



LOG OF AMENDMENTS

ESRS G1

BUSINESS CONDUCT



JULY 2025



EFRAG

Log of Amendments by Standard – ESRS G1 *Business conduct*

Annex to the Basis for Conclusions – Illustration of the Amendments

Disclaimer: The Log of Amendments by Standard accompanies but is not part of the ESRS Amendments Exposure Drafts. It complements and should be read in conjunction with Chapter 7 of the Basis for Conclusions (BFC), where a summarised description of the main changes to individual Standards can be found. It does not reflect the position of the European Union or the European Commission DG Financial Stability, Financial Services and Capital Markets Union (DG FISMA).

Introduction

1. **This document complements and should be read in conjunction with Chapter 7 of the Basis for Conclusions (BFC) where a summarised description of the main changes to individual Standards can be found.**
2. This document illustrates the Amendments at paragraph level in Amended ESRS G1 *Business conduct*.
3. The starting point is the text of the 2023 Delegated Act, with each paragraph listed and numbered in Column 1.
4. A markup of amendments is provided in Column 2 including text added or removed. Text added has been underlined in Column 2. Text deleted is marked as ~~strikethrough (strikethrough)~~ in Column 2. Where text is unchanged this is also included (no change to text) including where there is no change to the DR.
5. The last column includes an explanation of changes made to the DR (or Chapter for ESRS G1) using the following terminology: Amended, Unchanged, Merged, New or Deleted and moved to NMIG (where text has been deleted from mandatory content, but it is presented as illustration in NMIG).
6. The last column also includes additional explanations and rationale for changes useful to gain an understanding of why text or DRs have been amended.

Objective	Objective	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 <i>Business conduct</i>	
	1. <u>When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to ESES G1 'Business Conduct', when this topic is related to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions and targets (if in place), dependencies when relevant, metrics and financial effects.</u>	New Added to clarify the reporting areas that the undertaking is expected to cover when a topic is material.
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	2. The objective of this Standard is to specify Disclosure Requirements ('DRs') <u>in relation to the items of information mentioned in paragraph 1, that are not covered in ESRS 2 General Disclosures.</u> 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	Amended Specification introduced across topical standards to highlight interaction with ESRS 2, considering that content in topical standards for former ESRS specifications (GOV/SBM/IRO), PAT and financial effects has been deleted or significantly reduced. Provisions in ESRS also require disclosure at topical level, in addition to information disclose in accordance with the topical standards.
	3. When only one of the sub-topics covered by this Standard is material, the undertaking shall report only on that sub-topic.	New This is to provide flexibility and support more concise and relevant information, by disclosing at the right level of granularity and avoid over-reporting when only a sub-topic is material. Specification introduced across topical standards to highlight the approach to disclose

		information on material topics in accordance with ESRS 1 and 2.
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;	4. This Standard sets out DRs related to business conduct and in particular with respect to the following sub-topics: a) corporate culture, including anti-corruption and anti-bribery, the protection of whistleblowers and animal welfare;	Unchanged
b) the management of relationships with suppliers , including payment practices, especially with regard to late payment to small and medium sized undertakings	b) the management of relationships with suppliers, including <u>(unfair) payment practices, especially with regard to late payment to small and medium sized undertakings; and</u>	Amended Editorial for simplification purposes and align with language in the CSRD text.
c) activities and commitments of the undertaking related to exerting its political influence, including its lobbying activities	c) activities and commitments of the undertaking related to exerting its political influence, including its and lobbying activities	Amended Editorial for simplification purposes and support more concise and focused reporting.
Interaction with other ESRS	Interaction with other ESRS	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
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 <i>General principles</i> and ESRS 2 <i>General requirements</i>	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 <i>General principles</i> and ESRS 2 <i>General requirements</i>	Deleted Across topical standards to avoid repetition with ESRS 2.
	5. <u>The undertaking shall apply the provisions of ESRS 2 paragraphs 30 to 33 and GDR-P, GDR-A,GDR-T and GDR-M. In particular:</u> a. <u>if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact;</u>	New Specification introduced across topical standards to highlight interaction with ESRS 2. This is a consequence of deleting PAT provisions in topical standards, as well as to promote more concise and less repetitive reporting.

	b. <u>the undertaking may present the description of its material impacts, risks and opportunities, in accordance with ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative.</u>	
	6. <u>In this Standard, each DR is introduced by a disclosure objective, with the exception of policies, actions and targets, for which the provisions in ESRS 2 GDR-P, GDR-A and GDR-T provide the necessary framing for the relevant disclosures.</u>	New Specification introduced across topical standards to highlight interaction with ESRS 2.
Disclosure Requirements		
ESRS 2 General disclosures	ESRS 2 General disclosures	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
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).	Deleted Across topical standards to avoid repetition.
Governance		
Disclosure Requirement related to ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies	Disclosure Requirement related to ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
5.When disclosing information about the role of the administrative, management and supervisory bodies , the undertaking shall cover the following aspects	5.When disclosing information about the role of the administrative, management and supervisory bodies , the undertaking shall cover the following aspects-	Deleted Partially covered in ESRS 2 GOV1.
a)the role of the administrative, management and supervisory bodies related to business conduct; and	a)the role of the administrative, management and supervisory bodies related to business conduct; and-	Deleted Partially covered in ESRS 2 GOV1.

b)the expertise of the administrative, management and supervisory bodies on business conduct matters.	b)the expertise of the administrative, management and supervisory bodies on business conduct matters.	Deleted Partially covered in ESRS 2 GOV1.
Impact, risk and opportunity management		
Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
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 business conduct matters, the undertaking shall disclose all relevant criteria used in the process, including location, activity, sector and the structure of the transaction. -	Deleted Partially covered in ESRS 2.
Disclosure Requirement G1-1– Business conduct policies and corporate culture	Disclosure Requirement G1-1– <u>Policies related to business conduct</u> policies and corporate culture	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
7.The undertaking shall disclose its policies with respect to business conduct matters and how it fosters its corporate culture.	7.The undertaking shall disclose its policies with respect to business conduct matters and how it fosters its corporate culture. <u>policies in accordance with the provisions of ESRS 2 GDR-P.</u>	New Introduced PAT architecture to be consistent across topical standards. NMIG 1 contains related guidance for para 7.
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.	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.	Deleted Objective deleted for PAT requirements in topical standards, as the content of GDR in ESRS 2 has a similar role.
9. The disclosures required under paragraph 7 shall include how the undertaking establishes, develops, promotes and evaluates its corporate culture.	9. The disclosures required under paragraph 7 shall include how the undertaking establishes, develops, promotes and evaluates its corporate culture.	Deleted For simplification purposes and reduction of mandatory datapoints. Partially covered by the provisions in ESRS 2 GDR-PAT.

10. The disclosures in paragraph 7 shall cover the following aspects related to the undertaking's policies on business conduct matters:	10. The disclosures in paragraph 7 shall cover the following aspects related to the undertaking's policies on business conduct matters:- -	Deleted For simplification purposes and reduction of datapoints. The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic.
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;	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;-	Deleted For simplification purposes and reduction of datapoints. The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic.
b) where the undertaking has no policies on anti-corruption or anti-bribery consistent with the United Nations Convention against Corruption ¹ , it shall state this and whether it has plans to implement them and the timetable for implementation;	<u>8. In addition to the information required by ESRS 2 GDR-P, the undertaking shall disclose:</u> a) <u>the circumstance when</u> where it has no policies on anti-corruption or anti-bribery consistent with the United Nations Convention against Corruption ¹ ; it shall state this and whether it has plans to implement them and the timetable for implementation;-	Amended Unchanged: SFDR indicator #15 in Table III of Annex I of Commission Delegated Regulation (EU) 2022/1288. Simplified across all ESRS, "shall" and "may" datapoints to disclose plans and timetable for implementation of PAT have been deleted.
(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 European Parliament and of the Council ² ;	(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 European Parliament and of the Council²;-	Deleted For simplification purposes and reduction of datapoints. The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic. ESRS 2 AR 27 for para 29 covers avoidance of boilerplate because of other EU regulations.
(d) where the undertaking has no policies on the protection of whistle-blowers ⁴ , it shall state this and whether it has plans to implement them and the timetable for implementation	(d) (b) the circumstance when where it has no policies on the protection of whistle-blowers ⁴ ; it shall state this and whether it	Amended

	has plans to implement them and the timetable for implementation	<p>Unchanged: SFDR indicator #6 in Table III of Annex I of Commission Delegated Regulation (EU) 2022/1288.</p> <p>AR 1 contains related guidance for para 8 (b).</p> <p>Simplified: across all ESRS, “shall” and “may” datapoints to disclose plans and timetable for implementation of PAT have been deleted.</p>
(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;	(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;	<p>Deleted</p> <p>For simplification purposes and datapoint reduction. The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic.</p>
(f) where applicable, whether the undertaking has in place policies with respect to animal welfare;	(f) where applicable, whether the undertaking has in place policies with respect to animal welfare; -	<p>Deleted</p> <p>For simplification purposes and datapoint reduction. The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic.</p>
(g) the undertaking’s policy for training within the organisation on business conduct, including target audience, frequency and depth of coverage; and	(g) the undertaking’s policy for training within the organisation on business conduct, including target audience, frequency and depth of coverage; and -	<p>Deleted</p> <p>For simplification purposes and datapoint reduction. The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic.</p>
(h) the functions within the undertaking that are most at risk in respect of corruption and bribery.	(h) (c) the functions <u>and/or roles</u> within the undertaking that are most at risk in respect of corruption and bribery.	<p>Amended</p> <p>The wording was revised to promote more focused disclosure, by clarifying that not all roles of a given function may be at risk AR 2 contains related guidance for para 8(c).</p>
11. Undertakings that are subject to legal requirements under national law transposing Directive (EU) 2019/1937, or to	11. Undertakings that are subject to legal requirements under national law transposing Directive (EU) 2019/1937, or to	<p>Moved</p>

equivalent legal requirements with regard to the protection of whistle-blowers, may comply with the disclosure specified in paragraph 10 (d) by stating that they are subject to those legal requirements.	equivalent legal requirements with regard to the protection of whistle-blowers, may comply with the disclosure specified in paragraph 10 (d) by stating that they are subject to those legal requirements.	Moved to AR 1. This qualifies topical content, but is not a separate datapoint.
Disclosure Requirement G1-2 – Management of relationships with suppliers	Disclosure Requirement G1-2 – Management of relationships with suppliers <i>Actions related to business conduct</i>	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
	<u>9. The undertaking shall disclose its business conduct actions in accordance with the provisions of ESRS 2 GDR-A.</u>	New Introduced PAT architecture to be consistent across topical standards and reflecting the elimination of PAT content in topical standards.
12.The undertaking shall provide information about the management of its relationships with its suppliers and its impacts on its supply chain.	<u>10. In addition to the information required by ESRS 2 GDR-A, the undertaking shall disclose:</u> a) The undertaking shall provide information about the management of its relationships with its suppliers. and its impacts on its supply chain. and if the undertaking <u>takes into account social and environmental criteria for the selection of its suppliers, including how this is done.</u>	Amended This datapoint has been reformulated to adjust to PAT architecture. Incorporation of (former) para 15(b). (Former) para 15(b) amended, avoidance of the use of “whether and how” to avoid negative statements across Standards. NMIG 2 contains related guidance for para 10(a).
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.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	Deleted Objective deleted in alignment with EFRAG's approach to not include objectives for PATs under topical standards.
14.The undertaking shall provide a description of its policy to prevent late payments, specifically to SMEs.	14.The undertaking shall provide a description of its policy to prevent late payments, specifically to SMEs.	Deleted The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic.
15.The disclosure required under paragraph 12 shall include the following information:	15.The disclosure required under paragraph 12 shall include the following information:	Deleted For simplification purposes.

(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	(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 -	Deleted Promoting less granular requirements for narrative disclosure. The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic.
(b)whether and how it takes into account social and environmental criteria for the selection of its suppliers.	(b)whether and how it takes into account social and environmental criteria for the selection of its suppliers.	Amended Promoting less granular requirements for narrative disclosure. Amended and Incorporated in (new) para 10 (a).
Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery	Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
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	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	Deleted Promoting less granular requirements for narrative disclosure. Consolidated into (new) para 10 (c).
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.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 .	Deleted The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic.
18.The disclosure required under paragraph 16 shall include the following information:	18.The disclosure required under paragraph 16 shall include the following information:	Deleted The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic.

(a) description of the procedures in place to prevent, detect, and address allegations or incidents of corruption and bribery	(b) (a) description of the procedures in place information about the undertaking's approach to prevent, detect, <u>investigate and address</u> respond to allegations or incidents <u>related to of corruption and bribery, which includes any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery;</u>	Amended Incorporation of (former) para 24 (b): SFDR indicator #16 in Table III of Annex I of Commission Delegated Regulation (EU) 2022/1288.
(b) whether the investigators or investigating committee are separate from the chain of management involved in the matter; and	(b) whether the investigators or investigating committee are separate from the chain of management involved in the matter; and	Deleted The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic.
(c) the process, if any, to report outcomes to the administrative, management and supervisory bodies	(c) the process, if any, to report outcomes to the administrative, management and supervisory bodies	Deleted The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic.
19. Where the undertaking has no such procedures in place, it shall disclose this fact and, where applicable, its plans to adopt them.	19. Where the undertaking has no such procedures in place, it shall disclose this fact and, where applicable, its plans to adopt them.	Deleted The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic.
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.	Moved Deleted from mandatory content and moved to NMIG 1
21. The disclosure required by paragraph 16 shall include information about the following with respect to training	21. The disclosure required by paragraph 16 shall include information about the following with respect to training	Deleted Requirements on training have been grouped to enhance clarity.
(a) the nature, scope and depth of anti-corruption and anti-bribery training programmes offered or required by the undertaking	(a) the nature, scope and depth of anti-corruption and anti-bribery training programmes offered or required by the undertaking	Amended Editorial. NMIG 3 contains related guidance for para 10(c).

	<u>(c) training activities within the undertaking on business conduct, including the target audience, frequency and depth of coverage.</u>	
(b) the percentage of functions-at-risk covered by training programmes; and	(10(c) continued) This shall include the percentage of functions and/or roles most at risk within the undertaking in respect of <u>corruption and bribery</u> at risk covered by training programmes; and	Amended/Moved The wording was revised to promote more focused reporting, by clarifying that not all roles of a given function may be at risk. Incorporated to (new) para 10(c) with (former) paras 21 (a), (b) and (c), to have all training DPs in one place.
(c) the extent to which training is given to members of the administrative, management and supervisory bodies	(10(c) continued) the extent to which training is given to <u>as well as</u> members of the administrative, management and supervisory bodies.	Moved Incorporated in (new) para 10(c) with (former) paras 21 (a), (b) and (c), to have all training DPs in one place.
	(10(c) continued) <u>It shall also disclose whether the procurement team is involved in training related to its engagement with suppliers for the improvement of their sustainability performance.</u>	New Datapoint moved from a may DP in AR to a mandatory DP, to replace the two deleted DPs for the management of relationships with suppliers, since it was highlighted as more meaningful. Incorporated to (new) para 10(c) with (former) paras 21 (a), (b) and (c), to have all training DPs in one place.
Metrics and targets		
	Disclosure Requirement G1-3 – Targets related to business conduct	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
	<u>11. The undertaking shall disclose its business conduct targets in accordance with the provisions of ESRS 2 GDR-T.</u>	New Introduced PAT architecture to be consistent across topical standards.

Disclosure Requirement G1-4 – Incidents of corruption or bribery	Disclosure Requirement G1-4 – <i>Metrics related to Incidents of corruption or bribery</i>	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
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.	Deleted For simplification purposes.
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. <u>12.</u> The objective of this DR is to provide transparency on the incidents relating to corruption or bribery during the reporting period and the related outcomes.	Unchanged
24.The undertaking shall disclose	24. The undertaking shall disclose:-	Amended Editorial.
a)the number of convictions and the amount of fines for violation of anti-corruption and anti- bribery laws (¹³⁰); and	(a) 13. The undertaking shall disclose the number of convictions and the <u>total</u> amount of fines for violation of anti-corruption and anti- bribery laws <u>during the reporting period.</u> (130); and	Amended Editorial. AR 3, 4, 5 and 6 contains related guidance for para. 13.
(b)any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery (¹³¹)	(b) any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery (131).	Moved Moved up to “actions” and incorporated in (new) para 10 (b). No change in the status of the DP.
25.The undertaking may disclose:	25.The undertaking may disclose:-	Deleted from mandatory content and moved to NMIG
(a)the total number and nature of confirmed incidents of corruption or bribery	<u>14. The undertaking shall disclose the total number and nature of the confirmed incidents of corruption or bribery <u>that occurred during the reporting period.</u></u>	Amended/Moved May datapoint moved to mandatory. Exception to the rule of “no may DP converted to shall” and is justified by the fact that there are no other metrics on corruption and bribery, other than the number of convictions and amount of fines. NMIG 4 contains related guidance for para. 14

		AR 3 contains related guidance for para. 14.
(b) the number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	(b) the number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	Moved Deleted from mandatory content and moved to NMIG 4
(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	(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	Moved Deleted from mandatory content and moved to NMIG 4
(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	(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	Moved Deleted from mandatory content and moved to NMIG 4
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 upstream and downstream value chain only where the undertaking or its employees are directly involved	Moved Moved to AR 3. Qualifies topical content, not a separate datapoint.
Disclosure Requirement G1-5 – Political influence and lobbying activities	Disclosure Requirement G1-5 – <i>Metrics related to</i> Political influence and lobbying activities	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
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	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	Deleted For simplification purposes.
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	28-15. The objective of this DR 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.	Unchanged

29.The disclosure required by paragraph 27 shall include:	29.The disclosure required by paragraph 27 shall include:	Deleted For simplification purposes.
(a)if applicable, the representative(s) responsible in the administrative, management and supervisory bodies for the oversight of these activities	(a)if applicable, the representative(s) responsible in the administrative, management and supervisory bodies for the oversight of these activities	Deleted Partially covered in ESRS 2 GOV1.
(b) for financial or in-kind political contributions: 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	(b) 16. The undertaking shall disclose, for financial or in-kind political contributions:—for political influence —the total monetary value of financial and in-kind political contributions made directly and indirectly by the undertaking during the reporting period, aggregated by country or geographical area where relevant, as well as type of recipient/beneficiary.—and	Amended To create a clearer distinction between DPs political influence and for lobbying activities. Information gathering from stakeholders pointed to a need for more guidance on the difference between these concepts. AR 7 and 8 contains related guidance for para. 16.
ii.where appropriate, how the monetary value of in-kind contributions is estimated.	ii.where appropriate, how the monetary value of in-kind contributions is estimated.—	Deleted Covered in ESRS 1.
(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	(c) 17. The undertaking shall disclose for lobbying activities the main topics covered by these its lobbying activities and its main positions on these in brief,—This shall including explanations on how this interacts with its material impacts, risks and opportunities identified in its materiality assessment (see ESRS 2 IRO 2).	Amended To create a clearer distinction between DPs for political influence and for lobbying activities. Information gathering from stakeholders pointed to a need for more guidance on the difference between these concepts. NMIG 5 contains related guidance for para. 17.
(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.	If the undertaking is registered in the EU Transparency Register or in an equivalent transparency register in a Member State, the undertaking shall specify the name of any such register and its identification number in the register.—	Deleted For simplification purposes.

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	30. The disclosure 18. The undertaking shall disclose information about the appointment of any members of the administrative, management and supervisory bodies during the current reporting period, who held a comparable position in public administration (including regulators) in the two preceding years.	Amended Editorial. AR 9 contains related guidance for para. 18.
Disclosure Requirement G1-6 – Payment practices	Disclosure Requirement G1-6 – <u>Metrics in relation to payment practices</u>	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
31. The undertaking shall provide information on its payment practices, especially with respect to late payments to small and medium enterprises (SMEs).	31. The undertaking shall provide information on its payment practices, especially with respect to late payments to small and medium enterprises (SMEs).	Deleted For simplification purposes.
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.	32. 19. The objective of this DR is to provide <u>insights an understanding of</u> the contractual payment terms and on the undertaking's performance with regard to payment, especially <u>with regard to late payments to</u> especially as to how these impact SMEs. and specifically with respect to late payments to SMEs.	Amended Editorial.
33. The disclosure under paragraph 31 shall include:	33. 20. The undertaking The disclosure under paragraph 31 shall include: <u>disclose:</u>	Unchanged
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;	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;	Deleted Information gathering pointed to difficulty with methodologies and data collection. The reporting practices were not comparable. This led to the conclusion that the effort of calculation exceeds the value of information.
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	b. a) a description of the undertaking's standard payment terms in number of days by main category of suppliers,	Amended

	including SME's, and the percentage of its payments aligned with these standard terms;	Specification added for SMEs, since the other DPs referring to specific practices for SMEs have been deleted. NMIG 6 contains related guidance for para. 20(a). NMIG 7 contains related guidance for para. 20(a).
c. the number of legal proceedings currently outstanding for late payments; and	c. b) the number of legal proceedings currently outstanding for late payments.	Unchanged
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.	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.	Deleted Now addressed as a cross-cutting element in ESRS 2.
Application Requirements		
Impact, risk and opportunity management		
Disclosure Requirement G1-1 – Business conduct policies and corporate culture	Disclosure Requirement G1-1– <u>Policies related to business conduct</u> policies and corporate culture	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
AR1 . The undertaking may consider the following aspects when determining its disclosure under paragraph 7: (a) the aspects of corporate culture that are taken into consideration and discussed by the administrative, management and supervisory bodies and with which frequency; (b) the principal themes that are promoted and communicated as part of the corporate culture; (c) how the members of the undertaking's administrative, management and supervisory bodies provide direction to promote a corporate culture; and	AR1 . The undertaking may consider the following aspects when determining its disclosure under paragraph 7:- (a) the aspects of corporate culture that are taken into consideration and discussed by the administrative, management and supervisory bodies and with which frequency; (b) the principal themes that are promoted and communicated as part of the corporate culture; (c) how the members of the undertaking's administrative, management and supervisory bodies provide direction to promote a corporate culture; and	Deleted For simplification purposes and datapoint reduction.

(d) specific incentives or tools for its own workers to foster and encourage its corporate culture.	(d) specific incentives or tools for its own workers to foster and encourage its corporate culture. -	
	AR 1 for para 8 (b). 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 whistle-blowers, can comply with the disclosure specified in paragraph 10 (d) by stating that they are subject to those legal requirements.	Moved Moved from (former) para 11.
Disclosure Requirement G1-2 – Management of relationships with suppliers	Disclosure Requirement G1-2 – Management of relationships with suppliers	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
AR.2 For purposes of this standard, management of relationships with the undertaking's suppliers may include the following: (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;	AR.2 For purposes of this standard, management of relationships with the undertaking's suppliers may include the following: (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;	Deleted For simplification purposes and datapoint reduction.
(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;	(b) training of the undertaking's the 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;	Moved to mandatory Training for the procurement team moved to mandatory disclosure requirements, to replace the two deleted DP for the management of relationships with suppliers, since it was highlighted as more meaningful. Incorporated in (new) para 10(c) with (former) paras 21 (a), (b) and (c), to have all training DPs in one place.
(c) the screening and evaluation of social and environmental performance of suppliers;	(c) the screening and evaluation of social and environmental performance of suppliers;	Moved Deleted from mandatory content and moved to NMIG 2

(d) the inclusion of locally based suppliers in its supply chain and/or suppliers with certification;	(d) the inclusion of locally based suppliers in its supply chain and/or suppliers with certification;	Moved Deleted from mandatory content and moved to NMIG 2
(e) how the undertaking's practices deal with vulnerable suppliers	(e) how the undertaking's practices deal with vulnerable suppliers	Moved Deleted from mandatory content and moved to NMIG 2
(f) the undertaking's targets and actions with regard to communication and management of relationships with suppliers; and	(f) the undertaking's targets and actions with regard to communication and management of relationships with suppliers; and	Deleted For simplification purposes and burden relief.
(g) how the outcomes of these practices are evaluated, including supplier visits, audits or surveys.	(g) how the outcomes of these practices are evaluated, including supplier visits, audits or surveys.	Moved Deleted from mandatory content and moved to NMIG 2
AR3. Vulnerable suppliers' includes suppliers that are exposed to significant economic, environmental and/or social risks.	AR3. Vulnerable suppliers' includes suppliers that are exposed to significant economic, environmental and/or social risks.	Moved Deleted from mandatory content and moved to NMIG 2
Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery	Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
AR4. 'Functions-at-risk' means those functions deemed to be at risk of corruption and bribery as a result of its tasks and responsibilities.	AR 2 for para. 8(c). When disclosing paragraph 8(c), functions and/or roles most at risk means those functions and/or roles deemed to be most at risk of corruption and bribery as a result of their tasks and responsibilities within the undertaking. <u>Examples include those operating in high-risk countries or interacting with public authorities and governments.</u>	Amended Example included for functions and/or roles at risk. Information gathering from stakeholders pointed to a need for more guidance on this term.
AR5. 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	AR5. 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	Moved Deleted from mandatory content and moved to NMIG 1

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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.	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.	Moved Deleted from mandatory content and moved to NMIG 1
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.	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.	Moved Deleted from mandatory content and moved to NMIG 3
AR8. The undertaking may present the required information about training using the following table: Anti-corruption and bribery training illustrative example: xxx insert tablexxx	AR8. The undertaking may present the required information about training using the following table:- Anti-corruption and bribery training illustrative example : xxx insert tablexxx	Moved Deleted from mandatory content, moved to NMIG 3, and example amended
Metrics and targets		
Disclosure Requirement G1-4 – Incidents of corruption or bribery	Disclosure Requirement G1-4 – <u>Metrics related to Incidents of corruption or bribery</u>	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 <i>Business conduct</i>	
	<u>AR 3 for paras. 13 and 14. When disclosing information required by paragraph 13 and/or paragraph 14, the undertaking shall consider the incidents involving actors in its upstream and</u>	Moved/Amended Moved from (former) para 26. Containing related guidance for para. 13 and 14.

	<u>downstream value chain only where the undertaking or its employees are directly involved</u>	
	<p><u>AR 4 for para. 13. Convictions for the violation of anti-corruption and anti-bribery laws refer to final decisions issued by a criminal court against an individual or undertaking in respect of a criminal offence related to corruption and bribery, where these court decisions are entered in the criminal record of the convicting European Union Member State. In this context, final decisions include all the decisions in the reporting year while awaiting the outcome of a possible appeal. The reporting undertaking may provide additional information if an appeal is considered, has been lodged or was successful. This interpretation is aligned with the concept of a “conviction” under the European Criminal Records Information System (ECRIS).</u></p> <p><u>Decisions issued by administrative or regulatory authorities are not considered convictions (even if those decisions are final and legally binding) and, therefore, are covered under para 14.</u></p>	<p>New</p> <p>Guidance added to ensure consistency in reporting. Information gathering from stakeholders pointed to a need for more guidance on this term.</p>
	<p><u>AR 5 for para. 13. Fines issued for the violation of anti-corruption and anti-bribery laws refer to mandatory monetary penalties resulting from violations of anti-corruption and anti-bribery laws imposed by a court, commission, or other government authority, which are paid to a public treasury and which are recognised in the undertaking's financial statements during the reporting period</u></p> <p><u>It should be noted that the total amount of fines reported does not need to correspond directly with the number of convictions reported, as the scope of both metrics is not necessarily equivalent.</u></p>	<p>New</p> <p>Guidance added to ensure consistency in reporting. Information gathering from stakeholders pointed to a need for more guidance on this term.</p>
	<u>AR 6 for para. 13. For purposes of this Standard, the undertaking shall apply the ESRS definition of corruption and bribery (see ESRS Glossary), which is generic, specifically to</u>	<p>New</p> <p>Definition added to ensure consistency in reporting. Information gathering from</p>

	overcome the differing definitions found in local laws or in laws applicable in the jurisdiction of the parent company and to ensure comparability across reporting undertakings.	stakeholders indicated a lack of clarity regarding which definition to use.
Disclosure Requirement G1-5 – Political influence and lobbying activities	Disclosure Requirement G1-5 – <u>Metrics related to Political influence and lobbying activities</u>	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
AR 9. For purposes of this Standard ‘political contribution’ means financial or in-kind support provided directly to political parties, their elected representatives or persons seeking political office. Financial contributions can include donations, loans, sponsorships, advance payments for services, or the purchase of tickets for fundraising events and other similar practices. In-kind contributions can include advertising, use of facilities, design and printing, donation of equipment, provision of board membership, employment or consultancy work for elected politicians or candidates for office.	AR-9-7 for para. 16. For purposes of this Standard, ‘political contribution’ means financial or in-kind support provided directly to political parties, their elected representatives or persons seeking political office. Financial contributions can include donations, loans, sponsorships, advance payments for services, or the purchase of tickets for fundraising events and other similar practices. In-kind contributions can include advertising, use of facilities, design and printing, donation of equipment, provision of board membership, employment or consultancy work for elected politicians or candidates for office.	Unchanged
AR 10 ‘Indirect political contribution’ refers to those political contributions made through an intermediary organisation such as a lobbyist or charity, or support given to an organisation such as a think tank or trade association linked to or supporting particular political parties or causes.	AR 10-8 for para. 16. For purposes of this Standard, ‘indirect political contribution’ refers to those political contributions made through an intermediary organisation such as a lobbyist or charity, or support given to an organisation such as a think tank or trade association linked to or supporting particular political parties or causes.	Unchanged
AR 11. When determining ‘comparable position’ in this standard, the undertaking shall consider various factors, including level of responsibility and scope of activities undertaken.	AR 11-9 for para. 18. When determining ‘comparable position’ in this Standard, the undertaking shall consider factor in the level of responsibility and scope of activities undertaken various factors, including level of responsibility and scope of activities undertaken.	Unchanged
AR 12. The undertaking may provide the following information on its financial or in-kind contributions with regard to its lobbying expenses:	AR 12 The undertaking may provide the following information on its financial or in-kind contributions with regard to its lobbying expenses:	Deleted For simplification purposes and burden relief.

a. the total monetary amount of such internal and external expenses; and b. the total amount paid for membership to lobbying associations.	a. the total monetary amount of such internal and external expenses; and b. the total amount paid for membership to lobbying associations.	
AR 13. If the undertaking is legally obliged to be a member of a chamber of commerce or other organisation that represents its interests, it may disclose that this is the case	AR 13 If the undertaking is legally obliged to be a member of a chamber of commerce or other organisation that represents its interests, it may disclose that this is the case	Moved Deleted from mandatory content and moved to NMIG 5
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.	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. –	Moved Deleted from mandatory content and moved to NMIG 5
AR 15. An example of what such disclosures could look like: Political engagement (including lobbying activities) illustrative example	AR 15. An example of what such disclosures could look like: Political engagement (including lobbying activities) illustrative example	Deleted For simplification purposes.
Disclosure Requirement G1-6 – Payment practices	Disclosure Requirement G1-6 – <i>Metrics in relation to payment practices</i>	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 Business conduct	
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).	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).	Moved Deleted from mandatory content and moved to NMIG 7
AR 17 An example of what the description of standard contract term disclosures in paragraph 33(b) could look like: 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	AR 17 An example of what the description of standard contract term disclosures in paragraph 33(b) could look like: 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	Deleted For simplification purposes and datapoints reduction.

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.	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.	
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