**, the undertaking may disclose its total GHG **emissions** disaggregated by major countries and, if applicable, by operating segments (applying the same segments for the financial statements as required by the accounting standards, i.e., IFRS 8 *Operating Segments* or local GAAP). Scope 3 GHG emissions may be excluded from these breakdowns by country if the related data is not readily available.

AR 49. To highlight potential **transition risks**, the undertaking may disclose its total GHG **emissions** disaggregated by major countries and, if applicable, by operating segments (applying the same segments for the financial statements as required by the accounting standards, i.e., IFRS 8 *Operating Segments* or local GAAP). Scope 3 GHG emissions may be excluded from these breakdowns by country if the related data is not readily available.

AR 50. The Scope 3 GHG **emissions** may also be presented by according to the indirect emission categories defined in EN ISO 14064-1:2018.

AR 16. The Scope 3 GHG emissions may also be presented by according to the indirect emission categories defined in EN ISO 14064-1:2018.

LSME ED comparison with Set 1

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AR 51. If it is material for the undertaking's Scope 3 emissions, it shall disclose the GHG <b>emissions</b> from purchased cloud computing and data centre services as a subset of the overarching <b>Scope 3 category</b> "upstream purchased goods and services".	AR 17. If it is material for the undertaking's Scope 3 emissions, it shall disclose the GHG emissions from purchased cloud computing and data centre services as a subset of the overarching Scope 3 category "upstream purchased goods and services".																								
AR 52. The total GHG <b>emissions</b> disaggregated by Scope 1, 2 and 3 GHG emissions may be graphically presented in the <b>sustainability statement</b> (e.g., as a bar or pie chart) showing the split of GHG emissions across the <b>value chain</b> (Upstream, Own operations, Transport, Downstream).	AR 18. The total GHG emissions disaggregated by Scope 1, 2 and 3 GHG emissions may be graphically presented in the sustainability statement (e.g., as a bar or pie chart) showing the split of GHG emissions across the value chain (Upstream, Own operations, Transport, Downstream).																								
<p>GHG intensity based on net revenue</p> <p>Calculation guidance</p> <p>AR 53. When disclosing the information on GHG intensity based on net revenue required under paragraph 53, the undertaking shall:</p> <p>(a) calculate the GHG intensity ratio by the following formula:  <math display="block">\frac{\text{Total GHG emissions (t CO}_2\text{eq)}}{\text{Net revenue (Monetary unit)}}</math></p> <p>(b) express the total GHG emissions in metric tonnes of CO<sub>2</sub>eq and the net revenue in monetary units (e.g., Euros) and present the results for the market-based and location-based method;</p> <p>(c) include the total GHG emissions in the numerator and overall net revenue in the denominator;</p> <p>(d) calculate the total GHG emissions as required by paragraphs 44 (d) and 52; and</p> <p>(e) calculate the net revenue in line with the requirements in accounting standards applied for financial statements, i.e., IFRS 15 or local GAAP.</p>	<p>GHG intensity based on net revenue</p> <p>Calculation guidance</p> <p>AR 19. When disclosing the information on GHG intensity based on net revenue required under paragraph 32, the undertaking shall:</p> <p>(a) calculate the GHG intensity ratio by the following formula:  <math display="block">\frac{\text{Total GHG emissions (t CO}_2\text{eq)}}{\text{Net revenue (Monetary unit)}}</math></p> <p>(b) express the total GHG emissions in metric tonnes of CO<sub>2</sub>eq and the net revenue in monetary units (e.g., Euros) and present the results for the market-based and location-based method;</p> <p>(c) include the total GHG emissions in the numerator and overall net revenue in the denominator;</p> <p>(d) calculate the total GHG emissions as required by paragraphs 22 (d) and 31; and</p> <p>(e) calculate the net revenue in line with the requirements in accounting standards applied for financial statements, i.e., IFRS 15 or local GAAP.</p>																								
<p>AR 54. The quantitative information may be presented in the following tabular format.</p> <table border="1" data-bbox="94 879 734 1010"> <thead> <tr> <th>GHG intensity per net revenue</th> <th>Comparative</th> <th>N</th> <th>% N / N-1</th> </tr> </thead> <tbody> <tr> <td>Total GHG emissions (location-based) per net revenue (tCO<sub>2</sub>eq/Monetary unit)</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Total GHG emissions (market-based) per net revenue (tCO<sub>2</sub>eq/Monetary unit)</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	GHG intensity per net revenue	Comparative	N	% N / N-1	Total GHG emissions (location-based) per net revenue (tCO <sub>2</sub> eq/Monetary unit)				Total GHG emissions (market-based) per net revenue (tCO <sub>2</sub> eq/Monetary unit)				<p>AR 20. The quantitative information may be presented in the following tabular format.</p> <table border="1" data-bbox="1137 879 1778 1010"> <thead> <tr> <th>GHG intensity per net revenue</th> <th>Comparative</th> <th>N</th> <th>% N / N-1</th> </tr> </thead> <tbody> <tr> <td>Total GHG emissions (location-based) per net revenue (tCO<sub>2</sub>eq/Monetary unit)</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Total GHG emissions (market-based) per net revenue (tCO<sub>2</sub>eq/Monetary unit)</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	GHG intensity per net revenue	Comparative	N	% N / N-1	Total GHG emissions (location-based) per net revenue (tCO <sub>2</sub> eq/Monetary unit)				Total GHG emissions (market-based) per net revenue (tCO <sub>2</sub> eq/Monetary unit)			
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<p><i>Connectivity of GHG intensity based on revenue with financial reporting information</i></p> <p>AR 55. The reconciliation of the net revenue used to calculate GHG intensity to the relevant line item or notes in the financial statements (as required by paragraph 55) may be done by either:</p> <p>(a) a cross-reference to the related line item or disclosure in the financial statements; or</p> <p>(b) if the net revenue cannot be directly cross-referenced to a line item or disclosure in the financial statements, by a quantitative reconciliation using the below tabular format</p> <table border="1" data-bbox="94 1198 734 1302"> <tbody> <tr> <td>Net revenue used to calculate GHG intensity</td> <td></td> </tr> <tr> <td>Net revenue (other)</td> <td></td> </tr> <tr> <td>Total net revenue (in financial statements)</td> <td></td> </tr> </tbody> </table>	Net revenue used to calculate GHG intensity		Net revenue (other)		Total net revenue (in financial statements)		<p><i>Connectivity of GHG intensity based on revenue with financial reporting information</i></p> <p>AR 21. The reconciliation of the net revenue used to calculate GHG intensity to the relevant line item or notes in the financial statements (as required by paragraph 52) may be done by either:</p> <p>(a) a cross-reference to the related line item or disclosure in the financial statements; or</p> <p>(b) if the net revenue cannot be directly cross-referenced to a line item or disclosure in the financial statements, by a quantitative reconciliation using the below tabular format</p> <table border="1" data-bbox="1137 1198 1778 1302"> <tbody> <tr> <td>Net revenue used to calculate GHG intensity</td> <td></td> </tr> <tr> <td>Net revenue (other)</td> <td></td> </tr> <tr> <td>Total net revenue (in financial statements)</td> <td></td> </tr> </tbody> </table>	Net revenue used to calculate GHG intensity		Net revenue (other)		Total net revenue (in financial statements)													
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<p><b>GHG removals and storage in own operations and the upstream and downstream value chain</b></p> <p>AR 56. In addition to their GHG emission inventories, undertakings shall provide transparency on how and to what extent they either enhance natural sinks or apply technical solutions to remove GHGs from the atmosphere in their own operations and upstream and downstream value chain. While there are no generally accepted concepts and methodologies for accounting for GHG removals, this Standard aims to increase transparency on the undertaking's efforts to remove GHGs from the atmosphere (paragraphs 56 (a) and 58). The GHG removals outside the value chain that the undertaking supports through the purchase of carbon credits are to be disclosed separately as required by paragraphs 56 (b) and 59. .</p>	<p><b>GHG removals and storage in own operations and the upstream and downstream value chain</b></p> <p>AR 22. In addition to their GHG emission inventories, undertakings shall provide transparency on how and to what extent they either enhance natural sinks or apply technical solutions to remove GHGs from the atmosphere in their own operations and upstream and downstream value chain. While there are no generally accepted concepts and methodologies for accounting for GHG removals, this [draft] Standard aims to increase transparency on the undertaking's efforts to remove GHGs from the atmosphere (paragraphs 33 and 35(b)). The GHG removals outside the value chain that the undertaking supports through the purchase of carbon credits are to be disclosed separately as required by paragraphs 33 and 35.</p>
<p>AR 57. When disclosing the information on GHG removals and storage from the undertaking's own operations and its upstream and downstream value chain required under paragraphs 56 (a) and 58, for each removal and storage activity, the undertaking shall describe:</p> <ul style="list-style-type: none"> <li>(a) the GHGs concerned;</li> <li>(b) whether removal and storage are biogenic or from land-use change (e.g., afforestation, reforestation, forest restoration, urban tree planting, agroforestry, building soil carbon, etc.), technological (e.g., direct air capture), or hybrid (e.g., bioenergy with CO2 capture and storage), and technological details about the removal, the type of storage and, if applicable, the transport of removed GHGs;</li> <li>(c) if applicable, a brief explanation of whether the activity qualifies as a nature-based solution; and</li> <li>(d) how the risk of non-permanence is managed, including determining and monitoring leakage and reversal events, as appropriate.</li> </ul>	<p>AR 23. When disclosing the information on GHG removals and storage from the undertaking's own operations and its upstream and downstream value chain required under paragraphs 33 and 35, for each removal and storage activity, the undertaking <i>may</i> describe:</p> <ul style="list-style-type: none"> <li>(a) the GHGs concerned;</li> <li>(b) whether removal and storage are biogenic or from land-use change (e.g., afforestation, reforestation, forest restoration, urban tree planting, agroforestry, building soil carbon, etc.), technological (e.g., direct air capture), or hybrid (e.g., bioenergy with CO2 capture and storage) and technological details about the removal, the type of storage and, if applicable, the transport of removed GHGs;</li> <li>(c) if applicable, a brief explanation of whether the activity qualifies as a nature-based solution; and</li> <li>(d) how the risk of non-permanence is managed, including determining and monitoring leakage and reversal events, as appropriate</li> </ul>
<p>Calculation guidance</p> <p>AR 58. When preparing the information on GHG removals and storage from the undertaking's own operations and its upstream and downstream value chain required under paragraphs 56 (a) and 58, the undertaking may:</p> <ul style="list-style-type: none"> <li>(a) consider, as far as applicable, the GHG Protocol Corporate Standard (version 2004), Product Standard (version 2011), Agriculture Guidance (version 2014), Land use, land-use change, and forestry Guidance for GHG project accounting (version 2006);</li> <li>(b) apply consensus methods on accounting for GHG removals as soon as they are available, notably the EU regulatory framework for the certification of CO2 removals;</li> <li>(c) if applicable, explain the role of removals for its climate change mitigation policy;</li> <li>(d) include removals from operations that it owns or controls, or contributes to and that have not been sold to another party through carbon credits;</li> <li>(e) if applicable, mark those GHG removal activities in own operations or the value chain that have been converted into carbon credits and sold to other parties on the voluntary market;</li> <li>(f) account for the GHG emissions associated with a removal activity, including transport and storage, under Disclosure Requirement E1-3 (Scopes 1, 2 or 3). To increase transparency on the</li> </ul>	<p>Calculation guidance</p> <p>AR 24. When preparing the information on GHG removals and storage from the undertaking's own operations and its upstream and downstream value chain required under paragraphs 33 and 35, the undertaking may:</p> <ul style="list-style-type: none"> <li>(a) consider, as far as applicable, the GHG Protocol Corporate Standard (version 2004), Product Standard (version 2011), Agriculture Guidance (version 2014), Land use, land-use change, and forestry Guidance for GHG project accounting (version 2006);</li> <li>(b) apply consensus methods on accounting for GHG removals as soon as they are available, notably the EU regulatory framework for the certification of CO2 removals;</li> <li>(c) if applicable, explain the role of removals for its climate change mitigation policy;</li> <li>(d) include removals from operations that it owns or controls, or contributes to and that have not been sold to another party through carbon credits;</li> <li>(e) if applicable, mark those GHG removal activities in own operations or the value chain that have been converted into carbon credits and sold to other parties on the voluntary market;</li> <li>(f) account for the GHG emissions associated with a removal activity, including transport and storage, under Disclosure Requirement E1-3 (Scopes 1, 2 or 3). To increase transparency on the</li> </ul>

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<p>efficiency of a removal activity, including transport and storage, the undertaking may disclose the GHG emissions associated with this activity (e.g., GHG emissions from electricity consumption of direct air capture technologies) alongside, but separately from, the amount of removed GHG emissions;</p> <p>(g) in case of a reversal, account for the respective GHG emissions as an offset for the removals in the reporting period;</p> <p>(h) use the most recent GWP values published by the IPCC based on a 100-year time horizon to calculate CO<sub>2</sub>eq emissions of non-CO<sub>2</sub> gases and describe the assumptions made, methodologies and frameworks applied for calculation of the amount of GHG removals; and</p> <p>(i) consider nature-based solutions.</p>	<p>efficiency of a removal activity, including transport and storage, the undertaking may disclose the GHG emissions associated with this activity (e.g., GHG emissions from electricity consumption of direct air capture technologies) alongside, but separately from, the amount of removed GHG emissions;</p> <p>(g) in case of a reversal, account for the respective GHG emissions as an offset for the removals in the reporting period;</p> <p>(h) use the most recent GWP values published by the IPCC based on a 100-year time horizon to calculate CO<sub>2</sub>eq emissions of non-CO<sub>2</sub> gases and describe the assumptions made, methodologies and frameworks applied for calculation of the amount of GHG removals; and</p> <p>(i) consider nature-based solutions.</p>																																																																																
<p>AR 59. The undertaking shall disaggregate and separately disclose the GHG removals that occur in its own operations and those that occur in its upstream and downstream value chain. GHG removal activities in the upstream and downstream value chain shall include those that the undertaking is actively supporting, for example, through a cooperation project with a supplier. The undertaking is not expected to include any GHG removals that may occur in its upstream and downstream value chain that it is not aware of.</p>	<p>AR 25. The undertaking shall disaggregate and separately disclose the GHG removals that occur in its own operations and those that occur in its upstream and downstream value chain. GHG removal activities in the upstream and downstream value chain shall include those that the undertaking is actively supporting, for example, through a cooperation project with a supplier. The undertaking is not expected to include any GHG removals that may occur in its upstream and downstream value chain that it is not aware of.</p>																																																																																
<p>AR 60. The quantitative information on GHG removals may be presented by using the following tabular format.</p> <table border="1" data-bbox="91 703 730 1251"> <thead> <tr> <th>Removals</th> <th>Comparative</th> <th>N</th> <th>% N / N-1</th> </tr> </thead> <tbody> <tr> <td>GHG removal activity 1 (e.g., forest restoration)</td> <td>-</td> <td></td> <td></td> </tr> <tr> <td>GHG removal activity 2 (e.g., direct air capture)</td> <td>-</td> <td></td> <td></td> </tr> <tr> <td>...</td> <td>-</td> <td></td> <td></td> </tr> <tr> <td><b>Total GHG removals from own operations (tCO<sub>2</sub>eq)</b></td> <td></td> <td></td> <td></td> </tr> <tr> <td>GHG removal activity 1 (e.g., forest restoration)</td> <td>-</td> <td></td> <td></td> </tr> <tr> <td>GHG removal activity 2 (e.g., direct air capture)</td> <td>-</td> <td></td> <td></td> </tr> <tr> <td>...</td> <td>-</td> <td></td> <td></td> </tr> <tr> <td><b>Total GHG removals in the upstream and downstream value chain (tCO<sub>2</sub>eq)</b></td> <td></td> <td></td> <td></td> </tr> <tr> <td><b>Reversals (tCO<sub>2</sub>eq)</b></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Removals	Comparative	N	% N / N-1	GHG removal activity 1 (e.g., forest restoration)	-			GHG removal activity 2 (e.g., direct air capture)	-			...	-			<b>Total GHG removals from own operations (tCO<sub>2</sub>eq)</b>				GHG removal activity 1 (e.g., forest restoration)	-			GHG removal activity 2 (e.g., direct air capture)	-			...	-			<b>Total GHG removals in the upstream and downstream value chain (tCO<sub>2</sub>eq)</b>				<b>Reversals (tCO<sub>2</sub>eq)</b>				<p>AR 26. The quantitative information on GHG removals may be presented by using the following tabular format.</p> <table border="1" data-bbox="1133 703 1771 1251"> <thead> <tr> <th>Removals</th> <th>Comparative</th> <th>N</th> <th>% N / N-1</th> </tr> </thead> <tbody> <tr> <td>GHG removal activity 1 (e.g., forest restoration)</td> <td>-</td> <td></td> <td></td> </tr> <tr> <td>GHG removal activity 2 (e.g., direct air capture)</td> <td>-</td> <td></td> <td></td> </tr> <tr> <td>...</td> <td>-</td> <td></td> <td></td> </tr> <tr> <td><b>Total GHG removals from own operations (tCO<sub>2</sub>eq)</b></td> <td></td> <td></td> <td></td> </tr> <tr> <td>GHG removal activity 1 (e.g., forest restoration)</td> <td>-</td> <td></td> <td></td> </tr> <tr> <td>GHG removal activity 2 (e.g., direct air capture)</td> <td>-</td> <td></td> <td></td> </tr> <tr> <td>...</td> <td>-</td> <td></td> <td></td> </tr> <tr> <td><b>Total GHG removals in the upstream and downstream value chain (tCO<sub>2</sub>eq)</b></td> <td></td> <td></td> <td></td> </tr> <tr> <td><b>Reversals (tCO<sub>2</sub>eq)</b></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Removals	Comparative	N	% N / N-1	GHG removal activity 1 (e.g., forest restoration)	-			GHG removal activity 2 (e.g., direct air capture)	-			...	-			<b>Total GHG removals from own operations (tCO<sub>2</sub>eq)</b>				GHG removal activity 1 (e.g., forest restoration)	-			GHG removal activity 2 (e.g., direct air capture)	-			...	-			<b>Total GHG removals in the upstream and downstream value chain (tCO<sub>2</sub>eq)</b>				<b>Reversals (tCO<sub>2</sub>eq)</b>			
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<p><b>GHG mitigation projects financed through carbon credits</b></p> <p>AR 61. Financing GHG emission reduction projects outside the undertaking's value chain through purchasing carbon credits that fulfil high-quality standards can be a useful contribution towards</p>	<p><b>GHG mitigation projects financed through carbon credits</b></p> <p>AR 27. Financing GHG emission reduction projects outside the undertaking's value chain through purchasing carbon credits that fulfil high-quality standards can be a useful contribution towards</p>																																																																																



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mitigating climate change. This Standard requires the undertaking to disclose whether it uses carbon credits separately from the GHG emissions (paragraphs 56 (b) and 59) and GHG emission reduction targets (Disclosure Requirement E1-4). It also requires the undertaking to show the extent of use and which quality criteria it uses for those carbon credits.	mitigating climate change. This [draft] Standard requires the undertaking to disclose whether it uses carbon credits separately from the GHG emissions (paragraphs 33 and 36) and GHG emission reduction targets ( <i>Section 3 [draft] LSME ESRS</i> ). It also requires the undertaking to show the extent of use and which quality criteria it uses for those carbon credits.
AR 62. When disclosing the information on carbon credits required under paragraphs 56 (b) and 59, the undertaking shall disclose the following disaggregation as applicable: (a) the share (percentage of volume) of reduction projects and removal projects; (b) for carbon credits from removal projects, an explanation whether they are from biogenic or technological sinks; (c) the share (percentage of volume) for each recognised quality standard; (d) the share (percentage of volume) issued from projects in the EU; and (e) the share (percentage of volume) that qualifies as a corresponding adjustment under Article. 6 of the Paris Agreement.	AR 28. When disclosing the information on carbon credits required under paragraphs 33 and 36, the undertaking shall disclose the following disaggregation as applicable: (a) the share (percentage of volume) of reduction projects and removal projects; (b) for carbon credits from removal projects, an explanation whether they are from biogenic or technological sinks; (c) the share (percentage of volume) for each recognised quality standard; (d) the share (percentage of volume) issued from projects in the EU; and (e) the share (percentage of volume) that qualifies as a corresponding adjustment under Article. 6 of the Paris Agreement.
<i>Calculation guidance</i> AR 63. When preparing the information on carbon credits required under paragraphs 56 (b) and 59, the undertaking shall: (a) Consider recognised quality standards; (b) if applicable, explain the role of carbon credits in its climate change mitigation policy; (c) not include carbon credits issued from GHG emission reduction projects within its value chain as the respective GHG emission reductions shall already be disclosed under Disclosure Requirement E1-6 (Scope 2 or Scope 3) at the time they occur (i.e., double counting is avoided); (d) not include carbon credits from GHG removal projects within its value chain as the respective GHG removals may already be accounted for under Disclosure Requirement E1-7 at the time they occur (i.e., double counting is avoided); (e) not disclose carbon credits as an offset for its GHG emissions under Disclosure Requirement E1-6 on GHG emissions; (f) not disclose carbon credits as a means to reach the GHG emission reduction targets disclosed under Disclosure Requirement E1-4; and (g) calculate the amount of carbon credits to be cancelled in the future, as the sum of carbon credits in metric tonnes of CO <sub>2</sub> eq over the duration of existing contractual agreements.	<i>Calculation guidance</i> AR 29. When preparing the information on carbon credits required under paragraphs 53 (b) and 56, the undertaking shall: (a) Consider recognised quality standards; (b) if applicable, explain the role of carbon credits in its climate change mitigation policy; (c) not include carbon credits issued from GHG emission reduction projects within its value chain as the respective GHG emission reductions shall already be disclosed under Disclosure Requirement E1-3 (Scope 2 or Scope 3) at the time they occur (i.e., double counting is avoided); (d) not include carbon credits from GHG removal projects within its value chain as the respective GHG removals may already be accounted for under Disclosure Requirement E1-4 at the time they occur (i.e., double counting is avoided); (e) not disclose carbon credits as an offset for its GHG emissions under Disclosure Requirement E1-4 on GHG emissions; (f) not disclose carbon credits as a means to reach the GHG emission reduction targets disclosed under Disclosure Requirement E1-4; and (g) calculate the amount of carbon credits to be cancelled in the future, as the sum of carbon credits in metric tonnes of CO <sub>2</sub> eq over the duration of existing contractual agreements.
AR 64. The information on carbon credits cancelled in the reporting year and planned to be cancelled in the future may be presented using the following tabular formats.	AR 30. The information on carbon credits cancelled in the reporting year and planned to be cancelled in the future may be presented using the following tabular formats.

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<p><b>Disclosure Requirement E1-8 – Internal carbon pricing</b></p> <p>AR 65. When disclosing the information required under paragraphs 62 and 63, if applicable, the undertaking shall briefly explain whether and how the carbon prices used in internal carbon pricing schemes are consistent with those used in financial statements. This shall be done in respect of the internal carbon prices used for,</p> <p>(a) the assessment of the useful life and residual value of its assets (intangibles, property, plant and equipment);</p> <p>(b) the impairment of assets; and</p> <p>(c) the fair value measurement of assets acquired through business acquisitions.</p>	<p><b>Disclosure Requirement E1-8 – Internal carbon pricing</b></p> <p><del>AR 65. When disclosing the information required under paragraphs 62 and 63, if applicable, the undertaking shall briefly explain whether and how the carbon prices used in internal carbon pricing schemes are consistent with those used in financial statements. This shall be done in respect of the internal carbon prices used for,</del></p> <p><del>(a) the assessment of the useful life and residual value of its assets (intangibles, property, plant and equipment);</del></p> <p><del>(b) the impairment of assets; and</del></p> <p><del>(c) the fair value measurement of assets acquired through business acquisitions.</del></p>																																																																				
<p>AR 66. The information may be presented by using the following table:</p> <p><b>Disclosure Requirement E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities Anticipated financial effects from material physical and transition risks</b></p> <p>AR 67. Material climate-related physical risks and transition risks may affect the undertaking's financial position (e.g., owned assets, financially-controlled leased assets, and liabilities), performance (e.g., potential future increase/decrease in net revenue and costs due to business interruptions, increased supply prices resulting in potential margin erosions), and cash flows. The low probability, high severity and long-term time horizons of some climate-related physical risk</p>	<p>AR 66. The information may be presented by using the following table:</p> <p><b>Disclosure Requirement E1-4 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities Anticipated financial effects from material physical and transition risks</b></p> <p>AR 31. Material climate-related physical risks and transition risks may affect the undertaking's financial position (e.g., owned assets, financially-controlled leased assets, and liabilities), performance (e.g., potential future increase/decrease in net revenue and costs due to business interruptions, increased supply prices resulting in potential margin erosions), and cash flows. The low probability, high severity and long-term time horizons of some climate-related physical risk</p>																																																																				

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AR 68. Currently, there is no commonly accepted methodology to assess or measure how material physical risks and transition risks may affect the undertaking's future financial position, financial, performance and cash flows. Therefore, the disclosure of the financial effects (as required by paragraphs 64, 66 and 67) will depend on the undertaking's internal methodology and the exercise of significant judgement in determining the inputs, and assumptions needed to quantify their anticipated financial effects.	AR 32. Currently, there is no commonly accepted methodology to assess or measure how material physical risks and transition risks may affect the undertaking's future financial position, financial, performance and cash flows. Therefore, the disclosure of the financial effects (as required by paragraphs 45, 46 and 47) will depend on the undertaking's internal methodology and the exercise of significant judgement in determining the inputs, and assumptions needed to quantify their anticipated financial effects.
Calculation guidance - Anticipated financial effects from material physical risks AR 69. When disclosing the information required under paragraphs 64 (a) and 66, the undertaking shall explain whether and how: (a) it assessed the anticipated financial effects for assets and business activities at material physical risk, including the scope of application, time horizons, calculation methodology, critical assumptions and parameters and limitations of the assessment; and (b) the assessment of assets and business activities considered to be at material physical risk relies on or is part of the process to determine material physical risk as required under paragraphs 20 (b) and AR 11 and to determine climate scenarios as required under paragraphs 19 and AR 13 to AR 14. In particular, it shall explain how it has defined medium- and long-term time horizons and how these definitions are linked to the expected lifetime of the undertaking's assets, strategic planning horizons and capital allocation plans.	Calculation guidance - Anticipated financial effects from material physical risks AR 33. When disclosing the information required under paragraphs 37 (a) and 39, the undertaking shall explain whether and how: (a) it assessed the anticipated financial effects for assets and business activities at material physical risk, including the scope of application, time horizons, calculation methodology, critical assumptions and parameters and limitations of the assessment; and (b) the assessment of assets and business activities considered to be at material physical risk relies on or is part of the process to determine material physical risk as required under paragraphs 18 (b) and AR 12 and to determine climate scenarios as required under paragraphs 19 and AR 13 to AR 14. In particular, it shall explain how it has defined medium- and long-term time horizons and how these definitions are linked to the expected lifetime of the undertaking's assets, strategic planning horizons and capital allocation plans.
AR 70. When preparing the information on assets at material physical risk that is required to be disclosed under paragraph 66 (a), the undertaking shall: (a) Calculate the assets at material physical risk in terms of monetary amount and as a proportion (percentage) of total assets at the reporting date (i.e., the proportion is an estimate of the carrying value of assets at material physical risk divided by total carrying value as stated in the statement of financial position or balance sheet). The estimate of assets at material physical risk shall be derived starting from the assets recognised in the financial statements. The estimate of monetary amounts and proportion of assets at physical risk may be presented as either a single amount or range. (b) All types of assets including finance-lease / right-of-use assets shall be considered when determining the assets at material physical risk. (c) To contextualise this information, the undertaking shall: i. disclose the location of its significant assets at material physical risk. Significant assets located in the EU territory shall be aggregated by NUTS codes 3 level digits (Nomenclature of Territorial Units for Statistics). For significant assets located outside EU territory, the breakdown by NUTS code will only be provided where applicable. ii. disaggregate the monetary amounts of assets at risk by acute and chronic physical risk . (d) calculate the share of assets at material physical risk resulting from paragraph 66 (a) that is addressed by the climate change adaptation actions based on the information disclosed under Disclosure Requirement E1-3. This aims at approximating net risks.	AR 34. When preparing the information on assets at material physical risk that is required to be disclosed under paragraph 37 (a), the undertaking shall: (a) Calculate the assets at material physical risk in terms of monetary amount and as a proportion (percentage) of total assets at the reporting date (i.e., the proportion is an estimate of the carrying value of assets at material physical risk divided by total carrying value as stated in the statement of financial position or balance sheet). The estimate of assets at material physical risk shall be derived starting from the assets recognised in the financial statements. The estimate of monetary amounts and proportion of assets at physical risk may be presented as either a single amount or range. (b) All types of assets including finance-lease / right-of-use assets shall be considered when determining the assets at material physical risk. (c) To contextualise this information, the undertaking shall: i. disclose the location of its significant assets at material physical risk. Significant assets located in the EU territory shall be aggregated by NUTS codes 3 level digits (Nomenclature of Territorial Units for Statistics). For significant assets located outside EU territory, the breakdown by NUTS code will only be provided where applicable. ii. disaggregate the monetary amounts of assets at risk by acute and chronic physical risk . (d) calculate the share of assets at material physical risk resulting from paragraph AR 42 (a) that is addressed by the climate change adaptation actions based on the information disclosed

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<p>AR 71. When preparing the information required under paragraph 64 (a) and 66 (d), the undertaking may assess and disclose the share of net revenue from business activities at physical risk. This disclosure</p> <p>(a) shall be based on the net revenue in line with the requirements in accounting standards applied for financial statements, i.e., IFRS 15 or local GAAP.</p> <p>(b) may include a breakdown of the undertaking's business activities with the corresponding details of the associated percentage of total net revenue, the risk factors (hazards, exposure and sensitivity) and, if possible, the magnitude of the anticipated financial effects in terms of margin erosion over the short-, medium- and long-term time horizons. The nature of business activities may also be disaggregated by operating segments if the undertaking has disclosed the contribution of margins by operational segments in its segment reporting in the financial statements.</p>	<p>under Disclosure Requirement 11 (IR-3)-3 – <i>Policies and actions in relation to sustainability matters (Section 3)</i>. <del>This aims at approximating net risks.</del></p> <p>AR 35. When preparing the information required under paragraph 45(a), the undertaking may assess and disclose the share of net revenue from business activities at physical risk. This disclosure:</p> <p>(a) shall be based on the net revenue in line with the requirements in accounting standards applied for financial statements, i.e., IFRS 15 or local GAAP.</p> <p>(b) may include a breakdown of the undertaking's business activities with the corresponding details of the associated percentage of total net revenue, the risk factors (hazards, exposure and sensitivity) and, if possible, the magnitude of the anticipated financial effects in terms of margin erosion over the short-, medium and long-term time horizons. The nature of business activities may also be disaggregated by operating segments if the undertaking has disclosed the contribution of margins by operational segments in its segment reporting in the financial statements.</p>
<p>Calculation guidance - Anticipated financial effects from transition risk</p> <p>AR 72. When disclosing the information required under paragraphs 64 (b) and 67 (a), the undertaking shall explain whether and how:</p> <p>(a) it has assessed the potential effects on future financial performance and position for assets and business activities at material transition risk, including the scope of application, calculation methodology, critical assumptions and parameters, and limitations of the assessment; and</p> <p>(b) the assessment of assets and business activities considered to be at material transition risk relies on or is part of the process to determine material transition risks as described under paragraphs 20 (c) and AR 11 and to determine scenarios as required under paragraphs AR 12 to AR 13. In particular, it shall explain how it has defined medium- and long-term time horizons and how these definitions are linked to the expected lifetime of the undertaking's assets, strategic planning horizons and capital allocation plans.</p>	<p>Calculation guidance - Anticipated financial effects from transition risk</p> <p>AR 36. When disclosing the information required under paragraphs XX and XX, the undertaking shall explain whether and how:</p> <p>(a) it has assessed the potential effects on future financial performance and position for assets and business activities at material transition risk, including the scope of application, calculation methodology, critical assumptions and parameters, and limitations of the assessment; and</p> <p>(b) the assessment of assets and business activities considered to be at material transition risk relies on or is part of the process to determine material transition risks as described under paragraphs 18(c) and AR 12 and to determine scenarios as required under paragraphs AR 13 to AR 14. In particular, it shall explain how it has defined medium- and long-term time horizons and how these definitions are linked to the expected lifetime of the undertaking's assets, strategic planning horizons and capital allocation plans.</p>
<p>AR 73. When disclosing the information on assets at material transition risk as required under paragraphs 67 (a) and (b):</p> <p>(a) the undertaking shall at the very least include an estimate of the amount of potentially stranded assets (in monetary amounts and as a proportion/percentage) from the reporting year until 2030 and from 2030 to 2050. Stranded assets are understood as the active or firmly planned key assets of the undertaking with significant locked-in GHG emissions over their operating lifetime. Firmly planned key assets are those that the undertaking will most likely deploy within the next 5 years. The amount may be expressed as a range of asset values based on different climate and policy scenarios, including a scenario aligned with limiting climate change to 1.5°C.</p> <p>(b) the undertaking shall disclose a breakdown of the carrying value of its real estate assets, including rights-of-use assets, by energy efficiency classes. The energy efficiency shall be represented in terms of either the ranges of energy consumption in kWh/m<sup>2</sup> or the EPC (Energy Performance Certificate) label class. If the undertaking cannot obtain this information on a best-</p>	<p>AR 37. When disclosing the information on assets at material transition risk as required under paragraphs 40(a) and (b):</p> <p>(c) the undertaking shall at the very least include an estimate of the amount of potentially stranded assets (in monetary amounts and as a proportion/percentage) from the reporting year until 2030 and from 2030 to 2050. Stranded assets are understood as the active or firmly planned key assets of the undertaking with significant locked-in GHG emissions over their operating lifetime. Firmly planned key assets are those that the undertaking will most likely deploy within the next five years. The amount may be expressed as a range of asset values based on different climate and policy scenarios, including a scenario aligned with limiting climate change to 1.5°C.</p> <p>(d) the undertaking may disclose a breakdown of the carrying value of its real estate assets, including rights-of-use assets, by energy efficiency classes. The energy efficiency shall be represented in terms of either the ranges of energy consumption in kWh/m<sup>2</sup> or the EPC (Energy Performance Certificate) label class. If the undertaking cannot obtain this information on a best-</p>

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<p>effort basis, it shall disclose the total carrying amount of the real estate assets for which the energy consumption is based on internal estimates.</p> <p>(c) the undertaking shall calculate the proportion (percentage) of total assets (including finance lease/right-of-use assets) at material transition risk addressed by the climate change mitigation actions based on the information disclosed under Disclosure Requirement E1-3. The total assets amount is the carrying amount on the balance sheet at the reporting date.</p>	<p>effort basis, it shall disclose the total carrying amount of the real estate assets for which the energy consumption is based on internal estimates.</p> <p>(e) the undertaking shall calculate the proportion (percentage) of total assets (including finance lease/right-of-use assets) at material transition risk addressed by the climate change mitigation actions based on the information disclosed under Disclosure Requirement E1-3. The total assets amount is the carrying amount on the balance sheet as of the reporting date.</p>
<p>AR 74. When disclosing the information on potential liabilities from material transition risks required under paragraph 67(d):</p> <p>(a) undertakings that operate installations regulated under an emission trading scheme may include a range of potential future liabilities originating from these schemes;</p> <p>(b) undertakings subject to the EU ETS, may disclose the potential future liabilities that relate to their allocation plans for the period before and until 2030. The potential liability may be estimated on the basis of:</p> <p>i. the number of allowances held by the undertaking at the beginning of the reporting period;</p> <p>ii. the number of allowances to be purchased in the market yearly, i.e., before and until 2030;</p> <p>iii. the gap between estimated future emissions under various transition scenarios and free allocations of allowances that are known for the period until 2030, and iv. the estimated yearly cost per tonne of CO<sub>2</sub> for which an allowance needs to be purchased;</p> <p>(c) In assessing its potential future liabilities, the undertaking may consider and disclose the number of Scope 1 GHG emission allowances within regulated emission trading schemes and the cumulative number of emission allowances stored (from previous allowances) at the beginning of the reporting period;</p> <p>(d) undertakings disclosing volumes of carbon credits planned to be cancelled in the near future (Disclosure Requirement E1-7) may disclose the potential future liabilities associated with those based on existing contractual agreements;</p> <p>(e) the undertaking may also include its monetised gross Scope 1, 2 and total GHG emissions (in monetary units) calculated as follows:</p> <p>i. monetised Scope 1 and 2 GHG emissions in the reporting year by the following formula:</p> $\text{Total GHG emissions (t CO}_2\text{eq)} \times \text{GHG emission cost rate } \left( \frac{\text{€}}{\text{t CO}_2\text{eq}} \right)$ <p>ii. monetised total GHG emissions in the reporting year by the following formula:</p> $\text{Total GHG emissions (t CO}_2\text{eq)} \times \text{GHG emission cost rate } \left( \frac{\text{€}}{\text{t CO}_2\text{eq}} \right)$ <p>iii. by use of a lower, middle and upper cost rate<sup>29</sup> for GHG emissions (e.g., market carbon price and different estimates for the societal costs of carbon) and reasons for selecting them.</p>	<p>AR 38. When disclosing the information on potential liabilities from material transition risks required under paragraph 40(d):</p> <p>(a) undertakings that operate installations regulated under an emission trading scheme may include a range of potential future liabilities originating from these schemes;</p> <p>(b) undertakings subject to the EU ETS, may disclose the potential future liabilities that relate to their allocation plans for the period before and until 2030. The potential liability may be estimated on the basis of:</p> <p>i. the number of allowances held by the undertaking at the beginning of the reporting period;</p> <p>ii. the number of allowances to be purchased in the market yearly, i.e., before and until 2030;</p> <p>iii. the gap between estimated future emissions under various transition scenarios and free allocations of allowances that are known for the period until 2030; and</p> <p>iv. the estimated yearly cost per tonne of CO<sub>2</sub> for which an allowance needs to be purchased;</p> <p>(c) In assessing its potential future liabilities, the undertaking may consider and disclose the number of Scope 1 GHG emission allowances within regulated emission trading schemes and the cumulative number of emission allowances stored (from previous allowances) at the beginning of the reporting period;</p> <p>(d) undertakings disclosing volumes of carbon credits planned to be cancelled in the near future (Disclosure Requirement E1-7) may disclose the potential future liabilities associated with those based on existing contractual agreements;</p> <p>(e) the undertaking may also include its monetised gross Scope 1, 2 and total GHG emissions (in monetary units) calculated as follows:</p> <p>v. monetised Scope 1 and 2 GHG emissions in the reporting year by the following formula:</p> $\text{Total GHG emissions (t CO}_2\text{eq)} \times \text{GHG emission cost rate } \left( \frac{\text{€}}{\text{t CO}_2\text{eq}} \right)$ <p>vi. monetised total GHG emissions in the reporting year by the following formula:</p> $\text{Total GHG emissions (t CO}_2\text{eq)} \times \text{GHG emission cost rate } \left( \frac{\text{€}}{\text{t CO}_2\text{eq}} \right)$ <p>vii. by use of a lower, middle and upper cost rate for GHG emissions (e.g., market carbon price and different estimates for the societal costs of carbon) and reasons for selecting them.</p>

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AR 75. Other approaches and methodologies may be applied to assess how transition risks may affect the future financial position of the undertaking. In any case, the disclosure of anticipated financial effects shall include a description of the methodologies and definitions used by the undertaking	AR 39. Other approaches and methodologies may be applied to assess how transition risks may affect the future financial position of the undertaking. In any case, the disclosure of anticipated financial effects shall include a description of the methodologies and definitions used by the undertaking												
AR 76. When preparing the information required under paragraph 67 (e), the undertaking may assess and disclose the share of net revenue from business activities at transition risks. This disclosure: (a) shall be based on the net revenue in line with the requirements in accounting standards applied for financial statements, i.e., IFRS 15 or local GAAP. (b) may include a breakdown of the undertaking's business activities with the corresponding details of the associated percentage of current net revenue, risk factors (events and exposure), and when possible, the anticipated financial effects related to margin erosion over the short-, medium- and long-term. The nature of business activities may also be disaggregated by operating segments if the undertaking has disclosed the contribution of margins by operational segments in its segment reporting in the financial statements.	AR 40. When preparing the information required under paragraph 63 (d), the undertaking may assess and disclose the share of net revenue from business activities at transition risks. This disclosure: (a) shall be based on the net revenue in line with the requirements in accounting standards applied for financial statements, i.e., IFRS 15 or local GAAP. (b) may include a breakdown of the undertaking's business activities with the corresponding details of the associated percentage of current net revenue, risk factors (events and exposure), and when possible, the anticipated financial effects related to margin erosion over the short-, medium- and long-term. The nature of business activities may also be disaggregated by operating segments if the undertaking has disclosed the contribution of margins by operational segments in its segment reporting in the financial statements.												
<p>Connectivity with financial reporting information</p> <p>AR 77. The reconciliation of the significant amount of assets, liabilities, and net revenue (vulnerable to either material physical risks or transition risks) to the relevant line item or disclosure (e.g., in segment reporting) in the financial statements (as required by paragraph 68) may be presented by the undertaking as follows: (a) as a cross-reference to the related line item or disclosure in the financial statements if these amounts are identifiable in the financial statements; or (b) If these cannot be directly cross-referenced, as a quantitative reconciliation of each to the relevant line item or disclosure in the financial statement using the below tabular format:</p> <table border="1" data-bbox="91 933 734 1066"> <tr> <td>Carrying amount of assets or liabilities or net revenue vulnerable to either material physical or transition risks</td> <td></td> </tr> <tr> <td>Adjusting items</td> <td></td> </tr> <tr> <td>Assets or liabilities or net revenue in the financial statements</td> <td></td> </tr> </table>	Carrying amount of assets or liabilities or net revenue vulnerable to either material physical or transition risks		Adjusting items		Assets or liabilities or net revenue in the financial statements		<p>Connectivity with financial reporting information</p> <p>AR 41. The reconciliation of the significant amount of assets, liabilities, and net revenue (vulnerable to either material physical risks or transition risks) to the relevant line item or disclosure (e.g., in segment reporting) in the financial statements (as required by paragraph 65) may be presented by the undertaking as follows: (a) as a cross-reference to the related line item or disclosure in the financial statements if these amounts are identifiable in the financial statements; or (b) If these cannot be directly cross-referenced, as a quantitative reconciliation of each to the relevant line item or disclosure in the financial statement using the below tabular format:</p> <table border="1" data-bbox="1135 933 1778 1066"> <tr> <td>Carrying amount of assets or liabilities or net revenue vulnerable to either material physical or transition risks</td> <td></td> </tr> <tr> <td>Adjusting items</td> <td></td> </tr> <tr> <td>Assets or liabilities or net revenue in the financial statements</td> <td></td> </tr> </table>	Carrying amount of assets or liabilities or net revenue vulnerable to either material physical or transition risks		Adjusting items		Assets or liabilities or net revenue in the financial statements	
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AR 78. The undertaking shall ensure the consistency of data and assumptions to assess and report the anticipated financial effects from material physical risks and transition risks in the sustainability statement with the corresponding data and assumptions used for the financial statements (e.g., carbon prices used for assessing impairment of assets, the useful life of assets, estimates and provisions). The undertaking shall explain the reasons for any inconsistencies (e.g., if the full financial implications of climate-related risks are still under assessment or are not deemed material in the financial statements).	AR 42. The undertaking shall ensure the consistency of data and assumptions to assess and report the anticipated financial effects from material physical risks and transition risks in the sustainability statement with the corresponding data and assumptions used for the financial statements (e.g., carbon prices used for assessing impairment of assets, the useful life of assets, estimates and provisions). The undertaking shall explain the reasons for any inconsistencies (e.g., if the full financial implications of climate-related risks are still under assessment or are not deemed material in the financial statements).												
AR 79. For potential future effects on liabilities (as required by paragraph 67 (d)), if applicable, the undertaking shall cross-reference the description of the emission trading schemes in the financial statements.	AR 43. For potential future effects on liabilities (as required by paragraph 64(d)), if applicable, the undertaking shall cross-reference the description of the emission trading schemes in the financial statements.												



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<p><b>Climate-related opportunities</b> AR 80. When disclosing the information under paragraph 69 (a), the undertaking shall explain the nature of the cost savings (e.g., from reduced energy consumption), the time horizons and the methodology used, including the scope of the assessment, critical assumptions, and limitations, and whether and how scenario analysis was applied.</p>	<p><b>Climate-related opportunities</b> AR 44. When disclosing the information under paragraph 43, the undertaking may explain the nature of the cost savings (e.g., from reduced energy consumption), the time horizons and the methodology used, including the scope of the assessment, critical assumptions, and limitations, and whether and how scenario analysis was applied.</p>
<p>AR 81. When disclosing the information required under paragraph 69 (b), the undertaking shall explain how it has assessed the market size or any expected changes to net revenue from low-carbon products and services or adaptation solutions including the scope of the assessment, the time horizon, critical assumptions, and limitations and to what extent this market is accessible to the undertaking. The information on the market size may be put in perspective to the current taxonomy-aligned revenue disclosed under the provisions of Regulation (EU) 2020/852. The entity may also explain how it will pursue its climate-related opportunities and, where possible, this should be linked to the disclosures on policies, targets and actions under Disclosure Requirements E1-2, E1-3 and E1-4.</p>	<p>AR 45. When disclosing the information required under paragraph 43, the undertaking may explain how it has assessed the market size or any expected changes to net revenue from low-carbon products and services or adaptation solutions including the scope of the assessment, the time horizon, critical assumptions, and limitations and to what extent this market is accessible to the undertaking. The information on the market size may be put in perspective to the current taxonomy-aligned revenue disclosed under the provisions of Regulation (EU) 2020/852. The entity may also explain how it will pursue its climate-related opportunities and, where possible, this should be linked to the disclosures on policies, targets and actions under Disclosure Requirements E1-2, E1-3 and E1-4.</p>
<p><b>ESRS E2 - POLLUTION</b></p>	
<p><b>ESRS 2 General disclosures</b></p> <p><b>Impact, risk and opportunity management</b></p> <p><b>Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material pollution-related impacts, risks and opportunities</b></p>	<p><b>ESRS 2 General disclosures</b></p> <p><b>Impact, risk and opportunity management</b></p> <p><b>Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material pollution-related impacts, risks and opportunities</b></p>
<p><b>Disclosure Requirement E2-1 – Policies related to pollution</b></p>	<p><b>Disclosure Requirement E2-1 – Policies related to pollution</b></p> <p>Centralized in Section 2 and 3</p>
<p><b>Disclosure Requirement E2-2 – Actions and resources related to pollution</b></p>	<p><b>Disclosure Requirement E2-2 – Actions and resources related to pollution</b></p> <p>Centralized in Section 2 and 3</p>
<p><b>Metrics and targets</b></p> <p><b>Disclosure Requirement E2-3 – Targets related to pollution</b></p>	<p><b>Metrics and targets</b></p> <p><b>Disclosure Requirement E2-3 – Targets related to pollution</b></p> <p>Centralized in Section 2 and 3</p>
<p><b>Disclosure Requirement E2-4 – Pollution of air, water and soil</b></p>	<p><b>Disclosure Requirement E2-1 – Pollution of air, water and soil</b></p> <p>Centralized in Section 2 and 3</p>
<p>AR 20. The information to be provided on microplastics under paragraph 28(b) shall include microplastics that have been generated or used during production processes or that are procured, and that leave the undertaking’s facilities as emissions, as products, or as part of products or</p>	<p>AR 46. The information to be provided on microplastics under paragraph 27(e) shall include microplastics that have been generated or used during production processes or that are procured, and that leave the undertaking’s facilities as emissions, as products, or as part of products or</p>

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services. Microplastics may be unintentionally produced when larger pieces of plastics like car tires or synthetic textiles wear and tear or may be deliberately manufactured and added to products for specific purposes (e.g., exfoliating beads in facial or body scrubs).	services. Microplastics may be unintentionally produced when larger pieces of plastics like car tires or synthetic textiles wear and tear or may be deliberately manufactured and added to products for specific purposes (e.g., exfoliating beads in facial or body scrubs).
AR 21. The volume of pollutants shall be presented in appropriate mass units, for example tonnes or kilogrammes.	AR 47. The volume of pollutants shall be presented in appropriate mass units, for example in tonnes or kilogrammes.
AR 22. The information required under this Disclosure Requirement shall be provided at the level of the reporting undertaking. However, the undertaking may disclose additional breakdown including information at site level or a breakdown of its emissions by type of source, by sector or by geographical area.	AR 48. The information required under this Disclosure Requirement shall be provided at the level of the reporting undertaking. However, the undertaking may disclose additional breakdown including information at site level or a breakdown of its emissions by type of source, by sector or by geographical area.
AR 23. When providing contextual information on the emissions, the undertaking may consider: (a) the local air quality indices (AQI) for the area where the undertaking's air pollution occurs; (b) the degree of urbanisation (DEGURBA) for the area where air pollution occurs; and (c) the undertaking's percentage of the total emissions of pollutants to water and soil occurring in areas at water risk, including areas of high-water stress.	<i>Contextual information</i> AR 49. When providing contextual information on the emissions, the undertaking may consider: (a) the local air quality indices (AQI) for the area where the undertaking's air pollution occurs; (b) the degree of urbanisation (DEGURBA) for the area where air pollution occurs; and (c) the undertaking's percentage of the total emissions of pollutants to water and soil occurring in areas at water risk, including areas of high-water stress;
AR 24. The information provided under this Disclosure Requirement may refer to information the undertaking is already required to report under other existing legislation (i.e., IED, E-PRTR, etc.).	AR 50. The information provided under this Disclosure Requirement may refer to information the undertaking is already required to report under other existing legislation (i.e., IED, E-PRTR, etc.).
AR 25. Where the undertaking's activities are subject to Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions (IED) and relevant Best Available Techniques Reference Documents (BREFs), irrespective of whether the activity takes place within the European Union or not, the undertaking may disclose the following additional information: (a) a list of installations operated by the undertaking that fall under the IED and EU- BAT Conclusions; (b) a list of any non-compliance incidents or enforcement actions necessary to ensure compliance in case of breaches of permit conditions; (c) the actual performance, as specified in the EU-BAT conclusions for industrial installations, and comparison of the undertaking's environmental performance against "emission levels associated with the best available techniques" the (BATAEL) as described in EU-BAT conclusions; (d) the actual performance of the undertaking against "environmental performance levels associated with the best available techniques" (BAT-AEPLs) provided that they are applicable to the sector and installation; and (e) a list of any compliance schedules or derogations granted by competent authorities according to Art. 15(4) Directive 2010/75/EU that are associated with the implementation of BAT-AELs.	AR 51. Where the undertaking's activities are subject to Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions (IED) and relevant Best Available Techniques Reference Documents (BREFs), irrespective of whether the activity takes place within the European Union or not, the undertaking may disclose the following additional information: (a) a list of installations operated by the undertaking that fall under the IED and EU BAT Conclusions; (b) a list of any non-compliance incidents or enforcement actions necessary to ensure compliance in case of breaches of permit conditions; (c) the actual performance, as specified in the EU-BAT conclusions for industrial installations, and comparison of the undertaking's environmental performance against "emission levels associated with the best available techniques" the (BAT-AEL) as described in EU-BAT conclusions; (d) the actual performance of the undertaking against "environmental performance levels associated with the best available techniques (BAT-AEPLs) provided that they are applicable to the sector and installation; and (e) a list of any compliance schedules or derogations granted by competent authorities according to Art. 15(4) Directive 2010/75/EU that are associated with the implementation of BAT-AELs.
Methodologies AR 26. When providing information on pollutants, the undertaking shall consider approaches for quantification in the following order of priority: (a) direct measurement of emissions, effluents or other pollution through the use of recognised continuous monitoring systems (e.g., AMS Automated Measuring Systems); (b) periodic measurements;	Methodologies AR 52. When providing information on pollutants, the undertaking shall consider approaches for quantification in the following order of priority: (a) direct measurement of emissions, effluents or other pollution through the use of recognised continuous monitoring systems (e.g., AMS Automated Measuring Systems); (b) periodic measurements;

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(c) calculation based on site-specific data; (d) calculation based on published pollution factors; and (e) estimation.	(c) calculation based on site-specific data; (d) calculation based on published pollution factors; and (e) estimation.
AR 27. Regarding the disclosure of methodologies required by paragraph 30, the undertaking shall consider: (a) whether its monitoring is carried out in accordance with EU BREF Standards or another relevant reference benchmark; and (b) whether and how the calibration tests of the AMS were undertaken and the verification of periodic measurement by independent labs were ensured.	AR 53. Regarding the disclosure of methodologies required by paragraph 1, the undertaking shall consider: (a) whether its monitoring is carried out in accordance with EU BREF Standards or another relevant reference benchmark; and (b) whether and how the calibration tests of the AMS were undertaken and the verification of periodic measurement by independent labs were ensured.
	AR 54. <i>The amounts referred in paragraph 35 shall include the emissions from those facilities over which the undertaking has financial control and those over which it has operational control It shall include only the emissions from facilities for which the applicable threshold value specified in Annex II of Regulation (EC) No 166/2006 is exceeded.</i>
	AR 55. <i>When disclosing the information required under paragraph 36, when an inferior methodology compared to direct measurement of emissions is chosen to quantify emissions, the reasons for choosing this inferior methodology shall be outlined by the undertaking. If the undertaking uses estimates, it shall disclose the standard, sectoral study or sources which form the basis of its estimates, as well as the possible degree of uncertainty and the range of estimates reflecting the measurement uncertainty.</i>
<b>Disclosure Requirement E2-5 – Substances of concern and substances of very high concern</b>  <b>List of substances to be considered</b> AR 28. In order for the information to be complete, substances in the undertaking’s own operations and those procured shall be included (e.g., embedded in ingredients, semi-finished products, or the final product).	<b>Disclosure Requirement E2-2 – Substances of concern and substances of very high concern</b>  <b>List of substances to be considered</b> AR 56. In order for the information to be complete, substances in the undertaking’s own operations and those procured shall be included (e.g., embedded in ingredients, semi-finished products, or the final product).
AR 29. The volume of pollutants shall be presented in mass units, for example tonnes or kilogrammes or other mass units appropriate for the volumes and type of pollutants being released.	AR 57. The volume of pollutants shall be presented in mass units, for example tonnes or kilogrammes or other mass units appropriate for the volumes and type of pollutants being released.
Contextual information AR 30. The information provided under this Disclosure Requirement may refer to information the undertaking is already required to report under other existing legislation (i.e., Directive 2010/75/EU, Regulation (EC) No 166/2006 “E-PRTR”, etc.).	Contextual information AR 58. The information provided under this Disclosure Requirement may refer to information the undertaking is already required to report under other existing legislation (i.e., Directive 2010/75/EU, Regulation (EC) No 166/2006 “E-PRTR”, etc.).
<b>Disclosure Requirement E2-6 – Anticipated financial effects from material pollution-related risks and opportunities</b>	<del><b>Disclosure Requirement E2-6 – Anticipated financial effects from material pollution-related risks and opportunities</b></del> <b><i>Anticipated financial effects from material environmental-related matters other than climate</i></b>  (merged and centralized with the other Anticipated financial effect p. 48)  AR 81. The undertaking may include an assessment of its related products and services at risk over the short-, medium- and long-term, explaining how these are defined, how financial amounts are estimated, and which critical assumptions are made.

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AR 33. The undertaking may include an assessment of its related products and services at risk over the short-, medium- and long-term, explaining how these are defined, how financial amounts are estimated, and which critical assumptions are made.	
AR 34. The quantification of the anticipated financial effects in monetary terms under paragraph 38(a) may be a single amount or a range.	AR 82. The quantification of the anticipated financial effects in monetary terms under paragraph 68(a) may be a single amount or a range.
<p>AR 31. The operating and capital expenditures related to incidents and deposits may include for instance:</p> <p>(a) cost for eliminating and remediating the respective pollution of air, water and soil including environmental protection;</p> <p>(b) damage compensation costs including payment of fines and penalties imposed by regulators or government authorities.</p> <p>AR 32. Incidents may include for instance interruptions of production, whether arising from the supply chain and/or from own operations, which resulted in pollution.</p>	<p>AR 83. The undertaking may to consider as part of its anticipated financial effects related with pollution:</p> <p>a) the operating and capital expenditures related to incidents and deposits may include for instance:</p> <p>i) cost for eliminating and remediating the respective pollution of air, water and soil including environmental protection;</p> <p>ii) damage compensation costs including payment of fines and penalties imposed by regulators or government authorities.</p> <p>b) <i>Costs related to the management of incidents which may include for instance</i> interruptions of production, whether arising from the supply chain and/or from own operations, which resulted in pollution.</p>
<b>ESRS E3 – WATER</b>	
<p><b>ESRS 2 General disclosures</b></p> <p><b>Impact, risk and opportunity management</b></p> <p><b>Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities</b></p>	<p><del><b>ESRS 2 General disclosures</b></del></p> <p><del><b>Impact, risk and opportunity management</b></del></p> <p><del><b>Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities</b></del></p> <p>Centralized in Section 2 and 3</p>
<p><b>Disclosure Requirement E3-1 – Policies related to water and marine resources</b></p>	<p><del><b>Disclosure Requirement E3-1 – Policies related to water and marine resources</b></del></p> <p>Centralized in Section 2 and 3</p>
<p><b>Disclosure Requirement E3-2 – Actions and resources related to water and marine resources policies</b></p>	<p><del><b>Disclosure Requirement E3-2 – Actions and resources related to water and marine resources policies</b></del></p> <p>Centralized in Section 2 and 3</p>
<p><b>Metrics and targets</b></p> <p><b>Disclosure Requirement E3-3 – Targets related to water and marine resources</b></p>	<p><del><b>Metrics and targets</b></del></p> <p><del><b>Disclosure Requirement E3-3 – Targets related to water and marine resources</b></del></p> <p>Centralized in Section 2 and 3</p>
<p><b>Disclosure Requirement E3-4 – Water consumption</b></p>	<p><b>Disclosure Requirement E3-1 – Water consumption</b></p>

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AR 28. The undertaking may operate in various areas at water risk. When disclosing information under paragraph 28 (b), the undertaking shall include such information only for those areas that have been identified as material in accordance with ESRS2 IRO-1 and ESRS2 SBM-3.	<del>AR 28. The undertaking may operate in various areas at water risk. When disclosing information under paragraph 28 (b), the undertaking shall include such information only for those areas that have been identified as material in accordance with ESRS2 IRO 1 and ESRS2 SBM 3.</del>
AR 29. When disclosing contextual information on water consumption performance required by paragraph 26, the undertaking shall explain the calculation methodologies and more specifically the share of the measure obtained from direct measurement, from sampling and extrapolation, or from best estimates.	AR 59. When disclosing contextual information on water management performance required by paragraph 42, the undertaking shall explain the calculation methodologies and more specifically the share of the measure obtained from direct measurement, from sampling and extrapolation, or from best estimates.
AR 30. The undertaking may provide information on other breakdowns (i.e., per sector or segments).	<del>AR 30. The undertaking may provide information on other breakdowns (i.e., per sector or segments).</del>
AR 31. When disclosing information required by paragraph 29 the undertaking may provide additional intensity ratios based on other denominators.	<del>AR 31. When disclosing information required by paragraph 29 the undertaking may provide additional intensity ratios based on other denominators.</del>
AR 32. The undertaking may also provide information on its water withdrawals and water discharges	<del>AR 32. The undertaking may also provide information on its water withdrawals and water discharges</del>
<b>Disclosure Requirement E3-5 - Anticipated financial effects from material water and marine resources-related risks and opportunities</b>	<del><b>Disclosure Requirement E3-5 - Anticipated financial effects from material water and marine resources-related risks and opportunities</b></del> <i>Anticipated financial effects from material environmental-related matters other than climate</i>  (merged and centralized with the other Anticipated financial effects)
<b>ESRS E4 - ECOSYSTEM AND BIODIVERSITY</b>	
<b>ESRS 2 General disclosures</b>  <b>Strategy</b>  <b>Disclosure Requirement E4-1 - Transition plan and consideration of biodiversity and ecosystems in strategy and business model</b>	<del><b>ESRS 2 General disclosures</b></del>  <del><b>Strategy</b></del>  <del><b>Disclosure Requirement E4-1 - Transition plan and consideration of biodiversity and ecosystems in strategy and business model</b></del>  Centralized in Section 2 and 3
<b>Impact, risk and opportunity management</b>  <b>Disclosure requirements related to ESRS 2 IRO-1 - Description of the processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities</b>	<del><b>Impact, risk and opportunity management</b></del>  <del><b>Disclosure requirements related to ESRS 2 IRO-1 - Description of the processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities</b></del>  Centralized in Section 2 and 3
<b>Disclosure Requirement E4-2 - Policies related to biodiversity and ecosystems</b>	<del><b>Disclosure Requirement E4-2 - Policies related to biodiversity and ecosystems</b></del>  Centralized in Section 2 and 3
<b>Disclosure Requirement E4-3 - Actions and resources related to biodiversity and ecosystems</b>	<del><b>Disclosure Requirement E4-3 - Actions and resources related to biodiversity and ecosystems</b></del>  Centralized in Section 2 and 3

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<p><b>Metrics and targets</b></p> <p><b>Disclosure Requirement E4-4 - Targets related to biodiversity and ecosystems</b></p>	<p><b>Metrics and targets</b></p> <p><b>Disclosure Requirement E4-4 – Targets related to biodiversity and ecosystems</b></p> <p>Centralized in Section 2 and 3</p>
<p><b>Disclosure Requirement E4-5 - Impact metrics related to biodiversity and ecosystems change</b></p> <p>AR 27. When preparing the information required under this Disclosure Requirement, the undertaking shall consider and may describe:</p> <p>(a) the methodologies and metrics used and an explanation for why these methodologies and metrics are selected, as well as their assumptions, limitations and uncertainties, and any changes in methodologies made over time and why they occurred;</p>	<p><b>Disclosure Requirement E4-1 - Impact metrics related to biodiversity and ecosystems change</b></p> <p>AR 60. When preparing the information required under this Disclosure Requirement, the undertaking shall <del>consider and may</del> briefly describe the <i>metrics and methodologies used including:</i></p> <p>(a) <del>the methodologies and metrics used and an explanation for why these methodologies and metrics are selected, as well as their assumptions, limitations and uncertainties, and any changes in methodologies made over time and why they occurred</del> <i>why these were selected;</i></p>
<p>(b) the scope of the metrics and methodologies, for example:</p> <p>i. undertaking, site, brand, commodity, corporate business unit, activity;</p> <p>ii. aspects (as set out in paragraph AR 4) covered.</p> <p>(c) the biodiversity components of the metrics: species specific, ecosystem specific;</p>	<p><del>(b) the scope of the metrics and methodologies, for example:</del></p> <p><del>i. undertaking, site, brand, commodity, corporate business unit, activity;</del></p> <p><del>ii. aspects (as set out in paragraph AR 4) covered.</del></p> <p><del>(c) the biodiversity components of the metrics: species specific, ecosystem specific;</del></p>



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<p>(d) the geographies covered by the methodology and an explanation of why any relevant geographies were omitted;</p>	<p><del>(d) the geographies covered by the methodology and an explanation of why any relevant geographies were omitted;</del></p> <p>(b) their organizational scope (undertaking, site, brand, commodity, corporate business unit, activity), operational scope (entire value chain, upstream or downstream value chain, or own operations and leased assets) and geographical scope (geographies covered by the metrics);</p> <p>(c) if metrics are species specific or ecosystem specific;</p>
<p>(h) an indication of which action is measured and monitored via the metrics and how they relate to the achievement of targets;</p>	<p>(d) an indication of which actions are measured and monitored via the metrics and how they relate to the achievement of targets.</p>
<p>(e) how the metrics integrate ecological thresholds (e.g., the biosphere integrity and land-system change, planetary boundaries) and allocations;</p> <p>(f) the frequency of monitoring, key metrics being monitored, and the baseline condition/value and baseline year/period, as well as the reference period;</p> <p>(g) whether these metrics rely on primary data, secondary data, modelled data or on expert judgement, or a mixture of these;</p> <p>(i) whether metrics are mandatory (required by legislation) or voluntary. If they are mandatory, the undertaking may indicate the relevant legislation; if voluntary, the undertaking may refer to any voluntary standard or procedure used; and</p> <p>(j) whether the metrics are informed by or correspond to expectations or recommendations of relevant and authoritative national, EU-level or intergovernmental guidelines, policies, legislation or agreements, such as the Convention for Biological Diversity (CBD) or IPBES.</p>	<p>AR 61. <i>The undertaking may also disclose:</i></p> <p>(a) how the metrics integrate ecological thresholds (e.g., the biosphere integrity and land-system change planetary boundaries) and allocations;</p> <p>(b) the frequency of monitoring, key indicators being monitored, and the baseline condition/value and baseline year/period, as well as the reference period;</p> <p>(c) other methodological aspects such as if the parametrisation of these metrics rely on primary data, secondary data, modelled data or on expert judgement, or a mixture of these;</p> <p>(d) whether metrics are mandatory (based on legislation) or voluntary. If they are mandatory, the undertaking may consider listing the relevant legislation; if voluntary, refer to the voluntary standard/procedure used; and</p> <p>(e) whether the metrics are informed by or correspond to expectations or recommendations of relevant and authoritative national, EU-level or intergovernmental guidelines, policies, legislation or agreements, such as the Convention for Biological Diversity (CBD) and IPBES.</p>
<p>AR 28. The undertaking shall disclose metrics that are verifiable and that are technically and scientifically robust considering the appropriate time scales geographies, and may disclose how its selected metrics correspond to those criteria. To ensure that the metric is relevant there should be a clear relationship between the indicator and the purpose of the measurement. Uncertainties should be reduced as far as possible. Data or mechanisms used should be supported by well-established organisations and updated over time. Robust modelled data and expert judgment can be used where data gaps exist. The methodology shall be sufficiently detailed to allow for meaningful comparison of impacts and mitigation activities over time. Information gathering processes and definitions must be systematically applied. This enables a meaningful review of the undertaking's performance over time and helps internal and peer comparison.</p>	<p><del>AR 28. The undertaking shall disclose metrics that are verifiable and that are technically and scientifically robust considering the appropriate time scales geographies, and may disclose how its selected metrics correspond to those criteria. To ensure that the metric is relevant there should be a clear relationship between the indicator and the purpose of the measurement. Uncertainties should be reduced as far as possible. Data or mechanisms used should be supported by well-established organisations and updated over time. Robust modelled data and expert judgment can be used where data gaps exist. The methodology shall be sufficiently detailed to allow for meaningful comparison of impacts and mitigation activities over time. Information gathering processes and definitions must be systematically applied. This enables a meaningful review of the undertaking's performance over time and helps internal and peer comparison.</del></p>
<p>AR 29. If a metric corresponds to a target, the baseline for both shall be aligned. The biodiversity baseline is an essential component of the larger biodiversity and ecosystems management process. The baseline is necessary to inform impact assessment and management planning, as well as monitoring and adaptive management.</p>	<p><del>AR 29. If a metric corresponds to a target, the baseline for both shall be aligned. The biodiversity baseline is an essential component of the larger biodiversity and ecosystems management process. The baseline is necessary to inform impact assessment and management planning, as well as monitoring and adaptive management.</del></p>
<p>AR 30. Methodologies available to collect data and measure the undertakings' impacts on biodiversity and ecosystems may be separated into three categories as follows:</p>	<p>AR 62. Methodologies available to collect data and measure the undertakings' impacts on biodiversity and ecosystems may be separated into three categories as follows:</p>

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<p>(a) primary data: collected in-situ using on the ground surveys;</p> <p>(b) secondary data: including geospatial data layers that are overlaid with geographic location data of business activities.</p> <p>i. At the species level, data layers on the ranges of different species can be used to predict the species that may be present at different locations. This includes operation sites and sourcing locations. Different range layers will have different levels of accuracy depending on certain factors (e.g., whether species ranges have been refined based on availability of habitat). Information on the threat status of the species, and the activities that threaten them, can provide an indication of the likely contribution that business activities may be having on driving population trends and threat status.</p> <p>ii. At the ecosystem level, data layers reflecting change in the extent and condition of ecosystems can be applied, including levels of habitat fragmentation and connectivity.</p> <p>(c) modelled biodiversity state data: Model-based approaches are commonly used for measuring ecosystem level indicators (e.g., extent, condition, or function). Models quantify how the magnitude of different pressures affects the state of biodiversity. These are referred to as pressure-state relationships and are based on globally collected data. Modelling results are applied locally to estimate how undertaking-level pressures will cause changes in ecosystem condition. An impact driver generally has three main characteristics: magnitude (e.g., amount of contaminant, noise intensity), spatial extent (e.g., area of land contaminated) and temporal extent (duration of persistence of contaminant).</p>	<p>(a) primary data: collected in-situ using on the ground surveys;</p> <p>(b) secondary data: including geospatial data layers that are overlaid with geographic location data of business activities:</p> <p>i. at the species level, data layers on the ranges of different species can be used to predict the species that may be present at different locations. This includes operation sites and sourcing locations. Different range layers will have differing levels of accuracy depending on certain factors (e.g., whether species ranges have been refined based on availability of habitat). Information on the threat status of the species, and the activities that threaten them, can provide an indication of the likely contribution that business activities may be having on driving population trends and threat status;</p> <p>ii. at the ecosystem level, data layers reflecting change in the extent and condition of ecosystems can be applied, including levels of habitat fragmentation and connectivity;</p> <p>(c) modelled biodiversity state data: Model-based approaches are commonly used for measuring ecosystem level indicators (e.g., extent, condition, or function). Models quantify how the magnitude of different pressures affects the state of biodiversity. These are referred to as pressure-state relationships and are based on globally collected data. Modelling results are applied locally to estimate how undertaking-level pressures will cause changes in ecosystem condition. An impact driver generally has three main characteristics: magnitude (e.g., amount of contaminant, noise intensity), spatial extent (e.g., area of land contaminated) and temporal extent (duration of persistence of contaminant).</p>
<p>AR 31. With regard to life cycle assessment for land-use, the undertaking may refer to the "Landuse related environmental indicators for Life Cycle Assessment" by the Joint Research Center.</p>	<p>AR 63. With regard to life cycle assessment for land-use, the undertaking may refer to the "Land-use related environmental indicators for Life Cycle Assessment" by the Joint Research Center.</p>
<p>AR 32. With regard to the introduction of invasive alien species, the undertaking may disclose the pathways and number of invasive alien species and the extent of surface covered by invasive alien species.</p>	<p>AR 64. With regard to the introduction of invasive alien species, the undertaking may disclose the pathways and number of invasive alien species and the extent of surface covered by invasive alien species.</p>
<p>AR 33. With regard to metrics on the extent and condition of ecosystems, useful guidance can be found in the work of the United Nations System of Environmental Economic Accounting Ecosystem Accounting (UN SEEA EA).</p>	<p>AR 65. With regard to metrics on the extent and condition of ecosystems, useful guidance can be found in the work of the United Nations System of Environmental Economic Accounting Ecosystem Accounting (UN SEEA EA).</p>
<p>AR 34. The undertaking may disclose in units of area (e.g., m<sup>2</sup> or ha) on land-use using guidance provided by the Eco-Management and Audit Scheme (EMAS) :</p> <p>(a) total use of land;</p> <p>(b) total sealed area;</p> <p>(c) total nature-oriented area on site; and (d) total nature-oriented area off site.</p>	<p>AR 66. The undertaking may disclose in units of area (e.g., m<sup>2</sup> or ha) on land-use using guidance provided by the Eco-Management and Audit Scheme (EMAS) :</p> <p>(a) total use of land;</p> <p>(b) total sealed area;</p> <p>(c) total nature-oriented area on site; and (d) total nature-oriented area off site.</p>
<p>AR 35. The undertaking may disclose, for example, land cover change, which is the physical representation of the drivers "habitat modification" and "industrial and domestic activities", i.e., the man-made or natural change of the physical properties of the earth's surface at a specific location.</p>	<p>AR 67. The undertaking may disclose, for example, land cover change, which is the physical representation of the drivers "habitat modification" and "industrial and domestic activities", i.e., the man-made or natural change of the physical properties of Earth's surface at a specific location.</p>
<p>AR 36. Land cover is a typical variable that can be assessed with earth observation data.</p>	<p>AR 68. Land cover is a typical variable that can be assessed with earth observation data.</p>
<p>AR 37. When reporting on material impacts related to the ecosystems, the undertaking may, in addition to the extent and condition of ecosystems, also consider the functioning of ecosystems by using:</p>	<p>AR 69. When reporting on material impacts related to the ecosystems, the undertaking may, in addition to the extent and condition of ecosystems, also consider the functioning of ecosystems by using:</p>

LSME ED comparison with Set 1

SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
<p>(a) a metric that measures a process or function that the ecosystem completes, or that reflects the ability of the ecosystem to undertake that specific process or function: e.g. net primary productivity, which is a measure of plant productivity based on the rate at which energy is stored by plants and made available to other species in the ecosystem. It is a core process that occurs for ecosystems to function. It is related to many factors, such as species diversity, but does not measure these factors directly; or</p> <p>(b) A metric that measures changes to the population of scientifically identified species under threat.</p>	<p>(a) a metric that measures a process or function that the ecosystem completes, or that reflects the ability of the ecosystem to undertake that specific process or function: e.g. net primary productivity, which is a measure of plant productivity based on the rate at which energy is stored by plants and made available to other species in the ecosystem. It is a core process that occurs for ecosystems to function. It is related to many factors, such as species diversity, but does not measure these factors directly; or</p> <p>(b) A metric that measures changes to the population of scientifically identified species under threat.</p>
<p>AR 38. At the ecosystem level, data layers reflecting change in the extent and condition of ecosystems may be applied, including levels of habitat fragmentation and connectivity.</p>	<p>AR 70. At the ecosystem level, data layers reflecting change in the extent and condition of ecosystems may be applied, including levels of habitat fragmentation and connectivity.</p>
<p><b>Disclosure Requirement E4-6 - Anticipated financial effects from material biodiversity and ecosystem-related risks and opportunities</b></p>	<p><del><b>Disclosure Requirement E3-5 - Anticipated financial effects from material water and marine resources-related risks and opportunities</b></del>  <b>Anticipated financial effects from material environmental-related matters other than climate</b>                       (merged and centralized with the other Anticipated financial effect p. 48)</p>
<p><b>ESRS E5 - CIRCULAR ECONOMY</b></p>	
<p><b>ESRS 2 General disclosures</b></p> <p><b>Impact, risk and opportunity management</b></p> <p><b>Disclosure requirement related to ESRS 2 IRO-1 - Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities</b></p>	<p><del><b>ESRS 2 General disclosures</b></del></p> <p><del><b>Impact, risk and opportunity management</b></del></p> <p><del><b>Disclosure requirement related to ESRS 2 IRO-1 - Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities</b></del>                       Centralized in Section 2 and 3</p>
<p><b>Disclosure Requirement E5-1 - Policies related to resource use and circular economy</b></p>	<p><del><b>Disclosure Requirement E5-1 - Policies related to resource use and circular economy</b></del>                       Centralized in Section 2 and 3</p>
<p><b>Disclosure Requirement E5-2 - Actions and resources in relation to resource use and circular economy</b></p>	<p><del><b>Disclosure Requirement E5-2 - Actions and resources in relation to resource use and circular economy</b></del>                       Centralized in Section 2 and 3</p>
<p><b>Metrics and targets</b></p> <p><b>Disclosure Requirement E5-3 - Targets related to resource use and circular economy</b></p>	<p><del><b>Metrics and targets</b></del></p> <p><del><b>Disclosure Requirement E5-3 - Targets related to resource use and circular economy</b></del>                       Centralized in Section 2 and 3</p>
<p><b>Disclosure Requirement E5-4 - Resource inflows</b></p>	<p><b>Disclosure Requirement E5-1 - Resource inflows</b></p>

LSME ED comparison with Set 1

SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
<p>AR 21. Resource inflows may cover the following categories: IT equipment, textiles, furniture, buildings, heavy machinery, mid-weight machinery, light machinery, heavy transport, midweight transport, light transport and warehousing equipment. With regard to materials, resource inflow indicators include raw materials, associated process materials, and semimanufactured goods or parts.</p>	<p>AR 71. <i>The disclosure required by paragraph 57 on a description of resource inflows used in the undertaking's own operations and along its upstream value chain, may distinguish between:</i></p> <p><del>Resource inflows may cover the following categories: IT equipment, textiles, furniture, buildings, heavy machinery, mid-weight machinery, light machinery, heavy transport, midweight transport, light transport and warehousing equipment. With regard to materials, resource inflow indicators include raw materials, associated process materials, and semimanufactured goods or parts.</del></p> <p><i>a) materials, including:</i></p> <p><i>i) raw materials, distinguishing between critical raw materials and rare earths;</i></p> <p><i>ii) associated process materials;</i></p> <p><i>iii) semi-manufactured goods or parts;</i></p> <p><i>b) products, including several categories such as packaging, IT equipment, textiles, furniture, buildings, heavy machinery, mid-weight machinery, light machinery, heavy transport, mid-weight transport, light transport and warehousing equipment;</i></p> <p><i>c) water;</i></p> <p><i>c) property, plant and equipment. When describing the relevant resource inflows that generate IROs the undertaking shall explain what type it is referring to, for example to raw materials (e.g. wood, ores), products (e.g. machinery) or goods or semi-manufactured goods or parts used as input into its products and services (e.g. electronic components).</i></p>
<p>AR 22. When the undertaking is subject to paragraph 31, it may also provide transparency on the materials that are sourced from by-products/waste stream (e.g., offcuts of a material that has not previously been in a product).</p>	<p>AR 72. When the undertaking is subject to paragraph 31, it may also provide transparency on the materials that are sourced from by-products/waste stream (e.g., offcuts of a material that has not previously been in a product).</p>
<p>AR 23. The denominator of the percentage indicator required under paragraphs 31(b) and 31(c) is the overall total weight of materials used during the reporting period.</p>	<p>AR 73. The denominator of the percentage indicator required under paragraphs 31(b) and 31(c) is the overall total weight of materials used during the reporting period.</p>
<p>AR 24. The reported usage data are to reflect the material in its original state, and not to be presented with further data manipulation, such as reporting it as “dry weight”.</p>	<p>AR 74. The reported usage data are to reflect the material in its original state, and not to be presented with further data manipulation, such as reporting it as “dry weight”.</p>
<p>AR 25. In cases where there is an overlap between categories of reused, recycled, the undertaking shall specify how double counting was avoided and the choices that were made.</p>	<p>AR 75. In cases where there is an overlap between categories of reused, recycled, the undertaking shall specify how double counting was avoided and the choices that were made.</p>
<p><b>Disclosure Requirement E5-5 - Resource outflows</b></p>	<p><b>Disclosure Requirement E5-2 - Resource outflows</b></p>
<p>AR 26. Products and materials information to be provided under paragraph 35 refers to all materials and products that come out of the undertaking's production process and that a company puts on the market (including packaging).</p>	<p>AR 76. Products and materials information to be provided under paragraph 58 refer to all products and materials that come out of the undertaking's production process and that a company puts on the market (including packaging).</p>
<p>AR 27. When compiling the rate, the undertaking shall use as denominator the overall total weight of materials used during the reporting period.</p>	<p><del>AR 27. When compiling the rate, the undertaking shall use as denominator the overall total weight of materials used during the reporting period.</del></p>
<p>AR 28. The undertaking may disclose its engagement in product end-of-life waste management, for example through extended producer responsibility schemes or take-back schemes.</p>	<p>AR 77. The undertaking may disclose its engagement in product end-of-life waste management, for example through extended producer responsibility schemes or take-back schemes.</p>
<p>AR 29. Type of waste is to be understood as hazardous waste or non-hazardous waste. Some specific waste, such as radioactive waste, may also be presented as a separate type.</p>	<p><del>AR 29. Type of waste is to be understood as hazardous waste or non-hazardous waste. Some specific waste, such as radioactive waste, may also be presented as a separate type.</del></p>

LSME ED comparison with Set 1

SET 1 E1 / E2 / E3 / E4 / E5 (version July 2023)	LSME ESRS ED Section 4
AR 30. When considering the waste streams relevant to its sectors or activities, the undertaking may consider the list of waste descriptions from the European Waste Catalogue.	AR 78. When considering the waste streams relevant to its sectors or activities, the undertaking may consider the list of waste descriptions from the European Waste Catalogue.
AR 31. Examples of other types of recovery operations under paragraph 37(b)iii may be found in Annex II of Directive 2008/98/EC (Waste Framework Directive).	AR 79. Examples of other types of disposal operations under paragraph 63 (iii) can be found in Annex I of Directive 2008/98/EC (Waste Framework Directive).
AR 32. Examples of other types of disposal operations under paragraph 37(c)iii may be found in Annex I of Directive 2008/98/EC (Waste Framework Directive).	<del>AR 32. Examples of other types of disposal operations under paragraph 37(c)iii may be found in Annex I of Directive 2008/98/EC (Waste Framework Directive).</del>
AR 33. When providing contextual information under paragraph 40 the undertaking may: (a) explain the reasons for high weights of waste directed to disposal (e.g., local regulations that prohibit landfill of specific types of waste); (b) describe sector practices, sector standards, or external regulations that mandate a specific disposal operation; and (c) specify whether the data has been modelled or sourced from direct measurements, such as waste transfer notes from contracted waste collectors.	AR 80. When providing contextual information under paragraph 64 the undertaking may: (a) explain the reasons for high weights of waste directed to disposal (e.g., local regulations that prohibit landfilling of specific types of waste); (b) describe sector practices, sector standards, or external regulations that mandate a specific disposal operation; and (c) specify whether the data has been modelled or sourced from direct measurements, such as waste transfer notes from contracted waste collectors.
<b>Disclosure Requirement E5-6 – Anticipated financial effects from material resource use and circular economy-related risks and opportunities</b>	<del><b>Disclosure Requirement E5-6 – Anticipated financial effects from material resource use and circular economy-related risks and opportunities</b></del> <i>Anticipated financial effects from material environmental-related matters other than climate</i>  (merged and centralized with the other Anticipated financial effect p. 48)

ESRS LSME ED Section 5 – Social

SET 1 S1 / S2 / S3 / S4 (version July 2023)	LSME ESRS ED Section 5
<b>ESRS S1 OWN WORKFORCE</b>	<b>OWN WORKFORCE (S1)</b>
<b>Objective</b>	<b>Objective</b>
<p>1. The objective of this Standard is to specify disclosure requirements which will enable users of the sustainability statement to understand the undertaking's material impacts on its own workforce, as well as related material risks and opportunities, including:</p> <ul style="list-style-type: none"> <li>(a) how the undertaking affects its own workforce, in terms of material positive and negative actual or potential impacts;</li> <li>(b) any actions taken, and the result of such actions, to prevent, mitigate or remediate actual or potential negative impacts, and to address risks and opportunities;</li> <li>(c) the nature, type and extent of the undertaking's material risks and opportunities related to its impacts and dependencies on its own workforce, and how the undertaking manages them; and</li> <li>(d) the financial effects on the undertaking over the short-, medium- and long-term of material risks and opportunities arising from the undertaking's impacts and dependencies on its own workforce.</li> </ul>	<p>1. The objective of this [draft] Section is to specify disclosure requirements which will enable users of the sustainability statement to understand <del>the undertaking's material impacts on its own workforce, as well as related material risks and opportunities, including:</del></p> <ul style="list-style-type: none"> <li>(a) <i>how the undertaking affects its own workforce, workers in its value chain, affected communities and consumers and end-users</i>; in terms of material negative actual or potential impacts;</li> <li>(b) any actions taken, and the result of such actions, to prevent, mitigate or remediate actual or potential negative impacts, and to address risks <i>and opportunities</i>;</li> <li>(c) the nature, type and extent of the undertaking's material risks <del>and opportunities related to its impacts and dependencies on its own workforce</del> <i>on its own workforce, workers in its value chain, affected communities and consumers and end-users</i>; and how the undertaking manages them;</li> <li>(d) the financial effects on the undertaking over the short-, medium- and long-term of material risks <del>and opportunities</del> arising from the undertaking's impacts and dependencies on its own workforce, <i>workers in its value chain, affected communities and consumers and end-users</i>.</li> </ul>
<p>2. In order to meet the objective, this Standard also requires an explanation of the general approach the undertaking takes to identify and manage any material actual and potential impacts on its own workforce in relation to the following social, including human rights, factors or matters:</p> <ul style="list-style-type: none"> <li>(a) working conditions, including: <ul style="list-style-type: none"> <li>i. secure employment;</li> <li>ii. working time;</li> <li>iii. adequate wages;</li> <li>iv. social dialogue;</li> <li>v. freedom of association, the existence of works councils and the information, consultation and participation rights of workers;</li> <li>vi. collective bargaining, including the rate of the undertaking's workforce covered by collective agreements;</li> <li>vii. work-life balance; and</li> <li>viii. health and safety.</li> </ul> </li> <li>(b) equal treatment and opportunities for all, including: <ul style="list-style-type: none"> <li>i. gender equality and equal pay for work of equal value;</li> <li>ii. training and skills development;</li> <li>iii. employment and inclusion of persons with disabilities;</li> <li>iv. measures against violence and harassment in the workplace; and</li> <li>v. diversity.</li> </ul> </li> <li>(c) other work-related rights, including those that relate to: <ul style="list-style-type: none"> <li>i. child labour;</li> </ul> </li> </ul>	<p>See par. 3 SET 1</p> <p>2. <del>This Standard also requires an explanation</del> <i>These [draft] Disclosure Requirements</i> also require the provision of an explanation by the undertaking of how such impacts, as well as the undertaking's dependencies on its own workforce, <i>workers in the value chain, affected communities and consumers and end-users</i> can create material risks <del>or opportunities</del> for the undertaking. <del>For example, on the matter of equal opportunities, discrimination in hiring and promotion against women can reduce the undertaking's access to qualified labour and harm its reputation. Conversely, policies to increase the representation of women in the workforce and in upper levels of management can have positive effects, such as increasing the pool of qualified labour and improving the undertaking's reputation.</del></p> <p>No correspondence with par. 2 SET 1</p> <p><del>In order to meet the objective, this Standard also requires an explanation of the general approach the undertaking takes to identify and manage any material actual and potential impacts on its own workforce in relation to the following social, including human rights, factors or matters:</del></p> <ul style="list-style-type: none"> <li>(a) <del>working conditions, including:</del> <ul style="list-style-type: none"> <li>i. <del>secure employment;</del></li> <li>ii. <del>working time;</del></li> <li>iii. <del>adequate wages;</del></li> <li>iv. <del>social dialogue;</del></li> </ul> </li> </ul>



LSME ED comparison with Set 1

SET 1 S1 / S2 / S3 / S4 (version July 2023)	LSME ESRS ED Section 5
<p>ii. forced labour; iii. adequate housing; and iv. privacy.</p>	<p><del>v. freedom of association, the existence of works councils and the information, consultation and participation rights of workers;</del> <del>vi. collective bargaining, including the rate of the undertaking's workforce covered by collective agreements;</del> <del>vii. work-life balance; and</del> <del>viii. health and safety.</del> <del>(b) equal treatment and opportunities for all, including:</del> <del>i. gender equality and equal pay for work of equal value; ii. training and skills development;</del> <del>iii. employment and inclusion of persons with disabilities; iv. measures against violence and harassment in the workplace; and</del> <del>v. diversity.</del> <del>(c) other work-related rights, including those that relate to:</del> <del>i. child labour;</del> <del>ii. forced labour;</del> <del>iii. adequate housing; and</del> <del>iv. privacy.</del></p>
<p>3. This Standard also requires an explanation of how such impacts, as well as the undertaking's dependencies on its own workforce, can create material risks or opportunities for the undertaking. For example, on the matter of equal opportunities, discrimination in hiring and promotion against women can reduce the undertaking's access to qualified labour and harm its reputation. Conversely, policies to increase the representation of women in the workforce and in upper levels of management can have positive effects, such as increasing the pool of qualified labour and improving the undertaking's reputation.</p>	<p>See Par. 2 LSME</p>
<p>4. This Standard covers an undertaking's own workforce, which is understood to include both people who are in an employment relationship with the undertaking ("employees") and nonemployees who are either people with contracts with the undertaking to supply labour ("selfemployed people") or people provided by undertakings primarily engaged in "employment activities" (NACE Code N78). See Application Requirement 3 for examples of who falls under own workforce. The information required to be disclosed with regard to non-employees shall not affect their status pursuant to applicable labour law.</p>	<p>3. <i>For Own Workforce (S1):</i> (a) <i>These [draft] Disclosure Requirements relate to the following sustainability matters: (a) working conditions (including secure employment; working time; adequate wages; social dialogue; freedom of association, the existence of works councils and the information, consultation and participation rights of workers; collective bargaining, including the rate of the undertaking's employees covered by collective agreements; work-life balance; and health and safety), (b) equal treatment and opportunities for all (including gender equality and equal pay for work of equal value; training and skills development; employment and inclusion of persons with disabilities; measures against violence and harassment in the workplace; and diversity), (c) other work-related rights (including those that relate to child labour; forced labour; adequate housing; and privacy).</i> (b) <del>This Standard</del> <i>These [draft] Disclosure Requirements cover an undertaking's own workforce, which is understood to include both people who are in an employment relationship with the undertaking ("employees") and non-employees who are either people with contracts with the undertaking to supply labour ("self-employed people") or people provided by undertakings primarily engaged in "employment activities" (NACE Code N78). See Application Requirement 3 for examples of who falls under own workforce. The information required to be disclosed with regard to non-employees shall not affect in any way the employment status pursuant to applicable labour law.</i></p>

LSME ED comparison with Set 1

SET 1 S1 / S2 / S3 / S4 (version July 2023)	LSME ESRS ED Section 5
	<p>(c) These [draft] Disclosure Requirements require undertakings to describe their own workforce, including key characteristics of the employees and non-employees that are part of it. This description provides users with an understanding of the structure of the undertaking's relationship with present workforce and helps to contextualise information that are relevant and material to other social disclosures included in this Section of LSME ESRS.</p> <p>(d) The objective of these [draft] Disclosure Requirements is also to enable users to understand the extent to which the undertaking aligns or complies with international and European human rights instruments and conventions, including the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and ILO fundamental conventions, the UN Convention on Persons with Disabilities, the European Convention of Human Rights, the revised European Social Charter, the Charter of Fundamental Rights of the European Union, the EU policy priorities as set out by the European Pillar of Social Rights, and Union legislation.</p>
<p>5. This Standard does not cover workers in the undertaking's upstream or downstream value chain; these categories of workers are covered in ESRS S2 Workers in the value chain.</p>	<p>4. For Workers in the value chain (S2):</p> <p>(a) These [draft] Disclosure Requirements relate to the following sustainability matters: (a) working conditions (for example, secure employment, working time, adequate wage, social dialogue, freedom of association, including the existence of work councils, collective bargaining, work-life balance and health and safety); (b) equal treatment and opportunities for all (for example, gender equality and equal pay for work of equal value, training and skills development, the employment and inclusion of persons with disabilities, measures against violence and harassment in the workplace, and diversity); (c) other work-related rights (for example, child labour, forced labour, adequate housing, water and sanitation and privacy).</p> <p>(b) <del>This Standard does not cover workers in the undertaking's upstream or downstream value chain; these categories of workers are covered in ESRS S2 Workers in the value chain.</del> These [draft] Disclosure Requirements cover all workers in the undertaking's upstream and downstream value chain who are or can be materially impacted by the undertaking, including the impacts that are connected with the undertaking's own operations, products and or services, this also includes the value chain through its business relationships. This includes also all the workers who are not included in the scope of "own workforce" ("own workforce" includes employees, individual contractors, i.e., self-employed workers, and workers provided by third party undertakings primarily engaged in 'employment activities') and are or can be significantly affected by the undertaking. See AR 3 for examples of what is included in the scope of this [draft] Standard.</p>
<p>6. The Standard requires undertakings to describe their own workforce, including key characteristics of the employees and non-employees that are part of it. This description provides users with an understanding of the structure of the undertaking's own workforce and helps to contextualise information provided through other disclosures.</p>	<p>No correspondence with SET 1</p> <p>5. For Affected communities (S3), these [draft] Disclosure Requirements relate to the following sustainability matters: (a) communities' economic, social and cultural rights (for example, adequate housing, adequate food, water and sanitation, land-related and security-related impacts); (b) communities' civil and political rights (for example, freedom of expression, freedom of assembly, impacts on human rights defenders); (c) particular rights of indigenous peoples (for example, free, prior and informed consent, self-determination, cultural rights).</p>

LSME ED comparison with Set 1

SET 1 S1 / S2 / S3 / S4 (version July 2023)	LSME ESRS ED Section 5
<p>7. The objective of the Standard is also to enable users to understand the extent to which the undertaking aligns or complies with international and European human rights instruments and conventions, including the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work and ILO fundamental conventions, the UN Convention on Persons with Disabilities, the European Convention of Human Rights, the revised European Social Charter, the Charter of Fundamental Rights of the European Union, the EU policy priorities as set out by the European Pillar of Social Rights, and Union legislation, including the EU labour law acquis.</p>	<p>No correspondence with SET 1          6. For Consumers and end-users (S4), these [draft] Disclosure Requirements relate to the following sustainability matters: (a) information-related impacts on consumers and/or end-users (for example, privacy, freedom of expression and access to (quality) information; (b) personal safety of consumers and/or end-users (for example, health and safety, security of a person and protection of children); (c) social inclusion of consumers and/or end-users (for example, non-discrimination, access to products and services and responsible marketing practices).</p>
<p><b>Interaction with other ESRS</b></p>	<p><b>Interaction with other ESRS</b></p>
<p>8. This Standard shall be read in conjunction with ESRS 1 General principles and ESRS 2 General requirements.</p>	
<p>9. This Standard shall be read in conjunction with ESRS S2 Workers in the value chain, ESRS S3 Affected communities and ESRS S4 Consumers and end-users.</p>	
<p>10. The reporting under this Standard shall be consistent, coherent and where relevant clearly linked with reporting on the undertaking’s own workforce under ESRS S2, in order to ensure effective reporting.</p>	
<p><b>Disclosure requirements</b></p>	
<p><b>ESRS 2 General disclosures</b></p>	
<p>11. The requirements of this section should be read in conjunction with the disclosures required by ESRS 2 on Strategy (SBM). The resulting disclosures shall be presented alongside the disclosures required by ESRS 2, except for ESRS 2 SBM-3, for which the undertaking has an option to present the disclosures alongside the topical disclosure.</p>	
<p>Strategy</p>	
<p>Disclosure Requirement related to ESRS 2 SBM-2 – Interests and views of stakeholders</p>	
<p>12. When responding to ESRS 2 SBM-2, the undertaking shall disclose how the interests, views, and rights of people in its own workforce, including respect for their human rights, inform its strategy and business model. The undertaking’s own workforce is a key group of affected stakeholders.</p>	
<p><b>Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model</b></p>	<p><b>Centralised in AR of Section 2</b></p>
<p>13. When responding to ESRS 2 SBM-3 paragraph 48, the undertaking shall disclose:          (a) whether and how actual and potential impacts on its own workforce as identified in ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities: (i) originate from or are connected to the undertaking’s strategy and business models, and (ii) inform and contribute to adapting the undertaking’s strategy and business model; and          (b) the relationship between its material risks and opportunities arising from impacts and dependencies on own workforce and its strategy and business model.</p>	

*LSME ED comparison with Set 1*

SET 1 S1 / S2 / S3 / S4 (version July 2023)	LSME ESRS ED Section 5
<p>14. When fulfilling the requirements of paragraph 48, the undertaking shall disclose whether all people in its own workforce who could be materially impacted by the undertaking are included in the scope of its disclosure under ESRS 2. These material impacts shall include impacts that are connected with the undertaking’s own operations and its value chain, including through its products or services, as well as through its business relationships. In addition, the undertaking shall provide the following information:</p> <p>(a) a brief description of the types of employees and non-employees in its own workforce subject to material impacts by its operations, and specify whether they are employees, self-employed people, or people provided by third party undertakings primarily engaged in employment activities;</p> <p>(b) in the case of material negative impacts, whether they are either (i) widespread or systemic in contexts where the undertaking operates (for example, child labour or forced labour or compulsory labour in specific countries or regions outside the EU), or (ii) related to individual incidents (for example, an industrial accident or an oil spill);</p> <p>(c) in the case of material positive impacts, a brief description of the activities that result in the positive impacts, the types of employees and non-employees in its own workforce that are positively affected or could be positively affected; the undertaking may also disclose whether the positive impacts occur in specific countries or regions;</p> <p>(d) any material risks and opportunities for the undertaking arising from impacts and dependencies on its own workforce;</p> <p>(e) any material impacts on its own workforce that may arise from transition plans for reducing negative impacts on the environment and achieving greener and climate- neutral operations, including information on the impacts on own workforce caused by the undertaking’s plans and actions to reduce carbon emissions in line with international agreements. Impacts, risks and opportunities include restructuring and employment loss as well as opportunities arising from job creation and reskilling or upskilling;</p> <p>(f) operations at significant risk of incidents of forced labour or compulsory labour either in terms of:</p> <p>i. type of operation (such as manufacturing plant); or ii. countries or geographic areas with operations considered at risk;</p> <p>(g) operations at significant risk of incidents of child labour either in terms of:</p> <p>i. type of operation (such as manufacturing plant); or</p> <p>ii. countries or geographic areas with operations considered at risk.</p>	
<p>15. In describing the main types of people in its own workforce who are or could be negatively affected, based on the materiality assessment set out in ESRS 2 IRO 1, the undertaking shall disclose whether and how it has developed an understanding of how people with particular characteristics, those working in particular contexts, or those undertaking particular activities may be at greater risk of harm.</p>	
<p>16. The undertaking shall disclose which, if any, of its material risks and opportunities arising from impacts and dependencies on people in its own workforce relate to specific groups of people</p>	

*LSME ED comparison with Set 1*

SET 1 S1 / S2 / S3 / S4 (version July 2023)	LSME ESRS ED Section 5
(for example, particular age groups, or people working in a particular factory or country) rather than to all of its own workforce (for example, a general pay cut, or training offered to all people in its own workforce).	
<b>Impacts, risks and opportunities management</b>	
<b>Disclosure Requirement S1-1 - Policies related to own workforce</b>	<b>Centralised in Section 3 AR</b>
17. The undertaking shall describe its policies adopted to manage its material impacts on its own workforce, as well as associated material risks and opportunities.	
18. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of material impacts on the undertaking's own workforce specifically, as well as policies that cover material impacts, risks and opportunities related to its own workforce.	
19. The disclosure required by paragraph 17 shall contain the information on the undertaking's policies to manage its material impacts, risks and opportunities related to its own workforce in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters. In addition, the undertaking shall specify if such policies cover specific groups within its own workforce or all of its own workforce.	
20. The undertaking shall describe its human rights policy commitments that are relevant to its own workforce, including those processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises . In its disclosure it shall focus on those matters that are material in relation to, as well as its general approach to: (a) respect for the human rights, including labour rights, of people in its own workforce; (b) engagement with people in its own workforce; and (c) measures to provide and/or enable remedy for human rights impacts.	
21. The undertaking shall disclose whether and how its policies with regard to its own workforce are aligned with relevant internationally recognised instruments, including the UN Guiding Principles on Business and Human Rights .	
22. The undertaking shall state whether its policies in relation to its own workforce explicitly address trafficking in human beings, forced labour or compulsory labour and child labour.	
23. The undertaking shall state whether it has a workplace accident prevention policy or management system	
24. The undertaking shall disclose: (a) whether it has specific policies aimed at the elimination of discrimination, including harassment, promoting equal opportunities and other ways to advance diversity and inclusion; (b) whether the following grounds for discrimination are specifically covered in the policy: racial and ethnic origin, colour, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national extraction or social origin, or other forms of discrimination covered by Union regulation and national law;	

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<p>(c) whether the undertaking has specific policy commitments related to inclusion or positive action for people from groups at particular risk of vulnerability in its own workforce and, if so, what these commitments are; and</p> <p>(d) whether and how these policies are implemented through specific procedures to ensure discrimination is prevented, mitigated and acted upon once detected, as well as to advance diversity and inclusion in general</p>	
<p><b>Disclosure Requirement S1-2 – Processes for engaging with own workforce and workers’ representatives about impacts</b></p>	<p><b>Centralised in Section 3 AR</b></p>
<p>25. The undertaking shall disclose its general processes for engaging with people in its own workforce and workers' representatives about actual and potential impacts on its own workforce.</p> <p>26. The objective of this Disclosure Requirement is to enable an understanding of how the undertaking engages, as part of its ongoing due diligence process, with people in its own workforce and workers' representatives about material, actual and potential, positive and/or negative impacts that do or are likely to affect them, and whether and how perspectives of its own workforces are taken into account in the decision-making processes of the undertaking.</p>	
<p>27. The undertaking shall disclose whether and how the perspectives of its own workforce inform its decisions or activities aimed at managing the actual and potential impacts on its own workforce. This shall include, where relevant, an explanation of:</p> <p>(a) whether engagement occurs directly with the undertaking’s own workforce or workers’ representatives;</p> <p>(b) the stage(s) at which engagement occurs, the type of engagement and frequency of the engagement;</p> <p>(c) the function and the most senior role within the undertaking that has operational responsibility for ensuring that this engagement happens and that the results inform the undertaking’s approach;</p> <p>(d) where applicable, a Global Framework Agreement or other agreements that the undertaking has with workers' representatives related to the respect of human rights of its own workforce, including an explanation of how the agreement enables the undertaking to gain insight into the perspectives of its own workforce; and</p> <p>(e) where applicable, how the undertaking assesses the effectiveness of its engagement with its own workforce, including, where relevant, any agreements or outcomes that result.</p>	
<p>28. Where applicable, the undertaking shall disclose the steps it takes to gain insight into the perspectives of people in its own workforce who may be particularly vulnerable to impacts and/or marginalised (for example, women, migrants, people with disabilities).</p>	
<p>29. If the undertaking cannot disclose the above required information because it has not adopted a general process to engage with its own workforce, it shall disclose this to be the case. It may disclose a timeframe in which it aims to have such a process in place.</p>	
<p>Disclosure Requirement S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns</p>	



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30. The undertaking shall describe the processes it has in place to provide for or cooperate in the remediation of negative impacts on people in its own workforce that the undertaking is connected with, as well as channels available to its own workforce to raise concerns and have them addressed.	
31. The objective of this Disclosure Requirement is to enable an understanding of the formal means by which the undertaking's own workforce can make their concerns and needs known directly to the undertaking and/or through which the undertaking supports the availability of such channels (for example, grievance mechanisms) in the workplace, and how follow up is carried out with the people concerned regarding the issues raised and the effectiveness of these channels	
32. The undertaking shall describe the processes in place to cover the matters defined within paragraph 2 of the Objective section by disclosing the following information: (a) its general approach to and processes for providing or contributing to remedy where it has caused or contributed to a material negative impact on people in its own workforce, including whether and how the undertaking assesses that the remedy provided is effective; (b) any specific channels it has in place for its own workforce to raise their concerns or needs directly with the undertaking and have them addressed, including whether these are established by the undertaking itself and/or through participation in third-party mechanisms; (c) whether or not the undertaking has a grievance/complaints handling mechanism related to employee matters ; and (d) the processes through which the undertaking supports the availability of such channels in the workplace of its own workforce; and (e) how it tracks and monitors issues raised and addressed, and, how it ensures the effectiveness of the channels, including through the involvement of stakeholders who are intended users.	
33. The undertaking shall disclose whether and how it assesses that people in its own workforce are aware of, and trust, these structures or processes as a way to raise their concerns or needs and have them addressed. In addition, the undertaking shall disclose whether it has policies in place regarding the protection of individuals that use them, including workers' representatives, against retaliation. If such information has been disclosed in accordance with ESRS G1-1, the undertaking may refer to that information.	
34. If the undertaking cannot disclose the above required information because it has not adopted a channel for raising concerns and/or does not support the availability of such a channel in the workplace for its own workforce, it shall disclose this to be the case. It may disclose a timeframe in which it aims to have such a channel in place.	
<b>Disclosure Requirement S1-4 - Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions</b>	

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35. The undertaking shall disclose how it takes action to address material negative and positive impacts, and to manage material risks and pursue material opportunities related to its own workforce, and the effectiveness of those actions.	
36. The objective of this Disclosure Requirement is twofold. Firstly, it is to enable an understanding of any actions and initiatives through which the undertaking seeks to: (a) to prevent, mitigate and remediate negative material impacts on its own workforce; and/or (b) to achieve positive material impacts for its own workforce. Secondly, it is to enable an understanding of the ways in which the undertaking is addressing the material risks and pursuing the material opportunities related to its own workforce.	
37. The undertaking shall provide a summarised description of the action plans and resources to manage its material impacts, risks, and opportunities related to its own workforce in accordance with ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.	
38. In relation to the material impacts related to its own workforce, the undertaking shall describe: (a) actions taken, planned or underway to prevent or mitigate material negative impacts on its own workforce; (b) whether and how it has taken action to provide or enable remedy in relation to an actual material impact; (c) any additional actions or initiatives it has in place with the primary purpose of delivering positive impacts for its own workforce; and (d) how it tracks and assesses the effectiveness of these actions and initiatives in delivering outcomes for its own workforce.	
39. In relation to paragraph 36, the undertaking shall describe the processes through which it identifies what action is needed and appropriate in response to a particular actual or potential negative impact on its own workforce.	
40. In relation to material risks and opportunities, the undertaking shall describe: (a) what action is planned or underway to mitigate material risks for the undertaking arising from its impacts and dependencies on its own workforce and how it tracks effectiveness in practice; and (b) what action is planned or underway to pursue material opportunities for the undertaking in relation to its own workforce.	
41. The undertaking shall disclose whether and how it ensures that its own practices do not cause or contribute to material negative impacts on own workforce, including, where relevant, its practices in relation to procurement, sales and data use. This may include disclosing what approach is taken when tensions arise between the prevention or mitigation of material negative impacts and other business pressures.	

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42. When disclosing the information required under paragraph 40, the undertaking shall consider ESRS 2 MDR-T Tracking effectiveness of policies and actions through targets if it evaluates the effectiveness of an action by setting a target.	
43. The undertaking shall disclose what resources are allocated to the management of its material impacts, with information that allows users to gain an understanding of how the material impacts are managed.	
<b>Metrics and targets</b>	
<b>Disclosure Requirement S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</b>	
44. The undertaking shall disclose the time-bound and outcome-oriented targets it may have set related to: (a) reducing negative impacts on its own workforce; and/or (b) advancing positive impacts on its own workforce; and/or (c) managing material risks and opportunities related to its own workforce.	
45. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking is using outcome-oriented targets to drive and measure its progress in addressing its material negative impacts and/or advancing positive impacts on its own workforce, and/or in managing material risks and opportunities related to its own workforce.	
46. The summarised description of the targets set to manage its material impacts, risks and opportunities related to the undertaking’s own workforce shall contain the information requirements defined in ESRS 2 MDR-T.	
47. The undertaking shall disclose the process for setting the targets, including whether and how the undertaking engaged directly with its own workforce or workers’ representatives in: (a) setting any such targets; (b) tracking the undertaking’s performance against them; and (c) identifying any lessons or improvements as a result of the undertaking’s performance.	
<b>Disclosure Requirement S1-6 – Characteristics of the undertaking’s employees</b>	<b>OWN WORKFORCE (S1) Metrics Disclosure Requirement S1-6 S1-1 – Characteristics of the undertaking’s employees</b>
48. The undertaking shall describe key characteristics of employees in its own workforce.	7. The undertaking shall describe key characteristics of employees in its own workforce.
49. The objective of this Disclosure Requirement is to provide insight into the undertaking’s approach to employment, including the scope and nature of impacts arising from its employment practices, to provide contextual information that aids an understanding of the information reported in other disclosures, and to serve as the basis for calculation for quantitative metrics to be disclosed under other disclosure requirements in this Standard.	8. The objective of this Disclosure Requirement is to provide insight into the undertaking’s approach to employment, including the scope and nature of impacts arising from its employment practices, to provide contextual information that aids an understanding of the information reported in other disclosures, and to serve as the basis for calculation for quantitative metrics to be disclosed under other disclosure requirements in this Standard.
50. In addition to the information required by paragraph 40(a)iii of ESRS 2 General Disclosures, the undertaking shall disclose:	9. The disclosure required by paragraph 40(a)iii of ESRS 2 General Disclosures, the undertaking paragraph 7 shall include:

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<p>(a) the total number of employees by head count, and breakdowns by gender and by country for countries in which the undertaking has 50 or more employees representing at least 10% of its total number of employees;</p> <p>(b) the total number by head count or full time equivalent (FTE) of:</p> <ol style="list-style-type: none"> <li>permanent employees, and breakdown by gender;</li> <li>temporary employees, and breakdown by gender; and</li> <li>non-guaranteed hours employees, and breakdown by gender.</li> </ol> <p>(c) the total number of employees who have left the undertaking during the reporting period and the rate of employee turnover in the reporting period.</p> <p>(d) a description of the methodologies and assumptions used to compile the data, including whether the numbers are reported:</p> <ol style="list-style-type: none"> <li>in head count or full-time equivalent (FTE) (including an explanation of how FTE is defined); and</li> <li>at the end of the reporting period, as an average across the reporting period, or using another methodology.</li> </ol> <p>(e) where applicable, a provision of contextual information necessary to understand the data (for example, to understand fluctuations in number of employees during the reporting period); and</p> <p>(f) a cross-reference of the information reported under (a) above to the most representative number in the financial statements.</p>	<p>(a) the total number of employees by head count, and breakdowns by gender and by country for countries in which the undertaking has 50 or more employees representing at least 10% of its total number of employees;</p> <p>(b) the total number by head count or full time equivalent (FTE) of:</p> <ol style="list-style-type: none"> <li>permanent employees, and breakdown by gender;</li> <li>temporary employees, and breakdown by gender; and</li> <li>non-guaranteed hours employees, and breakdown by gender.</li> </ol> <p><del>(c) the total number of employees who have left the undertaking during the reporting period and the rate of employee turnover in the reporting period.</del></p> <p>(d) a description of the methodologies and assumptions used to compile the data, including whether the numbers are reported:</p> <ol style="list-style-type: none"> <li>in head count or full-time equivalent (FTE) (including an explanation of how FTE is defined); and</li> <li>at the end of the reporting period, as an average across the reporting period, or using another methodology.</li> </ol> <p><del>(e) where applicable, a provision of contextual information necessary to understand the data (for example, to understand fluctuations in number of employees during the reporting period); and</del></p> <p><del>(f)</del> (e) where applicable, a cross-reference of the information reported under (a) above to the most representative number in the financial statements.</p>
<p>51. For the information specified in point (b) of paragraph 50, the undertaking may in addition disclose the breakdown by region.</p>	<p><del>51. For the information specified in point (b) of paragraph 50, the undertaking may in addition disclose the breakdown by region.</del></p>
<p>52. The undertaking may disclose by head count or full time equivalent (FTE) the following information:</p> <ol style="list-style-type: none"> <li>full-time employees, and breakdowns by gender and by region; and</li> <li>part-time employees, and breakdowns by gender and by region.</li> </ol>	<p><del>10. The</del> An undertaking may disclose by head count or full time equivalent (FTE) the following information:</p> <ol style="list-style-type: none"> <li>full-time employees, and breakdown by gender <del>and by region</del>; and</li> <li>part-time employees, and breakdown by gender <del>and by region</del>.</li> </ol>
<p><b>Disclosure Requirement S1-7 – Characteristics of non-employees in the undertaking’s own workforce</b></p>	<p>Disclosure Requirement <del>S1-7</del> S1-2 – Characteristics of non-employees in the undertaking’s own workforce</p>
<p>53. The undertaking shall describe key characteristics of non-employees in its own workforce.</p>	<p>11. The undertaking shall describe key characteristics of non-employees in its own workforce.</p>
<p>54. The objective of this Disclosure Requirement is to provide insight into the undertaking’s approach to employment, including the scope and nature of impacts arising from its employment practices, to provide contextual information that aids the understanding of the information reported in other disclosures, and to serve as the basis for calculation for quantitative metrics to be disclosed under other disclosure requirements in this Standard. It also allows an understanding of how much the undertaking relies on non-employees as part of its workforce.</p>	<p>12. The objective of this Disclosure Requirement is to provide insight into the undertaking’s approach to employment, including the scope and nature of impacts arising from its employment practices, to provide contextual information that aids the understanding of the information reported in other disclosures, and to serve as the basis for calculation for quantitative metrics to be disclosed under other disclosure requirements in this Standard. It also allows an understanding of how much the undertaking relies on non-employees as part of its workforce.</p>
<p>55. The disclosure required by paragraph 53 shall include:</p> <ol style="list-style-type: none"> <li>a disclosure of the total number of non-employees in the undertaking’s own workforce, i.e., either people with contracts with the undertaking to supply labour (“self-employed people”) or people provided by undertakings primarily engaged in “employment activities” (NACE Code N78).</li> </ol>	<p>13. The disclosure required by paragraph <del>53</del> 11 shall include:</p> <ol style="list-style-type: none"> <li>a disclosure of the total number of non-employees in the undertaking’s own workforce, i.e., either people with contracts with the undertaking to supply labour (“self-employed people”) or people provided by undertakings primarily engaged in “employment activities” (NACE Code N78).</li> </ol>

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<p>(b) an explanation of the methodologies and assumptions used to compile the data, including whether the number of non-employees is reported:</p> <p>i. in headcount or full-time equivalent (FTE) (including a definition of how FTE is defined); and</p> <p>ii. at the end of the reporting period, as an average across the reporting period, or using another methodology.</p> <p>(c) where applicable, a provision of contextual information necessary to understand the data (for example, significant fluctuations in the number of non-employees in the undertaking's own workforce during the reporting period and between the current and the previous reporting period).</p>	<p>(b) an explanation of the methodologies and assumptions used to compile the data, including whether the number of non-employees is reported:</p> <p>i. in headcount or full-time equivalent (FTE) (including a definition of how FTE is defined); and</p> <p>ii. at the end of the reporting period, as an average across the reporting period, or using another methodology.</p> <p><del>(c) where applicable, a provision of contextual information necessary to understand the data (for example, significant fluctuations in the number of non-employees in the undertaking's own workforce during the reporting period and between the current and the previous reporting period).</del></p>
<p>56. For the information specified in point (a) of paragraph 55, the undertaking may disclose the most common types of non-employees (for example, self-employed people, people provided by undertakings primarily engaged in employment activities, and other types relevant to the undertaking), their relationship with the undertaking, and the type of work that they perform.</p>	<p>14. For the information specified in point (a) of paragraph <del>55</del> 13, the undertaking may disclose the most common types of non-employees (for example, self-employed people, people provided by undertakings primarily engaged in employment activities, and other types relevant to the undertaking), and their relationship with the undertaking <del>and the type of work that they perform.</del></p>
<p>57. Where data is not available, the undertaking shall estimate the number and state that it has done so. When the undertaking performs estimates, it shall describe the basis of preparation of this estimation</p>	<p><del>57. Where data is not available, the undertaking shall estimate the number and state that it has done so. When the undertaking performs estimates, it shall describe the basis of preparation of this estimation</del></p>
<p><b>Disclosure Requirement S1-8 – Collective bargaining coverage and social dialogue</b></p>	<p><b>Disclosure Requirement <del>S1-8</del> S1-3 – Collective bargaining coverage</b></p>
<p>58. The undertaking shall disclose information on the extent to which the working conditions and terms of employment of its employees are determined or influenced by collective bargaining agreements and on the extent to which its employees are represented in social dialogue in the European Economic Area (EEA) at the establishment and European level.</p>	<p>15. The undertaking shall disclose information on the extent to which the working conditions and terms of employment of its employees are determined or influenced by collective bargaining agreements <del>and on the extent to which its employees are represented in social dialogue in the European Economic Area (EEA) at the establishment and European level.</del></p>
<p>59. The objective of this Disclosure Requirement is to enable an understanding of the coverage of collective bargaining agreements and social dialogue for the undertaking's own employees.</p>	<p>16. The objective of this Disclosure Requirement is to enable an understanding of the coverage of collective bargaining agreements <del>and social dialogue</del> for the undertaking's own employees.</p>
<p>60. The undertaking shall disclose:</p> <p>(a) the percentage of its total employees covered by collective bargaining agreements;</p> <p>(b) in the EEA, whether it has one or more collective bargaining agreements and, if so, the overall percentage of its employees covered by such agreement(s) for each country in which it has significant employment, defined as at least 50 employees by head count representing at least 10% of its total number of employees; and</p> <p>(c) outside the EEA, the percentage of its own employees covered by collective bargaining agreements by region.</p>	<p>17. The undertaking shall disclose:</p> <p>(a) the percentage of its total employees covered by collective bargaining agreements;</p> <p><del>(b) in the EEA, whether it has one or more collective bargaining agreements and, if so, the overall percentage of its employees covered by such agreement(s) for each country in which it has significant employment, defined as at least 50 employees by head count representing at least 10% of its total number of employees; and</del></p> <p><del>(c) outside the EEA, the percentage of its own employees covered by collective bargaining agreements by region.</del></p>
<p>61. For employees not covered by collective bargaining agreements, the undertaking may disclose whether it determines their working conditions and terms of employment based on</p>	<p>18. For employees not covered by collective bargaining agreements, the undertaking may disclose whether it determines their working conditions and terms of employment based on</p>

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collective bargaining agreements that cover its other employees or based on collective bargaining agreements from other undertakings.	collective bargaining agreements that cover its other employees or based on collective bargaining agreements from other undertakings.
62. The undertaking may disclose the extent to which the working conditions and terms of employment of non-employees in its own workforce are determined or influenced by collective bargaining agreements, including an estimate of the coverage rate.	19. The undertaking may disclose the extent to which the working conditions and terms of employment of non-employees in its own workforce are determined or influenced by collective bargaining agreements, <del>including an estimate of the coverage rate.</del>
63. The undertaking shall disclose the following information in relation to social dialogue: (a) the global percentage of employees covered by workers' representatives, reported at the country level for each EEA country in which the undertaking has significant employment; and (b) the existence of any agreement with its employees for representation by a European Works Council (EWC), a Societas Europaea (SE) Works Council, or a Societas Cooperativa Europaea (SCE) Works Council.	<del>63. The undertaking shall disclose the following information in relation to social dialogue: (a) the global percentage of employees covered by workers' representatives, reported at the country level for each EEA country in which the undertaking has significant employment; and (b) the existence of any agreement with its employees for representation by a European Works Council (EWC), a Societas Europaea (SE) Works Council, or a Societas Cooperativa Europaea (SCE) Works Council.</del>
<b>Disclosure Requirement S1-9 – Diversity metrics</b>	<b>Disclosure Requirement S1-9 – Diversity metrics</b>
64. The undertaking shall disclose the gender distribution at top management and the age distribution amongst its employees.	<del>64. The undertaking shall disclose the gender distribution at top management and the age distribution amongst its employees.</del>
65. The objective of this Disclosure Requirement is to enable an understanding of gender diversity at top management level and the age distribution of its employees.	<del>65. The objective of this Disclosure Requirement is to enable an understanding of gender diversity at top management level and the age distribution of its employees.</del>
66. The undertaking shall disclose: (a) the gender distribution in number and percentage at top management level; and (b) the distribution of employees by age group: under 30 years old; 30-50 years old; over 50 years old.	<del>66. The undertaking shall disclose: (a) the gender distribution in number and percentage at top management level; and (b) the distribution of employees by age group: under 30 years old; 30-50 years old; over 50 years old.</del>
<b>Disclosure Requirement S1-10 – Adequate wages</b>	<b>Disclosure Requirement S1-10 S1-4 – Adequate wages</b>
67. The undertaking shall disclose whether or not its employees are paid an adequate wage, and if they are not all paid an adequate wage, the countries and percentage of employees concerned.	20. The undertaking shall disclose whether or not its employees are paid an adequate wage, and if they are not all paid an adequate wage, the countries and percentage of employees concerned.
68. The objective of this Disclosure Requirement is to enable an understanding of whether or not all the undertaking's employees are paid an adequate wage, in line with applicable benchmarks.	21. The objective of this Disclosure Requirement is to enable an understanding of whether or not all the undertaking's employees are paid an adequate wage, in line with applicable benchmarks.
69. The undertaking shall disclose whether all its employees are paid an adequate wage, in line with applicable benchmarks. If so, stating this will be sufficient to fulfil this disclosure requirement and no further information is needed.	22. The undertaking shall disclose whether all its employees are paid an adequate wage, in line with applicable benchmarks. If so, stating this will be sufficient to fulfil this disclosure requirement and no further information is needed.
70. If not all its employees are paid an adequate wage in line with applicable benchmarks, the undertaking shall disclose the countries where employees earn below the applicable adequate wage benchmark and the percentage of employees that earn below the applicable adequate wage benchmark for each of these countries.	23. If not all its employees are paid an adequate wage in line with applicable benchmarks, the undertaking shall disclose the countries where employees earn below the applicable adequate wage benchmark and the percentage of employees that earn below the applicable adequate wage benchmark for each of these countries.
71. The undertaking may also disclose the information specified in this disclosure requirement with regard to non-employees in its workforce	24. The undertaking may disclose the information specified in this disclosure requirement with regard to non-employees in this workforce.
<b>Disclosure Requirement S1-11 – Social protection</b>	<b>Disclosure Requirement S1-11 S1-5 – Social protection</b>



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72. The undertaking shall disclose whether its employees are covered by social protection against loss of income due to major life events, and, if not, the countries where this is not the case.	25. The undertaking shall disclose whether its employees are covered by social protection against loss of income due to major life events, and, if not, the countries where this is not the case.
73. The objective of this Disclosure Requirement is to enable an understanding of whether the undertaking's employees are covered by social protection against loss of income due to major life events, and, if not, the countries where this is not the case.	26. The objective of this Disclosure Requirement is to enable an understanding of whether the undertaking's employees are covered by social protection against loss of income due to major life events, and, if not, the countries where this is not the case.
74. The undertaking shall disclose whether all its employees are covered by social protection, through public programs or through benefits offered by the undertaking, against loss of income due to any of the following major life events: (a) sickness; (b) unemployment starting from when the own worker is working for the undertaking; (c) employment injury and acquired disability; (d) parental leave; and (e) retirement. If so, stating this is sufficient to fulfil this disclosure requirement and no further information is needed.	27. The undertaking shall disclose whether all its employees are covered by social protection, through public programs or through benefits offered by the undertaking, against loss of income due to any of the following major life events: (a) sickness; (b) unemployment starting from when the own worker is working for the undertaking; (c) employment injury and acquired disability; (d) parental leave; and (e) retirement. If so, stating this is sufficient to fulfil this disclosure requirement and no further information is needed.
75. If not all of its employees are covered by social protection in accordance with paragraph 72, the undertaking shall in addition disclose the countries where employees do not have social protection with regard to one or more of the types of events listed in paragraph 72 and for each of those countries the types of employees who do not have social protection with regard to each applicable major life event.	28. If not all of its employees are covered by social protection in accordance with paragraph 26, the undertaking shall may in addition disclose: (a) the countries where employees do not have social protection with regard to one or more of the types of events listed in paragraph 28; and, (b) for each of those countries, the types of employees who do not have social protection with regard to each applicable major life event.
76. The undertaking may also disclose the information specified in this disclosure requirement with regard to non-employees in its workforce.	29. The undertaking may also disclose the information specified in this disclosure requirement with regard to non-employees in its workforce.
<b>Disclosure Requirement S1-12- Persons with disabilities</b>	<b>Disclosure Requirement S1-12 S1-10 - Diversity metrics</b>
77. The undertaking shall disclose the percentage of its own employees with disabilities.	47. The undertaking shall disclose <i>the gender distribution at top management</i> and the percentage of its employees with disabilities.
78. The objective of this Disclosure Requirement is to enable an understanding of the extent to which persons with disabilities are included among the undertaking's employees.	48. The objective of this Disclosure Requirement is to enable an understanding of the gender diversity at top management level and the extent to which persons with disabilities are included among the undertaking's employees.
79. The undertaking shall disclose the percentage of persons with disabilities amongst its employees subject to legal restrictions on the collection of data.	49. The undertaking shall disclose: (a) <i>the gender distribution in number and percentage at top management level; and,</i> (b) the percentage of persons with disabilities amongst its employees subject to legal restrictions on the collection of data.
80. The undertaking may disclose the percentage of employees with disabilities with a breakdown by gender.	<del>80. The undertaking may disclose the percentage of employees with disabilities with a breakdown by gender.</del>

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<b>Disclosure Requirement S1-13 – Training and skills development metrics</b>	<b>Disclosure Requirement <del>S1-13</del> – Training and skills development metrics S1-6 – Training metrics</b>
81. The undertaking shall disclose the extent to which training and skills development is provided to its employees.	30. The undertaking shall disclose the extent to which training is provided to its employees.
82. The objective of this Disclosure Requirement is to enable an understanding of the training and skills development -related activities that have been offered to employees, within the context of continuous professional growth, to upgrade employees’ skills and facilitate continued employability.	31. The objective of this Disclosure Requirement is to enable an understanding of the training <del>and skills development</del> - related activities that have been offered to employees, within the context of continuous professional growth, to upgrade employees’ skills and facilitate continued employability.
83. The disclosure required by paragraph 81 shall include: (a) the percentage of employees that participated in regular performance and career development reviews; such information shall be broken down by gender; (b) the average number of training hours per employee and by gender.	32. The disclosure required by paragraph <del>81</del> 30 shall include <del>(a) the percentage of employees that participated in regular performance and career development reviews; such</del> information shall be broken down by gender; <del>(b) the average number of training hours per employee and by gender.</del>
84. The undertaking may disclose breakdowns by employee category for the percentage of employees that participated in regular performance and career development and for the average number of training hours per employee.	<del>84. The undertaking may disclose breakdowns by employee category for the percentage of employees that participated in regular performance and career development and for the average number of training hours per employee.</del>
85. The undertaking may also disclose the information specified in this disclosure requirement with regard to non-employees in its workforce	<del>85. The undertaking may also disclose the information specified in this disclosure requirement with regard to non-employees in its workforce</del>
<b>Disclosure Requirement S1-14 – Health and safety metrics</b>	<b>Disclosure Requirement <del>S1-14</del> S1-7 – Health and safety metrics</b>
86. The undertaking shall disclose information on the extent to which its own workforce is covered by its health and safety management system and the number of incidents associated with work-related injuries, ill health and fatalities of its own workforce. In addition, it shall disclose the number of fatalities as a result of work-related injuries and work-related ill health of other workers working on the undertaking’s sites.	33. The undertaking shall disclose information on the extent to which its own workforce is covered by its health and safety management system and the number of incidents associated with work-related injuries, ill health and fatalities of its own workforce. <del>In addition, it shall disclose the number of fatalities as a result of work-related injuries and work-related ill health of other workers working on the undertaking’s sites.</del>
87. The objective of this Disclosure Requirement is to allow an understanding of the coverage, quality and performance of the health and safety management system established to prevent work-related injuries.	34. The objective of this Disclosure Requirement is to allow an understanding of the coverage, quality and performance of the health and safety management system established to prevent work-related injuries.
88. The disclosure required by paragraph 86 shall include the following information, where applicable broken down between employees and non-employees in the undertaking’s own workforce: (a) the percentage of people in its own workforce who are covered by the undertaking’s health and safety management system based on legal requirements and/or recognised standards or guidelines; (b) the number of fatalities as a result of work-related injuries and work-related ill health; (c) the number and rate of recordable work-related accidents; (d) with regard to the undertaking’s employees, the number of cases of recordable workrelated ill health, subject to legal restrictions on the collection of data; and	35. The disclosure required by paragraph <del>86</del> 33 shall include the following information, where applicable broken down between employees and non-employees in the undertaking’s own workforce: <del>(a) the percentage of people in its own workforce who are covered by the undertaking’s health and safety management system based on legal requirements and/or recognised standards or guidelines;</del> (a) the number of fatalities as a result of work-related injuries and work-related ill health; (b) the number and rate of recordable work-related accidents; <del>(d) with regard to the undertaking’s employees, the number of cases of recordable workrelated ill health, subject to legal restrictions on the collection of data; and</del>

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(e) with regard to the undertaking's employees, the number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health. The information for (b) shall also be reported for other workers working on the undertaking's sites, such as value chain workers if they are working on the undertaking's sites.	(c) with regard to the undertaking's employees, the number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health. The information for (b) shall also be reported for other workers working on the undertaking's sites, such as value chain workers if they are working on the undertaking's sites.
89. The undertaking may also disclose the information specified in points (d) and (e) of paragraph 88 with regard to non-employees.	36. The undertaking may also disclose the information specified in point in points (d) and (e) of paragraph 88 (c) of paragraph 36 with regard to non-employees.
90. In addition, the undertaking may include the following additional information on the health and safety coverage: the percentage of its own workers covered by a health and safety management system which is based on legal requirements and/or recognised standards or guidelines and which has been internally audited and/or audited or certified by an external party.	90. In addition, the undertaking may include the following additional information on the health and safety coverage: the percentage of its own workers covered by a health and safety management system which is based on legal requirements and/or recognised standards or guidelines and which has been internally audited and/or audited or certified by an external party.
<b>Disclosure Requirement S1-15 - Work-life balance metrics</b>	<b>Disclosure Requirement Voluntary Disclosure S1-15-S1-11 - Work-life balance metrics</b>
91. The undertaking shall disclose the extent to which employees are entitled to and make use of family-related leave.	50. The undertaking may disclose the extent to which employees are entitled to and make use of family-related leave.
92. The objective of this Disclosure Requirement is to provide an understanding of the entitlement and actual practices amongst the employees to take family-related leave in a gender equitable manner, as it is one of the dimensions of work-life balance.	51. The objective of this Disclosure Requirement is to provide an understanding of the entitlement and actual practices amongst the employees to take family-related leave in a gender equitable manner, as it is one of the dimensions of work-life balance.
93. The disclosure required by paragraph 91 shall include: (a) the percentage of employees entitled to take family-related leave; and (b) the percentage of entitled employees that took family-related leave, and a breakdown by gender.	52. <del>The disclosure required by paragraph 91 shall include</del> <i>The undertaking may disclose:</i> (a) the percentage of employees entitled to take family-related leave; and (b) the percentage of entitled employees that took family-related leave, and a breakdown by gender.
94. If all of the undertaking's employees are entitled to family-related leave through social policy and/or collective bargaining agreements, it is sufficient to disclose this in order to meet the requirement of paragraph 93a.	94. <del>If all of the undertaking's employees are entitled to family-related leave through social policy and/or collective bargaining agreements, it is sufficient to disclose this in order to meet the requirement of paragraph 93a.</del>
<b>Disclosure Requirement S1-16 - Remuneration metrics (pay gap and total remuneration)</b>	<b>Disclosure Requirement S1-16 S1-8 - Remuneration metrics (pay gap and total remuneration)</b>
95. The undertaking shall disclose the percentage gap in pay between its female and male employees and the ratio between the remuneration of its highest paid individual and the median remuneration for its employees.	37. The undertaking shall disclose the percentage gap in pay between its female and male employees and the ratio between the remuneration of its highest paid individual and the median remuneration for its employees.
96. The objective of this Disclosure Requirement is twofold: to allow an understanding of the extent of any gap in the pay between women and men amongst the undertaking's employees; and to provide insight into the level of remuneration inequality inside the undertaking and whether wide pay disparities exist.	38. The objective of this Disclosure Requirement is twofold: to allow an understanding of the extent of any gap in the pay between women and men amongst the undertaking's employees; and to provide insight into the level of remuneration inequality inside the undertaking and whether wide pay disparities exist.
97. The disclosure required by paragraph 95 shall include: (a) the gender pay gap, defined as the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees ; (b) the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual) ; and	39. The disclosure required by paragraph 95 37 shall include: (a) the gender pay gap, defined as the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees ; (b) the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual) ; and

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(c) where applicable, any contextual information necessary to understand the data and how the data has been compiled and other changes to the underlying data that are to be considered.	<del>(c) — where applicable, any contextual information necessary to understand the data and how the data has been compiled and other changes to the underlying data that are to be considered.</del>
98. The undertaking may disclose a breakdown of the gender pay gap as defined in paragraph 97(a) by employee category and/or by country/segment. The undertaking may also disclose the gender pay gap between employees by categories of employees broken down by ordinary basic salary and complementary or variable components.	40. The undertaking may disclose a breakdown of the gender pay gap as defined in paragraph 97 39 (a) by employee category and/or by country/segment. The undertaking may also disclose the gender pay gap between employees by categories of employees broken down by ordinary basic salary and complementary or variable components.
99. In relation to paragraph 97 (b), the undertaking may report this figure adjusted for purchasing power differences between countries, in which case it shall report the methodology used for the calculation.	41. In relation to paragraph <del>97</del> 39 (b), the undertaking may report this figure adjusted for purchasing power differences between countries, in which case it shall report the methodology used for the calculation.
<b>Disclosure Requirement S1-17 – Incidents, complaints and severe human rights impacts</b>	<b>Disclosure Requirement <del>S1-17</del> S1-9 – Incidents , <del>complaints</del> and severe human rights impacts</b>
100. The undertaking shall disclose the number of work-related incidents and/or complaints and severe human rights impacts within its own workforce, and any related material fines, sanctions or compensation for the reporting period.	42. The undertaking shall disclose the number of work-related incidents and severe human rights impacts within its own workforce, and any related material fines, sanctions or compensation for the reporting period.
101. The objective of this Disclosure Requirement is to allow an understanding of the extent to which work-related incidents and severe cases of human rights impacts are affecting its own workforce.	43. The objective of this Disclosure Requirement is to allow an understanding of the extent to which work-related incidents and severe cases of human rights impacts <i>that are reported in the reporting period</i> are affecting its own workforce.
102. The disclosure required by paragraph 100 shall include, subject to the relevant privacy regulations, work-related incidents of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination involving internal and/or external stakeholders across operations in the reporting period. This includes incidents of harassment as a specific form of discrimination.	44. The disclosure required by paragraph <del>100</del> 41 shall include, subject to the relevant privacy regulations, work-related incidents of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination involving internal and/or external stakeholders across operations in the reporting period. This includes incidents of harassment as a specific form of discrimination.
103. The undertaking shall disclose: (a) the total number of incidents of discrimination, including harassment, reported in the reporting period; (b) the number of complaints filed through channels for people in the undertaking’s own workforce to raise concerns (including grievance mechanisms) and, where applicable, to the National Contact Points for OECD Multinational Enterprises related to the matters defined in paragraph 2 of this Standard, excluding those already reported in (a) above; (c) the total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints disclosed above, and a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the financial statements; and (d) where applicable, contextual information necessary to understand the data and how such data has been compiled.	45. The undertaking shall disclose: (a) <b>the total number of incidents of discrimination, including harassment, reported in the reporting period;</b> <del>(b) — the number of complaints filed through channels for people in the undertaking’s own workforce to raise concerns (including grievance mechanisms) and, where applicable, to the National Contact Points for OECD Multinational Enterprises related to the matters defined in paragraph 2 of this Standard, excluding those already reported in (a) above;</del> (b) the total amount of fines, penalties, and compensation for damages as a result of the incidents <del>and complaints</del> disclosed above, and a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the financial statements. <i>If it is not possible to provide a reconciliation after making reasonable efforts to do so, the undertaking shall provide an explanation of where in the financial statements these monetary amounts can be found.</i> <del>(d) — where applicable, contextual information necessary to understand the data and how such data has been compiled.</del>

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<p>104. The undertaking shall disclose the following information regarding identified cases of severe human rights incidents (e.g., forced labour, human trafficking or child labour):</p> <p>(a) the number of severe human rights incidents connected to the undertaking’s workforce in the reporting period, including an indication of how many of these are cases of nonrespect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises. If no such incidents have occurred, the undertaking shall state this ; and</p> <p>(b) the total amount of fines, penalties and compensation for damages for the incidents described in (a) above, and a reconciliation of the monetary amounts disclosed in the most relevant amount in the financial statements.</p>	<p>46. The undertaking shall disclose the following information regarding identified cases of severe human rights incidents (e.g., forced labour, human trafficking or child labour):</p> <p>(a) the number of severe human rights incidents connected to the undertaking’s workforce in the reporting period, including an indication of how many of these are cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises. If no such incidents have occurred, the undertaking shall state this ; and</p> <p>(b) the total amount of fines, penalties and compensation for damages for the issues and incidents described in (a) above, and a reconciliation of the monetary amounts disclosed in the most relevant amount in the financial statements. <i>If it is not possible to provide a reconciliation after making reasonable efforts to do so, the undertaking shall provide an explanation of where in the financial statements these monetary amounts can be found.</i></p>
<p><b>Appendix A: Application Requirements</b></p>	
<p>This appendix is an integral part of the ESRS S1 Own workforce. It supports the application of the disclosure requirements set out in this standard and has the same authority as the other parts of this Standard.</p>	
<p><b>Objective</b></p>	<p><b>Objective Own workforce</b></p>
<p>AR 1. In addition to the issues listed in paragraph 2, the undertaking may also consider disclosing information about other issues relevant to a material impact for a shorter period of time, for instance initiatives regarding the health and safety of its own workforce during a pandemic</p>	<p>AR 1. The undertaking’s impacts in relation to sustainability matters and dependencies on specific stakeholder groups can create material risks for the undertaking. For instance, on the matter of equal opportunities, discrimination in hiring and promotion against women can reduce the undertaking’s access to qualified labour and harm its reputation; negative impacts on value chain workers may disrupt the undertaking’s operations (through customers refusing to buy its products or state agencies impounding its goods) and harm its reputation; negative relationships with affected communities may disrupt the undertaking’s own operations or harm its reputation; negative impacts on the reputation of the undertaking’s products and/or services can deteriorate its business performance.</p>
<p>AR 2. The overview of social matters provided in paragraph 2 is not meant to imply that all of these issues should be reported on in each Disclosure Requirement in this Standard. Rather, they provide a list of matters derived from the sustainability reporting requirements set out in Directive 2013/34/EU that the undertaking shall consider for the ESRS 2 materiality assessment related to its own workforce and, as appropriate, report as material impacts, risks and opportunities within the scope of this Standard.</p>	<p>AR 2. The overview of social matters provided in paragraph 3 (a) is not meant to imply that all of these issues should be reported on in each Disclosure Requirement in this [draft] Standard. Rather, they provide a list of matters derived from the CSRD that undertakings shall consider for the ESRS 2 materiality assessment related to own workforce and, subsequently, report as material impacts and risks within the scope of this [draft] Standard.</p>
<p>AR 3. Examples of people that fall within the scope of “Own workforce” are:</p> <p>(a) Examples of contractors (self-employed persons) in the undertaking’s own workforce include:</p> <p>i. Contractors hired by the undertaking to perform work that would otherwise be carried out by an employee</p> <p>ii. Contractors hired by the undertaking to perform work in a public area (e.g., on a road, on the street).</p>	<p>AR 3. Examples of people that fall within the scope of “non-employees” are:</p> <p>(a) Examples of contractors (self-employed persons) in the undertaking’s own workforce include:</p> <p>i. Contractors hired by the undertaking to perform work that would otherwise be carried out by an employee.</p> <p>ii. Contractors hired by the undertaking to perform work in a public area (e.g., on a road, on the street).</p>

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<p>iii. Contractors hired by the undertaking to deliver the work/service directly at the workplace of a client of the undertaking.</p> <p>(b) Examples of people employed by a third party engaged in ‘employment activities’ include people who perform the same work that employees carry out, such as:</p> <p>i. people who fill in for employees who are temporarily absent (due to illness, holiday, parental leave, etc.);</p> <p>ii. people performing work additional to regular employees; iii. people who are dispatched temporarily from another EU member state to work for the undertaking (‘posted workers’).</p>	<p>iii. Contractors hired by the undertaking to deliver the work/service directly at the workplace of a client of the undertaking.</p> <p>(b) Examples of people employed by a third party engaged in ‘employment activities’ include people who perform the same work that employees carry out, such as:</p> <p>i. people who fill in for employees who are temporarily absent (due to illness, holiday, parental leave, etc.);</p> <p>ii. people performing work additional to regular employees;</p> <p>iii. people who are dispatched temporarily from another EU member state to work for the undertaking (‘posted workers’)</p>
	<p><i>Value chain workers</i></p> <p>AR 4. The overview of social and human rights matters provided in paragraph 4 (a) is not meant to imply that all of these issues should be disclosed in each Disclosure Requirement in this [draft] Standard. Rather, it provides a list of matters that the undertaking shall consider in its materiality assessment (ref. to ESRS 1 chapter 3 Double materiality as the basis for sustainability disclosures and ESRS 2 IRO-1) related to workers in the value chain and, subsequently, disclose as material impacts and risks within the scope of this [draft] Standard.</p>
	<p>AR 5. Examples of workers that fall within the scope of this [draft] Standard are:</p> <p>(a) workers of outsourced services working in the workplace of the undertaking (e.g., third party catering or security workers);</p> <p>(b) workers of a supplier contracted by the undertaking who work on the supplier’s premises using the supplier’s work methods;</p> <p>(c) workers for a ‘downstream’ entity which purchases goods or services from the undertaking;</p> <p>(d) workers of an equipment supplier to the undertaking who, at a workplace controlled by the undertaking, perform regular maintenance on the supplier’s equipment (e.g., photocopier) as stipulated in the contract between the equipment supplier and the undertaking; and</p> <p>(e) workers deeper in the supply chain who are extracting commodities that are then processed into components that go in the undertaking’s products.</p>
	<p><i>Affected communities</i></p> <p>AR 6. The overview of social and human rights matters provided in paragraph 5 is not meant to imply that all of these issues should be disclosed in each Disclosure Requirement in this [draft] Standard. Rather, it provides a list of matters that the undertaking shall consider in its materiality assessment (ref. to ESRS 1 chapter 3 Double materiality as the basis for sustainability disclosures and ESRS 2 IR-1) related to affected communities and, subsequently, disclose as material impacts and risks within the scope of this [draft] Standard.</p>
	<p><i>Consumers and end-users</i></p> <p>AR 7. The overview of social and human rights matters provided in paragraph 6 is not meant to imply that all of these issues should be disclosed in each Disclosure Requirement in this [draft] Standard. Rather, it provides a list of matters that the undertaking shall consider in its materiality assessment (ref. to ESRS 1 chapter 3 Double materiality as the basis for sustainability disclosures and ESRS 2 IRO-1) related to consumers and/or end-users and, subsequently, disclose as material impacts and risks within the scope of this [draft] Standard.</p>



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<b>ESRS 2 General Disclosures</b>	
<b>Strategy</b>	
<b>Disclosure Requirement related to ESRS 2 SBM-2 – Interests and views of stakeholders</b>	<b>Disclosure Requirement related to ESRS 2 SBM-2 – Interests and views of stakeholders</b>
AR 4. ESRS 2 SBM-2 requires the undertaking to provide an understanding of whether and how it considers the role that its strategy and business model may play in creating, exacerbating or mitigating significant material impacts on its own workforce, and whether and how the business model and strategy are adapted to address such material impacts.	
AR 5. While the undertaking’s own workforce may not be engaging with the undertaking at the level of its strategy or business model, their views can inform the undertaking’s assessment of its strategy and business model. The undertaking shall consider the views of workers’ representatives when applicable to fulfil this disclosure.	
<b>Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model</b>	<b>Centralised in AR of Section 2</b>
AR 6. Impacts on the undertaking’s own workforce can originate in its strategy or business model in a number of different ways. For example, impacts may relate to the undertaking’s value proposition (such as providing lowest cost products or services, or high-speed delivery, in ways that put pressure on labour rights in its own operations), or its cost structure and the revenue model (such as shifting inventory risk to suppliers, with knock-on effects on the labour rights of people who work for them).	
AR 7. Impacts on the undertaking’s own workforce that originate in the strategy or business model can also bring material risks to the undertaking. For example, risks arise if some people in the workforce are at risk of forced labour, and the undertaking is importing products into countries where the law allows for the confiscation of imported goods that are suspected of being made with forced labour. An example of opportunities for the undertaking may result from providing opportunities for the workforce such as job creation and upskilling in the context of a “just transition”. Another example, in the context of a pandemic or other severe health crisis, relates to the undertaking potentially relying on contingent labour with little to no access to sick care and health benefits that may face severe operational and business continuity risks as workers have no choice but to keep working while sick, further exacerbating the spread of the disease and causing major supply chain breakdowns. Reputational and business opportunity risks linked to the exploitation of lowskilled, low-paid workers in sourcing geographies with minimal protections for them are also increasing with media backlash and consumer preferences moving to more ethically sourced or sustainable goods.	
AR 8. Examples of particular characteristics of people in the undertaking’s own workforce that may be considered by the undertaking when responding to paragraph 15 relate to young people that may be more susceptible to impacts on their physical and mental development, or women in a context where women are routinely discriminated against in the terms and conditions of work, or migrants in a context where the market for the supply of labour is poorly regulated and workers are routinely charged recruitment fees. For some people in the workforce, the inherent nature of the activity that they are required to undertake may put them at risk (for	

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example, people required to handle chemicals or operate certain equipment or low paid employees who are on “zero hours” contracts).	
AR 9. With regard to paragraph 16, material risks could also arise because of the undertaking’s dependency on its own workforce where low-likelihood but high-impact events may trigger financial effects; for example, where a global pandemic leads to severe health impacts on the undertaking’s workforce resulting in major disruptions to production and distribution. Other examples of risk related to the undertaking’s dependency on its workforce include a shortage in skilled workers or political decisions or legislation affecting its own operations and own workforce.	
<b>Impacts, risks and opportunities management</b>	
<b>Disclosure Requirement S1-1 – Policies related to own workforce</b>	<b>Centralised in AR of Section 3</b>
AR 10. The undertaking shall consider whether explanations of significant changes to the policies adopted during the reporting year (for example, new expectations for foreign subsidiaries, new or additional approaches to due diligence and remedy) provide contextual information for users and may disclose such explanations. This includes policies and commitments of the undertaking to prevent or mitigate the risks and negative impacts on people in its own workforce of reducing carbon emissions and transitioning to greener and climate-neutral operations as well as to provide opportunities for the workforce such as job creation and upskilling, including explicit commitments to a ‘just transition’	
AR 11. The policy may take the form of a stand-alone policy regarding the undertaking’s own workforce or be included in a broader document such as a code of ethics or a general sustainability policy that has already been disclosed by the undertaking as part of another ESRS. In those cases, the undertaking shall provide an accurate cross-reference to identify the aspects of the policy that satisfy the requirements of this Disclosure Requirement.	
AR 12. When disclosing the alignment of its policies with the UN Guiding Principles on Business and Human Rights, the undertaking shall consider that the Guiding Principles refer to the International Bill of Human Rights, which consist of the Universal Declaration of Human Rights and the two Covenants that implement it, as well as the International Labour Organisation’s Declaration on Fundamental Rights and Principles at Work and the core conventions that underpin it, and may report on alignment with these instruments.	
AR 13. When explaining how external-facing policies are embedded, the undertaking may, for example, consider internal policies of responsible sourcing, and alignment with other policies relevant to own workers, for example, regarding forced labour. With regard to supplier codes of conduct that the undertaking may have, it shall indicate whether they include provisions addressing the safety of workers, precarious work (i.e., use of workers on short-term or limited hours contracts, workers employed via third parties, sub-contracting to third parties or use of informal workers), human trafficking, the use of forced labour or child labour, and whether such provisions are fully in line with applicable ILO standards.	
AR 14. The undertaking may provide an illustration of the types of communication of its policies to those individuals, group of individuals or entities for whom they are relevant, either because they	

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<p>are expected to implement them (for example, the undertaking's employees, contractors and suppliers), or because they have a direct interest in their implementation (for example, people in its own workforce, investors). It may disclose communication tools and channels (for example, flyers, newsletters, dedicated websites, social media, face to face interactions, workers' representatives), aimed at ensuring that the policy is accessible and that different audiences understand its implications. The undertaking may also explain how it identifies and removes potential barriers for dissemination, such as through translation into relevant languages or the use of graphic depictions.</p>	
<p>AR 15. Discrimination in employment and occupation occurs when someone is treated differently or less favourably because of characteristics that are not related to merit or the inherent requirements of the job. These characteristics are commonly defined in national laws. Besides the grounds mentioned in the Disclosure Requirement, the undertaking shall consider other grounds for discrimination prohibited under national legislation.</p>	
<p>AR 16. Discrimination can arise in a variety of work-related activities. These include access to employment, particular occupations, training and vocational guidance and social security. Moreover, it can occur with respect to the terms and conditions of employment, such as: recruitment, remuneration, hours of work and rest, paid holidays, maternity protection, security of tenure, job assignments, performance assessment and advancement, training opportunities, promotion prospects, occupational safety and health, termination of employment. The undertaking may address these areas specifically when disclosing its policies and underlying procedures to fulfil the disclosure requirement.</p>	
<p>AR 17. The undertaking may disclose whether it:</p> <ul style="list-style-type: none"> <li>(a) has policies and procedures which make qualifications, skills and experience the basis for the recruitment, placement, training and advancement at all levels, while accounting for the fact that some individuals may have more difficulty than others to acquire such qualifications, skills and experience;</li> <li>(b) assigns responsibility at top management level for equal treatment and opportunities in employment, issue clear company-wide policies and procedures to guide equal employment practices, and link advancement to desired performance in this area;</li> <li>(c) provides staff training on non-discrimination policies and practices, with a particular focus on middle and upper management to raise awareness and address resolution strategies for preventing and addressing systemic and incidental discrimination;</li> <li>(d) makes adjustments to the physical environment to ensure health and safety for workers, customers and other visitors with disabilities;</li> <li>(e) evaluates whether job requirements have been defined in a way that could systematically disadvantage certain groups;</li> <li>(f) keeps up-to-date records on recruitment, training and promotion that provide a transparent view of opportunities for employees and their progression within the undertaking;</li> <li>(g) puts in place grievance procedures to address complaints, handle appeals and provide recourse for employees (especially in the context of negotiations and collective agreements) when discrimination is identified, and is alert to formal structures and informal cultural issues that can</li> </ul>	

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prevent employees from raising concerns and grievances; and (h) has programs to promote access to skills development.	
<b>Disclosure Requirement S1-2 – Processes for engaging with own workforce and workers' representatives about impacts</b>	<b>Centralised in AR of Section 3</b>
AR 18. When describing what function or role has operational responsibility for such engagement and/or ultimate accountability, the undertaking may disclose whether this is a dedicated role or function or part of a broader role or function, and whether any capacity building activities have been offered to support the staff to undertake engagement. If it cannot identify such a position or function, it may state that this is the case. This disclosure could also be fulfilled by making reference to information disclosed according to ESRS 2 GOV-1 The role of the administrative, management and supervisory bodies.	
AR 19. When preparing the disclosures described in paragraph 27 b) and c), the following illustrations may be considered: (a) examples of stages at which engagement occurs are i) determining the approach to mitigation and ii) evaluating the effectiveness of mitigation; (b) for type of engagement, these could be participation, consultation and/or information; (c) for the frequency of the engagement, information may be provided on whether engagement occurs on a regular basis, at certain points in a project or business process, (for example, when a new harvest season begins or a new production line is opened), as well as whether it occurs in response to legal requirements and/or in response to stakeholder requests and whether the result of the engagement is being integrated into the undertaking's decision-making processes; and (d) for the role with operational responsibility, whether the undertaking requires relevant staff to have certain skills, or whether it provides training or capacity building to relevant staff to undertake engagement.	
AR 20. Global Framework Agreements (GFA) serve to establish an ongoing relationship between a multinational enterprise and a Global Union Federation to ensure that the undertaking adheres to the same standards in every country in which it operates.	
AR 21. To illustrate how the perspectives of its own workforce have informed specific decisions or activities, the undertaking may provide examples from the current reporting period.	
AR 22. Where the undertaking has agreements with national, European or international trade unions or works councils related to the rights of people its own workforce, this can be disclosed to illustrate how the agreement enables the undertaking to gain insight into the perspectives of such people.	
AR 23. Where possible, the undertaking may disclose examples from the reporting period to illustrate how the perspectives of its own workforce and workers' representatives have informed specific decisions or activities of the undertaking.	
AR 24. The undertaking shall consider the following aspects when fulfilling this Disclosure Requirement:	

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<p>(a) The type of engagement (for example, information, consultation or participation) and its frequency (for example, ongoing, quarterly, annually);</p> <p>(b) how feedback is recorded and integrated into decision-making, and how people in the workforce are informed about the way in which their feedback has influenced decisions;</p> <p>(c) whether engagement activities take place at the organisational level or at a lower level, such as at the site or project level, and in the latter case, how information from engagement activities is centralised;</p> <p>(d) the resources (for example, financial or human resources) allocated to engagement; and</p> <p>(e) how it engages with people in its workforce and workers' representatives on the impacts on its own workforce that may arise from reducing carbon emissions and transitioning to greener and climate-neutral operations, in particular restructuring, employment loss or creation, training and up/reskilling, gender and social equity, and health and safety.</p>	
<p>AR 25. The undertaking may also disclose the following information in relation to paragraph 24 on diversity:</p> <p>(a) how it engages with at-risk or persons in vulnerable situations (for example whether it takes specific approaches and gives special attention to potential barriers);</p> <p>(b) how it takes into account potential barriers to engagement with people in its workforce (for example, language and cultural differences, gender and power imbalances, divisions within a community or group);</p> <p>(c) how it provides people in its workforce with information that is understandable and accessible through appropriate communication channels;</p> <p>(d) any conflicting interests that have arisen among its workforce and how the undertaking has resolved these conflicting interests; and</p> <p>(e) how it seeks to respect the human rights of all stakeholders engaged, for example, their rights to privacy, freedom of expression, and peaceful assembly and protest.</p>	
<p>AR 26. The undertaking may also report information about the effectiveness of processes for engaging with its own workforce from previous reporting periods. This applies in cases where the undertaking has assessed the effectiveness of these processes or derived lessons during the current reporting period. Processes used to track effectiveness can include internal or external auditing or verification, impact assessments, measurement systems, stakeholder feedback, grievance mechanisms, external performance ratings, and benchmarking.</p>	
<p><b>Disclosure Requirement S1-3 - Processes to remediate negative impacts and channels for own workers to raise concerns</b></p>	<p><b>Centralised in AR of Section 3</b></p>
<p>AR 27. In fulfilling the requirements set out by the disclosure criteria of Disclosure Requirement ESRS S1-3, the undertaking may be guided by the content of the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct focused on remediation and grievance mechanisms.</p>	
<p>AR 28. Channels for raising concerns or needs include grievance mechanisms, hotlines, trade unions (where people in the workforce are unionised), works councils, dialogue processes or other means through which the undertaking's own workforce or workers' representatives can raise</p>	

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<p>concerns about impacts or explain needs that they would like the undertaking to address. This could include both channels provided by the undertaking directly and channels provided by the entities where their own workforce is working, in addition to any other mechanisms an undertaking may use to gain insight into the management of impacts on its own workforce, such as compliance audits. Where the undertaking is relying solely on information about the existence of such channels provided by its business relationships to answer this requirement, it may state that.</p>	
<p>AR 29. Third party mechanisms could include those operated by the government, NGOs, industry associations and other collaborative initiatives. The undertaking may disclose whether these are accessible to all of its own workforce (or workers’ representatives or, in their absence, individuals or organisations acting on their behalf or who are otherwise in a position to be aware of negative impacts).</p>	
<p>AR 30. The undertaking shall consider whether and how people in its own workforce that may be affected and their workers’ representatives are able to access channels at the level of the undertaking they are employed by, or contracted to work for, in relation to each material impact. Relevant channels may include hotlines, trade unions (where people in the workforce are unionised) or works councils, or other grievance mechanisms operated by the relevant undertaking or by a third party.</p>	
<p>AR 31. In explaining whether and how the undertaking knows that people in its own workforce are aware of and trust any of these channels, the undertaking may provide relevant and reliable data about the effectiveness of these channels from the perspective of the people concerned. Examples of sources of information are surveys of people in the undertaking’s workforce that have used such channels and their levels of satisfaction with the process and outcomes.</p>	
<p>AR 32. In describing the effectiveness of channels for its own workforce and workers’ representatives to raise concerns, the undertaking may be guided by the following questions, based on the “effectiveness criteria for non-judicial grievance mechanisms”, as laid out in the UN Guiding Principles on Business and Human Rights, in particular principle 31. The considerations below may be applied to individual channels or to a collective system of channels:</p> <ul style="list-style-type: none"> <li>(a) do the channels have legitimacy by providing appropriate accountability for their fair conduct and building stakeholder trust?</li> <li>(b) are the channels known and accessible to stakeholders?</li> <li>(c) do the channels have clear and known procedures, with indicative timeframes?</li> <li>(d) do the channels ensure reasonable access for stakeholders to sources of information, advice and expertise?</li> <li>(e) do the channels offer transparency by providing sufficient information both to complainants and, where applicable, to meet any public interest?</li> <li>(f) do outcomes achieved through the channels accord with internationally recognised human rights?</li> <li>(g) does the undertaking identify insights from the channels that support continuous learning in both improving the channels and preventing future impacts?</li> <li>(h) does the undertaking focus on dialogue with complainants as the means to reach agreed solutions, rather than seeking to unilaterally determine the outcome?</li> </ul>	



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<b>Disclosure Requirement S1-4 – Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches</b>	<b>Centralised in AR of Section 3</b>
<p>AR 33. It may take time to understand negative impacts and how the undertaking may be involved with them through its own workforce, as well as to identify appropriate responses and put them into practice). Therefore, the undertaking may disclose:</p> <ul style="list-style-type: none"> <li>(a) its general and specific approaches to addressing material negative impacts;</li> <li>(b) its initiatives aimed at contributing to additional material positive impacts;</li> <li>(c) how far it has progressed in its efforts during the reporting period; and</li> <li>(d) its aims for continued improvement.</li> </ul>	
<p>AR 34. Appropriate action can vary according to whether the undertaking causes or contributes to a material impact, or whether it is involved because the impact is directly linked to its operations, products or services by a business relationship.</p>	
<p>AR 35. Given that material negative impacts affecting its own workforce that have occurred during the reporting period may also be connected with other entities or operations outside its direct control, the undertaking may disclose whether and how it seeks to use its leverage in its business relationships to manage those impacts. This may include using commercial leverage (for example, enforcing contractual requirements with business relationships or implementing incentives), other forms of leverage within the relationship (such as providing training or capacity-building on workers’ rights to entities with which the undertaking has a business relationship) or collaborative leverage with peers or other actors (such as initiatives aimed at responsible recruitment or ensuring workers receive an adequate wage).</p>	
<p>AR 36. When the undertaking discloses its participation in an industry or multi-stakeholder initiative as part of its actions to address material negative impacts, the undertaking may disclose how the initiative, and its own involvement, is aiming to address the material impact concerned. It may report under ESRS S1-5 the relevant targets set by the initiative and progress towards them.</p>	
<p>AR 37. When disclosing whether and how the undertaking considers actual and potential impacts on its own workforce in decisions to terminate business relationships and whether and how it seeks to address any negative impacts that may result from termination, the undertaking may include examples.</p>	
<p>AR 38. Processes used to track the effectiveness of actions can include internal or external auditing or verification, court proceedings and/or related court decisions, impact assessments, measurement systems, stakeholder feedback, grievance mechanisms, external performance ratings, and benchmarking.</p>	
<p>AR 39. Reporting on effectiveness is aimed at enabling the understanding of the links between actions taken by an undertaking and the effective management of impacts. Additional information that the undertaking may provide includes data showing a decrease in the number of incidents identified.</p>	

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AR 40. With regard to initiatives or processes whose primary aim is to deliver positive impacts for people in the undertaking's own workforce that are based on their needs, and with regard to progress in the implementation of such initiatives or processes, the undertaking may disclose: (a) information about whether and how people in its own workforce and workers' representatives play a role in decisions regarding the design and implementation of these programmes or processes; and (b) information about the intended or achieved positive outcomes for the undertaking's own workforce of these programmes or processes.	
AR 41. The undertaking may explain whether any such initiatives are designed also to support the achievement of one or more Sustainable Development Goals. For example, an undertaking committing to SDG 8 to "promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all" may be actively working towards eliminating forced labour or compulsory labour or supporting higher levels of productivity on activities in developing countries through technological upgrades and training of local labour, which can benefit both the specific people in its own workforce targeted by the actions, and also their local communities.	
AR 42. When disclosing the intended or achieved positive outcomes of its actions for the undertaking's own workforce, a distinction is to be made between evidence of certain activities having occurred (for example, that x number of people have received financial literacy training) from evidence of actual outcomes for the people concerned (for example, that x people report that they are able to better manage their pay and their household budgets).	
AR 43. If the undertaking has taken measures to mitigate negative impacts on its own workforce that arise from the transition to a greener, climate-neutral economy, such as training and reskilling, employment guarantees, and in the case of downscaling or mass dismissal, measures such as job counselling, coaching, intra-company placements and early retirement plans, the undertaking shall disclose those measures. This includes measures to comply with prevailing regulation. The undertaking may highlight present and/or expected external developments that influence whether dependencies turn into risks. This includes consideration of impacts that may arise from the transition to greener and climate-neutral operations.	
AR 44. When disclosing the material risks and opportunities related to its impacts or dependencies on its own workforce, the undertaking may consider the following: (a) risks related to the undertaking's impacts on its own workforce may include the reputational or legal exposure where people in the undertaking's workforce are found to be subject to forced labour or child labour; (b) risks related to the undertaking's dependencies on its own workforce may include disruption of business operations where significant employee turnover or lack of skills/training development threaten the undertaking's business; and (c) opportunities related to the undertaking's impacts on its own workforce may include market differentiation and greater customer appeal from guaranteeing decent pay and conditions for non-employees.	

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AR 45. When explaining whether dependencies turn into risks, the undertaking shall consider external developments.	
AR 46. When disclosing policies, actions and resources and targets related to the management of material risks and opportunities, in cases where risks and opportunities arise from a material impact, the undertaking may cross-reference its disclosures on policies, actions and resources and targets in relation to that impact.	
AR 47. The undertaking shall consider whether and how its process(es) to manage material risks related to own workforce are integrated into its existing risk management process(es).	
AR 48. When disclosing the resources allocated to the management of material impacts, the undertaking may explain which internal functions are involved in managing the impacts and what types of action they take to address negative and advance positive impacts.	
<b>Metrics and targets</b>	
<b>Disclosure Requirement S1-5 – Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities</b>	<b>Centralised in AR of Section 3</b>
AR 49. When disclosing information about targets in accordance with paragraph 46, the undertaking may disclose: (a) the intended outcomes to be achieved in the lives of a certain number of people in its own workforce; (b) the stability of the targets over time in terms of definitions and methodologies to enable comparability over time; and/or (c) the standards or commitments which the targets are based on (for instance codes of conduct, sourcing policies, global frameworks, or industry codes).	
AR 50. Targets related to risks and opportunities may be the same as or distinct from targets related to impacts. For example, a target to reach adequate wages for non-employees could both reduce impacts on those people and reduce associated risks in terms of the quality and reliability of their output.	
AR 51. The undertaking may also distinguish between short-, medium- and long-term targets covering the same policy commitment. For example, the undertaking may have a long-term target to achieve an 80% reduction in health and safety incidents affecting its delivery drivers by 2030 and a near-term target to reduce the overtime hours of delivery drivers by x% while maintaining their income by 2024.	
AR 52. When modifying or replacing a target in the reporting period, the undertaking may explain the change by cross-referencing it to significant changes in the business model or to broader changes in the accepted standard or legislation from which the target is derived to provide contextual information as per ESRS 2 BP-2 Disclosures in relation to specific circumstances.	
<b>Disclosure Requirement S1-6 – Characteristics of the Undertaking's Employees</b>	<b>Metrics and targets for Own workforce</b> <b>Disclosure Requirement S1-6 S1-1 – Characteristics of the undertaking's employees</b>
AR 53. This Disclosure Requirement covers all employees who perform work for any of the undertaking's entities included in its sustainability reporting.	AR 8. This Disclosure Requirement covers all employees who perform work for any of the undertaking's entities included in its sustainability reporting.
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numbers in averages across the reporting period takes into account fluctuations during the reporting period.	numbers in averages across the reporting period takes into account fluctuations during the reporting period.
AR 58. Quantitative data, such as the number of temporary or part-time employees, is unlikely to be sufficient on its own. For example, a high proportion of temporary or part-time employees could indicate a lack of employment security for employees, but it could equally signal workplace flexibility when offered as a voluntary choice. For this reason, the undertaking is required to disclose contextual information to help information users interpret the data. The undertaking can explain the reasons for temporary employment. An example of such a reason is the recruitment of employees to undertake work on a temporary or seasonal project or event. Another example is the standard practice of offering a temporary contract (for example, six months) to new employees before an offer of permanent employment is made. The undertaking may also explain the reasons for nonguaranteed hours employment.	AR 13. Quantitative data, such as the number of temporary or part-time employees, is unlikely to be sufficient on its own. For example, a high proportion of temporary or part-time employees could indicate a lack of employment security for employees, but it could equally signal workplace flexibility when offered as a voluntary choice. For this reason, the undertaking is required to may disclose contextual information to help information users interpret the data. The undertaking can explain the reasons for temporary employment. An example of such a reason is the recruitment of employees to undertake work on a temporary or seasonal project or event. Another example is the standard practice of offering a temporary contract (for example, six months) to new employees before an offer of permanent employment is made. The undertaking may also explain the reasons for non-guaranteed hours employment.
AR 59. For the own employee turnover calculation, the undertaking shall calculate the aggregate of the number of employees who leave voluntarily or due to dismissal, retirement, or death in service. The undertaking shall use this number for the numerator of the employee turnover rate and may determine the denominator used to calculate this rate and describe its methodology.	<del>AR 59. For the own employee turnover calculation, the undertaking shall calculate the aggregate of the number of employees who leave voluntarily or due to dismissal, retirement, or death in service. The undertaking shall use this number for the numerator of the employee turnover rate and may determine the denominator used to calculate this rate and describe its methodology.</del>
AR 60. Where data is not available for detailed information, the undertaking shall use an estimation of the employee number or ratios, in accordance with ESRS 1, and clearly identify where the use of estimates has taken place.	<del>AR 60. Where data is not available for detailed information, the undertaking shall use an estimation of the employee number or ratios, in accordance with ESRS 1, and clearly identify where the use of estimates has taken place.</del>
<b>Disclosure Requirement S1-7 – Characteristics of non-employees in the undertaking’s own workforce</b>	<b>Disclosure Requirement S1-7 S1-2 – Characteristics of non-employees in the undertaking’s own workforce</b>
AR 61. This Disclosure Requirement provides insight into the undertaking’s approach to employment, as well as the scope and nature of impacts arising from its employment practices. It also provides contextual information that aids an understanding of the information reported in other disclosures. This disclosure covers both individual contractors supplying labour to the undertaking (“self-employed people”) and workers provided by undertakings primarily engaged in “employment activities” (NACE Code N78). If all the people performing work for the undertaking are employees and the undertaking does not have any people in its workforce who are not employees, this Disclosure Requirement is not material for the undertaking; notwithstanding, the undertaking may state this fact when disclosing the information required by Disclosure Requirement S1-6 as contextual information as this information can be relevant for the users of the Sustainability Statement.	AR 14. This Disclosure Requirement provides insight into the undertaking’s approach to employment, as well as the scope and nature of impacts arising from its employment practices. It also provides contextual information that aids an understanding of the information reported in other disclosures. <del>This disclosure covers both individual contractors supplying labour to the undertaking (“self-employed people”) and workers provided by undertakings primarily engaged in “employment activities” (NACE Code N78).</del> If all the people performing work for the undertaking are employees and the undertaking does not have any people in its workforce who are not employees, this Disclosure Requirement is not material for the undertaking; notwithstanding, the undertaking may state this fact when disclosing the information required by Disclosure Requirement <del>S1-6</del> S1-1 as contextual information as this information can be relevant for the users of the Sustainability Statement.
AR 62. Examples of contractors (self-employed people) in the undertaking’s own workforce include: contractors hired by the undertaking to perform work that would otherwise be carried out by an employee; contractors hired by the undertaking to perform work in a public area (for example, on a road, on the street); and contractors hired by the undertaking to deliver the work/service directly at the workplace of a client of the organization. Examples of people employed by a third party engaged in ‘employment activities’ whose work is under the direction of the undertaking include: people who perform the same work that employees carry out, such as	AR 15. Examples of contractors (self-employed people) in the undertaking’s own workforce include: contractors hired by the undertaking to perform work that would otherwise be carried out by an employee; contractors hired by the undertaking to perform work in a public area (for example, on a road, on the street); and contractors hired by the undertaking to deliver the work/service directly at the workplace of a client of the organization. Examples of people employed by a third party engaged in ‘employment activities’ whose work is under the direction of the undertaking include: people who perform the same work that employees carry out, such as



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<p>people who fill in for employees who are temporarily absent (due to illness, holiday, parental leave, etc.); people performing regular work at the same site as employees; and workers who are dispatched temporarily from another EU member state to work for the undertaking ('posted workers'). Examples of value chain workers (and thus of workers not in the undertaking's own workforce and reported under the scope of ESRS S2) include: workers for a supplier contracted by the undertaking who work on the supplier's premises using the supplier's work methods; workers for a 'downstream' entity which purchases goods or services from the undertaking; and workers of an equipment supplier to the undertaking who, at one or more of the undertaking's workplaces, perform regular maintenance on the supplier's equipment (for example, photocopier) as stipulated in the contract between the equipment supplier and the undertaking.</p>	<p>people who fill in for employees who are temporarily absent (due to illness, holiday, parental leave, etc.); people performing regular work at the same site as employees; and workers who are dispatched temporarily from another EU member state to work for the undertaking ('posted workers'). Examples of value chain workers (and thus of workers not in the undertaking's own workforce and reported under the scope of ESRS S2) include: workers for a supplier contracted by the undertaking who work on the supplier's premises using the supplier's work methods; workers for a 'downstream' entity which purchases goods or services from the undertaking; and workers of an equipment supplier to the undertaking who, at one or more of the undertaking's workplaces, perform regular maintenance on the supplier's equipment (for example, photocopier) as stipulated in the contract between the equipment supplier and the undertaking.</p>
<p>AR 63. If the undertaking cannot report exact figures, it shall use estimates according to the provisions in ESRS 1 to disclose the number of people in its own workforce who are not employees to the nearest ten or, where the number of people in its own workforce who are not employees is greater than 1,000, to the nearest 100, and explain this. In addition, it shall clearly identify the information that derives from actual data and estimates.</p>	<p><del>AR 63. If the undertaking cannot report exact figures, it shall use estimates according to the provisions in ESRS 1 to disclose the number of people in its own workforce who are not employees to the nearest ten or, where the number of people in its own workforce who are not employees is greater than 1,000, to the nearest 100, and explain this. In addition, it shall clearly identify the information that derives from actual data and estimates.</del></p>
<p>AR 64. Disclosing the number of people in the undertaking's own workforce who are not employees at the end of the reporting period provides information for that point in time without capturing fluctuations during the reporting period. Disclosing this number as an average across the reporting period considers fluctuations during the reporting period and can provide more insightful and relevant information for users.</p>	<p>AR 16. Disclosing the number of people in the undertaking's own workforce who are not employees at the end of the reporting period provides information for that point in time without capturing fluctuations during the reporting period. Disclosing this number as an average across the reporting period considers fluctuations during the reporting period and can provide more insightful and relevant information for users.</p>
<p>AR 65. The information disclosed by the undertaking allows users to understand how the number of non-employees in the undertaking's own workforce varies during the reporting period or compared to the previous reporting period (i.e., whether the numbers have increased or decreased). The undertaking may also disclose the reasons for the fluctuations. For example, an increase in the number of non-employees during the reporting period could be due to a seasonal event. Conversely, a decrease in the number of non-employees compared to the previous reporting period could be due to the completion of a temporary project. If the undertaking discloses fluctuations, it shall also explain the criteria used to determine which fluctuations it discloses. If there are no significant fluctuations in the number of non-employees during the reporting period or between the current and previous reporting period, the undertaking may disclose this information.</p>	<p><del>AR 17. The information disclosed by the undertaking allows users to understand how the number of non-employees in the undertaking's own workforce varies during the reporting period or compared to the previous reporting period (i.e., whether the numbers have increased or decreased). The undertaking may also disclose the reasons for the fluctuations. For example, an increase in the number of non-employees during the reporting period could be due to a seasonal event. Conversely, a decrease in the number of non-employees compared to the previous reporting period could be due to the completion of a temporary project. If the undertaking discloses fluctuations, it shall also explain the criteria used to determine which fluctuations it discloses. If there are no significant fluctuations in the number of non-employees during the reporting period or between the current and previous reporting period, the undertaking may disclose this information.</del></p>
<p><b>Disclosure Requirement S1-8 – Collective bargaining coverage and social dialogue</b></p>	<p><b>Disclosure Requirement S1-8 S1-3 – Collective bargaining coverage and social dialogue</b></p>
<p>Collective bargaining coverage</p>	<p>Collective bargaining coverage</p>
<p>AR 66. The percentage of employees covered by collective bargaining agreements is calculated using the following formula:</p> $\frac{\text{Number of employees covered by collective bargaining agreements}}{\text{Number of employees}} \times 100$	<p>AR 66. The percentage of employees covered by collective bargaining agreements is calculated using the following formula:</p> $\frac{\text{Number of employees covered by collective bargaining agreements}}{\text{Number of employees}} \times 100$
<p>AR 67. The employees in the undertaking's own workforce covered by collective bargaining agreements are those individuals to whom the undertaking is obliged to apply the agreement. This</p>	<p>AR 19. The employees in the undertaking's own workforce covered by collective bargaining agreements are those individuals to whom the undertaking is obliged to apply the agreement. This</p>

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<p>means that if none of the employees are covered by a collective bargaining agreement, the percentage reported is zero. An employee in the undertaking's own workforce covered by more than one collective bargaining agreement only needs to be counted once.</p>	<p>means that if none of the employees are covered by a collective bargaining agreement, the percentage reported is zero. An employee in the undertaking's own workforce covered by more than one collective bargaining agreement only needs to be counted once.</p>												
<p>AR 68. This requirement is not aimed at obtaining the percentage of employees represented by a works council or belonging to trade unions, which can be different. The percentage of employees covered by collective bargaining agreements can be higher than the percentage of unionised employees when the collective bargaining agreements apply to both union and non-union members. Alternatively, the percentage of employees covered by collective bargaining agreements can be lower than the percentage of unionised employees. This may be the case when there are no collective bargaining agreements available or when the collective bargaining agreements do not cover all unionised employees.</p>	<p>AR 20. This requirement is not aimed at obtaining the percentage of employees represented by a works council or belonging to trade unions, which can be different. The percentage of employees covered by collective bargaining agreements can be higher than the percentage of unionised employees when the collective bargaining agreements apply to both union and non-union members. Alternatively, the percentage of employees covered by collective bargaining agreements can be lower than the percentage of unionised employees. This may be the case when there are no collective bargaining agreements available or when the collective bargaining agreements do not cover all unionised employees.</p> <p><i>The information required by this Disclosure Requirement shall be reported as follows</i></p> <p><i>Table 1: Reporting template for collective bargaining coverage</i></p> <table border="1" data-bbox="1131 587 1767 1129"> <thead> <tr> <th data-bbox="1131 587 1451 742"><b>Coverage Rate</b></th> <th data-bbox="1453 587 1767 742"><b>Collective bargaining coverage of employees</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="1131 743 1451 818">0-19%</td> <td data-bbox="1453 743 1767 818"></td> </tr> <tr> <td data-bbox="1131 820 1451 895">20-39%</td> <td data-bbox="1453 820 1767 895"></td> </tr> <tr> <td data-bbox="1131 896 1451 971">40-59%</td> <td data-bbox="1453 896 1767 971"></td> </tr> <tr> <td data-bbox="1131 973 1451 1048">60-79%</td> <td data-bbox="1453 973 1767 1048"></td> </tr> <tr> <td data-bbox="1131 1050 1451 1129">80-100%</td> <td data-bbox="1453 1050 1767 1129"></td> </tr> </tbody> </table>	<b>Coverage Rate</b>	<b>Collective bargaining coverage of employees</b>	0-19%		20-39%		40-59%		60-79%		80-100%	
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<p><b>Social Dialogue</b></p> <p>AR 69. For calculating the information required by paragraph 63(a), the undertaking shall identify in which European Economic Area (EEA) countries it has significant employment (i.e., at least 50 employees representing at least 10% of its total employees). For these countries it shall report the percentage of employees in that country which are employed in establishments in which employees are represented by workers' representatives. Establishment is defined as any place of operations where the undertaking carries out a non-transitory economic activity with human means and goods. Examples include: a factory, a branch of a retail chain, or an undertaking's</p>	<p><b>Social Dialogue</b></p> <p>AR 69. For calculating the information required by paragraph 63(a), the undertaking shall identify in which European Economic Area (EEA) countries it has significant employment (i.e., at least 50 employees representing at least 10% of its total employees). For these countries it shall report the percentage of employees in that country which are employed in establishments in which employees are represented by workers' representatives. Establishment is defined as any place of operations where the undertaking carries out a non-transitory economic activity with human means and goods. Examples include: a factory, a branch of a retail chain, or an undertaking's</p>												

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<p>headquarters. For countries in which there is only one establishment the percentage reported shall be either 100% or 0%.</p> $\frac{\text{Number of employees working in establishments with workers' representatives}}{\text{Number of employees}} \times 100$	<p>headquarters. For countries in which there is only one establishment the percentage reported shall be either 100% or 0%.</p> $\frac{\text{Number of employees working in establishments with workers' representatives}}{\text{Number of employees}} \times 100$																																																						
<p>AR 70. The information required by this Disclosure Requirement shall be reported as follows Table 1: Reporting template for collective bargaining coverage and social dialogue</p> <table border="1" data-bbox="197 443 680 746"> <thead> <tr> <th rowspan="2">Coverage Rate</th> <th colspan="2">Collective Bargaining Coverage</th> <th>Social dialogue</th> </tr> <tr> <th>Employees – EEA (for countries with &gt;50 empl. representing &gt;10% total empl.)</th> <th>Employees – Non-EEA (estimate for regions with &gt;50 empl. representing &gt;10% total empl.)</th> <th>Workplace representation (EEA only) (for countries with &gt;50 empl. representing &gt;10% total empl.)</th> </tr> </thead> <tbody> <tr> <td>0-19%</td> <td></td> <td>Region A</td> <td></td> </tr> <tr> <td>20-39%</td> <td>Country A</td> <td>Region B</td> <td></td> </tr> <tr> <td>40-59%</td> <td>Country B</td> <td></td> <td>Country A</td> </tr> <tr> <td>60-79%</td> <td></td> <td></td> <td>Country B</td> </tr> <tr> <td>80-100%</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Coverage Rate	Collective Bargaining Coverage		Social dialogue	Employees – EEA (for countries with >50 empl. representing >10% total empl.)	Employees – Non-EEA (estimate for regions with >50 empl. representing >10% total empl.)	Workplace representation (EEA only) (for countries with >50 empl. representing >10% total empl.)	0-19%		Region A		20-39%	Country A	Region B		40-59%	Country B		Country A	60-79%			Country B	80-100%				<p>AR 70. The information required by this Disclosure Requirement shall be reported as follows Table 1: Reporting template for collective bargaining coverage and social dialogue</p> <table border="1" data-bbox="1240 443 1724 746"> <thead> <tr> <th rowspan="2">Coverage Rate</th> <th colspan="2">Collective Bargaining Coverage</th> <th>Social dialogue</th> </tr> <tr> <th>Employees – EEA (for countries with &gt;50 empl. representing &gt;10% total empl.)</th> <th>Employees – Non-EEA (estimate for regions with &gt;50 empl. representing &gt;10% total empl.)</th> <th>Workplace representation (EEA only) (for countries with &gt;50 empl. representing &gt;10% total empl.)</th> </tr> </thead> <tbody> <tr> <td>0-19%</td> <td></td> <td>Region A</td> <td></td> </tr> <tr> <td>20-39%</td> <td>Country A</td> <td>Region B</td> <td></td> </tr> <tr> <td>40-59%</td> <td>Country B</td> <td></td> <td>Country A</td> </tr> <tr> <td>60-79%</td> <td></td> <td></td> <td>Country B</td> </tr> <tr> <td>80-100%</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Coverage Rate	Collective Bargaining Coverage		Social dialogue	Employees – EEA (for countries with >50 empl. representing >10% total empl.)	Employees – Non-EEA (estimate for regions with >50 empl. representing >10% total empl.)	Workplace representation (EEA only) (for countries with >50 empl. representing >10% total empl.)	0-19%		Region A		20-39%	Country A	Region B		40-59%	Country B		Country A	60-79%			Country B	80-100%			
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<p><b>Disclosure Requirement S1-9 – Diversity metrics</b></p>	<p><b>Disclosure Requirement S1-9 – Diversity metrics</b></p>																																																						
<p>AR 71. In preparing the disclosure on gender at top management, the undertaking shall use the definition of top management as one and two levels below the administrative and supervisory bodies unless this concept has already been defined with the undertaking's operations and differs from the previous description. If this is the case, the undertaking can use its own definition for top management and disclose that fact and its own definition</p>	<p>AR 71. In preparing the disclosure on gender at top management, the undertaking shall use the definition of top management as one and two levels below the administrative and supervisory bodies unless this concept has already been defined with the undertaking's operations and differs from the previous description. If this is the case, the undertaking can use its own definition for top management and disclose that fact and its own definition</p>																																																						
<p><b>Disclosure Requirement S1-10 – Adequate Wages</b></p>	<p><b>Disclosure Requirement S1-10 S1-4 – Adequate Wages</b></p>																																																						
<p>AR 72. The lowest wage shall be calculated for the lowest pay category, excluding interns and apprentices. This is to be based on the basic wage plus any fixed additional payments that are guaranteed to all employees. The lowest wage shall be considered separately for each country in which the undertaking has operations, except outside the EEA when the relevant adequate or minimum wage is defined at a sub national level.</p>	<p>AR 21. The lowest wage shall be calculated for the lowest pay category, excluding interns and apprentices. This is to be based on the basic wage plus any fixed additional payments that are guaranteed to all employees. The lowest wage shall be considered separately for each country in which the undertaking has operations, except outside the EEA when the relevant adequate or minimum wage is defined at a sub national level.</p>																																																						
<p>AR 73. The adequate wage benchmark used for comparison with the lowest wage shall not be lower than:</p> <p>(a) in the EEA: the minimum wage set in accordance with Directive (EU) 2022/2041 of the European Parliament and of the Council on adequate minimum wages in the European Union. In the period until Directive (EU) 2022/2041 enters into application, where there is no applicable minimum wage determined by legislation or collective bargaining in an EEA country, the undertaking shall use an adequate wage benchmark that is either not lower than the minimum wage in a neighboring country with a similar socio-economic status or not lower than a commonly-</p>	<p>AR 22. The adequate wage benchmark used for comparison with the lowest wage shall not be lower than:</p> <p>(a) in the EEA: the minimum wage set in accordance with Directive (EU) 2022/2041 of the European Parliament and of the Council on adequate minimum wages in the European Union. In the period until Directive 2022/2041 enters into application, where there is no applicable minimum wage determined by legislation or collective bargaining in an EEA country, the undertaking shall use an adequate wage benchmark that is either not lower than the minimum wage in a neighboring country with a similar socio-economic status or not lower than a commonly-</p>																																																						

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<p>referenced international norm such as 60% of the country's median wage and 50% of the gross average wage.</p> <p>(b) outside of the EEA:</p> <p>i. the wage level established in any existing international, national or sub-national legislation, official norms or collective agreements, based on an assessment of a wage level needed for a decent standard of living;</p> <p>ii. if none of the instruments identified in (i) exist, any national or sub-national minimum wage established by legislation or collective bargaining; or</p> <p>iii. if none of the instruments identified in (i) or (ii) exist, any benchmark that meets the criteria set out by the Sustainable Trade Initiative (IDH) ('Roadmap on Living Wages - A Platform to Secure Living Wages in Supply Chains'), including applicable benchmarks aligned with the Anker methodology, or provided by the Wage Indicator Foundation or Fair Wage Network, provided the primacy of collective bargaining for the establishment of terms and conditions of employment is ensured.</p>	<p>referenced international norm such as 60% of the country's median wage and 50% of the gross average wage.</p> <p>(b) outside of the EEA:</p> <p>i. the wage level established in any existing international, national or sub-national legislation, official norms or collective agreements, based on an assessment of a wage level needed for a decent standard of living;</p> <p>ii. if none of the instruments identified in (i) exist, any national or sub-national minimum wage established by legislation or collective bargaining; or</p> <p>iii. if none of the instruments identified in (i) or (ii) exist, any benchmark that meets the criteria set out by the Sustainable Trade Initiative (IDH) ('Roadmap on Living Wages - A Platform to Secure Living Wages in Supply Chains'), including applicable benchmarks aligned with the Anker methodology, or provided by the Wage Indicator Foundation or Fair Wage Network, provided the primacy of collective bargaining for the establishment of terms and conditions of employment is ensured.</p>
<p>AR 74. Directive (EU) 2022/2041 on adequate minimum wages in the European Union references both indicative reference values commonly used at international level such as 60 % of the gross median wage and 50 % of the gross average wage, and/or indicative reference values used at national level. Data for the indicative values of 60% of the national median gross wage or 50% of the national average gross wage can be obtained from the European Labour Force Survey.</p>	<p>AR 23. Directive (EU) 2022/2041 on adequate minimum wages in the European Union references both indicative reference values commonly used at international level such as 60 % of the gross median wage and 50 % of the gross average wage, and/or indicative reference values used at national level. Data for the indicative values of 60% of the national median gross wage or 50% of the national average gross wage can be obtained from the European Labour Force Survey.</p>
<p><b>Disclosure Requirement S1-11 – Social protection</b></p>	<p><b>Disclosure Requirement S1-11 S1-5 – Social protection</b></p>
<p>AR 75. Social protection refers to all the measures that provide access to health care and income support in cases of challenging life events such as the loss of a job, being sick and in need of medical care, giving birth and raising a child, or retiring and in need of a pension.</p>	<p>AR 24. Social protection refers to all the measures that provide access to health care and income support in cases of challenging life events such as the loss of a job, being sick and in need of medical care, giving birth and raising a child, or retiring and in need of a pension.</p>
<p><b>Disclosure Requirement S1-12 – Persons with disabilities</b></p>	<p><b>Disclosure Requirement S1-12 – Persons with disabilities</b></p>
<p>AR 76. When disclosing the information required in paragraph 77 regarding persons with disabilities, the undertaking shall provide any contextual information necessary to understand the data and how the data has been compiled (methodology). For example, information about the impact of different legal definitions of persons with disabilities in the different countries in which the undertaking has operations.</p>	<p><del>AR 76. When disclosing the information required in paragraph 77 regarding persons with disabilities, the undertaking shall provide any contextual information necessary to understand the data and how the data has been compiled (methodology). For example, information about the impact of different legal definitions of persons with disabilities in the different countries in which the undertaking has operations.</del></p>
<p><b>Disclosure Requirement S1-13 – Training and Skills Development metrics</b></p>	<p><b>Disclosure Requirement S1-13 S1-6 – Training metrics</b></p>
<p>AR 77. A regular performance review is defined as a review based on criteria known to the employee and his or her superior undertaken with the knowledge of the employee at least once per year. The review can include an evaluation by the worker's direct superior, peers, or a wider range of employees. The review can also involve the human resources department. In order to disclose the information required by paragraph 83 (a), the undertaking shall use the employee headcount figures provided in Disclosure Requirement ESRS S1-6 in the denominator to calculate the:</p> <p>(a) number/proportion of performance reviews per employee; and</p> <p>(b) number of reviews in proportion to the agreed number of reviews by the management.</p>	<p><del>AR 77. A regular performance review is defined as a review based on criteria known to the employee and his or her superior undertaken with the knowledge of the employee at least once per year. The review can include an evaluation by the worker's direct superior, peers, or a wider range of employees. The review can also involve the human resources department. In order to disclose the information required by paragraph 83 (a), the undertaking shall use the employee headcount figures provided in Disclosure Requirement ESRS S1-6 in the denominator to calculate the:</del></p> <p><del>(a) number/proportion of performance reviews per employee; and</del></p> <p><del>(b) number of reviews in proportion to the agreed number of reviews by the management.</del></p>
<p>AR 78. To disclose the average required per paragraph 83 (b), the undertaking shall perform the following calculation: total number of training hours offered to and completed by employees per gender category divided by the total number of employees per gender category. For the total</p>	<p>AR 25. To disclose the average required per paragraph 32, the undertaking shall perform the following calculation: total number of training hours offered to and completed by employees per gender category divided by the total number of employees per gender category. For the total</p>

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training average and the average by gender, the head count figures for total employment and employment by gender reported in Disclosure Requirement ESRS S1-6 shall be used.	training average and the average by gender, the head count figures for total employment and employment by gender reported in Disclosure Requirement ESRS <del>S1-6</del> S1-1 shall be used.
AR 79. Employee categories are a breakdown of employees by level (such as senior management, middle management) or function (such as technical, administrative, production). This information is derived from the undertaking's own human resources system. In categorising the workforce, the undertaking shall define reasonable and meaningful employee categories which enable users of the information to understand different performance measures between the categories. The undertaking may present a category for executive and non- executive employees.	<del>AR 79. Employee categories are a breakdown of employees by level (such as senior management, middle management) or function (such as technical, administrative, production). This information is derived from the undertaking's own human resources system. In categorising the workforce, the undertaking shall define reasonable and meaningful employee categories which enable users of the information to understand different performance measures between the categories. The undertaking may present a category for executive and non- executive employees.</del>
<b>Disclosure Requirement S1-14 – Health and safety metrics</b>	<b>Disclosure Requirement S1-14 <span style="background-color: yellow;">S1-7</span> – Health and safety metrics</b>
AR 80. In relation to paragraph 88 (a), the percentage of its own workforce who are covered by the undertaking's health and safety management system shall be disclosed on a head count basis rather than a full-time equivalent basis.	<del>AR 80. In relation to paragraph 88 (a), the percentage of its own workforce who are covered by the undertaking's health and safety management system shall be disclosed on a head count basis rather than a full time equivalent basis.</del>
AR 81. With regard to paragraph 90, when the undertaking's health and safety management system, or certain parts thereof, has been subject to an internal audit or external certification, the undertaking may state this fact, or absence thereof, and the underlying standards for such audits/certifications, as applicable.	<del>AR 81. With regard to paragraph 90, when the undertaking's health and safety management system, or certain parts thereof, has been subject to an internal audit or external certification, the undertaking may state this fact, or absence thereof, and the underlying standards for such audits/certifications, as applicable.</del>
AR 82. Fatalities may be reported separately for those resulting from work-related injuries and those resulting from work-related ill health.	AR 26. Fatalities may be reported separately for those resulting from work-related injuries and those resulting from work-related ill health.
<b>Guidance on "work-related"</b>	<b>Guidance on "work-related"</b>
AR 83. Work-related injuries and work-related ill health arise from exposure to hazards at work. Notwithstanding, other types of incidents can occur that are not connected with the work itself. For example, the following incidents are generally not considered to be work-related, unless otherwise specified in applicable national legislation: (a) a person in the workforce suffers a heart attack while at work that it is not connected with work; (b) a person in the workforce driving to or from work is injured in a car accident (when driving is not part of the work and where the transport has not been organised by the undertaking); and (c) a person in the workforce with epilepsy has a seizure at work that is not connected with work.	AR 27. Work-related injuries and work-related ill health arise from exposure to hazards at work. Notwithstanding, other types of incidents can occur that are not connected with the work itself. For example, the following incidents are generally not considered to be work related, unless otherwise specified in applicable national legislation: (a) a person in the workforce suffers a heart attack while at work that it is not connected with work; (b) a person in the workforce driving to or from work is injured in a car accident (when driving is not part of the work and where the transport has not been organised by the undertaking); and (c) a person in the workforce with epilepsy has a seizure at work that it is not connected with work.
AR 84. With regard to travelling for work purposes, injuries and ill health that occur while a person is travelling are work-related if, at the time of the injury or ill health, the person was engaged in work activities "in the interest of the employer". Examples of such activities include travelling to and from customer contacts; conducting job tasks; and entertaining or being entertained to transact, discuss, or promote business (at the direction of the employer). If the undertaking is responsible for the transport commuting, incidents occurred while commuting are considered to be work-related. Nonetheless, incidents which arise during travel, outside of the undertaking's responsibility (i.e., regular commuting to and from work), may be reported separately provided that the undertaking has such data available across the undertaking.	AR 28. With regard to travelling for work purposes, injuries and ill health that occur while a person is travelling are work-related if, at the time of the injury or ill health, the person was engaged in work activities "in the interest of the employer". Examples of such activities include travelling to and from customer contacts; conducting job tasks; and entertaining or being entertained to transact, discuss, or promote business (at the direction of the employer). If the undertaking is responsible for the transport commuting, incidents occurred while commuting are considered to be work-related. Nonetheless, incidents which arise during travel, outside of the undertaking's responsibility (i.e. regular commuting to and from work), may be reported separately provided that the undertaking has such data available across the undertaking.

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AR 85. With regard to working from home, injuries and ill health that occur when working from home are work-related, if the injury or ill health occurs while the person is performing work from home; and the injury or ill health is directly related to the performance of work rather than the general home environment or setting.	AR 29. With regard to working from home, injuries and ill health that occur when working from home are work-related, if the injury or ill health occurs while the person is performing work from home; and the injury or ill health is directly related to the performance of work rather than the general home environment or setting.
AR 86. With regard to mental illness, it is considered to be work-related, if it has been notified voluntarily by the person concerned and it is supported by an opinion from a licensed healthcare professional with appropriate training and experience; and if such opinion states that the illness is work-related.	AR 30. With regard to mental illness, it is considered to be work related, if it has been notified voluntarily by the person concerned and it is supported by an opinion from a licensed healthcare professional with appropriate training and experience; and if such opinion states that the illness is work-related.
AR 87. Health issues resulting, for example, from smoking, drug and alcohol abuse, physical inactivity, unhealthy diets, and psychosocial factors unrelated to work are not considered work-related.	AR 31. Health issues resulting, for example, from smoking, drug and alcohol abuse, physical inactivity, unhealthy diets, and psychosocial factors unrelated to work are not considered work-related.
AR 88. Occupational diseases are not considered work-related injuries but are covered under work-related ill health.	AR 32. Occupational diseases are not considered work-related injuries but are covered under work-related ill health.
<b>Guidance on computing the rate of work-related injuries</b>	<b>Guidance on computing the rate of work-related injuries</b>
AR 89. In computing the rate of work-related injuries, the undertaking shall divide the respective number of cases by the number of total hours worked by people in its own workforce and multiplied by 1,000,000. Thereby, these rates represent the number of respective cases per one million hours worked. A rate based on 1,000,000 hours worked indicates the number of work-related injuries per 500 full time people in the workforce over a 1-year timeframe. For comparability purposes a rate based on 1,000,000 hours worked shall be used also for undertakings with less than 500 people in the workforce.	AR 33. In computing the rate of work-related injuries, the undertaking shall divide the respective number of cases by the number of total hours worked by people in its own workforce and multiplied by 1,000,000. Thereby, these rates represent the number of respective cases per one million hours worked. A rate based on 1,000,000 hours worked indicates the number of work-related injuries per 500 full time people in the workforce over a 1-year timeframe. For comparability purposes a rate based on 1,000,000 hours worked shall be used also for undertakings with less than 500 people in the workforce.
AR 90. If the undertaking cannot directly calculate the number of hours worked, it may estimate this on the basis of normal or standard hours of work, taking into account entitlements to periods of paid leave of absence from work (for example, paid vacations, paid sick leave, public holidays) and explain this in its disclosures.	AR 34. If the undertaking cannot directly calculate the number of hours worked, it may estimate this on the basis of normal or standard hours of work, taking into account entitlements to periods of paid leave of absence from work (for example, paid vacations, paid sick leave, public holidays) and explain this in its disclosures.
AR 91. An undertaking shall include fatalities as a result of work-related injury in the calculation of the number and rate of recordable work-related injuries.	AR 35. An undertaking shall include fatalities as a result of work-related injury in the calculation of the number and rate of recordable work-related injuries.
<b>Guidance on recordable work-related ill health</b>	<b>Guidance on recordable work-related ill health</b>
AR 92. Work-related ill health can include acute, recurring, and chronic health problems caused or aggravated by work conditions or practices. These include musculoskeletal disorders, skin and respiratory diseases, malignant cancers, diseases caused by physical agents (for example, noise-induced hearing loss, vibration-caused diseases), and mental illnesses (for example, anxiety, post-traumatic stress disorder). For the purpose of the required disclosures, the undertaking shall, at a minimum, include in its disclosure those cases outlined in the ILO List of Occupational Diseases.	AR 36. Work-related ill health can include acute, recurring, and chronic health problems caused or aggravated by work conditions or practices. These include musculoskeletal disorders, skin and respiratory diseases, malignant cancers, diseases caused by physical agents (for example, noise induced hearing loss, vibration-caused diseases), and mental illnesses (for example, anxiety, post-traumatic stress disorder). For the purpose of the required disclosures, the undertaking shall, at a minimum, include in its disclosure those cases outlined in the ILO List of Occupational Diseases.
AR 93. In the context of this Standard, work-related musculoskeletal disorders are covered under work-related ill health (and not injuries).	AR 37. In the context of this <i>[draft]</i> Standard, work-related musculoskeletal disorders are covered under work-related ill health (and not injuries).
AR 94. The cases to be disclosed in paragraph 88(d) relate to cases of work-related ill health notified to the undertaking or identified by the undertaking through medical surveillance, during the reporting period. The undertaking might be notified of cases of work-related ill health through	<del>AR 94. The cases to be disclosed in paragraph 88(d) relate to cases of work-related ill health notified to the undertaking or identified by the undertaking through medical surveillance, during the reporting period. The undertaking might be notified of cases of work-related ill health through</del>



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reports by affected people, compensation agencies, or healthcare professionals. The disclosure may include cases of work-related ill health that were detected during the reporting period among people who were formerly in the undertaking's workforce.	<del>reports by affected people, compensation agencies, or healthcare professionals. The disclosure may include cases of work-related ill health that were detected during the reporting period among people who were formerly in the undertaking's workforce.</del>
<b>Guidance on the number of days lost</b>	<b>Guidance on the number of days lost</b>
AR 95. The undertaking shall count the number of days lost such that the first full day and last day of absence shall be included. Calendar days should be considered for the calculation, thus days on which the affected individual is not scheduled for work (for example, weekends, public holidays) will count as lost days.	AR 38. The undertaking shall count the number of days lost as such that the first full day and last day of absence shall be included. Calendar days should be considered for the calculation, thus days on which the affected individual is not scheduled for work (for example, weekends, public holidays) will count as lost days.
<b>Disclosure Requirement S1-15 – Work-life balance</b>	<b>Voluntary Disclosure <del>S1-15</del> S1-11 – Work-life balance</b>
AR 96. Family-related leave include maternity leave, paternity leave, parental leave, and carers' leave that is available under national law or collective agreements. For the purpose of this Standard, these concepts are defined as: (a) maternity leave (also called pregnancy leave): employment-protected leave of absence for employed women directly around the time of childbirth (or, in some countries, adoption); (b) paternity leave: leave from work for fathers or, where and in so far as recognised by national law, for equivalent second parents, on the occasion of the birth or adoption of a child for the purposes of providing care; (c) parental leave: leave from work for parents on the grounds of the birth or adoption of a child to take care of that child, as defined by each Member State; (d) carers' leave from work: leave for workers to provide personal care or support to a relative, or a person who lives in the same household, in need of significant care or support for a serious medical reason, as defined by each Member State.	AR 49. Family-related leave include maternity leave, paternity leave, parental leave, and carers' leave that is available under national law or collective agreements. For the purpose of this [draft] Standard, these concepts are defined as: (a) maternity leave (also called pregnancy leave): employment-protected leave of absence for employed women directly around the time of childbirth (or, in some countries, adoption); (b) paternity leave: leave from work for fathers or, where and in so far as recognised by national law, for equivalent second parents, on the occasion of the birth or adoption of a child for the purposes of providing care; (c) parental leave: leave from work for parents on the grounds of the birth or adoption of a child to take care of that child, as defined by each Member State; (d) carers' leave from work: leave for workers to provide personal care or support to a relative, or a person who lives in the same household, in need of significant care or support for a serious medical reason, as defined by each Member State.
AR 97. With regard to paragraph 93 (a), employees entitled to family-related leave are those who are covered by regulations, organisational policies, agreements, contracts or collective bargaining agreements that contain family-related leave entitlements and have reported their entitlement to the undertaking or the undertaking is aware of the entitlement.	AR 50. <del>With regard to paragraph 93 (a),</del> Employees entitled to family-related leave are those who are covered by regulations, organisational policies, agreements, contracts or collective bargaining agreements that contain family-related leave entitlements and have reported their entitlement to the undertaking or the undertaking is aware of the entitlement.
<b>Disclosure Requirement S1-16 – Remuneration metrics (pay gap and total remuneration)</b>	<b>Disclosure Requirement <del>S1-16</del> S1-8 – Remuneration metrics (pay gap and total remuneration)</b>
<b>Pay gap</b>	<b>Pay gap</b>
AR 98. When compiling the information required under paragraph 97 (a) for the gap in pay between its female and male employees (also known as the "gender pay gap") the undertaking shall use the following methodology: (a) include all employees' gross hourly pay level; and (b) apply the following formula to calculate the gender pay gap  $\frac{\text{(Average gross hourly pay level of male employees – average gross hourly pay level of female employees)}}{\text{Average gross hourly pay level of male employees}} \times 100$	AR 39. When compiling the information required under paragraph 39(a) for the gap in pay between its female and male employees (also known as the "gender pay gap") the undertaking shall use the following methodology: (a) include all employees' gross hourly pay level; and (b) apply the following formula to calculate the gender pay gap  $\frac{\text{(Average gross hourly pay level of male employees – average gross hourly pay level of female employees)}}{\text{Average gross hourly pay level of male employees}} \times 100$
AR 99. When disclosing the information required under paragraph 97 (a), the undertaking shall provide any contextual information necessary to understand the data and how the data has been	AR 40. When disclosing the information required under paragraph 39 (a), the undertaking shall provide any contextual information necessary to understand the data and how the data has been

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compiled (methodology). Information regarding how objective factors such as type of work and country of employment influence the gender pay gap may be reported.	compiled (methodology). Information regarding how objective factors such as type of work and country of employment influence the gender pay gap may be reported.
AR 100. The measure of the undertaking's gender pay gap shall be reported for the current reporting period and, if reported in previous sustainability reports, for the previous two reporting periods.	AR 41. The measure of the undertaking's gender pay gap shall be reported for the current reporting period and, if reported in previous sustainability reports, for the previous two reporting periods.
<b>Total remuneration Ratio</b>	<b>Total remuneration Ratio</b>
<p>AR 101. When compiling the information required by paragraph 97 (b), the undertaking shall:</p> <ul style="list-style-type: none"> <li>(a) include all employees;</li> <li>(b) consider, depending on the undertaking's remuneration policies, all of the following: <ul style="list-style-type: none"> <li>i. base salary, which is the sum of guaranteed, short-term, and non-variable cash compensation;</li> <li>ii. benefits in cash, which is the sum of the base salary and cash allowances, bonuses, commissions, cash profit-sharing, and other forms of variable cash payments;</li> <li>iii. benefits in kind, such as cars, private health insurance, life insurance, wellness programs; and</li> <li>iv. direct remuneration, which is the sum of benefits in cash, benefits in kind and total fair value of all annual long-term incentives (for example, stock option awards, restricted stock shares or units, performance stock shares or units, phantom stock shares, stock appreciation rights, and long-term cash awards).</li> </ul> </li> <li>(c) apply the following formula for the annual total remuneration ratio: <math display="block">\frac{\text{Annual total remuneration for the undertaking's highest paid individual}}{\text{Median employee annual total remuneration (excluding the highest - paid individual)}}</math> </li> </ul>	<p>AR 42. When compiling the information required by paragraph 39 (b), the undertaking shall:</p> <ul style="list-style-type: none"> <li>(a) include all employees;</li> <li>(b) consider, depending on the undertaking's remuneration policies, all of the following: <ul style="list-style-type: none"> <li>i. base salary, which is the sum of guaranteed, short-term, and non-variable cash compensation;</li> <li>ii. benefits in cash, which is the sum of the base salary and cash allowances, bonuses, commissions, cash profit-sharing, and other forms of variable cash payments;</li> <li>iii. benefits in kind, such as cars, private health insurance, life insurance, wellness programs; and</li> <li>iv. direct remuneration, which is the sum of benefits in cash, benefits in kind and total fair value of all annual long-term incentives (for example, stock option awards, restricted stock shares or units, performance stock shares or units, phantom stock shares, stock appreciation rights, and long-term cash awards).</li> </ul> </li> <li>(c) apply the following formula for the annual total remuneration ratio: <math display="block">\frac{\text{Annual total remuneration for the undertaking's highest paid individual}}{\text{Median employee annual total remuneration (excluding the highest - paid individual)}}</math> </li> </ul>
AR 102. To illustrate the contextual information, the undertaking may provide an explanation to understand the data and how the data has been compiled (methodology). Quantitative data, such as the annual total remuneration ratio, may not be sufficient on its own to understand pay disparity and its drivers. For example, pay ratios can be influenced by the size of the undertaking (for example, revenue, number of employees), its sector, its employment strategy (for example, reliance on outsourced workers or part-time employees, a high degree of automation), or currency volatility.	<del>AR 102. To illustrate the contextual information, the undertaking may provide an explanation to understand the data and how the data has been compiled (methodology). Quantitative data, such as the annual total remuneration ratio, may not be sufficient on its own to understand pay disparity and its drivers. For example, pay ratios can be influenced by the size of the undertaking (for example, revenue, number of employees), its sector, its employment strategy (for example, reliance on outsourced workers or part-time employees, a high degree of automation), or currency volatility.</del>
<b>Disclosure Requirement S1-17 – Incidents, complaints and severe human rights impacts</b>	<b>Disclosure Requirement <del>S1-17</del> S1-9 – Incidents, <del>complaints</del> and severe human rights impacts</b>
	Discrimination incidents
AR 103. In addition to the information required by paragraphs 103 and 104, the undertaking may disclose the status of incidents and/or complaints and actions taken with reference to the following: <ul style="list-style-type: none"> <li>(a) incidents reviewed by the undertaking;</li> <li>(b) remediation plans being implemented;</li> <li>(c) remediation plans that have been implemented, with results reviewed through routine internal management review processes; and</li> <li>(d) incidents no longer subject to action.</li> </ul>	AR 43. In addition to the information required by paragraphs 45 and 46, the undertaking may disclose the status of incidents and/or complaints and actions taken with reference to the following: <ul style="list-style-type: none"> <li>(a) incidents reviewed by the undertaking;</li> <li>(b) remediation plans being implemented;</li> <li>(c) remediation plans that have been implemented, with results reviewed through routine internal management review processes; and</li> <li>(d) incidents no longer subject to action.</li> </ul>

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<p>AR 104. If the undertaking compiles the information described in AR 105, it shall consider the following:</p> <p>(a) an incident is no longer subject to action if it is resolved, the case is completed, or no further action is required by the undertaking. For example, an incident for which no further action is required can include cases that are withdrawn or where the underlying circumstances that led to the incident no longer exist;</p> <p>(b) remedial action is directed toward the alleged harasser and the alleged victim. Remedial action toward the victim may include offering to pay his/her expenses for counselling sessions, offering the victim some paid time off, offering to reinstate sick/vacation days if the victim has incurred any expenses due to the harassment (such as having used sick or vacation days); and</p> <p>(c) remedial action toward the harasser may include giving the harasser a verbal and/or written warning, mandating anti-harassment counselling or sending the harasser to an appropriate seminar, harassment awareness and prevention training. A suspension without pay may also be an option. If the harasser has been disciplined earlier but his/her harassment does not cease, then more serious discipline may be required.</p>	<p>AR 44. If the undertaking compiles the information described in AR 43, it shall consider the following:</p> <p>(a) an incident is no longer subject to action if it is resolved, the case is completed, or no further action is required by the undertaking. For example, an incident for which no further action is required can include cases that are withdrawn or where the underlying circumstances that led to the incident no longer exist;</p> <p>(b) remedial action is directed toward the alleged harasser and the alleged victim. Remedial action toward the victim may include offering to pay his/her expenses for counselling sessions, offering the victim some paid time off, offering to reinstate sick/vacation days if the victim has incurred any expenses due to the harassment (such as having used sick or vacation days); and</p> <p>(c) remedial action toward the harasser may include giving the harasser a verbal and/or written warning, mandating anti-harassment counselling or sending the harasser to an appropriate seminar, harassment awareness and prevention training. A suspension without pay may also be an option. If the harasser has been disciplined earlier but his/her harassment does not cease, then more serious discipline may be required.</p>
<p>AR 105. Severe human rights incidents include instances of lawsuits, formal complaints through the undertaking or third-party complaint mechanisms, serious allegations in public reports or the media, where these are connected to the undertaking's own workforce, and the fact of the incidents is not disputed by the undertaking, as well as any other severe impacts of which the undertaking is aware.</p>	<p>AR 45. Severe human rights incidents include instances of lawsuits, formal complaints through the undertaking or third-party complaint mechanisms, serious allegations in public reports or the media, where these are connected to the undertaking's own workforce, and the fact of the incidents is not disputed by the undertaking, as well as any other severe impacts of which the undertaking is aware.</p>
<p>AR 106. In addition to the information required by paragraph 104 above, the undertaking may disclose the number of severe human rights incidents where the undertaking played a role securing remedy for those affected during the reporting period.</p>	<p><del>AR 106. In addition to the information required by paragraph 104 above, the undertaking may disclose the number of severe human rights incidents where the undertaking played a role securing remedy for those affected during the reporting period.</del></p>
<p><b>ESRS S2 WORKERS IN THE VALUE CHAIN</b></p>	<p><b>S2, S3 and S4 centralised in Section 2 and 3</b></p>
<p><b>Objective</b></p> <p>1. The objective of this Standard is to specify disclosure requirements which will enable users of the sustainability statement to understand material impacts on value chain workers connected with the undertaking's own operations and value chain, including through its products or services, as well as through its business relationships, and its related material risks and opportunities, including:</p> <p>(a) how the undertaking affects workers in its value chain, in terms of material positive and negative actual or potential impacts;</p> <p>(b) any actions taken, and the result of such actions, to prevent, mitigate or remediate actual or potential negative impacts, and to address risks and opportunities;</p> <p>(c) the nature, type and extent of the undertaking's material risks and opportunities, including those related to its impacts and dependencies on workers in the value chain, and how the undertaking manages them; and</p> <p>(d) the financial effects on the undertaking over the short-, medium- and long-term of material risks and opportunities, including those arising from the undertaking's impacts and dependencies on workers in the value chain.</p>	

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<p>2. In order to meet the objective, this Standard requires an explanation of the general approach the undertaking takes to identify and manage any material actual and potential impacts on value chain workers in relation to:</p> <p>(a) working conditions (for example, secure employment, working time, adequate wage, social dialogue, freedom of association, including the existence of work councils, collective bargaining, work-life balance and health and safety);</p> <p>(b) equal treatment and opportunities for all (for example, gender equality and equal pay for work of equal value, training and skills development, the employment and inclusion of persons with disabilities, measures against violence and harassment in the workplace, and diversity);</p> <p>(c) other work-related rights (for example, child labour, forced labour, adequate housing, water and sanitation and privacy).</p>	
<p>3. This Standard also requires an explanation of how such impacts, as well as the undertaking's dependencies on value chain workers, can create material risks or opportunities for the undertaking. For example, negative impacts on value chain workers may disrupt the undertaking's operations (through customers refusing to buy its products or state agencies impounding its goods) and harm its reputation. Conversely, respect for workers' rights and active support programmes (for example through financial literacy initiatives) can bring business opportunities, such as more reliable supply or widening of the future consumer base.</p>	
<p>4. This Standard covers all workers in the undertaking's upstream and downstream value chain who are or can be materially impacted by the undertaking, including impacts that are connected with the undertaking's own operations and value chain, including through its products or services, as well as through its business relationships. This includes all workers who are not included in the scope of "own workforce" ("own workforce" includes employees, individual contractors, i.e., self-employed workers, and workers provided by third party undertakings primarily engaged in 'employment activities'). Own workforce is covered in ESRS S1 Own workforce. See AR 3 for examples of what is included in the scope of this Standard.</p>	
<p><b>Interaction with other ESRS</b></p>	
<p>5. This Standard applies when material impacts on and/or material risks and opportunities related to value chain workers have been identified through the materiality assessment process laid out in ESRS 2 General disclosures.</p>	
<p>6. This Standard shall be read in conjunction with ESRS 1 General requirements, and ESRS 2, as well as the ESRS S1, ESRS S3 Affected communities and ESRS S4 Consumers and end-users.</p>	
<p>7. The reporting under this Standard shall be consistent, coherent and where relevant clearly linked with reporting on the undertaking's own workforce under ESRS S1, in order to ensure effective reporting.</p>	
<p><b>Disclosure Requirements</b></p>	
<p><b>ESRS 2 General disclosures</b></p>	<p><b>ESRS 2 General disclosures</b></p>
<p>8. The requirements of this section should be read in conjunction with the disclosures required by ESRS 2 on Strategy (SBM). The resulting disclosures shall be presented alongside the disclosures required by ESRS 2, except for SBM-3 Material impacts, risks and opportunities</p>	

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<p>SET 1 S1 / S2 / S3 / S4 (version July 2023)</p>	<p>LSME ESRS ED Section 5</p>
<p>and their interaction with strategy and business model, for which the undertaking has an option to present the disclosures alongside the topical disclosure.</p>	
<p><b>Strategy</b></p>	
<p><b>Disclosure Requirement related to ESRS 2 SBM-2 Interests and views of stakeholders</b></p>	<p><b>Disclosure Requirement related to ESRS 2 SBM-2 Interests and views of stakeholders</b></p>
<p>9. When responding to ESRS 2 SBM-2 paragraph 43, the undertaking shall disclose how the interests, views, and rights of its value chain workers could be materially impacted by the undertaking, including respect for their human rights, inform its strategy and business model. Value chain workers are a key group of affected stakeholders.</p>	
<p><b>Disclosure Requirement related to ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model</b></p>	<p><b>Centralised in AR of Section 2</b></p>
<p>10. When responding to ESRS 2 SBM-3 paragraph 48, the undertaking shall disclose: (a) whether and how actual and potential impacts on value chain workers, as identified in ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities: (i) originate from or are connected to the undertaking's strategy and business models, and (ii) inform and contribute to adapting the undertaking's strategy and business model; and (b) the relationship between on the one hand its material risks and opportunities arising from impacts and dependencies on value chain workers, and on the other hand its strategy and business model.</p>	
<p>11. When fulfilling the requirements of paragraph ESRS 2 SBM-3 paragraph 48, the undertaking shall disclose whether all value chain workers who are likely to be materially impacted by the undertaking, including impacts that are connected with the undertaking's own operations and value chain, including through its products or services , as well as through its business relationships, are included in the scope of its disclosure under ESRS 2. In addition, the undertaking shall provide the following information: (a) a brief description of the types of value chain workers who could be materially impacted by the undertaking, including impacts that connected with the undertaking's own operations and value chain, including through its products or services, as well as through its business relationships, and specify whether they are: i. workers working on the undertaking site but who are not part of own workforce, i.e., who are not self-employed workers or workers provided by third party undertakings primarily engaged in employment activities (covered through ESRS S1); ii. workers working for entities in the undertaking's upstream value chain (e.g., those involved in the extraction of metals or minerals or harvesting of commodities, in refining, manufacturing or other forms of processing); iii. workers working for entities in the undertaking's downstream value chain (e.g., those involved in the activities of logistics or distribution providers, franchisees, retailers); iv. workers working in the operations of a joint venture or special purpose vehicle involving the reporting undertaking;</p>	

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<p>v. workers who (within the prior categories or additionally) are particularly vulnerable to negative impacts whether due to their inherent characteristics or to the particular context, such as trade unionists, migrant workers, home workers, women or young workers.</p> <p>(b) any geographies, at country level or other levels, or commodities for which there is a significant risk of child labour, or of forced labour or compulsory labour, among workers in the undertaking's value chain ;</p> <p>(c) in the case of material negative impacts, whether they are either (i) widespread or systemic in contexts where the undertaking operates or has sourcing or other business relationships (e.g., child labour or forced labour in particular commodity supply chains in specific countries or regions), or (ii) related to individual incidents (e.g., an industrial accident or an oil spill) or to specific business relationships. This includes consideration of impacts on value chain workers that may arise from the transition to greener and climate-neutral operations. Potential impacts include impacts associated with innovation and restructuring, closure of mines, increased mining of minerals needed for the transition to a sustainable economy, and solar panel production;</p> <p>(d) in the case of material positive impacts, a brief description of the activities that result in the positive impacts (e.g., updated purchasing practices, capacity-building to supply chain workers), including providing opportunities for the workforce such as job creation and upskilling in the context of a 'just transition', and the types of value chain workers that are positively affected or could be positively affected; the undertaking may also disclose whether the positive impacts occur in specific countries or regions; and</p> <p>(e) any material risks and opportunities for the undertaking arising from impacts and dependencies on value chain workers.</p>	
<p>12. In describing the main types of value chain workers who are or could be negatively affected, based on the materiality assessment set out in ESRS 2 IRO-1, the undertaking shall disclose whether and how it has developed an understanding of how workers with particular characteristics, those working in particular contexts, or those undertaking particular activities may be at greater risk of harm.</p>	
<p>13. The undertaking shall disclose which, if any, of its material risks and opportunities arising from impacts and dependencies on its value chain workers relate to specific groups of value chain workers (for example, particular age groups, workers in a particular factory or country) rather than to all of the value chain workers.</p>	
<p>Impact, risk and opportunity management</p>	
<p><b>Disclosure Requirement S2-1 - Policies related to value chain workers</b></p>	<p><b>Centralised in AR of Section 3</b></p>
<p>14. The undertaking shall describe its policies adopted to manage its material impacts on value chain workers, as well as associated material risks and opportunities.</p>	
<p>15. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of material impacts on value chain workers specifically, as well as policies that cover material risks or opportunities related to value chain workers.</p>	
<p>16. The disclosure required by paragraph 14 shall contain the information on the undertaking's policies to manage its material impacts, risks and opportunities related to value</p>	



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chain workers in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters. In addition, the undertaking shall specify whether such policies cover specific groups of value chain workers or all value chain workers.	
<p>17. The undertaking shall describe its human rights policy commitments that are relevant to value chain workers, including those processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises. In its disclosure, it shall focus on those matters that are material in relation to, as well as the general approach to:</p> <p>(a) respect for the human rights, including labour rights, of workers;</p> <p>(b) engagement with value chain workers; and</p> <p>(c) measures to provide and/or enable remedy for human rights impacts.</p>	
18. The undertaking shall state whether its policies in relation to value chain workers explicitly address trafficking in human beings, forced labour or compulsory labour and child labour. It shall also state whether the undertaking has a supplier code of conduct	
19. The undertaking shall disclose whether and how its policies with regard to value chain workers are aligned with internationally recognised instruments relevant to value chain workers, including the United Nations (UN) Guiding Principles on Business and Human Rights. The undertaking shall also disclose the extent to which cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve value chain workers have been reported in its upstream and downstream value chain and, if applicable, an indication of the nature of such cases	
<b>Disclosure Requirement S2-2 – Processes for engaging with value chain workers about impacts</b>	<b>Centralised in AR of Section 3</b>
20. The undertaking shall disclose its general processes for engaging with value chain workers and their representatives about actual and potential impacts on them.	
21. The objective of this Disclosure Requirement is to enable an understanding of whether and how the undertaking engages, as part of its ongoing due diligence process, with value chain workers and their legitimate representatives, or with credible proxies, about material actual and potential positive and/or negative impacts that do or are likely to affect them, and whether and how perspectives of value chain workers are taken into account in the decision-making processes of the undertaking.	
22. The undertaking shall disclose whether and how the perspectives of value chain workers inform its decisions or activities aimed at managing the actual and potential impacts on value is derived from a mandatory indicator related to principal adverse impacts as set out by indicator #10 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments; and benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1816 as set out by indicators “Number of benchmark constituents subject to social violations (absolute number and relative divided by all benchmark constituents),	

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<p>as referred to in international treaties and conventions, United Nations principles and, where applicable, national law” and “Exposure of the benchmark portfolio to companies without due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8” in section 1 and 2 of Annex II.</p> <p>chain workers. This shall include, where relevant, an explanation of:</p> <p>(a) whether engagement occurs with value chain workers or their legitimate representatives directly, or with credible proxies that have insight into their situation;</p> <p>(b) the stage(s) at which engagement occurs, the type of engagement, and the frequency of the engagement;</p> <p>(c) the function and the most senior role within the undertaking that has operational responsibility for ensuring that this engagement happens, and that the results inform the undertaking’s approach;</p> <p>(d) where applicable, Global Framework Agreements or for agreements that the undertaking has with global union federations related to respect of human rights of workers in the value chain, including their right to bargain collectively, and including an explanation of how the agreement enables the undertaking to gain insight into those workers’ perspectives; and</p> <p>(e) where applicable, how the undertaking assesses the effectiveness of its engagement with workers in the value chain, including, where relevant, any agreements or outcomes that result.</p>	
<p>23. Where applicable, the undertaking shall disclose the steps it takes to gain insight into the perspectives of workers that may be particularly vulnerable to impacts and/or marginalised (for example, women workers, migrant workers, workers with disabilities).</p>	
<p>24. If the undertaking cannot disclose the above required information because it has not adopted a general process to engage with workers in the value chain, it shall disclose this to be the case. It may disclose a timeframe in which it aims to have such a process in place.</p>	
<p><b>Disclosure Requirement S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns</b></p>	<p><b>Centralised in AR of Section 3</b></p>
<p>25. The undertaking shall describe the processes it has in place to provide for or cooperate in the remediation of negative impacts on value chain workers that the undertaking is connected with, as well as channels available to value chain workers to raise concerns and have them addressed.</p>	
<p>26. The objective of this Disclosure Requirement is to enable an understanding of the formal means by which value chain workers can make their concerns and needs known directly to the undertaking and/or through which the undertaking supports the availability of such channels (for example, grievance mechanisms ) in the workplace of value chain workers, how follow up is carried out with these workers regarding the issues raised, and the effectiveness of these channels.</p>	
<p>27. The undertaking shall describe:</p> <p>(a) its general approach to and processes for providing or contributing to remedy where it has caused or contributed to a material negative impact on value chain workers, including whether and how the undertaking assesses that the remedy provided is effective;</p>	

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<p>(b) any specific channels it has in place for value chain workers to raise their concerns or needs directly with the undertaking and have them addressed, including whether these are established by the undertaking itself and/or whether they are third-party mechanisms;</p>	
<p>28. The undertaking shall disclose whether and how it assesses that value chain workers are aware of and trust these structures or processes as a way to raise their concerns or needs and have them addressed. In addition, the undertaking shall disclose whether it has policies in place regarding the protection of individuals that use them against retaliation. If such information has been disclosed in accordance with ESRS G1-1, the undertaking may refer to that information.</p>	
<p>29. If the undertaking cannot disclose the above required information because it has not adopted a channel for raising concerns and/or does not support the availability of such a channel in the workplace of value chain workers, it shall disclose this to be the case. It may disclose a timeframe in which it aims to have such a channel or processes in place.</p>	
<p><b>Disclosure Requirement S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions</b></p>	<p><b>Centralised in AR of Section 3</b></p>
<p>30. The undertaking shall disclose how it takes action to address material impacts on value chain workers, and to manage material risks and pursue material opportunities related to value chain workers and the effectiveness of those actions.</p> <p>31. The objective of this Disclosure Requirement is twofold. Firstly, it is to enable an understanding of any actions or initiatives through which the undertaking seeks to:</p> <p>(a) prevent, mitigate and remediate the negative material impacts on value chain workers; and/or</p> <p>(b) achieve positive material impacts for value chain workers.</p> <p>Secondly, it is to enable an understanding of the ways in which the undertaking is addressing the material risks and pursuing the material opportunities related to workers in the value chain. The undertaking shall provide a summarised description of the action plans and resources to manage its material impacts, risks, and opportunities related to value chain workers as per ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.</p> <p>32. In relation to material impacts, the undertaking shall describe:</p> <p>(a) actions taken, planned or underway to prevent or mitigate material negative impacts on value chain workers;</p> <p>(b) whether and how it has taken action to provide or enable remedy in relation to an actual material impact;</p> <p>(c) any additional actions or initiatives it has in place with the primary purpose of delivering positive impacts for value chain workers; and</p> <p>(d) how it tracks and assesses the effectiveness of such actions and initiatives in delivering intended outcomes for value chain workers.</p>	
<p>33. In relation to paragraph 30, the undertaking shall describe:</p> <p>(a) the processes through which it identifies what action is needed and appropriate in response to a particular actual or potential negative impact on value chain workers;</p>	

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<p>(b) its approach to taking action in relation to specific material negative impacts on value chain workers, including any action in relation to its own purchasing or other internal practices, as well as capacity- building or other forms of engagement with entities in the value chain, or forms of collaborative action with industry peers or other relevant parties; and</p> <p>(c) how it ensures that processes to provide or enable remedy in the event of material negative impacts are available and effective in their implementation and outcomes.</p>	
<p>34. In relation to material risks and opportunities, the undertaking shall describe:</p> <p>(a) what action is planned or underway to mitigate material risks for the undertaking arising from its impacts and dependencies on value chain workers and how it tracks effectiveness in practice; and</p> <p>(b) what action is planned or underway to pursue material opportunities for the undertaking in relation to value chain workers.</p>	
<p>35. When disclosing the information required under paragraph 32 (c), the undertaking shall consider ESRS 2 (see ESRS 2 MDR-T Tracking effectiveness of policies and actions The undertaking shall disclose whether and how it takes action to avoid causing or contributing to material negative impacts on value chain workers through its own practices, including, where relevant, in relation to procurement, sales and data use. This may include disclosing what approach is taken when tensions arise between the prevention or mitigation of material negative impacts and other business pressures.</p>	
<p>36. The undertaking shall also disclose whether severe human rights issues and incidents connected to its upstream and downstream value chain have been reported and, if applicable, disclose these .</p>	
<p>37. through targets) if it evaluates the effectiveness of an action by setting a target.</p>	
<p>38. The undertaking shall disclose what resources are allocated to the management of its material impacts, with information that enables users to gain an understanding of how the material impacts are managed.</p>	
<p>Metrics and targets</p>	
<p><b>Disclosure Requirement S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</b></p>	<p><b>Centralised in AR of Section 3</b></p>
<p>39. The undertaking shall disclose the time-bound and outcome-oriented targets it may have set related to:</p> <p>(a) reducing negative impacts on value chain workers; and/or</p> <p>(b) advancing positive impacts on value chain workers; and/or</p> <p>(c) managing material risks and opportunities related to value chain workers.</p>	
<p>40. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking is using time-bound and outcome-oriented targets to drive and measure its progress in addressing material negative impacts, and/or advancing positive impacts on value chain workers, and/or in managing material risks and opportunities related to value chain workers.</p>	

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41. The summarised description of the targets to manage its material impacts, risks and opportunities related to value chain workers shall contain the information requirements defined in ESRS 2 MDR-T.	
42. The undertaking shall disclose the process for setting the targets, including whether and how the undertaking engaged directly with workers in the value chain, their legitimate representatives, or with credible proxies that have insight into their situation in: (a) setting any such targets; (b) tracking the undertaking's performance against them; and (c) identifying any lessons or improvements as a result of the undertaking's performance.	
<b>ESRS S3 AFFECTED COMMUNITIES</b>	<b>Centralised in AR of Section 3</b>
<b>Objective</b>	<b>Objective</b>
1. The objective of this Standard is to specify disclosure requirements which will enable users of the sustainability statement to understand material impacts on affected communities connected with the undertaking's own operations and value chain, including through its products or services, as well as through its business relationships, and its related material risks and opportunities, including: (a) how the undertaking affects communities, in areas where impacts are most likely to be present and severe, in terms of material positive and negative actual or potential impacts; (b) any actions taken, and the result of such actions, to prevent, mitigate or remediate actual or potential negative impacts, and to address risks and opportunities; (c) the nature, type and extent of the undertaking's material risks and opportunities related to its impacts and dependencies on affected communities, and how the undertaking manages them; and (d) the financial effects on the undertaking over the short-, medium- and long-term of material risks and opportunities arising from the undertaking's impacts and dependencies on affected communities.	
2. In order to meet the objective, this Standard requires an explanation of the general approach the undertaking takes to identify and manage any material actual and potential impacts on affected communities in relation to: (a) communities' economic, social and cultural rights (for example, adequate housing, adequate food, water and sanitation, land-related and security-related impacts); (b) communities' civil and political rights (for example, freedom of expression, freedom of assembly, impacts on human rights defenders); and (c) particular rights of indigenous peoples (for example, free, prior and informed consent, self-determination, cultural rights).	
3. This Standard also requires an explanation of how such impacts, as well as the undertaking's dependencies on affected communities, can create material risks or opportunities for the undertaking. For example, negative relationships with affected communities may disrupt the undertaking's own operations or harm its reputation, while constructive relationships can bring business benefits, such as stable and conflict-free operations and a greater ease of recruiting locally.	

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<b>Interaction with other ESRS</b>	<b>Interaction with other ESRS</b>
4. This standard applies when material impacts on and/or material risks and opportunities related to affected communities have been identified through the materiality assessment process laid out in ESRS 2 General disclosures.	
5. This Standard shall be read in conjunction with ESRS 1 General requirements, and ESRS 2, as well as the ESRS S1 Own workforce, ESRS S2 Workers in the value chain and ESRS S4 Consumers and end-users.	
<b>Disclosure Requirements</b>	
<b>ESRS 2 General disclosures</b>	<b>ESRS 2 General disclosures</b>
6. The requirements of this section should be read in conjunction with the disclosures required by ESRS 2 on Strategy (SBM). The resulting disclosures shall be presented alongside the disclosures required by ESRS 2, except for SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model, for which the undertaking has an option to present the disclosures alongside the topical disclosure.	
<b>Strategy</b>	
<b>Disclosure Requirement related to ESRS 2 SBM-2 – Interests and views of stakeholders</b>	<b>Centralised in AR of Section 2</b>
7. When responding to ESRS 2 SBM-2, paragraph 43, the undertaking shall disclose how the views, interests, and rights of affected communities, including respect for their human rights (and their rights as indigenous peoples, where applicable), inform its strategy and business model. Affected communities are a key group of affected stakeholders.	
<b>Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model</b>	<b>Centralised in AR of Section 2</b>
8. When responding to ESRS 2 SBM-3 paragraph 48, the undertaking shall disclose: (a) whether and how actual and potential impacts on affected communities as identified in ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities: (i) originate from or are connected to the undertaking’s strategy and business models, and (ii) inform and contribute to adapting the undertaking’s strategy and business model; and (b) the relationship between its material risks and opportunities arising from impacts and dependencies on affected communities and its strategy and business model.	
9. When fulfilling the requirements of paragraph 48, the undertaking shall disclose whether all affected communities who are likely to be materially impacted by the undertaking, including impacts that are connected with the undertaking’s own operations and value chain, including through its products or services, as well as through its business relationships, are included in the scope of its disclosure under ESRS 2. In addition, the undertaking shall provide the following information: (a) a brief description of the types of communities subject to material impacts by its own operations or through its upstream and downstream value chain, and specify whether they are: i. communities living or working around the undertaking’s operating sites, factories, facilities or other physical operations, or more remote communities affected by activities at those sites (for example by downstream water pollution);	



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<p>ii. communities along the undertaking's value chain (for example, those affected by the operations of suppliers' facilities or by the activities of logistics or distribution providers);</p> <p>iii. communities at one or both endpoints of the value chain (for example, at the point of extraction of metals or minerals or harvesting of commodities, or communities around waste or recycling sites);</p> <p>iv. communities of indigenous peoples.</p> <p>(b) in the case of material negative impacts, whether they are either (i) widespread or systemic in contexts where the undertaking operates or has sourcing or other business relationships (for example, marginalised populations suffering impacts on their health and quality of life in a highly industrialised area), or (ii) related to individual incidents in the undertaking's own operations (e.g., a toxic waste spill affecting a community's access to clean drinking water) or in a specific business relationship (e.g., a peaceful protest by communities against business operations that was met with a violent response from the undertaking's security services). This includes consideration of impacts on affected communities that may arise from the transition to greener and climate- neutral operations. Potential impacts include impacts associated with innovation and restructuring, closure of mines, increased mining of minerals needed for the transition to a sustainable economy and solar panel production;</p> <p>(c) in the case of material positive impacts, a brief description of the activities that result in the positive impacts (for example, capacity-building to support more and new forms of local livelihoods) and the types of communities that are positively affected or could be positively affected; the undertaking may also disclose whether the positive impacts occur in specific countries or regions; and</p> <p>(d) any material risks and opportunities for the business arising from impacts and dependencies on affected communities.</p>	
<p>10. In describing the main types of communities who are or could be negatively affected, based on the materiality assessment set out in Disclosure Requirement ESRS 2 IRO-1, the undertaking shall disclose whether and how it has developed an understanding of how affected communities with particular characteristics or those living in particular contexts, or those undertaking particular activities may be at greater risk of harm.</p>	
<p>11. The undertaking shall disclose which, if any, of its material risks and opportunities arising from impacts and dependencies on affected communities relate to specific groups of affected communities rather than to all affected communities.</p>	
<p>Impact, risk and opportunity management</p>	
<p><b>Disclosure Requirement S3-1 - Policies related to affected communities</b></p>	<p><b>Centralised in AR of Section 3</b></p>
<p>12. The undertaking shall describe its policies adopted to manage its material impacts on affected communities, as well as associated material risks and opportunities.</p>	
<p>13. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of material impacts on affected communities specifically, as well as policies that cover material risks or opportunities related to affected communities.</p>	

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14. The disclosure required by paragraph 12 shall contain the information on the undertaking's policies to manage its material impacts, risks and opportunities related to affected communities in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters. In addition, the undertaking shall specify if such policies cover specific affected communities or all affected communities.	
15. The undertaking shall disclose any particular policy provisions for preventing and addressing impacts on indigenous peoples.	
16. The undertaking shall describe its human rights policy commitments that are relevant to affected communities, including those processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises. In its disclosure it shall focus on those matters that are material in relation to , as well as its general approach to: (a) respect for the human rights of communities, and indigenous peoples specifically; (b) engagement with affected communities; and (c) measures to provide and/or enable remedy for human rights impacts.	
17. The undertaking shall disclose whether and how its policies with regard to affected communities are aligned with internationally recognised standards relevant to communities and indigenous peoples specifically, including the United Nations (UN) Guiding Principles on Business and Human Rights. The undertaking shall also disclose the extent to which cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve affected communities have been reported in its own operations or in its upstream and downstream value chain and, if applicable, an indication of the nature of such cases .	
18. The policy may take the form of a stand-alone policy regarding communities or be included in a broader document such as a code of ethics or a general sustainability policy that has already been disclosed by the undertaking as part of another ESRS. In those cases, the undertaking shall provide an accurate cross-reference to identify the aspects of the policy that satisfy the requirements of this Disclosure Requirement.	
<b>Disclosure Requirement S3-2 – Processes for engaging with affected communities about impacts</b>	<b>Centralised in AR of Section 3</b>
19. The undertaking shall disclose its general processes for engaging with affected communities and their representatives about actual and potential impacts on them.	
20. The objective of this Disclosure Requirement is to enable an understanding of whether and how the undertaking engages, as part of its ongoing due diligence process, with affected communities, their legitimate representatives, or with credible proxies, about material actual and potential positive and/or negative impacts that do or are likely to affect them, and whether and how perspectives of affected communities are taken into account in the decision-making processes of the undertaking.	

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<p>21. The undertaking shall disclose whether and how the perspectives of affected communities inform its decisions or activities aimed at managing actual and potential impacts on communities. This shall include, where relevant, an explanation of:</p> <p>(a) whether engagement occurs with affected communities or their legitimate representatives directly, or with credible proxies that have insight into their situation;</p> <p>(b) the stage(s) at which engagement occurs, the type of engagement, and the frequency of the engagement;</p> <p>(c) the function and the most senior role within the undertaking that has operational responsibility for ensuring this engagement happens, and that the results inform the undertaking's approach;</p> <p>(d) where applicable, how the undertaking assesses the effectiveness of its engagement with affected communities, including, where relevant, any agreements or outcomes that result.</p>	
<p>22. Where applicable, the undertaking shall disclose the steps it takes to gain insight into the perspectives of affected communities that may be particularly vulnerable to impacts and/or marginalised, and into the perspective of specific groups within the affected communities, such as women and girls.</p>	
<p>23. Where affected communities are indigenous peoples, the undertaking shall also disclose how it takes into account and ensures respect of their particular rights in its stakeholder engagement approach, including their right to free, prior and informed consent with regard to: (i) their cultural, intellectual, religious and spiritual property; (ii) activities affecting their lands and territories; and (iii) legislative or administrative measures that affect them. In particular, where engagement occurs with indigenous peoples, the undertaking shall also disclose whether and how indigenous peoples have been consulted on the mode and parameters of the engagement (for example, in designing the agenda, nature, and timeliness of the engagement).</p>	
<p>24. If the undertaking cannot disclose the above required information because it has not adopted a general process to engage with affected communities, it shall disclose this to be the case. It may disclose a timeframe in which it aims to have such a process in place.</p>	
<p><b>Disclosure Requirement S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns</b></p>	<p><b>Centralised in AR of Section 3</b></p>
<p>25. The undertaking shall describe the processes it has in place to provide for or cooperate in the remediation of negative impacts on affected communities that the undertaking is connected with, as well as channels available to affected communities to raise concerns and have them addressed.</p>	
<p>26. The objective of this Disclosure Requirement is to enable an understanding of the formal means by which affected communities can make their concerns and needs known directly to the undertaking, and/or through which the undertaking supports the availability of such channels (for example, grievance mechanisms) by its business relationships, how follow up is performed with these communities regarding the issues raised, and the effectiveness of these channels.</p>	
<p>27. The undertaking shall describe:</p>	

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<p>(a) its general approach to and processes for providing or contributing to remedy where it has identified that it has caused or contributed to a material negative impact on affected communities, including whether and how the undertaking assesses that the remedy provided is effective;</p> <p>(b) any specific channels it has in place for affected communities to raise their concerns or needs directly with the undertaking and have them addressed, including whether these are established by the undertaking itself and/or through participation in third-party mechanisms;</p> <p>(c) its processes through which the undertaking supports the availability of such channels by its business relationships; and</p> <p>(d) how it tracks and monitors issues raised and addressed, and how it ensures the effectiveness of the channels, including through involvement of stakeholders who are the intended users of those channels.</p>	
<p>28. The undertaking shall disclose whether and how it assesses that affected communities are aware of and trust these structures or processes as a way to raise their concerns or needs and have them addressed. In addition, the undertaking shall disclose whether it has policies in place regarding the protection of individuals that use them against retaliation. If such information has been disclosed in accordance with ESRS G1-1, the undertaking may refer to that information.</p>	
<p>29. If the undertaking cannot disclose the above required information because it has not adopted a channel for raising concerns and/or does not support the availability of such a channel by its business relationships, it shall disclose this to be the case. It may disclose a timeframe in which it aims to have such a channel or processes in place.</p>	
<p><b>Disclosure Requirement S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions</b></p>	<p><b>Centralised in AR of Section 3</b></p>
<p>30. The undertaking shall disclose how it takes action to address material impacts on affected communities, and to manage material risks and pursue material opportunities related to affected communities and the effectiveness of those actions.</p>	
<p>31. The objective of this Disclosure Requirement is twofold. Firstly, it is to provide an understanding of any actions and initiatives through which the undertaking seeks to:</p> <p>(a) prevent, mitigate and remediate the negative material impacts on affected communities; and/or</p> <p>(b) achieve positive material impacts for affected communities.</p> <p>Secondly, it is to enable an understanding of the ways in which the undertaking is addressing the material risks and pursuing the material opportunities related to affected communities. The undertaking shall provide a summarised description of the action plans and resources to manage its material impacts, risks, and opportunities related to affected communities as per ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.</p>	
<p>32. In relation to material impacts, the undertaking shall describe:</p> <p>(a) actions taken, planned or underway to prevent or mitigate material negative impacts on affected communities;</p>	

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<p>(b) whether and how it has taken action to provide or enable remedy in relation to an actual material impact;</p> <p>(c) any additional actions or initiatives it has in place with the primary purpose of delivering positive impacts for affected communities; and</p> <p>(d) how it tracks and assesses the effectiveness of these actions and initiatives in delivering intended outcomes for affected communities.</p>	
<p>33. In relation to paragraph 29, the undertaking shall describe:</p> <p>(a) the processes through which it identifies what action is needed and appropriate in response to a particular actual or potential negative impact on affected communities;</p> <p>(b) its approach to taking action in relation to specific material negative impacts on communities, including any action in relation to its own practices regarding land acquisition, planning and construction, operation or closure practices, as well as whether wider industry or collaborative action with other relevant parties will be required; and</p> <p>(c) how it ensures that processes to provide or enable remedy in the event of material negative impacts are available and effective in their implementation and outcomes.</p>	
<p>34. In relation to material risks and opportunities, the undertaking shall describe:</p> <p>(a) what action is planned or underway to mitigate material risks for the undertaking arising from its impacts and dependencies on affected communities and how it tracks effectiveness in practice; and</p> <p>(b) what action is planned or underway to pursue material opportunities for the undertaking in relation to affected communities.</p>	
<p>35. The undertaking shall disclose whether and how it takes action to avoid causing or contributing to material negative impacts on affected communities through its own practices, including, where relevant, in relation to planning, land acquisition and exploitation, finance, extraction or production of raw materials, use of natural resources, and management of environmental impacts. This may include disclosing what approach is taken when tensions arise between the prevention or mitigation of material negative impacts and other business pressures.</p>	
<p>36. The undertaking shall also disclose whether severe human rights issues and incidents connected to affected communities have been reported and, if applicable, disclose these .</p>	
<p>37. When disclosing the information required under paragraph 31 (c), the undertaking shall consider ESRS 2 MDR-T Tracking effectiveness of policies and actions through targets if it evaluates the effectiveness of an action by setting a target.</p>	
<p>38. The undertaking shall disclose what resources are allocated to the management of its material impacts, with information that enables users to gain an understanding of how the material impacts are managed.</p>	
<p>Metrics and targets</p>	
<p>Disclosure Requirement S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</p>	
<p>39. The undertaking shall disclose the time-bound and outcome-oriented targets it may have set related to:</p>	

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SET 1 S1 / S2 / S3 / S4 (version July 2023)	LSME ESRS ED Section 5
<p>(a) reducing negative impacts on affected communities; and/or</p> <p>(b) advancing positive impacts on affected communities; and/or</p> <p>(c) managing material risks and opportunities related to affected communities.</p>	
<p>40. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking is using time-bound and outcome-oriented targets to drive and measure its progress in addressing material negative impacts, and/or advancing positive impacts on affected communities, and/or in managing material risks and opportunities related to affected communities</p>	
<p>41. The summarised description of the targets to manage its material impacts, risks and opportunities related to affected communities shall contain the information requirements defined in ESRS 2 MDR-T.</p>	
<p>42. The undertaking shall disclose the process for setting the targets, including whether and how the undertaking engaged directly with affected communities, their legitimate representatives, or with credible proxies that have insight into their situation in:</p> <p>(a) setting any such targets;</p> <p>(b) tracking the undertaking's performance against them; and</p> <p>(c) identifying, any, lessons or improvements as a result of the undertaking's performance</p>	
<b>ESRS S4 CONSUMERS AND END-USERS</b>	<b>Centralised in AR of Section 3</b>
<b>Objective</b>	<b>Objective</b>
<p>1. The objective of this Standard is to specify disclosure requirements which will enable users of the sustainability statement to understand material impacts on consumers and endusers connected with the undertaking's own operations and value chain, including through its products or services, as well as through its business relationships, and its related material risks and opportunities, including:</p> <p>(a) how the undertaking affects the consumers and/or end-users of its products and/or services (referred to in this Standard as "consumers and end-users"), in terms of material positive and negative actual or potential impacts;</p> <p>(b) any actions taken, and the result of such actions, to prevent, mitigate or remediate actual or potential negative impacts, and to address risks and opportunities;</p> <p>(c) the nature, type and extent of the undertaking's material risks and opportunities related to its impacts and dependencies on consumers and end-users, and how the undertaking manages such risks and opportunities; and</p> <p>(d) the financial effects on the undertaking over the short-, medium- and long-term of material risks and opportunities arising from the undertaking's impacts and dependencies on consumers and/or end-users.</p>	
<p>2. In order to meet the objective, this Standard requires an explanation of the general approach the undertaking takes to identify and manage any material actual and potential impacts on the consumers and/or end-users related to its products and/or services in relation to:</p> <p>(a) information-related impacts on consumers and/or end-users (for example, privacy, freedom of expression and access to (quality) information);</p>	



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SET 1 S1 / S2 / S3 / S4 (version July 2023)	LSME ESRS ED Section 5
(b) personal safety of consumers and/or end-users (for example, health and safety, security of a person and protection of children); (c) social inclusion of consumers and/or end-users (for example, non-discrimination, access to products and services and responsible marketing practices).	
3. This Standard also requires an explanation of how such impacts, as well as the undertaking's dependencies on consumers and/or end-users, can create material risks or opportunities for the undertaking. For example, negative impacts on the reputation of the undertaking's products and/or services can be detrimental to its business performance, while trust in products and/or services can bring business benefits, such as increased sales or widening of the future consumer base.	
4. The unlawful use or misuse of the undertaking's products and services by consumers and end-users fall outside the scope of this standard	
<b>Interaction with other ESRS</b>	<b>Interaction with other ESRS</b>
5. This standard applies when material impacts on and/or material risks and opportunities related to consumers and/or end-users have been identified through the materiality assessment process laid out in ESRS 2 General disclosures.	
6. This Standard shall be read in conjunction with ESRS 1 General requirements, and ESRS 2, as well as ESRS S1 Own workforce, ESRS S2 Workers in the value chain and ESRS S3 Affected communities.	
<b>Disclosure Requirements</b>	
<b>ESRS 2 General Disclosures</b>	<b>ESRS 2 General Disclosures</b>
7. The requirements of this section should be read in conjunction with the disclosures required by ESRS 2 on Strategy (SBM). The resulting disclosures shall be presented alongside the disclosures required by ESRS 2, except for SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model, for which the undertaking has an option to present the disclosures alongside the topical disclosure.	
<b>Strategy</b>	
<b>Disclosure Requirement related to ESRS 2 SBM-2 - Interests and views of stakeholders</b>	<b>Disclosure Requirement related to ESRS 2 SBM-2 - Interests and views of stakeholders</b>
8. When responding to ESRS 2 SBM-2, paragraph 43, the undertaking shall disclose how the interests, views and rights of its consumers and/or end-users, including respect for their human rights, inform its strategy and business model. Consumers and/or end-users are a key group of affected stakeholders.	
<b>Disclosure Requirement related to ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model</b>	<b>Centralised in AR of Section 2</b>
9. When responding to ESRS 2 SBM-3 paragraph 48, the undertaking shall disclose: (a) whether and how actual and potential impacts on consumers and/or end-users as identified in Disclosure Requirements ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities: (i) originate from or are connected to the undertaking's strategy and business model, and (ii) inform and contribute to adapting the undertaking's strategy and business model, and	

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SET 1 S1 / S2 / S3 / S4 (version July 2023)	LSME ESRS ED Section 5
(b) the relationship between its material risks and opportunities arising from impacts and dependencies on consumers and/or end-users and its strategy and business model.	
<p>10. When fulfilling the requirements of paragraph 48, the undertaking shall disclose whether all consumers and/or end-users who are likely to be materially impacted by the undertaking, including impacts connected with the undertaking's own operations and value chain, including through its products or services, as well as through its business relationships, are included in the scope of its disclosure under ESRS 2. In addition, the undertaking shall disclose the following information:</p> <p>(a) a brief description of the types of consumers and/or end-users subject to material impacts by its own operations or through its value chain, and specify whether they are:</p> <ul style="list-style-type: none"> <li>i. consumers and/or end-users of products that are inherently harmful to people and/or increase risks for chronic disease;</li> <li>ii. consumers and/or end-users of services that potentially negatively impact their rights to privacy, to have their personal data protected, to freedom of expression and to non-discrimination;</li> <li>iii. consumers and/or end-users who are dependent on accurate and accessible product- or service-related information, such as manuals and product labels, to avoid potentially damaging use of a product or service;</li> <li>iv. consumers and/or end-users who are particularly vulnerable to health or privacy impacts or impacts from marketing and sales strategies, such as children or financially vulnerable individuals;</li> </ul> <p>(b) in the case of material negative impacts, whether they are either (i) widespread or systemic in contexts where the undertaking sells or provides its products or services (for example, state surveillance that affects the privacy of service users), or (ii) related to individual incidents (for example, a defect linked to a particular product) or to specific business relationships (for example, a business partner uses marketing that inappropriately targets young consumers);</p> <p>(c) in the case of material positive impacts, a brief description of the activities that result in the positive impacts (for example, product design that improves its accessibility for persons with disabilities) and the types of consumers and/or end-users that are positively affected or could be positively affected; the undertaking may also disclose whether the positive impacts occur in specific countries or regions; and</p> <p>(d) any material risks and opportunities for the business arising from impacts and dependencies on consumers and/or end-users.</p>	
<p>11. In describing the main types of consumers and/or end-users who are or could be negatively affected, based on the materiality assessment set out in ESRS 2 IRO-1, the undertaking shall disclose whether and how it has developed an understanding of how consumers and/or end-users with particular characteristics, or those using particular products or services, may be at greater risk of harm.</p>	
<p>12. The undertaking shall disclose which, if any, of its material risks and opportunities arising from impacts and dependencies on consumers and/or end-users, relate to specific groups of consumers and/or end-users (for example, particular age groups) rather than to all consumers and/or end-users.</p>	

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SET 1 S1 / S2 / S3 / S4 (version July 2023)	LSME ESRS ED Section 5
<b>Impact, risk and opportunity management</b>	
<b>Disclosure Requirement S4-1 – Policies related to consumers and end-users</b>	<b>Centralised in AR of Section 3</b>
13. The undertaking shall describe its policies adopted to manage its material impacts of its products and/or services on consumers and end-users, as well as associated material risks and opportunities.	
14. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of material impacts on consumers and/or end-users specifically, as well as policies that cover material risks or opportunities related to consumers and/or end-users.	
15. The disclosure required by paragraph 13 shall contain the information on the undertaking’s policies to manage its material impacts, risks and opportunities related to consumers and/or end-users in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters. In addition, the undertaking shall specify if such policies cover specific groups or all consumers and/or end-users.	
16. The undertaking shall describe its human rights policy commitments that are relevant to consumers and/or end-users, including those processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises. In its disclosure it shall focus on those matters that are material, as well as the general approach in relation to : (a) respect for the human rights of consumers and/or end-users; (b) engagement with consumers and/or end-users; and (c) measures to provide and/or enable remedy for human rights impacts.	
17. The undertaking shall disclose whether and how its policies with regard to consumers and/or end-users are aligned with internationally recognised instruments relevant to consumers and/or end-users, including United Nations (UN) Guiding Principles on Business and Human Rights. The undertaking shall also disclose the extent to which cases of nonrespect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve consumers and/or end-users have been reported in its downstream value chain and, if applicable, an indication of the nature of such cases	
<b>Disclosure Requirement S4-2 – Processes for engaging with consumers and endusers about impacts</b>	<b>Centralised in AR of Section 3</b>
18. The undertaking shall disclose its general processes for engaging with consumers and end-users and their representatives about actual and potential impacts on them.	
19. The objective of this Disclosure Requirement is to enable an understanding of whether and how the undertaking engages, as part of its ongoing due diligence process, with consumers and/or end-users, their legitimate representatives, or with credible proxies, about material actual and potential positive and/or negative impacts that do or are likely to affect them, and whether and	

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SET 1 S1 / S2 / S3 / S4 (version July 2023)	LSME ESRS ED Section 5
how perspectives of consumers and/or end-users are taken into account in the decision-making processes of the undertaking.	
<p>20. The undertaking shall disclose whether and how the perspectives of consumers and/or endusers inform its decisions or activities aimed at managing actual and potential impacts on consumers and/or end-users. This shall include, where relevant, an explanation of:</p> <p>(a) whether engagement occurs with affected consumers and/or end-users or their legitimate representatives directly, or with credible proxies that have insight into their situation;</p> <p>(b) the stage(s) at which engagement occurs, the type of engagement, and the frequency of the engagement;</p> <p>(c) the function and the most senior role within the undertaking that has operational responsibility for ensuring this engagement happens and that the results inform the undertaking’s approach; and</p> <p>(d) where applicable, how the undertaking assesses the effectiveness of its engagement with consumers and/or end-users, and, where relevant, any agreements or outcomes that result from such engagement.</p>	
<p>21. Where applicable, the undertaking shall disclose the steps it takes to gain insight into the perspectives of consumers and/or end-users that may be particularly vulnerable to impacts and/or marginalised (for example, people with disabilities, children, etc.).</p>	
<p>22. If the undertaking cannot disclose the above required information because it has not adopted a general process to engage with consumers and/or end-users, it shall disclose this to be the case. It may disclose a timeframe in which it aims to have such a process in place.</p>	
<p><b>Disclosure Requirement S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns</b></p>	<p><b>Centralised in AR of Section 3</b></p>
<p>23. The undertaking shall describe the processes it has in place to provide for or cooperate in the remediation of negative impacts on consumers and end-users that the undertaking is connected with, as well as channels available to consumers and endusers to raise concerns and have them addressed.</p>	
<p>24. The objective of this Disclosure Requirement is to enable an understanding of the formal means by which consumers and/or end-users can make their concerns and needs known directly to the undertaking, and/or through which the undertaking supports the availability of such channels (for example, grievance mechanisms) by its business relationships, how follow up is performed with these consumers and/or end-users regarding the issues raised, and the effectiveness of these channels.</p>	
<p>25. The undertaking shall describe:</p> <p>(a) its general approach to and processes for providing or contributing to remedy where it has identified that it has caused or contributed to a material negative impact on consumers and/or end-users, including whether and how the undertaking assesses that the remedy provided is effective;</p> <p>(b) any specific channels it has in place for consumers and/or end-users to raise their concerns or needs directly with the undertaking and have them addressed, including whether these are established by the undertaking itself and/or through participation in third-party mechanisms;</p>	

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<p>(c) the processes through which the undertaking supports or requires the availability of such channels by its business relationships; and</p> <p>(d) how it tracks and monitors issues raised and addressed, and how it ensures the effectiveness of the channels, including through involvement of stakeholders who are the intended users.</p>	
<p>26. The undertaking shall disclose whether and how it assesses that consumers and/or endusers are aware of and trust these structures or processes as a way to raise their concerns or needs and have them addressed. In addition, the undertaking shall disclose whether it has policies in place to protect individuals from retaliation when they use such structures or processes. If such information has been disclosed in accordance with ESRS G1-1, the undertaking may refer to that information.</p>	
<p>27. If the undertaking cannot disclose the above required information because it has not adopted a channel for raising concerns and/or does not support the availability of mechanisms by its business relationships, it shall disclose this to be the case. It may disclose a timeframe in which it aims to have such a channel or processes in place.</p>	
<p><b>Disclosure Requirement S4-4 - Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions</b></p>	<p><b>Centralised in AR of Section 3</b></p>
<p>28. The undertaking shall disclose how it takes action to address material impacts on consumers and end-users, and to manage material risks and pursue material opportunities related to consumers and end-users, and effectiveness of those actions.</p>	
<p>29. The objective of this Disclosure Requirement is twofold. Firstly, it is to provide an understanding of any actions and initiatives through which the undertaking seeks to:</p> <p>(a) prevent, mitigate and remediate the negative material impacts on consumers and/or end-users, and/or</p> <p>(b) achieve positive material impacts for consumers and/or end-users.</p> <p>Secondly, it is to enable an understanding of the ways in which the undertaking is addressing the material risks and pursuing the material opportunities related to consumers and/or endusers.</p>	
<p>30. The undertaking shall provide a summarised description of the action plans and resources to manage its material impacts, risks, and opportunities related to consumers and end-users as per ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.</p>	
<p>31. In relation to material impacts, the undertaking shall describe:</p> <p>(a) actions taken, planned or underway to prevent, mitigate or remediate material negative impacts on consumers and/or end-users;</p> <p>(b) whether and how it has taken action to provide or enable remedy in relation to an actual material impact;</p> <p>(c) any additional actions or initiatives it has in place with the primary purpose of positively contributing to improved social outcomes for consumers and/or end-users; and</p> <p>(d) how it tracks and assesses the effectiveness of these actions and initiatives in delivering intended outcomes for consumers and/or end-users.</p>	

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<p>32. In relation to paragraph 28, the undertaking shall describe:</p> <p>(a) the processes through which it identifies what action is needed and appropriate in response to a particular actual or potential negative impact on consumers and/or endusers;</p> <p>(b) its approaches to taking action in relation to specific material negative impacts on consumers and/or end-users, including any action in relation to its own practices regarding product design, marketing or sales, as well as whether wider industry or collaborative action with other relevant parties will be required; and</p> <p>(c) how it ensures that processes to provide or enable remedy in the event of material negative impacts are available and effective in their implementation and outcomes.</p>	
<p>33. In relation to material risks and opportunities, the undertaking shall describe:</p> <p>(a) what action is planned or underway to mitigate material risks for the undertaking arising from its impacts and dependencies on consumers and/or end-users and how it tracks effectiveness in practice; and</p> <p>(b) what action is planned or underway to pursue material opportunities for the undertaking in relation to consumers and/or end-users.</p>	
<p>34. The undertaking shall disclose whether and how it takes action to avoid causing or contributing to material negative impacts on consumers and/or end-users through its own practices, including, where relevant, in relation to marketing, sales and data use. This may include disclosing what approach is taken when tensions arise between the prevention or mitigation of material negative impacts and other business pressures.</p>	
<p>35. When preparing this disclosure, the undertaking shall consider whether severe human rights issues and incidents connected to its consumers and/or end-users have been reported and, if applicable, disclose these</p>	
<p>36. Where the undertaking evaluates the effectiveness of an action by setting a target, in disclosing the information required under paragraph 32 (c), the undertaking shall consider ESRS 2 MDR-T Tracking effectiveness of policies and actions through targets.</p>	
<p>37. The undertaking shall disclose what resources are allocated to the management of its material impacts with information that enables users to gain an understanding of how the material impacts are managed.</p>	
<p>Metrics and targets</p>	
<p>Disclosure Requirement S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</p>	<p><b>Centralised in AR of Section 3</b></p>
<p>38. The undertaking shall disclose the time-bound and outcome-oriented targets it may have set related to:</p> <p>(a) reducing negative impacts on consumers and/or end-users; and/or</p> <p>(b) advancing positive impacts on consumers and/or end-users; and/or</p> <p>(c) managing material risks and opportunities related to consumers and/or endusers.</p>	
<p>39. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking is using time-bound and outcome-oriented targets to drive and measure progress in addressing material negative impacts, and/or advancing positive impacts on</p>	

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SET 1 S1 / S2 / S3 / S4 (version July 2023)	LSME ESRS ED Section 5
consumers and/or end-users, and/or in managing material risks and opportunities related to consumers and/or end-users .	
40. The summarised description of the targets to manage its material impacts, risks and opportunities related to consumers and/or end-users shall contain the information requirements defined in ESRS 2 MDR-T.	
41. The undertaking shall disclose the process for setting the targets, including whether and how the undertaking engaged directly with consumers and/or end-users, their legitimate representatives, or with credible proxies that have insight into their situation in: (a) setting any such targets; (b) tracking the undertaking's performance against them; and (c) identifying, if any, lessons or improvements as a result of the undertaking's performance.	



ESRS LSME ED Section 6 – Business conduct

SET 1 ESRS G1 – Business conduct (version July 2023)	LSME ESRS ED – Section 6 Business conduct
<b>Objective</b>	<b>Objective</b>
1. The objective of this Standard is to specify disclosure requirements which will enable users of the undertaking’s sustainability statements to understand the undertaking’s strategy and approach, processes and procedures as well as its performance in respect of business conduct.	1. The objective of this section of this <i>[draft]</i> Standard is to specify disclosure requirements which will enable users of the undertaking’s sustainability statements to understand the undertaking’s strategy and approach, processes and procedures as well as its performance in respect of business conduct.
2. This Standard focusses on the following matters, collectively referred to in this Standard as ‘business conduct or business conduct matters’: (a) business ethics and corporate culture, including anti-corruption and anti-bribery, the protection of whistleblowers, and animal welfare; (b) the management of relationships with suppliers, including payment practices, especially with regard to late payment to small and medium-sized undertakings. (c) activities and commitments of the undertaking related to exerting its political influence, including its lobbying activities;	2. This section focusses on the following matters collectively referred to in this Standard as ‘business conduct or business conduct matters’: (a) <del>business ethics and corporate culture</del> anti-corruption and anti-bribery; <del>the protection of whistleblowers, and animal welfare;</del> (b) the management of relationships with suppliers including payment practices, especially with regard to late payment to small and medium-sized undertakings.; and; (c) <del>activities and commitments of the undertaking related to exerting its political influence including its and</del> lobbying activities.
<b>Interaction with other ESRS</b>	<b>Interaction with other ESRS</b>
3. The content of this Standard on general disclosures as well as impact, risk and opportunity management and metrics and targets shall be read in conjunction respectively with ESRS 1 General principles and ESRS 2 General requirements.	3. <del>The content of this Standard on general disclosures as well as impact, risk and opportunity management and metrics and targets</del> <i>The objectives in par. 1 and the metrics disclosure requirements under section 6 G1-1 to G1-3</i> shall be read in conjunction with Section 2 and 3 of this <i>[draft]</i> ESRS.
<b>Disclosure Requirements</b>	<b>Disclosure Requirements</b>
<b>ESRS 2 General disclosures</b>	<b>ESRS 2 General disclosures</b>
4. The requirements of this section should be read in conjunction with and reported alongside the disclosures required by ESRS 2 on Governance (GOV), Strategy (SBM) and Management of impacts, risks and opportunities (IRO).	4. The requirements of this section should be read in conjunction with and reported alongside the disclosures required by ESRS 2 on Governance (GOV), Strategy (SBM) and Management of impacts, risks and opportunities (IRO).
<b>Disclosure Requirement related to ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies</b>	<b>Disclosure Requirement related to ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies</b> (Centralised in Section 3 Disclosure Requirement 11 (IR-3) –Policies and actions in relation to sustainability Matters)
5. When disclosing information about the role of the administrative, management and supervisory bodies, the undertaking shall cover the following aspects: (a) the role of the administrative, management and supervisory bodies related to business conduct; and (b) the expertise of the administrative, management and supervisory bodies on business conduct matters.	(Centralised in Section 3 Disclosure Requirement 11 (IR-3) –Policies and actions in relation to sustainability Matters)
<b>Impact, risk and opportunity management</b>	<b>Impact, risk and opportunity management</b>
<b>Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities</b>	<b>Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities</b>
6. When describing the process to identify material impacts, risks and opportunities in relation to business conduct matters, the undertaking shall disclose all relevant criteria used in the process, including location, activity, sector and the structure of the transaction.	6. When describing the process to identify material impacts, risks and opportunities in relation to <del>business conduct matters, the undertaking shall disclose all relevant criteria used in the process, including location, activity, sector and the structure of the transaction.</del>

*LSME ED comparison with Set 1*

SET 1 ESRS G1 – Business conduct (version July 2023)	LSME ESRS ED – Section 6 Business conduct
<b>Disclosure Requirement G1-1- Business conduct policies and corporate culture</b>	<b><del>Disclosure Requirement G1-1 – Business conduct policies and corporate culture</del></b>
7. The undertaking shall disclose its policies with respect to business conduct matters and how it fosters its corporate culture.	(Centralised in Section 3 Disclosure Requirement 11 (IR-3) –Policies and actions in relation to sustainability Matters)
8. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of its material impacts, risks and opportunities related to business conduct matters. It also aims to provide an understanding of the undertaking’s approach to corporate culture.	(Centralised in Section 3 Disclosure Requirement 11 (IR-3) –Policies and actions in relation to sustainability Matters)
9. The disclosures required under paragraph 7 shall include how the undertaking establishes, develops, promotes and evaluates its corporate culture.	(Centralised in Section 3 Disclosure Requirement 11 (IR-3) –Policies and actions in relation to sustainability Matters)
10. The disclosures in paragraph 7 shall cover the following aspects related to the undertaking’s policies on business conduct matters: (a) a description of the mechanisms for identifying, reporting and investigating concerns about unlawful behaviour or behaviour in contradiction of its code of conduct or similar internal rules; and whether it accommodates reporting from internal and/or external stakeholders; (b) where the undertaking has no policies on anti-corruption or anti-bribery consistent with the United Nations Convention against Corruption , it shall state this and whether it has plans to implement them and the timetable for implementation; (c) how the undertaking protects whistleblowers, including: i. details on the establishment of internal whistleblower reporting channels, including whether the undertaking provides for information and training to its own workers and information about the designation and training of staff receiving reports; and ii. measures to protect against retaliation its own workers who are whistleblowers in accordance with the applicable law transposing Directive (EU) 2019/1937 of the European Parliament and of the Council ; (d) where the undertaking has no policies on the protection of whistle-blowers , it shall state this and whether it has plans to implement them and the timetable for implementation; (e) beyond the procedures to follow-up on reports by whistleblowers in accordance with the applicable law transposing Directive (EU) 2019/1937, whether the undertaking has procedures to investigate business conduct incidents, including incidents of corruption and bribery, promptly, independently and objectively; (f) where applicable, whether the undertaking has in place policies with respect to animal welfare; (g) the undertaking’s policy for training within the organisation on business conduct, including target audience, frequency and depth of coverage; and (h) the functions within the undertaking that are most at risk in respect of corruption and bribery.	(Centralised in Section 3 Disclosure Requirement 11 (IR-3) –Policies and actions in relation to sustainability Matters)
11. Undertakings that are subject to legal requirements under national law transposing Directive (EU) 2019/1937, or to equivalent legal requirements with regard to the protection of whistleblowers, may comply with the disclosure specified in paragraph 10 (d) by stating that they are subject to those legal requirements.	(Centralised in Section 3 Disclosure Requirement 11 (IR-3) –Policies and actions in relation to sustainability Matters)
<b>Disclosure Requirement G1-2 – Management of relationships with suppliers</b>	<b>Disclosure Requirement G1-1 – Management of relationships with suppliers (G1-2 and G1-6 of SET 1 merged and simplified)</b>

LSME ED comparison with Set 1

SET 1 ESRS G1 – Business conduct (version July 2023)	LSME ESRS ED – Section 6 Business conduct
12. The undertaking shall provide information about the management of its relationships with its suppliers and its impacts on its supply chain.	4. The undertaking shall provide information about the management of its relationships with its suppliers <i>as well as the management of its impacts on its supply chain.</i>
13. The objective of this Disclosure Requirement is to provide an understanding of the undertaking's management of its procurement process including fair behaviour with suppliers.	13. <del>The objective of this Disclosure Requirement is to provide an understanding of the undertaking's management of its procurement process including fair behaviour with suppliers.</del>
	5. <i>This disclosure requirement should be read in conjunction with Section 2 IR 3, where the undertaking shall state whether it has a supplier code of conduct.</i>
14. The undertaking shall provide a description of its policy to prevent late payments, specifically to SMEs.	14. <del>The undertaking shall provide a description of its policy to prevent late payments, specifically to SMEs.</del>
	6. <i>The undertaking may disclose information on its purchasing practice / procedure and whether it considers also ESG criteria.</i>
15. The disclosure required under paragraph 12 shall include the following information: (a) the undertaking's approach to its relationships with its suppliers, taking account of risks to the undertaking related to its supply chain and of impacts on sustainability matters; and (b) whether and how it takes into account social and environmental criteria for the selection of its suppliers.	15. <del>The disclosure required under paragraph 12 shall include the following information: (a) the undertaking's approach to its relationships with its suppliers, taking account of risks to the undertaking related to its supply chain and of impacts on sustainability matters; and (b) whether and how it takes into account social and environmental criteria for the selection of its suppliers.</del>
	7. <i>The undertaking shall disclose whether it has established a practice / procedure to monitor late payments.</i>
<b>Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery</b>	<b>Disclosure Requirement G1-2 – <del>Prevention and detection</del> Anti-corruption and anti-bribery</b> (G1-3 and G1-4 of SET 1 merged and simplified)
16. The undertaking shall provide information about its system to prevent and detect, investigate, and respond to allegations or incidents relating to corruption and bribery including the related training.	8. The undertaking shall <del>provide information about its system</del> <i>report whether it has a system in place and describe it if applicable</i> to prevent and detect, investigate, and respond to allegations or incidents relating to corruption and bribery including the related training.
	9. The undertaking shall disclose: (a) any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery; (b) the number of convictions and the amount of fines for violation of anti-corruption and anti-bribery laws. (NOTE: ALSO a Benchmark indicator)
17. The objective of this Disclosure Requirement is to provide transparency on the key procedures of the undertaking to prevent, detect, and address allegations about corruption and bribery. This includes the training provided to own workers and/or information provided internally or to suppliers.	17. <del>The objective of this Disclosure Requirement is to provide transparency on the key procedures of the undertaking to prevent, detect, and address allegations about corruption and bribery. This includes the training provided to own workers and/or information provided internally or to suppliers.</del>
18. The disclosure required under paragraph 16 shall include the following information: (a) a description of the procedures in place to prevent, detect, and address allegations or incidents of corruption and bribery; (b) whether the investigators or investigating committee are separate from the chain of management involved in the matter; and (c) the process, if any, to report outcomes to the administrative, management and supervisory bodies.	18. <del>The disclosure required under paragraph 16 shall include the following information: (a) a description of the procedures in place to prevent, detect, and address allegations or incidents of corruption and bribery; (b) whether the investigators or investigating committee are separate from the chain of management involved in the matter; and (c) the process, if any, to report outcomes to the administrative, management and supervisory bodies.</del>
19. Where the undertaking has no such procedures in place, it shall disclose this fact and, where applicable, its plans to adopt them.	19. <del>Where the undertaking has no such procedures in place, it shall disclose this fact and, where applicable, its plans to adopt them.</del>

LSME ED comparison with Set 1

SET 1 ESRS G1 – Business conduct (version July 2023)	LSME ESRS ED – Section 6 Business conduct
20. The disclosures required by paragraph 16 shall include information about how the undertaking communicates its policies to those for whom they are relevant to ensure that the policy is accessible and that they understand its implications.	20. The disclosures required by paragraph 16 shall include information about how the undertaking communicates its policies to those for whom they are relevant to ensure that the policy is accessible and that they understand its implications.
21. The disclosure required by paragraph 16 shall include information about the following with respect to training: (a) the nature, scope and depth of anti-corruption and anti-bribery training programmes offered or required by the undertaking; (b) the percentage of functions-at-risk covered by training programmes; and (c) the extent to which training is given to members of the administrative, management and supervisory bodies.	21. The disclosure required by paragraph 16 shall include information about the following with respect to training: (a) the nature, scope and depth of anti-corruption and anti-bribery training programmes offered or required by the undertaking; (b) the percentage of functions-at-risk covered by training programmes; and (c) the extent to which training is given to members of the administrative, management and supervisory bodies.
<b>Metrics and targets</b>	<b>Metrics and targets</b>
<b>Disclosure Requirement G1-4 – Incidents of corruption or bribery</b>	(G1-3 and G1-4 of SET 1 merged and simplified / see G1-2 above)
22. The undertaking shall provide information on incidents of corruption or bribery during the reporting period.	22. The undertaking shall provide information on incidents of corruption or bribery during the reporting period.
23. The objective of this Disclosure Requirement is to provide transparency on the incidents relating to corruption or bribery during the reporting period and the related outcomes.	23. The objective of this Disclosure Requirement is to provide transparency on the incidents relating to corruption or bribery during the reporting period and the related outcomes.
24. The undertaking shall disclose: (a) the number of convictions and the amount of fines for violation of anti-corruption and anti-bribery laws ; and (b) any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery .	24. The undertaking shall disclose: (a) the number of convictions and the amount of fines for violation of anti-corruption and anti-bribery laws ; and (b) any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery .
25. The undertaking may disclose: (a) the total number and nature of confirmed incidents of corruption or bribery; (b) the number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents; (c) the number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery; and (d) details of public legal cases regarding corruption or bribery brought against the undertaking and its own workers during the reporting period and the outcomes of such cases. This includes cases that were initiated in previous years where the outcome was only established in the current reporting period.	25. The undertaking may disclose: (a) the total number and nature of confirmed incidents of corruption or bribery; (b) the number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents; (c) the number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery; and (d) details of public legal cases regarding corruption or bribery brought against the undertaking and its own workers during the reporting period and the outcomes of such cases. This includes cases that were initiated in previous years where the outcome was only established in the current reporting period.
26. The disclosures required shall include incidents involving actors in its value chain only where the undertaking or its employees are directly involved.	26. The disclosures required shall include incidents involving actors in its value chain only where the undertaking or its employees are directly involved.
<b>Disclosure Requirement G1-5 – Political influence and lobbying activities</b>	<b>Disclosure Requirement G1-3 – Political influence and lobbying activities</b>
27. The undertaking shall provide information on the activities and commitments related to exerting its political influence, including its lobbying activities related to its material impacts, risks and opportunities.	10. The undertaking shall provide <i>disclose information whether it has in place</i> activities and commitments related to exerting its political influence, including its lobbying activities related to its material impacts, risks and <i>(opportunities), and describe them if applicable.</i>
28. The objective of this Disclosure Requirement is to provide transparency on the undertaking’s activities and commitments related to exerting its political influence with political contributions, including the types and purpose of lobbying activities.	28. The objective of this Disclosure Requirement is to provide transparency on the undertaking’s activities and commitments related to exerting its political influence with political contributions, including the types and purpose of lobbying activities.
29. The disclosure required by paragraph 27 shall include:	11. The disclosure required by paragraph 10 shall include:

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SET 1 ESRs G1 – Business conduct (version July 2023)	LSME ESRs ED – Section 6 Business conduct
<p>(a) if applicable, the representative(s) responsible in the administrative, management and supervisory bodies for the oversight of these activities;</p> <p>(b) for financial or in-kind political contributions:</p> <p>i. the total monetary value of financial and in-kind political contributions made directly and indirectly by the undertaking aggregated by country or geographical area where relevant, as well as type of recipient/beneficiary; and</p> <p>ii. where appropriate, how the monetary value of in-kind contributions is estimated.</p> <p>(c) the main topics covered by its lobbying activities and the undertaking’s main positions on these in brief. This shall include explanations on how this interacts with its material impacts, risks and opportunities identified in its materiality assessment per ESRs 2; and</p> <p>(d) if the undertaking is registered in the EU Transparency Register or in an equivalent transparency register in a Member State, the name of any such register and its identification number in the register.</p>	<p>(a) if applicable, the representative(s) responsible in the administrative, management and supervisory bodies for the oversight of these activities;</p> <p>(b) for financial or in-kind political contributions:</p> <p>i. the total monetary value of financial and in-kind political contributions made directly and indirectly by the undertaking aggregated by country or geographical area where relevant, as well as type of recipient/beneficiary; and</p> <p>ii. where appropriate, how the monetary value of in-kind <i>political</i> contributions is estimated.</p> <p>(c) the main topics covered by its lobbying activities and the undertaking’s main positions on these in brief. This shall include explanations on how this interacts with its material impacts, risks and opportunities identified in its materiality assessment per ESRs 2; and</p> <p><del>(d) if the undertaking is registered in the EU Transparency Register or in an equivalent transparency register in a Member State, the name of any such register and its identification number in the register.</del></p>
<p>30. The disclosure shall also include information about the appointment of any members of the administrative, management and supervisory bodies who held a comparable position in public administration (including regulators) in the 2 years preceding such appointment in the current reporting period.</p>	<p><del>30. The disclosure shall also include information about the appointment of any members of the administrative, management and supervisory bodies who held a comparable position in public administration (including regulators) in the 2 years preceding such appointment in the current reporting period.</del></p>
<p><b>Disclosure Requirement G1-6 – Payment practices</b></p>	<p><b>(G1-6 of SET 1 merged and simplified in G1-1 above)</b></p>
<p>31. The undertaking shall provide information on its payment practices, especially with respect to late payments to small and medium enterprises (SMEs).</p>	
<p>32. The objective of this Disclosure Requirement is to provide insights on the contractual payment terms and on its performance with regard to payment, especially as to how these impact SMEs and specifically with respect to late payments to SMEs.</p>	
<p>33. The disclosure under paragraph 31 shall include:</p> <p>(a) the average time the undertaking takes to pay an invoice from the date when the contractual or statutory term of payment starts to be calculated, in number of days;</p> <p>(b) a description of the undertaking’s standard payment terms in number of days by main category of suppliers and the percentage of its payments aligned with these standard terms;</p> <p>(c) the number of legal proceedings currently outstanding for late payments; and</p> <p>(d) complementary information necessary to provide sufficient context. If the undertaking has used representative sampling to calculate the information required under point (a), it shall state that fact and briefly describe the methodology used.</p>	
<p><b>Appendix A: Application Requirements</b></p>	<p><b>Appendix A: Application Requirements</b></p>
<p>This appendix is an integral part of the ESRs G1 Business conduct. It supports the application of the disclosure requirements set out in this standard and has the same authority as the other parts of the Standard.</p>	<p>This appendix is an integral part of the <i>[draft]</i> ESRs G1 Business conduct. It supports the application of the disclosure requirements set out in this <i>section</i> and has the same authority as the other parts of the <i>[draft]</i> Standard.</p>
<p><b>Impact, risk and opportunity management</b></p>	<p><b>Impact, risk and opportunity management</b></p>
<p><b>Disclosure Requirement G1-1 – Business conduct policies and corporate culture</b></p>	<p><b>Disclosure Requirement G1-1 – Business conduct policies and corporate culture</b></p>
<p>AR 1. The undertaking may consider the following aspects when determining its disclosure under paragraph 7:</p>	

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SET 1 ESRS G1 – Business conduct (version July 2023)	LSME ESRS ED – Section 6 Business conduct
<p>(a) the aspects of corporate culture that are taken into consideration and discussed by the administrative, management and supervisory bodies and with which frequency;</p> <p>(b) the principal themes that are promoted and communicated as part of the corporate culture;</p> <p>(c) how the members of the undertaking’s administrative, management and supervisory bodies provide direction to promote a corporate culture; and</p> <p>(d) specific incentives or tools for its own workers to foster and encourage its corporate culture.</p>	
<p><b>Disclosure Requirement G1-2 – Management of relationships with suppliers</b></p>	<p><b>Disclosure Requirement G1-1 – Management of relationships with suppliers</b></p>
<p>AR 2. For purposes of this standard, management of relationships with the undertaking’s suppliers may include the following:</p> <p>(a) how the undertaking’s practices, including activities to avoid or minimise the impacts of disruptions to its supply chain, support its strategy and risk management;</p> <p>(b) training of the undertaking’s procurement/supply chain workforce on engagement and dialogue with suppliers as well as incentives of its procurement workforce including whether such incentives refer to price, quality or sustainability factors;</p> <p>(c) the screening and evaluation of social and environmental performance of suppliers;</p> <p>(d) the inclusion of locally based suppliers in its supply chain and/or suppliers with certification;</p> <p>(e) how the undertaking’s practices deal with vulnerable suppliers;</p> <p>(f) the undertaking’s targets and actions with regard to communication and management of relationships with suppliers; and</p> <p>(g) how the outcomes of these practices are evaluated, including supplier visits, audits or surveys.</p>	<p>AR 1. For purposes of this standard, management of relationships with the undertaking’s suppliers may include the following:</p> <p>(a) how the undertaking’s practices, including activities to avoid or minimise the impacts of disruptions to its supply chain, support its strategy and risk management;</p> <p><del>(b) training of the undertaking’s procurement/supply chain workforce on engagement and dialogue with suppliers as well as incentives of its procurement workforce including whether such incentives refer to price, quality or sustainability factors;</del></p> <p><del>(c) the screening and evaluation of social and environmental performance of suppliers;</del></p> <p><del>(d) the inclusion of locally based suppliers in its supply chain and/or suppliers with certification;</del></p> <p><del>(e) how the undertaking’s practices deal with vulnerable suppliers;</del></p> <p>(b) the undertaking’s targets and actions, if any, with regard to communication and management of relationships with suppliers.</p> <p><del>(g) how the outcomes of these practices are evaluated, including supplier visits, audits or surveys.</del></p>
<p>AR 3. ‘Vulnerable suppliers’ includes <b>suppliers</b> that are exposed to significant economic, environmental and/or social risks.</p>	<p>AR 3. ‘Vulnerable suppliers’ includes <b>suppliers</b> that are exposed to significant economic, environmental and/or social risks.</p>
<p><b>Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery</b></p>	<p><b>Disclosure Requirement G1-2 – Prevention and detection Anti - corruption and anti - bribery</b></p>
<p>AR 4. ‘Functions-at-risk’ means those functions deemed to be at risk of corruption and bribery as a result of its tasks and responsibilities.</p>	<p>AR 4. ‘Functions at risk’ means those functions deemed to be at risk of corruption and bribery as a result of its tasks and responsibilities.</p>
<p>AR 5. Disclosures may include details about the risk assessments and/or mapping, as well as monitoring programmes and/or internal control procedures performed by the undertaking to detect corruption and bribery.</p>	<p>AR 2. Disclosures may include details about the risk assessments and/or mapping as well as monitoring programmes and/or internal control procedures performed by the undertaking to detect corruption and bribery. <i>Such procedures may include training or whistleblowing systems.</i></p>
	<p>AR 3. <i>The undertaking may present the required information about training on its anti-bribery and corruption policies using the following table:</i></p>

LSME ED comparison with Set 1

SET 1 ESRS G1 – Business conduct (version July 2023)	LSME ESRS ED – Section 6 Business conduct																					
	<p><b>Anti-corruption and bribery training illustrative example</b>  <i>During the 20XY financial year ABC provided training to its at-risk own workers in terms of its policy (see note x).. Details of its training during the year is as follows:</i></p> <table border="1" data-bbox="1137 240 1615 424"> <thead> <tr> <th></th> <th>Managers</th> <th>Other employees</th> </tr> </thead> <tbody> <tr> <td><b>Training coverage</b></td> <td></td> <td></td> </tr> <tr> <td><i>Total</i></td> <td>5</td> <td>50</td> </tr> <tr> <td><i>Total receiving training</i></td> <td>3</td> <td>42</td> </tr> <tr> <td><b>Total hours of training</b></td> <td>6</td> <td>84</td> </tr> <tr> <td><b>Frequency</b></td> <td></td> <td></td> </tr> <tr> <td><i>How often training is required</i></td> <td>Annually</td> <td>Annually</td> </tr> </tbody> </table>		Managers	Other employees	<b>Training coverage</b>			<i>Total</i>	5	50	<i>Total receiving training</i>	3	42	<b>Total hours of training</b>	6	84	<b>Frequency</b>			<i>How often training is required</i>	Annually	Annually
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<p>AR 6. The undertaking’s policies on corruption and bribery may be relevant to specific groups of people, either because they are expected to implement them (for example, the undertaking’s employees, contractors and suppliers), or because they have a direct interest in their implementation (for example, value chain workers, investors). The undertaking may disclose the communication tools and channels (e.g., flyers, newsletters, dedicated websites, social media, face to face interactions, unions and/or workers representatives) to communicate policies to such groups. This may also include the identification and/or removal of potential barriers to dissemination, such as through translation into relevant languages or the use of graphic depictions.</p>	<p><del>AR 6. The undertaking’s policies on corruption and bribery may be relevant to specific groups of people, either because they are expected to implement them (for example, the undertaking’s employees, contractors and suppliers), or because they have a direct interest in their implementation (for example, value chain workers, investors). The undertaking may disclose the communication tools and channels (e.g., flyers, newsletters, dedicated websites, social media, face to face interactions, unions and/or workers representatives) to communicate policies to such groups. This may also include the identification and/or removal of potential barriers to dissemination, such as through translation into relevant languages or the use of graphic depictions.</del></p>																					
<p>AR 7. The undertaking may disclose an analysis of its training activities by, for example, region of training or category of own workforce where its programmes differ significantly based on such factors and such information would be useful to users.</p>	<p><del>AR 7. The undertaking may disclose an analysis of its training activities by, for example, region of training or category of own workforce where its programmes differ significantly based on such factors and such information would be useful to users.</del></p>																					
<p>AR 8. The undertaking may present the required information about training using the following table:</p>	<p><del>AR 8. The undertaking may present the required information about training using the following table:</del></p>																					



LSME ED comparison with Set 1

SET 1 ESRS G1 – Business conduct (version July 2023)	LSME ESRS ED – Section 6 Business conduct																																																																											
<p><b>Anti-corruption and bribery training illustrative example</b> During the 20XY financial year ABC provided training to its at-risk own workers in terms of its policy (see note x). For those at-risk functions the training is mandatory, but ABC also made available voluntary training for other own workers. Details of its training during the year is as follows:</p> <table border="1" data-bbox="107 320 696 724"> <thead> <tr> <th></th> <th>At-risk functions</th> <th>Managers</th> <th>AMSB<sup>105</sup></th> <th>Other own workers</th> </tr> </thead> <tbody> <tr> <td><b>Training coverage</b></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Total</td> <td>20,000</td> <td>200</td> <td>16</td> <td>70,000</td> </tr> <tr> <td>Total receiving training</td> <td>19,500</td> <td>150</td> <td>8</td> <td>5,000</td> </tr> <tr> <td><b>Delivery method and duration</b></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Classroom training</td> <td>5 hours</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Computer-based training</td> <td>1 hour</td> <td>2 hours</td> <td>1 hour</td> <td></td> </tr> <tr> <td>Voluntary computer-based training</td> <td></td> <td></td> <td></td> <td>1 hour</td> </tr> <tr> <td><b>Frequency</b></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>How often training is required</td> <td>Annually</td> <td>Annually</td> <td>Bi-annually</td> <td>-</td> </tr> <tr> <td><b>Topics covered</b></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Definition of corruption</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Policy</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Procedures on suspicion/detection</td> <td>X</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Etc.</td> <td>X</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		At-risk functions	Managers	AMSB <sup>105</sup>	Other own workers	<b>Training coverage</b>					Total	20,000	200	16	70,000	Total receiving training	19,500	150	8	5,000	<b>Delivery method and duration</b>					Classroom training	5 hours				Computer-based training	1 hour	2 hours	1 hour		Voluntary computer-based training				1 hour	<b>Frequency</b>					How often training is required	Annually	Annually	Bi-annually	-	<b>Topics covered</b>					Definition of corruption	X	X	X	X	Policy	X	X	X	X	Procedures on suspicion/detection	X	X			Etc.	X				
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LSME ED comparison with Set 1

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<p>AR 14. In meeting the requirement in paragraph 29(c) the undertaking shall consider the alignment between its public statements on its material impacts, risks and opportunities and its lobbying activities.</p>	<p><del>AR 14. In meeting the requirement in paragraph 29(c) the undertaking shall consider the alignment between its public statements on its material impacts, risks and opportunities and its lobbying activities.</del></p>																														
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<p><b>Disclosure Requirement G1-6 – Payment practices</b></p>	<p><del><b>Disclosure Requirement G1-6 – Payment practices</b></del></p>																														
<p>AR 16. In some cases, the undertaking's standard contractual payment terms may differ significantly depending on country or type of supplier. In such cases, information about the standard terms per main categories of suppliers or country or geographical region could be examples of additional contextual information to explain the disclosures in paragraph 33(b).</p>	<p><del>AR 16. In some cases, the undertaking's standard contractual payment terms may differ significantly depending on country or type of supplier. In such cases, information about the standard terms per main categories of suppliers or country or geographical region could be examples of additional contextual information to explain the disclosures in paragraph 33(b).</del></p>																														
<p>AR 17. An example of what the description of standard contract term disclosures in paragraph 33(b) could look like:</p> <p>ABC's standard contract payment terms are payment on receipt of invoice for wholesalers which encompass approximately 80% of its annual invoices by value. It pays for services received within 30 days after receipt of the invoice which are about 5% of its annual invoices. The remainder of its invoices are paid within 60 days of receipt except for those in country X which in accordance with the marketplace standards are paid within 90 days of receipt.</p>	<p><del>AR 17. An example of what the description of standard contract term disclosures in paragraph 33(b) could look like:</del></p> <p><del>ABC's standard contract payment terms are payment on receipt of invoice for wholesalers which encompass approximately 80% of its annual invoices by value. It pays for services received within 30 days after receipt of the invoice which are about 5% of its annual invoices. The remainder of its invoices are paid within 60 days of receipt except for those in country X which in accordance with the marketplace standards are paid within 90 days of receipt.</del></p>																														