

 DRAFT

ESRS 2

GENERAL DISCLOSURES

NOVEMBER 2025

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Objective

1. (1) ESRS 2 *General Disclosures* sets out the Disclosure Requirements (DRs) that apply across sustainability **topics** (i.e. cross-cutting). It covers the reporting areas defined in ESRS 1 *General Requirements*, paragraph 5.
2. (new) The undertaking shall apply the DRs defined in this Standard when providing information on material **impacts, risks** and **opportunities** and the **topics** related to them and present such information in accordance with ESRS 1 *General Requirements*, paragraph 55.

Disclosure Requirements

Disclosure Requirement BP-1 – Basis for preparation of the sustainability statement

3. (4 and 7 amended) The objective of this DR is to enable an understanding of the basis for preparation of the **sustainability statement**, including the disclosures required by ESRS 1 *General Requirements* in specific circumstances.
4. (5 amended) The undertaking shall disclose:
 - (a) whether the **sustainability statement** has been prepared on a consolidated or individual basis and in case the reporting boundary of the undertaking's own operations differs from the one adopted in the consolidated financial statements, a description of and the reasons for this difference; and
 - (b) an overview of the extent to which the sustainability statement covers the undertaking's upstream and downstream value chain.
5. The undertaking shall state that its **sustainability statement** has been prepared in accordance with ESRS as applicable at the end of the reporting period.
6. The undertaking shall disclose any relief, option or other specific provision prescribed in ESRS 1 *General Requirements* that it applies, together with the related required information.

APPLICATION REQUIREMENTS FOR BP-1

AR 1 for para. 4(a)	Differences from the reporting boundary used in the consolidated financial statements may arise when a subsidiary is excluded from consolidation as financially non-material (ESRS 1 <i>General Requirements</i> , paragraph 62).
AR 2 for para. 6	<p>(new) Reliefs, options or other specific provisions to be considered are the following:</p> <p>(a) relief for acquisitions and disposals (ESRS 1 <i>General Requirements</i>, paragraphs 75 and 76);</p> <p>(b) deviation from pre-defined time horizons (ESRS 1 <i>General Requirements</i>, paragraph 82);</p> <p>(c) changes in preparation or presentation of sustainability information (ESRS 1 <i>General Requirements</i>, paragraphs 85 and 86);</p> <p>(d) adjustments to comparative information (ESRS 1 <i>General Requirements</i>, paragraph 88);</p> <p>(e) application of material judgement and information subject to significant uncertainties (ESRS 1 <i>General Requirements</i>, paragraph 89);</p> <p>(f) omission of required information if applicable law or regulations prohibit the disclosure of such information or allow the omission of such disclosure (ESRS 1 <i>General Requirements</i>, paragraph 101);</p> <p>(g) relief to exclude from the calculation of a metric activities that are not significant drivers of impacts, risks or opportunities (ESRS 1 <i>General Requirements</i>, paragraph 91);</p> <p>(h) relief to report a partial reporting boundary for a metric due to lack of reliable data (ESRS 1 <i>General Requirements</i>, paragraph 92);</p>

APPLICATION REQUIREMENTS FOR BP-1

	<p>(i) relief to exclude joint operations from environmental metrics (ESRS 1 <i>General Requirements</i>, paragraph 93);</p> <p>(j) significant limitations affecting the reported information under the undue cost or effort provision for specific datapoints (ESRS 1 <i>General Requirements</i>, Chapter 7.4);</p> <p>(k) update of disclosures for events after the end of the reporting period (ESRS 1 <i>General Requirements</i>, paragraphs 97 and 98);</p> <p>(l) reporting errors in prior periods (ESRS 1 <i>General Requirements</i>, paragraphs 98 and 99).</p> <p>The undertaking may present the information required under paragraph 6 in the General Information section of its sustainability statement or alongside the relevant disclosures to which the information pertains.</p>
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Disclosure Requirement BP-2 – *Specific information if the undertaking uses phasing-in options*

7. The objective of this DR is to enable an understanding of the phasing-in provisions that the undertaking has used.
8. If, by applying the phase-in provisions provided by ESRS 1 *General Requirements* paragraph 125(a), the undertaking omits the information required by the standards listed in this paragraph, it shall nevertheless disclose whether the **impacts**, **risks** and **opportunities** organised under the related **topics** covered in those standards have been assessed to be material as a result of the undertaking's **materiality** assessment.
9. In addition to paragraph 8, if one or more of these **topics** have been assessed to be material, the undertaking shall:
 - (a) disclose the topic or sub-topic(s) that are assessed to be material, and briefly describe how the undertaking's **business model** and strategy take account of its **impacts** related to those topics. The undertaking may disclose at the level of topic or sub-topic;
 - (b) briefly describe any time-bound **targets** it has set related to the topics 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;
 - (c) briefly describe its **policies** in relation to the topics in question;
 - (d) briefly describe **actions** it has taken to identify, monitor, prevent, mitigate, remediate or bring an end to **actual** or **potential** negative **impacts** related to the topic in question, and the result of such actions; and
 - (e) disclose **metrics** relevant to the topic in question.
10. (17 amended) If, by applying the other phase-in provisions provided by ESRS 1 *General Requirements* in paragraphs 125(b)-(e), the undertaking omits the information required by other DRs listed in those paragraphs, it shall disclose this fact.

APPLICATION REQUIREMENTS FOR BP-2

AR 3 for para. 9	(new) The undertaking may present the information required in paragraph 9 either in the general part of its sustainability statement or alongside the relevant topical disclosures.
AR 4 for para. 10	(new) The undertaking may present the information required in paragraph 10 either in the general part of its sustainability statement or within the content index, if it opts for this as defined in ESRS 2 <i>General Disclosures</i> IRO-2, AR 30.

Governance

Disclosure Requirement GOV-1 – The role of the administrative, management and supervisory bodies in relation to sustainability

11. (20 amended) The objective of this DR is to enable an understanding of the roles and responsibilities of the **administrative, management and supervisory bodies**, as well as the associated processes, controls and procedures in monitoring, managing and overseeing material **impacts, risks and opportunities**.

12. The undertaking shall disclose:

- (a) (21(d), (e) and (b)) with respect to the composition of its *administrative, management and supervisory bodies*, the percentage of *independent board members*¹, the representation of *employees* and other workers, if present, and the percentage by gender and by other aspects of diversity that the undertaking takes into account;
- (b) (23 amended) how the administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to manage or oversee strategies and other measures designed to respond to material *impacts, risks and opportunities*;
- (c) (22(a)(b), 26(6) amended) the identity and responsibilities of the individuals, board committee or similar body within the administrative, management and supervisory bodies, which are responsible for the management or oversight of material impacts, risks and opportunities, with an indication of those impacts, risks and opportunities that are directly addressed by the administrative, management and supervisory bodies without delegating key decision to other bodies or to management if any;
- (d) (22(d)) how the administrative, management and supervisory bodies manage or oversee the setting of *targets* related to material impacts, risks and opportunities, and how they monitor progress towards them; and
- (e) (26(b)) how the administrative, management and supervisory bodies take into account material impacts, risks and opportunities when managing or overseeing the undertaking's strategy, its decisions on major transactions, and its risk management process and related *policies*, including whether the body(ies) or individual(s) have considered trade-offs associated with those impacts, risks and opportunities.

APPLICATION REQUIREMENTS FOR GOV-1

AR 5 for para. 12(a)	(21(d)) The board's gender diversity shall be calculated as the average ratio of female to male board members ² .
AR 6 for para. 12(b)	Sustainability-related expertise refers to expertise that the bodies directly possess or have access to.
AR 7 for para. 12(c)	The description of the responsibilities shall consist of an overview of how the responsibilities of each body or individual for material impacts, risks and opportunities and related topics are reflected in the undertaking's terms of reference, board mandates and other related policies .
AR 8 for para. 12 (e)	For the purposes of this disclosure, the management of material impacts, risks and opportunities includes the due diligence process put in place.

¹ This information supports the information needs of benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1816 as set out by indicator 'Weighted average percentage of board members who are independent' in Section I of Annex II.

² This information supports the information needs of: financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #13 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to disclosures rules on sustainable investments ('Board gender diversity') and benchmark administrators to disclose ESG factors subject to Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as set out by indicator 'Weighted average ratio of female to male board members' in Section 1 and 2 of Annex II.

Disclosure Requirement GOV-2 – Integration of sustainability-related performance in incentive schemes

13. (28) The objective of this DR is to enable an understanding of the key features of any incentive schemes that are linked to sustainability **topics** that are in place for members of the **administrative, management and supervisory bodies**.
14. (29) If the undertaking has incentive schemes for members of the **administrative, management and supervisory bodies** that are linked to sustainability **topics**, it shall disclose how members' remuneration is linked to sustainability topics, including:
 - (a) a description of the key characteristics of the incentive schemes;
 - (b) (29(b)) **targets** or **metrics** used if the performance is assessed against specific sustainability-related targets or metrics; and
 - (c) (29(d)) the proportion of variable remuneration dependent on sustainability-related targets or metrics.

Disclosure Requirement GOV-3 – Statement on due diligence

15. (31) The objective of this DR is to enable an understanding of where, within the **sustainability statement**, the main steps of the due diligence process (see ESRS 1 *General Requirements*, Chapter 4) applied with regard to sustainability **topics** are disclosed.
16. (32) The undertaking shall explain where its application of the main aspects and steps of the due diligence process, outlined in ESRS 1 *General Requirements*, AR 33, are reflected in its **sustainability statement**³.

APPLICATION REQUIREMENTS FOR GOV-3

AR 9 for para. 16	(AR 8) The undertaking may present the information required in paragraph 16 in the form of a table, cross-referencing the main steps of its due diligence process to the relevant disclosures in its sustainability statement .
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Disclosure Requirement GOV-4 – Risk management and internal controls over sustainability reporting

17. (35) The objective of this DR is to enable an understanding of the undertaking's risk management and internal control processes and systems in relation to sustainability reporting.
18. (36(a)) The undertaking shall disclose the scope, main features and components of its risk management and internal control processes and systems in relation to sustainability reporting.

APPLICATION REQUIREMENTS FOR GOV-4

AR 10 for para. 18	(AR 11) The undertaking shall consider the completeness and integrity of the data, and the accuracy of estimation results, as aspects that are relevant in the context of the risk management associated with the reporting process.
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Strategy

Disclosure Requirement SBM-1 – Strategy, business model and value chain

19. (39) The objective of this DR is to enable an understanding of the key elements of the undertaking's general strategy, **business model** and upstream and downstream value chain that relate to or affect material **impacts, risks** and **opportunities**, in order to enable an understanding of its exposure to such material impacts, risks and opportunities and where they originate.

³ This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts as set out by indicator #10 in Table III of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments ('Lack of due diligence').

20. (40 amended) The undertaking shall disclose the following information about the key elements of its general strategy and **business model** that relate to, or affect, the **topics** associated with its **material impacts, risks** and **opportunities**:

- (a) a description of its **business model**, its upstream and downstream value chain and its position in that value chain;
- (b) a description of:
 - i. the significant groups of **products** and services offered, significant markets or customer groups served, and their relevance in contributing to the undertaking's sustainability-related overall objectives, including significant changes in the reporting period (e.g. new/removed products, services, markets or customer groups);
 - ii. where applicable and significant, **products** and **services banned** in certain markets;
- (c) the significant sectors, including activities that are internal to the group if those activities are significant or are connected or may be connected to material impacts, risks and opportunities;
- (d) where applicable, a statement indicating, together with the related revenues, whether the undertaking is active in:
 - i. the **fossil fuel** (coal, oil and gas) sector⁴;
 - ii. chemicals production⁵, i.e. whether its activities fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006;
 - iii. the controversial weapons industry⁶ (anti-personnel mines, cluster munitions, chemical weapons or biological weapons); and
 - iv. the cultivation and production of tobacco⁷.

APPLICATION REQUIREMENTS FOR SBM-1

AR 11 for para. 20(c)	(new) Disclosing the significant sectors is relevant for users , as it supports the understanding of material impacts, risks and opportunities to which the undertaking is connected, notably when these are common in a given sector. In addition, this supports the understanding of possible entity-specific information included in the sustainability statement to cover aspects that are either specific to the undertaking or common in a given sector.
AR 12 for para. 20(c)	The sectors in which the undertaking is active are those of its own operations.
AR 13 for para. 20 (b)(c)	<p>(AR 13 amended) A sector, a market, and a group of products, services or consumers shall be considered significant if:</p> <ul style="list-style-type: none"> (a) it accounts for more than 10 per cent of the undertaking's revenue; or (b) it is connected with the undertaking's actual or potential material impacts.

⁴ This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #4 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosures rules on sustainable investments ('Exposure to companies active in the fossil fuel sector').

⁵ This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #9 in Table II of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosures rules on sustainable investments ('Investments in companies producing chemicals').

⁶ This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from an additional indicator related to principal adverse impacts set out by indicator #14 in Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosures rules on sustainable investments ('Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)').

⁷ This information supports the needs of benchmark administrators to disclose ESG factors subject to Regulation (EU) 2020/1818 as set out by paragraph b) of Article 12.1.

APPLICATION REQUIREMENTS FOR SBM-1

	<p>For significant sectors arising from activities that are internal to the group only the criterion in letter (b) applies.</p> <p>ESRS 2 <i>General Disclosures</i> does not mandate a specific classification system of business activities. When disclosing its significant sectors, the undertaking may apply one of the following approaches:</p> <p>(a) the NACE classification system (Nomenclature générale des Activités Economiques dans les Communautés Européennes NACE Rev.2.1);</p> <p>(b) the reportable segments disclosed in the financial statements in accordance with IFRS 8 <i>Operating segments</i> or local generally accepted accounting principles; or</p> <p>(c) available classification best practices or frameworks, such as the IFRS industry-based guidance and GRI Standards defined in ESRS 1 <i>General Requirements</i>, AR 5.</p>
AR 14 for para. 20(d)(i)	<p>(40 (d)(i)) The calculation of revenues derived from the fossil fuel sector shall be based on revenues from the exploration, mining, extraction, production, processing, storage, refining or distribution of fossil fuels, including their transportation, storage and trade, as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council). The undertaking may present a disaggregation of revenues derived from coal, oil and gas.</p>

Disclosure Requirement SBM-2 – *Interests and views of stakeholders*

21. (44 amended) The objective of this DR is to enable an understanding of the undertaking's **stakeholder engagement** and how key **stakeholders'** interests and views are brought to the attention of its **administrative, management and supervisory bodies** and inform its strategy and **business model**.
22. (45 amended) The undertaking shall disclose:
 - (a) a summarised description of its **stakeholder engagement**, including information about the key **stakeholders** with which it engaged, with reference to typical categories of affected stakeholders defined in ESRS 1 *General Requirements*, AR 21;
 - (b) its understanding of the interests and views of its key stakeholders as they relate to its strategy and **business model**; and
 - (c) how the **administrative, management and supervisory bodies** are informed about the views and interests of key affected stakeholders (including **workers' representatives**) with regard to its material **impacts, risks** and **opportunities**.

Disclosure Requirement SBM-3 – *Interaction of material impacts risks and opportunities with strategy and business model, and financial effects*

23. (47 amended) The objective of this DR is to enable an understanding of the interactions between the undertaking's material **impacts, risks** and **opportunities** and its strategy and **business model**, as well as of the related **financial effects**.
24. (48 amended) The undertaking shall disclose a high-level description of how material **impacts** originate from its strategy and **business model**, the effects of **risks** and **opportunities** on its business model and **value chain**, and how it has responded, and plans to respond, to them in its strategy and decision-making.
25. The undertaking shall disclose qualitative and quantitative information about how material **risks** and **opportunities** have affected its financial position, financial performance and cash flows for the reporting period (**current financial effects**).
26. The undertaking shall disclose qualitative information about the material **risks** and **opportunities** identified in paragraph 25 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.
27. The undertaking shall disclose qualitative and quantitative information on how it expects its financial position, financial performance, and cash flows to change over the short, medium and long term, given its strategy to manage material **risks** and **opportunities** (**anticipated financial effects**).
28. (new) The undertaking need not provide quantitative information about the **current financial effects** or **anticipated financial effects** if it determines that:
- (a) the effects are not separately identifiable; or
 - (b) the level of measurement uncertainty involved in estimating those effects is so high that the resulting quantitative information would not be useful (see ESRS 1 *General Requirements*, paragraphs 89 and 90).
29. (new) The undertaking need not provide quantitative information about the **anticipated financial effects** of material **risks** or **opportunities** if it does not have the skills, capabilities or resources to provide that quantitative information.
30. (new) In preparing disclosures about its **anticipated financial effects**, the undertaking shall use all reasonable and supportable information available to it at the reporting date without undue cost or effort (see ESRS 1 *General Requirements*, paragraphs 94, 95 and 96).
31. If the undertaking cannot provide quantitative information about the **current financial effects** or **anticipated financial effects** of a **risk** or **opportunity** in accordance with paragraphs 28 and 29, it shall:
- (a) explain why it has not provided quantitative information;
 - (b) provide qualitative information about those **financial effects**, including identifying line items, totals and subtotals within the related financial statements that are likely to be affected, or have been affected, by that risk or opportunity; and
 - (c) provide quantitative information about the combined financial effects of that risk or opportunity with other risks or opportunities and other factors, unless the undertaking determines that quantitative information about the combined financial effects would not be useful.
32. (48(f) amended) When providing quantitative information, the undertaking may present single amounts or ranges.
33. The undertaking shall disclose qualitative information about the resilience of its strategy and **business model** regarding its capacity to manage its material **risks** as disclosed in accordance with paragraph 24. This information shall include how the analysis was conducted and the time horizons considered.

APPLICATION REQUIREMENTS FOR SBM-3

AR 15 for para. 24	<p>The undertaking may consider the linkages that exist between paragraph 24 and IRO-2, paragraph 37(a) to present the content in a way that avoids duplications and facilitates an understanding of the information reported in accordance with these paragraphs. Paragraph 24 focuses on reporting the interaction of the undertaking's material impacts, risks and opportunities with its strategy and business model. IRO-2, paragraph 37(a) focuses on a description of those impacts, risks and opportunities and how they are likely to affect people and the environment.</p> <p>A description of the undertaking's material impacts, risks and opportunities is required in accordance with IRO-2, paragraph 37(a). The undertaking may present the descriptions of its material impacts, risks and opportunities in the same location as its disclosures on the related policies, actions, metrics and targets through which it manages them, in order to avoid duplication and support a coherent narrative.</p>
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APPLICATION REQUIREMENTS FOR SBM-3

AR 16 for paras. 25 and 26	If the information is included in the financial statements, it may be incorporated by reference (see ESRS 1 <i>General Requirements</i> , Chapter 9.3).
AR 17 for para. 27	(48(d) amended) In preparing the disclosure on anticipated financial effects , the undertaking shall consider how it 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: (a) its announced investment and disposal plans (e.g. capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas and asset retirements), including plans to which the undertaking is not contractually committed; and (b) its planned sources of funding to implement its strategy.
AR 18 for paras. 25 and 27	Quantitative information may consist of non-monetary information such as volumes, number of products , or number of employees .
AR 19 for paras. 25 and 27	In presenting information reported in accordance with paragraphs 25 and 27 about current financial effects and anticipated financial effects , the undertaking may consider the linkage with the information reported in accordance with GDR-A, paragraphs 46(b)(c) about financial resources allocated to the key actions .
AR 20 for paras. 25 and 27	The DR related to current financial effects and anticipated financial effects are designed to produce information that complements information provided in the financial statements. See Chapter 9 of ESRS 1 <i>General Requirements</i> for the requirements on how to support the understandability of connections between risks and opportunities and the information reported in the financial statements.
AR 21 for paras. 28 and 29	(new) If the undertaking cannot provide quantitative information in accordance with paragraphs 28 and 29, it is expected to provide qualitative information that is decision useful according to paragraph 23 of ESRS 1 <i>General Requirements</i> . In such instance, paragraph 24 of ESRS 1 <i>General Requirements</i> also applies.

Disclosure Requirement IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported

34. (52) The objective of this DR is to enable an understanding of the process through which the undertaking identifies **impacts**, **risks**, **opportunities** and the related **topics**, and assesses their **materiality**, as the basis for determining the disclosures to be made in its **sustainability statement** (see ESRS 1 *General Requirements*, Chapter 3).
35. (53 amended) The undertaking shall disclose:
- (a) a concise description of the process and decision-making steps it follows to identify **impacts**, **risks** and **opportunities** and the related **topics** and to assess their **materiality**, including the approach to cover its own operations and its upstream and downstream value chain covered, the key methodologies, inputs and assumptions adopted, as well as the qualitative considerations or quantitative thresholds;
 - (b) how it assessed and prioritised impacts based on their severity and likelihood (see ESRS 1 *General Requirements*, paragraphs 44 and 45), how prevention, mitigation and **remediation actions** are considered, and how the undertaking considered areas of heightened risks of negative impacts related to specific activities, **business relationships**, or **geographies**;
 - (c) whether the assessment is informed by the undertaking's sustainability due diligence process, and, if it consults with affected **stakeholders** and external experts to understand the impacts, how it **leverages** it in the process; and

- (d) significant changes to the process compared to the prior reporting period.

APPLICATION REQUIREMENTS FOR IRO-1

AR 22 for para. 35(a)	(new) Input may include, where relevant and beyond generic information, due diligence processes that informed the assessment, specific data sources, sector benchmark analysis, and risk management processes; engagement with affected stakeholders ; industry and peer group experience; reports, statistics and scientific data; and experts' engagement.
AR 23 for para. 35(a)	(new) The description of the process to identify and assess material risks and opportunities is expected to cover dependencies when relevant.
AR 24. for para. 35(a)–(d)	(new) The undertaking shall focus on information that is specific to its own materiality assessment process. It shall avoid standardised, generic disclosures, sometimes referred to as 'boilerplate', such as information describing in detail that it has applied the criteria outlined in ESRS 1 <i>General Requirements</i> or followed the recommended process.
AR 25. for para. 35(b)	(new) Information concerning engagement with affected stakeholders is addressed in ESRS 2 IRO-1 and SBM-2 and ESRS S1-S4. To avoid duplication and support a coherent narrative: <ul style="list-style-type: none"> (a) relevant disclosures under ESRS 2 IRO-1, paragraph 35(c), include how the materiality process includes consultation with affected stakeholders and external experts; (b) information on ongoing engagement with affected stakeholders (as defined in ESRS 1 <i>General Requirements</i>, AR 21) is addressed in the respective social standards (ESRS S1-2, S2-2, S3-2 and S4-2); (c) disclosures related to how key affected stakeholders' (including workers' representatives) interests and views are brought to the attention of the undertakings' administrative, management and supervisory bodies and inform its strategy and business model, with regard to its material impacts, risks and opportunities, are covered under ESRS 2 SBM-2, paragraph 22(c).
AR 26 for para. 35(b)	In disclosing how the undertaking considered areas of heightened risks of negative impacts related to specific activities, business relationships , or geographies , guidance is provided in ESRS 1 <i>General Requirements</i> , paragraphs 32 (b) and 33.
AR 27 for para. 35(d)	Disclosing changes from the previous period allows <i>users</i> to understand the last reporting period in which a full double materiality assessment was conducted and the aspects of it that have been updated in the reporting period in accordance with ESRS 1 <i>General Requirements</i> , paragraph 35.

Disclosure Requirement IRO-2 – Material impacts, risks and opportunities and disclosure requirements included in the sustainability statement

36. (55) The objective of this DR is to enable an understanding of the outcome of the **materiality** assessment, in terms of material **impacts, risks** and **opportunities** and material information reported in accordance with ESRS.
37. (56) The undertaking shall disclose:
- (a) (48(a) amended) a concise description of its **actual** and **potential**, positive and negative material **impacts**, including how they affect or are likely to affect people or the environment, and its **material risks** and **opportunities**, specifying the related **topics** and how and where impacts, risks and opportunities are connected to its own operations and its upstream and downstream value chain;

- (b) (57 amended) the basis for concluding that climate change is not material, if the undertaking has reached this conclusion and therefore omits all DRs in ESRS E1 *Climate Change*;
- (c) (48(g) amended) changes related to its material impacts, risks and opportunities compared to the previous reporting period;
- (d) a list of the DRs complied with in preparing the **sustainability statement**, allowing **users** to identify where the related disclosures are located in the sustainability statement and giving a separate indication of those that are incorporated by reference (see ESRS 1 *General Requirements*, Chapter 9.3);
- (e) (15 amended) a list of ‘supplementary’ information provided in accordance with ESRS 1 *General Requirements*, Chapter 8.2;
- (f) its exposure to heightened risk of **incidents** related to **forced** or compulsory **labour** and **child labour** by type of operations (such as manufacturing plants), or by countries or **geographies**⁸, if the undertaking is connected through its own operations or its upstream and downstream value chain to material negative impacts related to forced or compulsory labour or child labour; and
- (f) a table of all the datapoints that derive from other EU legislation as listed in Appendix A of this Standard, indicating where they can be found in the sustainability statement or, for those that the undertaking has assessed as not material, that they are ‘not material’.

APPLICATION REQUIREMENTS FOR IRO-2

AR 28 for para. 37(a)	<p>(new) The description of material risks and opportunities also covers the related dependencies to the extent that is necessary for an understanding of those risks and opportunities.</p> <p>Paragraph 50 of ESRS 1 <i>General Requirements</i> applies in presenting the disclosure prescribed by this DR.</p>
AR 29 for para. 37(a)	<p>The undertaking may present the description of its material impacts, risks or opportunities in the same location as its disclosures on the related policies, actions, metrics and targets through which it manages them, in order to avoid duplication and support a coherent narrative. If the undertaking exercises this option, it shall still present a concise description of its material impacts, risks and opportunities alongside its disclosures prepared in accordance with IRO-2.</p>
AR 30 for para. 37(d)	<p>(AR 19) The undertaking may present the disclosure as a content index, i.e. a tabular list of the DRs included in the sustainability statement, to support the identification of where they are located (page/paragraphs). It may present the list of information incorporated by reference in an appendix within its sustainability statement, or by including the necessary information in the list of reported DRs as required in paragraph 37(d).</p> <p>The undertaking may directly reference the DR numbers within its sustainability statement (e.g. in section headings or paragraph titles).</p> <p>The undertaking may present the ‘supplementary’ information provided under paragraph 37(e) by highlighting it in the section headings, paragraph titles, or the aforementioned content index, so that it is clearly distinguished as supplementary.</p>

General Disclosure Requirements (‘GDR’) for policies, actions, metrics and targets

38. (new) Information about **policies**, **actions**, **metrics** and **targets** shall enable an understanding of the level at which the undertaking manages its material **impacts**, **risks** and **opportunities**. If the undertaking

⁸ This information supports the information needs of financial market participants subject to Regulation (EU) 2019/2088 because it is derived from additional indicators related to principal adverse impacts as set out by indicator # 12 and 13 in Table III of Annex I of Commission Delegated Regulation (EU) 2022/1288 with regard to disclosure rules on sustainable investments (“Operations and suppliers at significant risk of incidents of forced or compulsory labour” and “Operations and suppliers at significant risk of child labour”).

has adopted policies, put in place actions, set targets or uses metrics only for certain aspects of a **topic**, this shall be reflected in the way the disclosure is prepared and presented, enabling **users** to understand the specific aspects that are covered.

39. (62 and 72 amended) 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.
40. (56) The undertaking shall apply the requirements provided below when disclosing either in accordance with a topical standard or on an entity-specific basis on:
- (a) its policies and **actions** to manage the prevention, mitigation and **remediation** of **actual** and **potential** material negative **impacts**, and to manage material **risks** or pursue actual and potential material positive impacts and material **opportunities**; and
 - (b) the **metrics** and the **targets** to assess progress over time in relation to its material impacts, risks and opportunities.

APPLICATION REQUIREMENTS FOR GDR PATM

AR 31 for para. 38	<p>(new) If the undertaking applies the same policies, actions, metrics or targets across more than one material impact, risk or opportunity (or topic), it may disclose the information only once, in aggregate, reflecting the level at which they are managed, while making clear the scope of its application. It may cross-refer to that information from other locations in the report where it is relevant.</p> <p>The undertaking may structure and present its disclosures in a way that reflects the managerial approach based on its management priorities that reflect and align with its strategy and business model.</p>
AR 32 for para. 39	<p>(new) If the undertaking presents its material impacts, risks and opportunities (IRO-2, paragraph 37(a)) and the related topics in a tabular form, it may indicate in the same table the material topics or material impacts, risks and opportunities for which it does not have policies, actions or targets in place by marking them as such in the table.</p>
AR 33 for para. 38	<p>(new) The level of detail provided may vary with regard to each DR, depending on the nature of the material impacts, risks and opportunities in question, and differences in the undertaking's current approach to their management.</p> <p>The level of detail provided shall be proportionate to the severity of the impacts, the magnitude of risk or opportunity, or the importance of the impacts, risks and opportunities for the undertaking's strategy and business model.</p> <p>The information shall, wherever possible, be specific to the reporting period.</p> <p>(new) When reporting on policies, actions, metrics and targets, the undertaking shall report relevant information, avoiding information that is boilerplate, and therefore not relevant for users. Excessive detail, especially about common practices, which are known to reasonably knowledgeable users, may obscure material information.</p>
AR 34 for para. 40	<p>(new) To avoid duplication and support a coherent narrative, the undertaking may present the description of its material impacts, risks and opportunities, as required under IRO-2, paragraph 37(a), alongside information about the policies, actions, metrics and targets through which it manages them.</p>

General Disclosure Requirement for policies – GDR-P

41. (64) The objective of this GDR is to enable an understanding of the **policies** that the undertaking has in place to manage the prevention, mitigation or **remediation** of material **actual** and **potential** negative **impacts**, and material **risks** and pursue material **opportunities** or positive impacts.
42. (65 amended) The undertaking shall disclose the following information about **policies** adopted to manage its material **impacts**, **risks** and **opportunities**:

- (a) a description of the key contents of the policy, including its general objectives and the material impacts, risks or opportunities it relates to, and, if there have been changes to the policies adopted during the reporting period, a description of those changes;
 - (b) a description of the scope of the policy, or of its exclusions, in terms of the undertaking's own operations, its upstream or downstream value chain and **geographies** and, if defined, the affected **stakeholder** groups;
 - (c) if the policy refers to third-party standards or initiatives that the undertaking commits to respect through the implementation of the policy, a reference to the third-party standard or initiative in question; and
 - (d) for social **topics**, a description of the consideration given to the interest of affected stakeholders in setting this policy, if such considerations have been given.
43. (new from ESRS S1-S4) The undertaking shall disclose whether it has an overarching human rights **policy** committing to implement⁹ the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. If this is the case, the undertaking shall disclose the information specified in paragraph 42 and shall specify which groups of affected **stakeholders** are covered (e.g. **own workforce**, **workers in the value chain**, **affected communities**, **consumers** and **end-users**).

APPLICATION REQUIREMENTS FOR GDR-P

AR 35 for para. 43	When disclosing information about its human rights policy to implement the UN Guiding Principles on Business and Human Rights, the undertaking shall consider the International Bill of Human Rights, which consists of the Universal Declaration of Human Rights and the two Covenants that implement them, and the ILO principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
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General Disclosure Requirement for actions and resources – GDR-A

44. (67) The objective of this GDR is to enable an understanding of the undertaking's key **actions**, taken or planned, to manage its material **impacts**, **risks** and **opportunities**, and where applicable, to achieve the objectives of related **policies**.
45. (68 amended) When the undertaking implements key **actions** to manage material **impacts**, **risks** and **opportunities**, it shall disclose:
- (a) a description of the key actions taken in the reporting year and those planned for the future, including their scope and timeframe; and
 - (b) the expected outcomes of the key actions and, where applicable, how their implementation contributes to achieving the related **policy** objectives.
46. (69 amended) Where significant financial resources (operational or capital expenditure) have been or are expected to be allocated to the implementation of the key **actions**, the undertaking shall:
- (a) describe the type of current and future significant financial resources allocated to the key actions, and whether the ability to implement these key actions depends on specific preconditions (e.g., granting of financial support or public **policy** and market developments);
 - (b) disclose the amount of significant financial resources allocated to the key actions in the reporting period (if any), and indicate the corresponding line items or notes where they are included in the financial statements; and
 - (c) provide an indicative range of future financial resources expected to be allocated for the implementation of the key actions.

⁹ (SFDR table 1 indicator 11 and SFDR table 3 indicator 9).

APPLICATION REQUIREMENTS FOR GDR-A

AR 36 for para. 45	<p>(AR 22) Key actions in the context of this DR are those actions that play a significant role in managing the undertaking's material impacts risks and opportunities including actions taken to support the provision of remedy.</p> <p>Key actions include actions that are part of the undertaking's business practices, sustainability due diligence and overall business and risk management .</p> <p>Key actions may have been initiated in prior reporting periods and continue to be implemented or produce effects in the current reporting period. For the sake of understandability, key actions may be aggregated if applicable. Conversely, if key actions cover more than one material impact, risk or opportunity, this can be indicated and cross-referenced if necessary.</p>
AR 37 for para. 45	<p>(new) Actions may be undertaken individually or in collaboration with other undertakings, especially if actual impacts or potential impacts are systemic or widespread in nature and cannot be addressed by the undertaking alone.</p> <p>Users may find it useful to know whether a key action is collaborative.</p>
AR 38 for para. 45	<p>(new) In the description of environmental actions, these may be classified in accordance with the mitigation hierarchy (i.e. avoidance, minimisation, restoration and compensation).</p>
AR 39 for para. 45(a)	<p>(68(a)(b) amended) The scope of key actions refers to their coverage in terms of activities within its own operations, its upstream and downstream value chain, subsidiaries, geographies, and if defined, the affected stakeholder groups in scope. The timeframe refers to the time horizons over which the undertaking intends to complete each action.</p>
AR 40 for para. 46	<p>The undertaking may present the information on resource allocation in the form of a table broken down between (i) capital expenditure and operating expenditure, and between (ii) resources applied in the current reporting year and the planned allocation of resources over specific time horizons.</p>
AR 41 for para. 46(b) and (c)	<p>(new). If the undertaking has allocated significant non-financial resources (e.g. full-time equivalent resources), the information about those resources may be presented as non-monetary quantities.</p>
AR 42 for para. 46(b) and (c)	<p>(new) When preparing disclosures on significant financial resources that have been or are expected to be allocated to the implementation of key actions, the undertaking may limit the disclosure to:</p> <ul style="list-style-type: none"> (a) its approved and announced key actions and action plans; and (b) its planned sources of funding for implementing these key actions.

General Disclosure Requirement for metrics – GDR-M

47. (74) The objective of this GDR is to support the preparation of the disclosures on **metrics** by the undertaking.
48. (75 and 76 amended) The undertaking shall disclose the **metrics** required by topical standards, in relation to material **impacts, risks** and **opportunities**, as well as metrics defined on an entity-specific basis in accordance with ESRS 1 *General Requirements*, paragraph 11. This may include those used by the undertaking to evaluate its performance and to track the effectiveness of its **actions** to manage its material impacts, risks and opportunities.
49. (77 amended) For each **metric**, the undertaking shall disclose:

- (a) the metric itself, its unit of measurement, the calculation methodology and the sources (e.g. input parameters) used for the calculation, and where relevant, the estimation methodology, including significant assumptions and limitations;
- (b) for **value chain** metrics, if applicable, the reliance on data from indirect sources or proxies and the planned **actions** to improve the data quality in the future if such actions are planned (see ESRS 1 *General Requirements*, Chapter 5);
- (c) contextual information about the metric; and
- (d) significant changes in the performance compared to the previous reporting periods, including informing about the progress made in achieving the **targets** set by the undertaking, and in case of major acquisitions or disposals, how the transaction affects the progress.

APPLICATION REQUIREMENTS FOR GDR-M

AR 43 for para. 48	(76 amended) Metrics include those defined in ESRS, as well as metrics identified on an entity-specific basis, whether taken from other sources or developed by the undertaking itself, such as for ESRS S2-S4 topical standards that do not contain metrics.
AR 44 for para. 49(a)	(new) The European system of units of measurement stems from the International System of Units (SI). The units of measurement shall be expressed using the names and symbols set down in Directive 80/181/EEC, as amended by Directive 2009/3/EC. Metrics shall be disclosed using the units specified in the topical standards, which are aligned with this Directive. SI prefixes and their corresponding symbols may be used to designate certain decimal multiples or submultiples where appropriate, in order to present values at the level the undertaking considers most appropriate. For example, instead of reporting 1 200 000 tCO ₂ e, the undertaking may report 1.2 MtCO ₂ e.
AR 45 for para. 49(c)	(new) Contextual information about a metric may include: <ul style="list-style-type: none"> (a) the reasons why the undertaking has chosen a particular measurement approach, as well as the reasons for the inputs and assumptions it uses; and (b) for environmental metrics, the specific environmental conditions and characteristics of the area where the impact is occurring that are necessary to understand the metric in question.

General Disclosure Requirement for targets – GDR-T

50. (79 amended) The objective of this GDR is to enable an understanding of how the undertaking sets **targets**, as defined in terms of expected results for people, the environment or the undertaking itself, and of how the undertaking tracks the effectiveness of its **policies** and **actions** in relation to its material **impacts, risks** and **opportunities**, as well as the overall progress and effectiveness towards the adopted targets over time. This includes – where applicable – whether the progress is aligned with a related action plan or whether any significant facts and circumstances related to the action plan affect the achievement of the target.
51. (80 amended) The undertaking shall disclose the measurable, time-bound, outcome-oriented qualitative or quantitative **targets** it has set related to its material **impacts, risks** and **opportunities**. For each target, the undertaking shall disclose:
- (a) a description of the relationship of the target to its **policy** objectives and **actions**;
 - (b) the defined target value (or level if the target is qualitative) to be achieved, including whether the target is absolute or relative if these are defined as such and in which unit it is measured;
 - (c) the scope of the target, in terms of the undertaking's activities within its own operations or its upstream and downstream value chain, as well as geographical boundaries;
 - (d) the baseline value (or level if the target is qualitative) and the base year from which progress is measured, if defined by the undertaking;

- (e) the target year or period to which the target applies, and if the undertaking has set any milestones or interim targets, a description of those milestones or interim targets;
- (f) the methodologies and significant assumptions used to define targets, whether the target is required by law, and, where applicable, the selected **scenarios** on which it is based, the key data sources and the level of compatibility with national, EU or international policy goals; and
- (g) whether the undertaking's targets related to environmental **topics** are based on conclusive scientific evidence.

52. (81 amended) If the undertaking has not set any measurable outcome-oriented **targets**, it shall disclose whether and, if so, how it nevertheless tracks the effectiveness of its **policies** and **actions** in relation to its material **impacts**, **risks** and **opportunities**.

APPLICATION REQUIREMENTS FOR GDR-T

AR 46 for para. 50	Information about progress and effectiveness towards the adopted targets over time is disclosed under GDR-M, paragraph 49(d).
AR 47 for para. 51	Outcome-oriented targets regarding material impacts are defined in terms of expected results for people and the environment.
AR 48 for para. 51 (g)	'Based on conclusive scientific evidence' shall be understood as the use of robust, peer-reviewed or otherwise authoritative biophysical information that identifies relevant ecological thresholds or that quantifies conditions, trajectories, and constraints using empirical data, modelling, or recognised scientific frameworks. Such evidence shall enable the undertaking to set ecologically grounded, context-specific and measureable targets .

Appendix A: List of datapoints in cross-cutting and topical standards that derive from other EU legislation

This Appendix is an integral part of ESRS 2 *General Disclosures* and provides a non-binding illustration of the datapoints in ESRS 2 *General Disclosures* and topical standards that derive from other EU legislation.

NOTE TO THE EUROPEAN COMMISSION: THIS MAPPING DOES NOT TAKE INTO ACCOUNT POTENTIAL AMENDMENTS TO PILLAR 3 ARISING FROM ONGOING UPDATES TO REGULATION (EU) NO 575/2013 AND AMENDEMENTS TO SFDR ARISING FROM ONGOING REVISIONS TO REGULATION (EU) 2019/2088.

Table 1: Datapoints in the main body of the Standard

Disclosure Requirement and related datapoint in ESRS	SFDR ¹⁰ reference	Pillar 3 ¹¹ reference	Benchmark Regulation ¹² reference	EU Climate Law ¹³ reference
ESRS 2 GOV-1 Percentage of board members who are independent			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 GOV-4 Statement on due diligence	Indicator number 10 Table #3 of Annex 1		Delegated Regulation (EU) 2022/1288, Annex I	
ESRS 2 SBM-1 Involvement in activities related to <i>fossil fuel</i> activities	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013 read in conjunction with Article 435 of that Regulation; Commission Implementing Regulation (EU) 2024/3172 ¹⁴ Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk; Template 1: Banking book- Indicators of potential climate Change	Delegated Regulation (EU) 2020/1816, Annex II	

¹⁰ Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosures Regulation) (OJ L 317, 9.12.2019, p. 1).

¹¹ Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation 'CRR').

¹² Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

¹³ Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') (OJ L 243, 9.7.2021, p. 1).

¹⁴ Commission Implementing Regulation (EU) 2024/3172, of 29 November 2024, laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of that Regulation, and repealing Commission Implementing Regulation (EU) 2021/637.

Disclosure Requirement and related datapoint in ESRS	SFDR ¹⁰ reference	Pillar 3 ¹¹ reference	Benchmark Regulation ¹² reference	EU Climate Law ¹³ reference
		transition risk: Credit quality of exposures by sector, emissions and residual maturity		
ESRS 2 SBM-1 Involvement in activities related to chemical production	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 ¹⁵ , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-1 Transition plan for climate change mitigation				Regulation (EU) 2021/1119, Article 2(1)
ESRS E1-6 GHG emission reduction targets	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2024/3172 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6	
ESRS E1-7 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1			

¹⁵ Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks (OJ L 406, 3.12.2020, p. 17).

Disclosure Requirement and related datapoint in ESRS	SFDR ¹⁰ reference	Pillar 3 ¹¹ reference	Benchmark Regulation ¹² reference	EU Climate Law ¹³ reference
ESRS E1-7 Energy consumption and mix	Indicator number 5 Table #1 of Annex 1			
ESRS E1-8 Gross Scope 1, 2, 3 GHG emissions	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2024/3172 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)	
ESRS E1-9 GHG removals and carbon credits				Regulation (EU) 2021/1119, Article 2(1)
ESRS E1-11 Exposure of the benchmark portfolio to climate-related physical risks			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-11 Location of significant assets at material physical risk		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2024/3172; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.		
ESRS E1-11 Breakdown of the carrying value of its real estate assets by energy-efficiency classes		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2024/3172; Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral		

Disclosure Requirement and related datapoint in ESRS	SFDR ¹⁰ reference	Pillar 3 ¹¹ reference	Benchmark Regulation ¹² reference	EU Climate Law ¹³ reference
ESRS E1-11 Degree of exposure of the portfolio to climate-related opportunities			Delegated Regulation (EU) 2020/1818, Annex II	
ESRS E2-4 Amount of material pollutants emitted to air, water and soil	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1			
ESRS E3-1 Water-related policies	Indicator number 7 Table #2 of Annex 1			
ESRS E3-1 Policy covering areas with- water stress	Indicator number 8 Table 2 of Annex 1			
ESRS E3-4 Total water recycled and reused	Indicator number 6.2 Table #2 of Annex 1			
ESRS E4-5 Activities negatively affecting biodiversity-sensitive areas	Indicator number 7 Table #1 of Annex 1			
ESRS E4-2 Policy covering sites in or near biodiversity-sensitive areas	Indicator number 14.2 Table #2 of Annex 1			
ESRS E5-5 Hazardous waste and radioactive waste	Indicator number 9 Table #1 of Annex 1			
ESRS 2 IRO-2	Indicator number 13			

Disclosure Requirement and related datapoint in ESRS	SFDR ¹⁰ reference	Pillar 3 ¹¹ reference	Benchmark Regulation ¹² reference	EU Climate Law ¹³ reference
Risk of incidents of forced labour	Table #3 of Annex I			
ESRS 2 IRO-2 Risk of incidents of child labour	Indicator number 12 Table #3 of Annex I			
ESRS 2 GDR-P Human rights policy commitments	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-1 Processes and measures for preventing trafficking in human beings	Indicator number 11 Table #3 of Annex I			
ESRS S1-1 Occupational risk prevention policy or management system	Indicator number 1 Table #3 of Annex I			
ESRS S1-2 Grievance mechanism , including employee -related matters	Indicator number 5 Table #3 of Annex I and Indicator number 11 Table #1 of Annex I			
ESRS S1-13 Rate of work-related accidents	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-13 Number of days lost to injuries, accidents, illness	Indicator number 3 Table #3 of Annex I			
ESRS S1-15 Unadjusted gender pay gap	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-15	Indicator number 8 Table #3 of Annex I			

Disclosure Requirement and related datapoint in ESRS	SFDR ¹⁰ reference	Pillar 3 ¹¹ reference	Benchmark Regulation ¹² reference	EU Climate Law ¹³ reference
Annual total remuneration ratio				
ESRS S1-16 Incidents of discrimination	Indicator number 7 Table #3 of Annex I			
ESRS S1-16 Human rights incidents	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S2-1 Processes and measures for preventing trafficking in human beings	Indicator number 11 Table #3 of Annex I			
ESRS S2-1 Code of conduct	Indicator number 4 Table #3 of Annex 1			
ESRS S3-2 Grievance mechanism	Indicator number 11 Table #1 of Annex I			
ESRS S2-3 Human rights incidents	Indicator number 10 Table #1 of Annex I and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S3-3 Human rights incidents	Indicator number 10 Table #1 of Annex I and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S4-2 Grievance mechanism	Indicator number 11 Table #1 of Annex I			

Disclosure Requirement and related datapoint in ESRS	SFDR ¹⁰ reference	Pillar 3 ¹¹ reference	Benchmark Regulation ¹² reference	EU Climate Law ¹³ reference
ESRS S4-3 Human rights incidents	Indicator number 10 Table #1 of Annex I and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS G1-1 Policies consistent with United Nations Convention against Corruption	Indicator number 15 Table #3 of Annex 1			
ESRS G1-1 Protection of whistle-blowers	Indicator number 6 Table #3 of Annex 1			
ESRS G1-4 Convictions and Fines for violation of anti-corruption and anti-bribery laws	Indicator number 17 Table #3 of Annex 1			
ESRS G1-4 Actions to address breaches of Standards of anti-corruption and anti-bribery	Indicator number 16 Table #3 of Annex 1			

Table 2: Methodological specifications in AR corresponding to EU legislation

Application Requirement in [Draft] Amended ESRS	SFDR ¹⁶ reference	Pillar 3 ¹⁷ reference	Benchmark Regulation ¹⁸ reference	EU Climate Law ¹⁹ reference
ESRS 2 GOV-1 Board's gender diversity	Indicator number 13 of Table #1 of Annex 1			
ESRS E4-5 "Land degradation, desertification, soil sealing"	Indicator number 10 Table #2 of Annex 1			
ESRS E4-5 Natural species and protected areas	Indicator number 14.1 Table #2 of Annex 1			
ESRS E4-2 Sustainable land / agriculture practices or policies	Indicator number 11 Table #2 of Annex 1			
ESRS E4-2 Sustainable oceans / seas practices or policies	Indicator number 12 Table #2 of Annex 1			
ESRS E4-2 Policies to address deforestation	Indicator number 15 Table #2 of Annex 1			

¹⁶ Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosures Regulation) (OJ L 317, 9.12.2019, p. 1).

¹⁷ Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation 'CRR') (OJ L 176, 27.6.2013, p. 1).

¹⁸ Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

¹⁹ Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') (OJ L 243, 9.7.2021, p. 1).



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