CSRD: Preparing for new EU ESG reporting requirements

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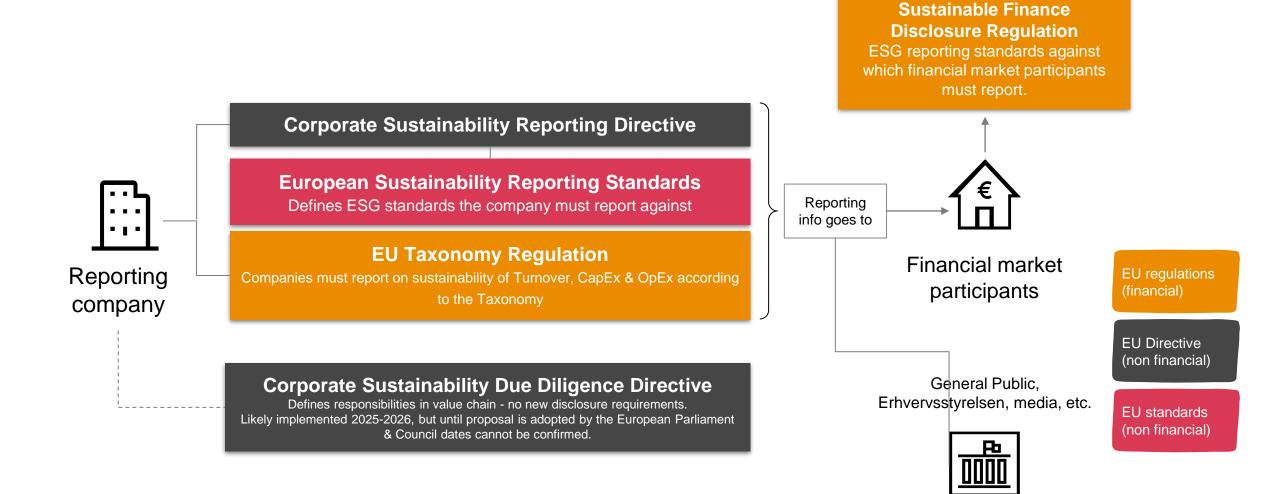


Sustainability is a megatrend.

This is a game changer All large and listed companies must report against the ESRS

Pre-ESRS	Post-ESRS		
Voluntary standards & norms	Hard law incl. EU Corporate Sustainability Reporting Directive & Taxonomy		
A large number of competing standards and frameworks	Consolidated, universal standards		
Some quantitative, lots of qualitative, anecdotal reporting on ESG	A combination of both quantitative and qualitative reporting, including targets		
Materiality defined by impact on enterprise value	Double materiality based on impacts, risks and opportunities for societal & enterprise value		
Optional assurance of ESG reporting	Limited assurance required on Taxonomy & CSRD/ESRS, moving to reasonable assurance		

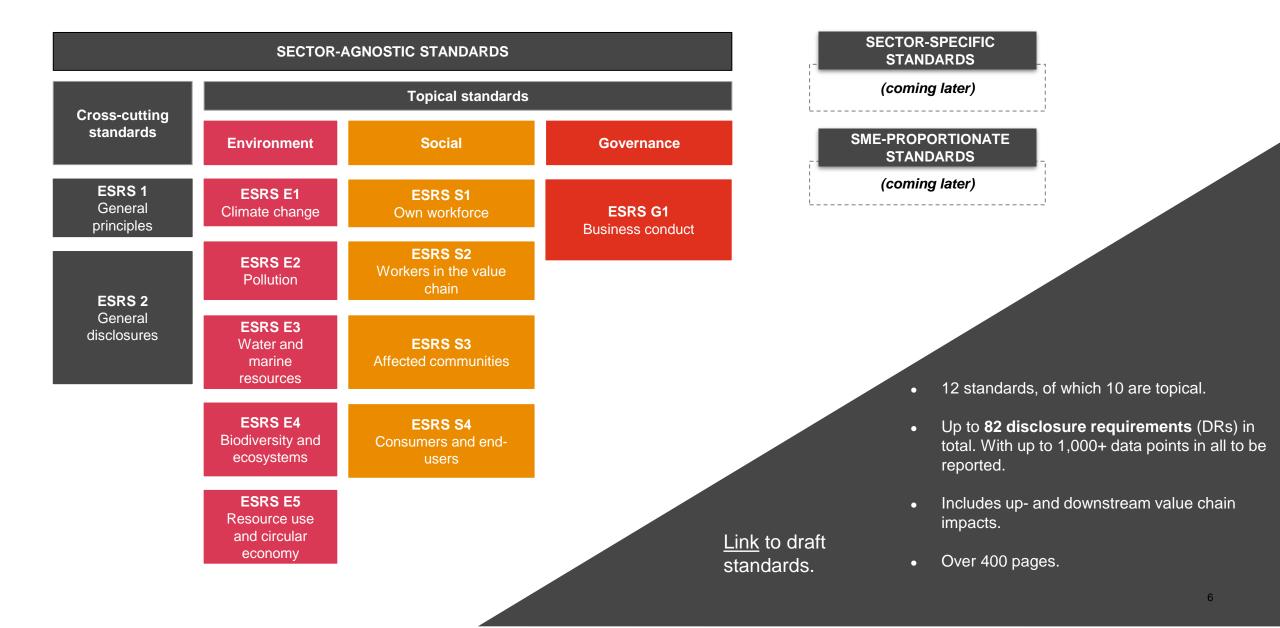
The purpose is to increase quality and transparency of ESG reporting to encourage the flow of capital



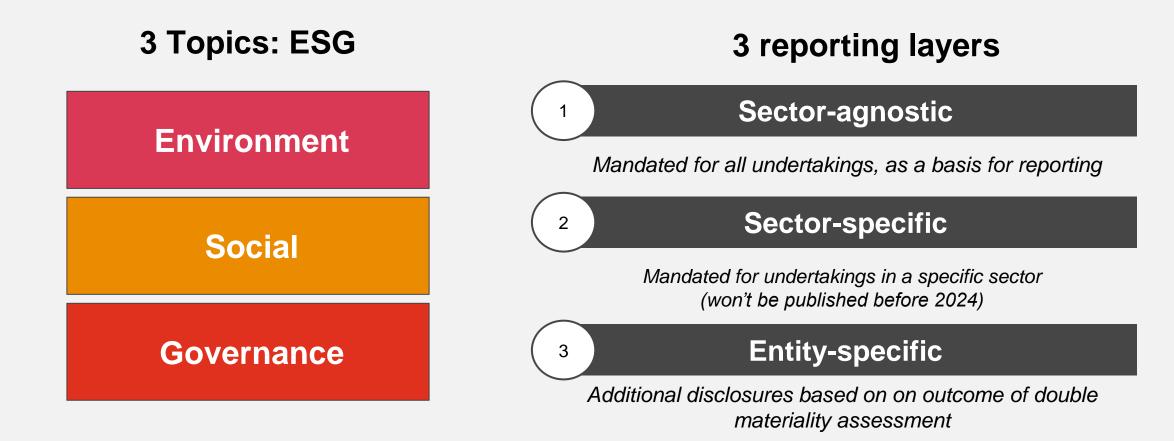
The CSRD is expected to apply for large listed companies from FY24 and for large 'C' companies from FY25

Main changes	Who?	Significant extension of the scope of sustainability reporting
	What?	 Expanding the content of sustainability reports Reporting must meet requirements of European Sustainability Reporting Standards. ESG reporting in management report of annual accounts
	Where?	Sustainability report mandatory component of the (consolidated) management report
	How?	Electronic format and tagging of sustainability reports mandatory
	Responsibility?	Responsibility of management and governance and new role (oversight) of the audit committee
	Enforcement?	Clear responsibilities for preparation, oversight and enforcement
	Audit?	Mandatory audit of sustainability reports with limited assurance
	Large liste	ed for reporting periods starting from: d undertakings for first financial year from 1 January 2024 ertakings for first financial year from 1 January 2025

The architecture of the new European Standards (ESRS)



ESRS differentiates three kinds of reporting requirements across Environmental, Social & Governance Topics



Example of Social Sustainability Topics in the ESRS

ESRS 1 Appendix B - List of sustainability matters to be included in the materiality assessment

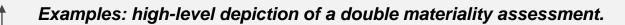
S S	Social					
ESRS	Торіс	Sub-topic	Sub-sub-topic			
S1	Own workforce	Working conditions	 Secure employment Working time Adequate wages Social dialogue Freedom of association, the existence of works councils and the information, consultation and participation rights of workers Collective bargaining, including rate of workers covered by collective agreements Work-life balance Health and safety 			
		Equal treatment and opportunities for all	 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 Diversity 			
		• Other work-related rights	Child labour • Forced labour • Adequate housing • Privacy			
	Workers in the value chain	Working conditions	 Secure employment Working time Adequate wages Social dialogue Freedom of association, including the existence of work councils Collective bargaining Work-life balance Health and safety 			
S2		Equal treatment and opportunities for all	 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 Diversity 			
		• Other work-related rights	Child labour • Forced labour • Adequate housing • Water and sanitation • Privacy			
	Affected communities	 Communities' economic, social and cultural rights 	• Adequate housing • Adequate food • Water and sanitation • Land-related impacts • Security-related impacts			
S 3		 Communities' civil and political rights 	Freedom of expression Freedom of assembly Impacts on human rights defenders			
		 Particular rights of indigenous communities 	Free, prior and informed consent Self-determination Cultural rights			
	Consumers and end-users	Information-related impacts	Privacy • Freedom of expression • Access to (quality) information			
S 4		Personal safety	Health and safety Security of a person Protection of children			
		Social inclusion	Non-discrimination • Access to products and services • Responsible marketing practices			

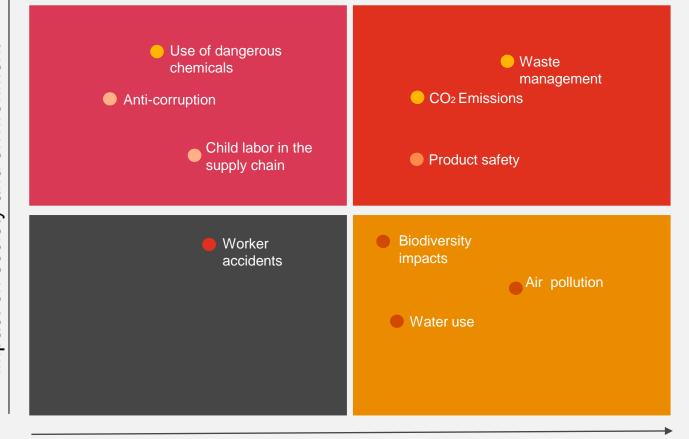
Double materiality assessment: the starting point

Double materiality assessment

- According to the ESRS, companies must conduct a double materiality assessment.
- The assessment enables companies to identify their reporting requirements - and understand where their impacts are greatest.
- The new EU standards have clear guidelines on how this must be done, including inclusion of external stakeholders' views and value chain impacts.

Impact on society and environment





Risks and opportunities for the business

Double materiality reflects risks and opportunities *on* and impacts *from* the company

Financial materiality

ESG risks and opportunities that may impact the performance, development and position of the company.

Examples: carbon taxation increasing costs of operation, supply chain disruptions due to extreme weather events, changing customer demands affecting revenue.

Risks and opportunities for the business





Company

Impacts of the business on society and environment

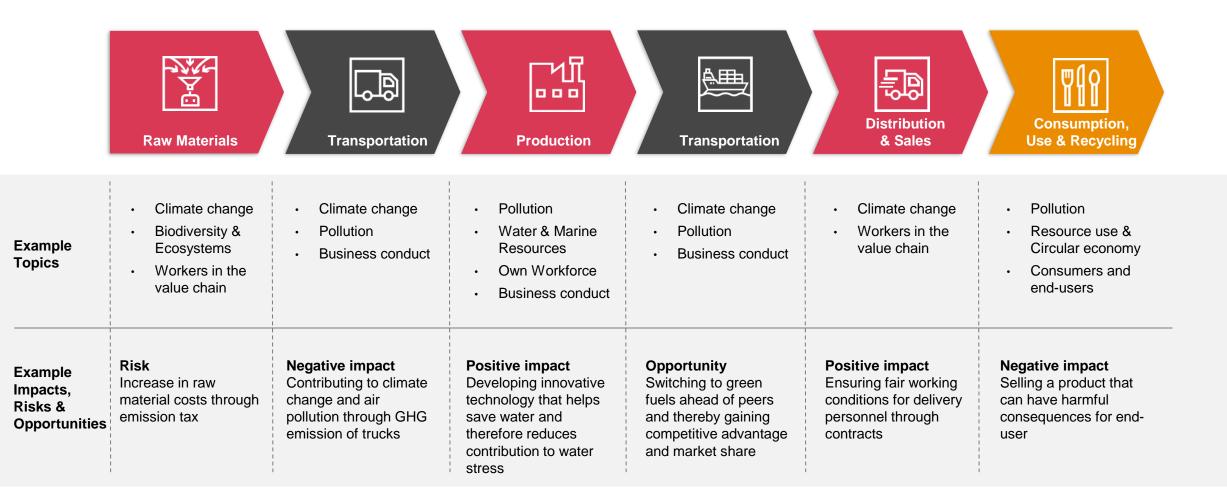
Impact Materiality

Actual or potential impacts on people and the environment, connected to a company's operations and value chain.

Examples: human rights issues in the supply chain, GHG emissions from production contributing to climate change, bribery and corruption due to poor governance.



Mapping the value chain is a crucial step to identify impacts risks and opportunities

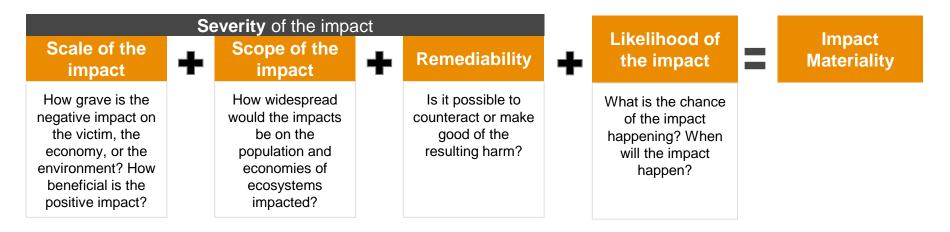


The ESRS requires a specific methodology for assessing impacts *from* the company on the environment and people

According to the assessment must address 4 parameters: **scale**, **scope**, **difficulty to repair** (remediability), and **likelihood**.

A quantitative value assesses the relative materiality of the given topic. This will rank the company's 'impact *from* the business' with respect to the given topic.

Impact assessment methodology required by the ESRS



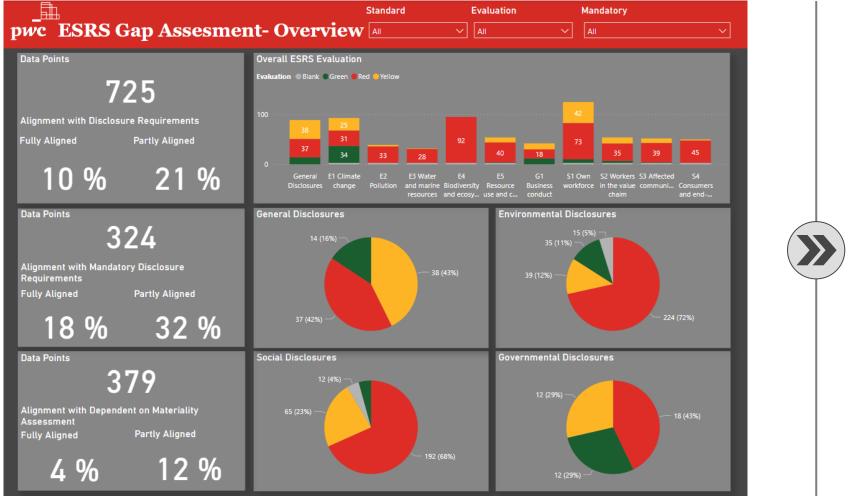
The compliance process begins with double materiality assessment and gap analysis

					by the ESRS
		Double Materiality Proces		Outputs	
1. Project Kick-off	2.1 Understanding	2.2 Identification	2.3 Assessment	3. CSRD Gap Assessment	4. CSRD Roadmap
Mobilise the project team: Map and engage relevant internal stakeholders to the ESRS and the Double Materiality Assessment (DMA) process	Gain a thorough understanding of the business model and map the value chain and external stakeholders that can be affected by the company.	Identification of key impacts, risks and opportunities (IROs)	Assessment of materiality for the shortlisted topics	Adoption of thresholds and final list of material topics, providing the information needed to perform the CSRD Gap analysis.	Use the information from the Gap analysis as a basis to make a road map for compliance and identifying key responsible staff to close data gaps.
Project Plan	Stakeholder description	Description of high level Impacts, Risks and Opportunities		Gap analysis	Compliance Road Map
	Business model description			1 1 1 1 1 1 1 1	
	Value Chain description				
		ESG due diligence	e (ongoing process)		

Disclosure required

Next step: ESRS Gap Analysis

After determining the material reporting requirements, companies should map current ESG data against future requirements, and develop a plan for closing data gaps.





Roadmap to close data gaps

We recommend a step-by step approach as you prepare for reporting according to the CSRD/ESRS

/ First focus

- Document the business, identify relevant internal and external stakeholders, outline the business model, map the value chain and identify peers
- Identify Impacts, Risks and Opportunities (IROs) based on currently available information
- Double materiality assessment considering both financial and impact materiality and external stakeholder mapping (ESRS requirement)
- **ESRS gap assessment** in relation to mandatory reporting standards
- High-level compliance road map Review existing sustainability reporting and available data and compare to the output of the ESRS gap assessment

Short term

- Review and revisit sustainability and reporting governance
- Review due diligence procedures for sustainability risk and impact assessment, prevention and mitigation
- Develop detailed roadmap towards full compliance with CSRD
- Prepare Audit Committee for tasks and obligations in CSRD
- Expand data collection on selected disclosure requirements in accordance with draft standards (ESRS)
- Prepare reporting on eligibility and alignment with the EU Green
 Taxonomy

Medium term

- Complete data collection and consider targets to track progress in accordance with the reporting standards (ESRS)
- Prepare for limited assurance in line with CSRD requirements
- Prepare for digital tagging of sustainability information
- Prepare inclusion of accounting principles for Taxonomy KPIs
- Explore digital tools for reliable data management (collection, internal controls and data analysis)

Long term

- Prepare for possible reasonable assurance in line with evolution of CSRD implementation
 - Design ongoing feedback mechanisms to continuously assess reporting (legislative and stakeholders)

Review digital solutions to support efficient data collection and controls through the value chain

Thank you



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