



LOG OF AMENDMENTS

# ESRS G1

BUSINESS CONDUCT



DECEMBER 2025

 EFRAG

# Log of Amendments by Standard –ESRS G1 *Business Conduct*

## Annex to the Basis for Conclusions accompanying the draft amended ESRS – Illustration of the Amendments

**Disclaimer:** The Log of Amendments by Standard accompanies but is not part of the draft amended ESRS. It complements and should be read in conjunction with 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 the Basis for Conclusions where a summarised description of the main changes to individual Standards can be found.**
2. This document illustrates the amendments at paragraph level in draft amended ESRS G1 *Business Conduct*.
3. The starting point is the text of the ESRS G1 as per the Delegated Act 2023, 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 a summary of changes made to the DR using the following terminology: Amended, Unchanged, Merged, New or Deleted.
6. The last column also includes 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>	
	<p>1. The <b><i>sustainability statement</i></b> shall include information in relation to ESRS G1 <i>Business Conduct</i> if this <b><i>topic</i></b> relates to material <b><i>impacts, risks</i></b> and <b><i>opportunities</i></b> to cover the reporting areas listed in paragraph 5 of ESRS 1 <i>General Requirements</i>. If not all the sub-topics prescribed by this standard are to be reported following the <b><i>materiality assessment</i></b>, paragraph 30 of ESRS 1 <i>General Requirements</i> applies.</p>	<p><b>[NEW]</b></p> <p>The entire section of the objective has been streamlined.</p> <p>This first paragraph emphasises the general requirement to disclose material information about a topic when it relates to material impacts, risks and opportunities ('IROs') and creates a reference to the reporting areas in ESRS 1 paragraph 5, to ensure completeness of the reported information across reporting areas.</p>
<p>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</p>	<p>2. The objective of this Standard is to <del>set out</del> <u>specify</u> Disclosure Requirements (DRs) <u>providing information in relation to the reporting areas referred above that implement and complement the cross-cutting provisions of ESRS 1 <i>General Requirements</i> and ESRS 2 <i>General Disclosures</i>.</u> <del>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</del></p>	<p><b>[AMENDED]</b></p> <p>Specification introduced across topical standards to highlight interaction with Amended ESRS 1 <i>General Requirements</i> and ESRS 2 <i>General Disclosures</i>. This is particularly important as a result of the elimination of financial effects from topical standards. Information about a material topic is not limited to the disclosures in topical standards, as topical information is also required in several DRs of ESRS 2 (e.g. SBM 3, IRO 1 and IRO 2).</p>
	<p>3. In this Standard, each DR is introduced by a disclosure objective, except for <b><i>policies, actions</i></b> and <b><i>targets</i></b>, for which</p>	<p><b>[NEW]</b></p>

	the provisions in ESRS 2 GDR-P, GDR-A and GDR-T provide the necessary framing for the relevant disclosures.	Specification introduced across topical standards to highlight interaction with Amended ESRS 2 <i>General Disclosures</i> .
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 <u>sets out DRs related to</u> <del>focusses on the following matters, collectively referred to in this Standard as ‘business conduct or business conduct matters’-s</del> : <u>particularly with respect to the following sub-topics</u> : a) <del>business ethics and</del> <b>corporate culture</b> , including anti- <b>corruption</b> and anti- <b>bribery</b> , the protection of whistleblowers and animal welfare;	[AMENDED] Editorial.
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 <b>suppliers</b> , including payment practices, especially <del>with regard to</del> late payment to small and medium sized undertakings ( <b>SMEs</b> ); <u>an</u>	[AMENDED] Editorial.
c) activities and commitments of the undertaking related to exerting its political influence, including its lobbying activities	c) <del>activities and commitments of the undertaking related to exerting its political influence, including its</del> <b>lobbying activities</b> .	[AMENDED] Editorial.
<b>Interaction with other ESRS</b>	<b>Interaction with other ESRS</b>	<b>Comment/Rationale</b>
<b>ESRS Set 1 as per Delegated Act 2023</b>	[Draft] [AMENDED] <b>G1 Business conduct</b>	
3.The content of this Standard on general disclosures as well as impact, risk and opportunity management and metrics and targets shall be read in conjunction respectively with ESRS 1 <i>General principles</i> and ESRS 2 <i>General requirements</i>	<del>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></del>	[DELETED] Superseded by the first 3 paragraphs.
<b>Disclosure Requirements</b>		
<b>ESRS 2 General disclosures</b>	<del><b>ESRS 2 General disclosures</b></del>	<b>Comment/Rationale</b>
<b>ESRS Set 1 as per Delegated Act 2023</b>	[Draft] Amended <b>G1 Business conduct</b>	
4.The requirements of this section should be read in conjunction with and reported alongside the disclosures required by ESRS 2 on Governance (GOV), Strategy (SBM) and Management of impacts, risks and opportunities (IRO).	<del>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).</del>	[DELETED] Same as above.
<b>Governance</b>		

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 aspect	<del>5. When disclosing information about the role of the administrative, management and supervisory bodies, the undertaking shall cover the following aspect</del>	<b>[DELETED]</b> Partially covered in Amended ESRS 2 GOV-1.
a) the role of the administrative, management and supervisory bodies related to business conduct; and	<del>a) the role of the administrative, management and supervisory bodies related to business conduct; and</del>	<b>[DELETED]</b> Same as above.
b) the expertise of the administrative, management and supervisory bodies on business conduct matters.	<del>b) the expertise of the administrative, management and supervisory bodies on business conduct matters.</del>	<b>[DELETED]</b> Same as above.
<b>Impact, risk and opportunity management</b>		
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.	<del>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.</del>	<b>[DELETED]</b> Partially covered in Amended ESRS 2.
Disclosure Requirement G1-1– Business conduct policies and corporate culture	Disclosure Requirement G1-1– <u>Policies related to business conduct policies and corporate culture</u>	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.	1. The undertaking shall disclose its <del>policies with respect to business conduct matters and how it fosters its corporate culture.</del> <u>policies in accordance with the provisions of ESRS 2 GDR-P.</u>	<b>[NEW]</b> To remediate to a misalignment of the architecture of ESRS G1 compared to the other topics. Introduced Policies, Actions, Targets (hereinafter: PAT) architecture and reflecting the elimination of PAT content in topical standards.  Amended ERSS G1 AR 1 contains related guidance for Amended ESRS G1 para. 5.

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.	<del>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.</del>	<b>[DELETED]</b> Objective deleted for PAT requirements in topical standards, as the content of GDR in Amended 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.	<del>9. The disclosures required under paragraph 7 shall include how the undertaking establishes, develops, promotes and evaluates its corporate culture.</del>	<b>[DELETED]</b> For simplification purposes and reduction of mandatory datapoints. Partially covered by the provisions in Amended 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:	<del>10. The disclosures in paragraph 7 shall cover the following aspects related to the undertaking's policies on business conduct matters:</del>	<b>[DELETED]</b> For simplification purposes and reduction of datapoints. The provisions in Amended 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;	<del>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;</del>	<b>[DELETED]</b> Same as above.
b) where the undertaking has no policies on anti-corruption or anti-bribery consistent with the United Nations Convention against Corruption <sup>1</sup> , it shall state this and whether it has plans to implement them and the timetable for implementation;	<u>6. In addition to the information required by ESRS 2 GDR-P, the undertaking shall disclose:</u> <del>b) (a) where the undertaking whether or not it has no policies on anti-corruption or and anti-bribery policies consistent with the United Nations Convention against Corruption<sup>1</sup>; it shall state this and whether it has plans to implement them and the timetable for implementation;</del>	<b>[AMENDED]</b> Editorial: 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	<del>(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</del>	<b>[DELETED]</b> For simplification purposes and reduction of datapoints. The provisions in Amended ESRS 2 GDR-PAT apply to material topics and/or subtopics.

ii.measures to protect against retaliation its own workers who are whistleblowers in accordance with the applicable law transposing Directive (EU) 2019/1937 of the European Parliament and of the Council <sup>2</sup> ;	<del>ii. — Measures to protect against retaliation its own workers who are whistleblowers in accordance with the applicable law transposing Directive (EU) 2019/1937 of the European Parliament and of the Council<sup>2</sup>;</del>	
(d) where the undertaking has no policies on the protection of whistle-blowers <sup>4</sup> , it shall state this and whether it has plans to implement them and the timetable for implementation	<del>(d) (b) where the undertaking whether or not it has no policies on the protection of whistle-blowers<sup>2</sup>; and it shall state this and whether it has plans to implement them and the timetable for implementation</del>	<b>[AMENDED]</b> Editorial: SFDR indicator #6 in Table III of Annex I of Commission Delegated Regulation (EU) 2022/1288.  Amended ESRS G1 AR 2 contains related guidance for Amended ESRS G1 para. 6 (b).  Simplified: across all ESRS, “shall” and “may” datapoints to disclose plans and timetable for implementation of PAT have been deleted.
(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;	<del>(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;</del>	<b>[DELETED]</b> For simplification purposes and datapoint reduction. The provisions in Amended ESRS 2 GDR-PAT apply to material topic and/or subtopic.
(f) where applicable, whether the undertaking has in place policies with respect to animal welfare;	<del>(f) where applicable, whether the undertaking has in place policies with respect to animal welfare;</del>	<b>[DELETED]</b> Same as above.
(g) the undertaking’s policy for training within the organisation on business conduct, including target audience, frequency and depth of coverage; and	<del>(g) the undertaking’s policy for training within the organisation on business conduct, including target audience, frequency and depth of coverage; and</del> -	<b>[AMENDED AND MOVED]</b> DP simplified to focus on two subtopics of business conduct: supplier relations and the prevention and detection of corruption and bribery. Incorporated in Amended ESRS G1 para. 8 (a) ii and 8 (b) i
(h) the functions within the undertaking that are most at risk in respect of corruption and bribery.	<del>(h) (c) the functions or roles within the undertaking that are most at risk in respect of</del> <b>corruption and or bribery.</b>	<b>[AMENDED]</b>

		The wording was revised to promote more focused disclosure, by clarifying that not all roles of a given function may be at risk. Amended ESRS G1 AR 3 contains related guidance for Amended ESRS G1 para. 6(c).
11.Undertakings that are subject to legal requirements under national law transposing Directive (EU) 2019/1937, or to equivalent legal requirements with regard to the protection of whistle-blowers, may comply with the disclosure specified in paragraph 10 (d) by stating that they are subject to those legal requirements.	<del>11. Undertakings that are subject to legal requirements under national law transposing Directive (EU) 2019/1937, or to equivalent legal requirements with regard to the protection of whistle-blowers, may comply with the disclosure specified in paragraph 10 (d) by stating that they are subject to those legal requirements.</del>	<b>[MOVED]</b> Moved to Amended ESRS G1 AR 2. This qualifies topical content but is not a separate datapoint.
<b>Disclosure Requirement G1-2 – Management of relationships with suppliers</b>	<b>Disclosure Requirement G1-2 – <del>Management of relationships with suppliers</del> <i>Actions related to business conduct</i></b>	<b>Comment/Rationale</b>
<b>ESRS Set 1 as per Delegated Act 2023</b>	<b>[Draft] Amended G1 <i>Business conduct</i></b>	
	7. The undertaking shall disclose its <b><i>actions</i></b> related to <u>business conduct</u> in accordance with the provisions of ESRS 2 GDR-A.	<b>[NEW]</b> 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.	8. In addition to the information required by ESRS 2 GDR-A, <u>the undertaking shall disclose information about the following actions:</u>  <del>(a) The undertaking shall provide information about the management of its relationships with its suppliers, including: and its impacts on its supply chain. and</del>	<b>[AMENDED]</b> This datapoint has been reformulated to adjust to PAT architecture.  Amended ESRS G1 AR 4 contains related guidance for Amended ESRS G1 para. 8 (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	<del>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</del>	<b>[DELETED]</b> 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.	<del>14.The undertaking shall provide a description of its policy to prevent late payments, specifically to SMEs.</del>	<b>[DELETED]</b> The provisions in Amended ESRS 2 GDR-PAT apply to material topic and/or subtopic.
15.The disclosure required under paragraph 12 shall include the following information:	<del>15.The disclosure required under paragraph 12 shall include the following information:</del>	<b>[DELETED]</b> For simplification purposes.



	<u>i. if the undertaking takes into account environmental, social, and governance (ESG) performance factors in the selection of its suppliers, how this is done;</u>	<b>[AMENDED AND MOVED]</b> Incorporated from 15(b) ESRS G1 as enacted in 2023. Amended: elimination of the use of “whether and how” to avoid negative statements across Standards.
	<u>ii. ESG <b>training</b> provided to the procurement team, if any; and</u>	<b>[AMENDED AND MOVED]</b> Incorporated from 10 (g) ESRS G1 as enacted in 2023.
(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	<del>(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</del> <u>iii. engagement with suppliers for the improvement of their ESG performance; and</u>	<b>[AMENDED]</b> Simplified to focus only on one area of the approach to supplier relationships, namely engagement, which was identified as most meaningful.
(b)whether and how it takes into account social and environmental criteria for the selection of its suppliers.	<del>(b)whether and how it takes into account social and criteria for the selection of its suppliers.</del>	<b>[AMENDED AND MOVED]</b> Editorial and incorporated in Amended ESRS G1 para. 8 (a).
<b>Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery</b>	<del><b>Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery</b></del>	<b>Comment/Rationale</b>
<b>ESRS Set 1 as per Delegated Act 2023</b>	<b>[Draft] Amended G1 <i>Business conduct</i></b>	
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	<del>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.</del>	<b>[DELETED]</b> To avoid repetition in the requirements. Consolidated into Amended ESRS G1 para.8 (b)
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 .	<del>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 .</del>	<b>[DELETED]</b> Objective deleted in alignment with EFRAG's approach to not include objectives for PATs under topical standards.

18.The disclosure required under paragraph 16 shall include the following information:	<del>18.The disclosure required under paragraph 16 shall include the following information:-</del>	<b>[DELETED]</b> For simplification purposes and datapoint reduction. The provisions in Amended 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	<del>(a) (b) description of the undertaking's procedures in place to prevent, detect, <u>investigate</u> and <u>address</u> respond to allegations or incidents <u>related to</u> of <b>corruption</b> and <b>or bribery</b>, <u>including</u>:</del>	<b>[AMENDED]</b> Editorial.
(b)whether the investigators or investigating committee are separate from the chain of management involved in the matter; and	<del>(b)whether the investigators or investigating committee are separate from the chain of management involved in the matter; and</del>	<b>[DELETED]</b> For simplification purposes and datapoint reduction. The provisions in Amended 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	<del>(c)the process, if any, to report outcomes to the administrative, management and supervisory bodies</del>	<b>[DELETED]</b> Same as above.
19.Where the undertaking has no such procedures in place, it shall disclose this fact and, where applicable, its plans to adopt them.	<del>19.Where the undertaking has no such procedures in place, it shall disclose this fact and, where applicable, its plans to adopt them.</del>	<b>[DELETED]</b> Simplified: across all ESRS, “shall” and “may” datapoints to disclose plans and timetable for implementation of PAT have been deleted.
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.	<del>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.</del>	<b>[DELETED]</b> For simplification purposes and datapoint reduction. The provisions in Amended ESRS 2 GDR-PAT apply to material topic and/or subtopic.
21.The disclosure required by paragraph 16 shall include information about the following with respect to training	<del>21.The disclosure required by paragraph 16 shall include information about the following with respect to training</del>	<b>[DELETED]</b> For simplification purposes and datapoint reduction. The provisions in Amended ESRS 2 GDR-PAT apply to material topic and/or subtopic.
(a)the nature, scope and depth of anti- corruption and anti- bribery training programmes offered or required by the undertaking;	<del>(a)the nature, scope and depth of anti- corruption and anti- bribery training programmes offered or required by the undertaking</del>	<b>[DELETED]</b> For simplification purposes, the scope of reporting on training on anti-corruption and

		anti-bribery is limited to functions or roles most at risk.
(b) the percentage of functions-at-risk covered by training programmes; and	i. anti-corruption and anti-bribery <b>training</b> given to functions or roles most at risk within the undertaking, <del>the percentage of functions at risk covered by training programmes; and</del>	<b>[AMENDED]</b> Changes in the formulation of the DP due to the deletion of 21 (a) of ESRS G1 as enacted in 2023. Also, the wording 'functions-at-risk' was revised to promote more focused disclosure, by clarifying that not all roles of a given function may be at risk.
(c) the extent to which training is given to members of the administrative, management and supervisory bodies.	<del>(8(b) i continued)</del> including members of the <b>administrative, management and supervisory bodies</b> ; and	<b>[AMENDED]</b> Incorporated with 21(b) of ESRS G1 as enacted in 2023, since administrative, management and supervisory bodies are considered functions or roles most at risk within the undertaking.
	ii. (24(b)) any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery.	<b>[MOVED]</b> Moved from 24(b) of ESRS G1 as enacted in 2023: SFDR indicator #16 in Table III of Annex I of Commission Delegated Regulation (EU) 2022/1288.
<b>Metrics and targets</b>		
	<b>Disclosure Requirement G1-3 – Targets related to business conduct</b>	<b>Comment/Rationale</b>
<b>ESRS Set 1 as per Delegated Act 2023</b>	<b>[Draft] Amended G1 Business conduct</b>	
	9. The undertaking shall disclose its business conduct <b>targets</b> in accordance with the provisions of ESRS 2 GDR-T.	<b>[NEW]</b> Introduced PAT architecture to be consistent across topical standards.
<b>Disclosure Requirement G1-4 – Incidents of corruption or bribery</b>	<b>Disclosure Requirement G1-4 – <u>Metrics related to corruption or bribery</u></b>	<b>Comment/Rationale</b>
<b>ESRS Set 1 as per Delegated Act 2023</b>	<b>[Draft] Amended G1 Business conduct</b>	
22.The undertaking shall provide information on incidents of corruption or bribery during the reporting period.	<del>22.The undertaking shall provide information on incidents of corruption or bribery during the reporting period.</del>	<b>[DELETED]</b> 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.	<del>23.-10.</del> The objective of this <del>Disclosure Requirement DR</del> is to <del>provide enable</del> transparency on the <del>incidents</del> <u>convictions and sanctions, including fines</u> , relating <del>ed</del> to corruption or bribery during the reporting period and the related outcomes.	<b>[AMENDED]</b> Amended to reflect the revised requirements.
24.The undertaking shall disclose	<del>24. The undertaking shall disclose:-</del>	<b>[AMENDED]</b> Editorial.
a)the number of convictions and the amount of fines for violation of anti-corruption and anti- bribery laws <sup>(130)</sup> ; and	<del>(a) 11. The undertaking shall disclose the number of convictions and <u>sanctions, including the total</u> amount of fines for violation of anti-<b>corruption</b> and anti-<b>bribery</b> laws <u>during the reporting period.</u> <sup>(130)</sup>; and</del>	<b>[AMENDED]</b> The scope of convictions and fines was expanded to include sanctions, thereby covering final decisions from administrative or regulatory authorities. This aims to (partially) compensate for the deletion of confirmed incidents and address the reality that most cases of corruption or bribery are resolved through non-trial outcomes.  Amended ESRS G1 AR 5 and 6 contains related guidance for Amended ESRS G1 para. 11.
(b)any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery <sup>(131)</sup>	<del>(b) any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery <sup>(131)</sup>.</del>	<b>[MOVED]</b> Moved up to Amended ESRS G1-2, para. 8(b) ii. No change in the status of the DP (SFDR indicator #16 in Table III of Annex I of Commission Delegated Regulation (EU) 2022/1288.)
25. The undertaking may disclose:	<del>25. The undertaking may disclose:</del>	<b>[DELETED]</b> Across all ESRS, all “may” datapoints have been deleted.
(a)the total number and nature of confirmed incidents of corruption or bribery	<del>(a)the total number and nature of confirmed incidents of corruption or bribery</del>	<b>[DELETED]</b> Same as above.

(b)the number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	<del>(b)the number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents</del>	<b>[DELETED]</b> Same as above.
(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	<del>(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</del>	<b>[DELETED]</b> Same as above.
(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	<del>(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</del>	<b>[DELETED]</b> Same as above.
26.The disclosures required shall include incidents involving actors in its value chain only where the undertaking or its employees are directly involved	<del>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</del>	<b>[DELETED]</b> Following the deletion of the DPs on confirmed incidents of corruption.
<b>Disclosure Requirement G1-5 – Political influence and lobbying activities</b>	<b>Disclosure Requirement G1-5 – <u>Metrics related to political influence, including lobbying activities</u></b>	<b>Comment/Rationale</b>
<b>ESRS Set 1 as per Delegated Act 2023</b>	<b>[Draft] Amended G1 <i>Business conduct</i></b>	
27.The undertaking shall provide information on the activities and commitments related to exerting its political influence, including its lobbying activities related to its material impacts, risks and opportunities	<del>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</del>	<b>[DELETED]</b> 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	<del>12.The objective of this Disclosure Requirement DR is to enable provide an understanding transparency on of the undertaking’s <b>activities</b> and commitments related to exerting its political influence through with political contributions, including the types and purpose of <b>lobbying activities</b>.</del>	<b>[AMENDED]</b> Editorial.
29.The disclosure required by paragraph 27 shall include:	<del>29.The disclosure required by paragraph 27 shall include:</del>	<b>[DELETED]</b> For simplification purposes.

(a)if applicable, the representative(s) responsible in the administrative, management and supervisory bodies for the oversight of these activities	<del>(a)if applicable, the representative(s) responsible in the administrative, management and supervisory bodies for the oversight of these activities</del>	<b>[DELETED]</b> Partially covered in Amended ESRS 2 GOV-1.
(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	<del>(b) 13. The undertaking shall disclose, 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 during the reporting period, aggregated by country or geographical area where relevant, as well as type of recipient/beneficiary. and</del>	<b>[AMENDED]</b> Editorial. Amended ESRS G1 AR 7 contains related guidance for Amended ESRS G1 para. 13.
ii.where appropriate, how the monetary value of in-kind contributions is estimated.	<del>ii.where appropriate, how the monetary value of in-kind contributions is estimated.</del>	<b>[DELETED]</b> Covered in Amended 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	<del>14 . The undertaking shall disclose (c) the main topics covered by these its lobbying activities and the undertakings its the main positions taken on these in brief. This shall including explanations on of how its lobbying activities this interactwith its material impacts, risks and opportunities. identified in its materiality assessment per ESRS 2; and</del>	<b>[AMENDED]</b> Editorial. Amended ESRS G1 AR 8 contains related guidance for Amended ESRS G1 para. 14.
(d)if the undertaking is registered in the EU Transparency Register or in an equivalent transparency register in a Member State, the name of any such register and its identification number in the register.	<del>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.</del>	<b>[DELETED]</b> 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	<del>30. 15. The disclosure undertaking shall also include 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 2-two preceding years. such appointment in the current reporting period</del>	<b>[AMENDED]</b> Editorial. Amended ESRS G1 AR 9 contains related guidance for Amended ESRS G1 para. 15.

Disclosure Requirement G1-6 – Payment practices	Disclosure Requirement G1-6 – <i>Metrics related to payment practices</i>	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 <i>Business conduct</i>	
31. The undertaking shall provide information on its payment practices, especially with respect to late payments to small and medium enterprises (SMEs).	<del>31. The undertaking shall provide information on its payment practices, especially with respect to late payments to small and medium enterprises (SMEs).</del>	<b>[DELETED]</b> 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.	<del>32</del> 16. The objective of this <del>Disclosure Requirement</del> DR is to enable <del>provide insights</del> <u>an understanding of the contractual</u> <b>standard payment terms</b> and on the undertaking's performance with regard to payment, especially <u>late payment to as to how these impact SMEs. and specifically with respect to late payments to SMEs.</u>	<b>[AMENDED]</b> Editorial.
33. The disclosure under paragraph 31 shall include:	<del>33</del> 17. The undertaking <del>The disclosure under paragraph 31 shall include:</del> <u>disclose:</u>	<b>[AMENDED]</b> Editorial.
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;	<del>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;</del>	<b>[DELETED]</b> 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	<del>b. (a) a description of the undertaking's standard payment terms in number of days by main category of <b>suppliers</b>, specifying those that apply to SMEs, only if they are different from those generally applied; and the percentage of its payments aligned with these standard terms;</del> (b) the percentage of its payments aligned with these standard terms; and	<b>[AMENDED]</b> Specification added on when to report payment terms for SMEs, since information gathering pointed to differences in interpretation. Amended ESRS G1 AR 10 contains related guidance for Amended ESRS G1 para. 17 (b).
c. the number of legal proceedings currently outstanding for late payments; and	(c) <del>the</del> number of legal proceedings currently outstanding for late payments.	<b>[UNCHANGED]</b>
d. complementary information necessary to provide sufficient context. If the undertaking has used representative sampling to	<del>d. complementary information necessary to provide sufficient context; If the undertaking has used representative sampling</del>	<b>[DELETED]</b> Now addressed as a cross-cutting element in Amended ESRS 2.

calculate the information required under point (a), it shall state that fact and briefly describe the methodology used.	<del>to calculate the information required under point (a), it shall state that fact and briefly describe the methodology used.</del>	
<b>Application Requirements</b>		
<i>Impact, risk and opportunity management</i>		
<b>Disclosure Requirement G1-1 – Business conduct policies and corporate culture</b>	<b>Disclosure Requirement G1-1– <u>Policies related to business conduct</u> <del>policies and corporate culture</del></b>	<b>Comment/Rationale</b>
<b>ESRS Set 1 as per Delegated Act 2023</b>	<b>[Draft] Amended G1 <i>Business conduct</i></b>	
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 (d) specific incentives or tools for its own workers to foster and encourage its corporate culture.	<del>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  (d) specific incentives or tools for its own workers to foster and encourage its corporate culture.</del> -	<b>[DELETED]</b> For simplification purposes and datapoint reduction.
	<u>AR 1 for para. 5 For purposes of this Standard, the undertaking shall apply the ESRS definition of <b>corruption</b> and <b>bribery</b> (see ESRS Glossary), which is generic, to 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.</u>	<b>[NEW]</b> Reference to definition added to ensure consistency in reporting. Information gathering from stakeholders indicated a lack of clarity regarding which definition to use.
	<u>AR 2 for para. 6(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 whistleblowers, can comply with the</u>	<b>[MOVED]</b> Moved from para. 11 of ESRS G1 as enacted in 2023.



	disclosure specified in paragraph 6 (b) by stating that they are subject to those legal requirements.	
<b>Disclosure Requirement G1-2 – Management of relationships with suppliers</b>	<b><del>Disclosure Requirement G1-2 – Management of relationships with suppliers</del> <i>Actions related to business conduct</i></b>	<b>Comment/Rationale</b>
<b>ESRS Set 1 as per Delegated Act 2023</b>	<b>[Draft] Amended G1 Business conduct</b>	
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;	<del>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;</del>	<b>[DELETED]</b> For simplification purposes.
(b) training of the undertaking's procurement/supply chain workforce on engagement and dialogue with suppliers as well as incentives of its procurement workforce including whether such incentives refer to price, quality or sustainability factors;	<del>(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;</del>	<b>[DELETED]</b> Same as above.
(c) the screening and evaluation of social and environmental performance of suppliers;	<del>(c) the screening and evaluation of social and environmental performance of suppliers;</del>	<b>[DELETED]</b> Same as above.
(d) the inclusion of locally based suppliers in its supply chain and/or suppliers with certification;	<del>(d) the inclusion of locally based suppliers in its supply chain and/or suppliers with certification;</del>	<b>[DELETED]</b> Same as above.
(e) how the undertaking's practices deal with vulnerable suppliers	<del>(e) how the undertaking's practices deal with vulnerable suppliers</del>	<b>[DELETED]</b> Same as above.
(f) the undertaking's targets and actions with regard to communication and management of relationships with suppliers; and	<del>(f) the undertaking's targets and actions with regard to communication and management of relationships with suppliers; and</del>	<b>[DELETED]</b> Same as above.
(g) how the outcomes of these practices are evaluated, including supplier visits, audits or surveys.	<del>(g) how the outcomes of these practices are evaluated, including supplier visits, audits or surveys.</del>	<b>[DELETED]</b> Same as above.
AR3. Vulnerable suppliers' includes suppliers that are exposed to significant economic, environmental and/or social risks.	<del>AR3. Vulnerable suppliers' includes suppliers that are exposed to significant economic, environmental and/or social risks.</del>	<b>[DELETED]</b> Same as above.

Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery	<del>Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery</del>	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 <i>Business conduct</i>	
AR4. ‘Functions-at-risk’ means those functions deemed to be at risk of corruption and bribery as a result of its tasks and responsibilities.	<del>AR4. AR 3 for para. 6(c). When disclosing information under paragraph 6(c), ‘functions or roles most at risk’ means those functions deemed to be at risk of <b>corruption and/or bribery</b> as a result of its tasks and responsibilities within the undertaking, such as those operating in high-risk countries or interacting with public authorities and governments.</del>	<b>[AMENDED]</b> Example included for functions and/or roles at risk. Information gathering from stakeholders pointed to a need for more guidance on this term.
	<del>AR 4 for para. 8(a) In presenting the information in accordance with paragraph 8(a), the undertaking may consider cross-referring to the information about the existence of a <b>supplier code of conduct</b> in accordance with ESRS S2 Workers in the Value Chain, paragraph 11.</del>	<b>[NEW]</b> Clarification added, as information gathering from stakeholders pointed to a possible overlap in information related to the supply code of conduct in S2 and the disclosures in G1-2 for supplier relations.
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	<del>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</del> -	<b>[DELETED]</b> For simplification purposes.
AR6. The undertaking’s policies on corruption and bribery may be relevant to specific groups of people, either because they are expected to implement them (for example, the undertaking’s employees , contractors and suppliers ), or because they have a direct interest in their implementation (for example, value chain workers, investors). The undertaking may disclose the communication tools and channels (e.g., flyers, Newsletters, dedicated websites, social media, face to face interactions, unions and/or workers representatives) to communicate policies to such groups. This may also include the identification and/or removal of potential barriers to dissemination, such as through translation into relevant languages or the use of graphic depictions.	<del>AR6. The undertaking’s policies on corruption and bribery may be relevant to specific groups of people, either because they are expected to implement them (for example, the undertaking’s employees , contractors and suppliers ), or because they have a direct interest in their implementation (for example, value chain workers, investors). The undertaking may disclose the communication tools and channels (e.g., flyers, Newsletters, dedicated websites, social media, face to face interactions, unions and/or workers representatives) to communicate policies to such groups. This may also include the identification and/or removal of potential barriers to dissemination, such as through translation into relevant languages or the use of graphic depictions.</del>	<b>[DELETED]</b> Same as above.

AR7. The undertaking may disclose an analysis of its training activities by, for example, region of training or category of own workforce where its programmes differ significantly based on such factors and such information would be useful to users.	<del>AR 7. The undertaking may disclose an analysis of its training activities by, for example, region of training or category of own workforce where its programmes differ significantly based on such factors and such information would be useful to users.</del>	<b>[DELETED]</b> Same as above.
AR8. The undertaking may present the required information about training using the following table: Anti-corruption and bribery training illustrative example: xxx insert table xxx	<del>AR8. The undertaking may present the required information about training using the following table: Anti-corruption and bribery training illustrative example : xxx insert tablexxx</del>	<b>[DELETED]</b> Same as above.
<b>Metrics and targets</b>		
<b>Disclosure Requirement G1-4 – Incidents of corruption or bribery</b>	<b>Disclosure Requirement G1-4 – <u>Metrics related to incidents of corruption or bribery</u></b>	<b>Comment/Rationale</b>
<b>ESRS Set 1 as per Delegated Act 2023</b>	<b>[Draft] Amended G1 <i>Business conduct</i></b>	
	<p>AR 5 for para. 11 <u>Convictions for the violation of anti-<b>corruption</b> and anti-<b>bribery</b> laws refer to final decisions issued by a criminal court against an individual or undertaking in respect of a criminal offence related to corruption or bribery, where these court decisions are entered in the criminal record of the convicting European Union Member State or, if outside the EU, in the equivalent register or record of the jurisdiction concerned.</u></p> <p><u>Sanctions for the violation of anti-corruption and anti-bribery laws refer to final decisions issued by administrative or regulatory authorities against an individual or undertaking in respect of corruption or bribery.</u></p>	<p><b>[NEW]</b> Guidance added to ensure consistency in reporting. Information gathering from stakeholders pointed to a need for more guidance on this term.</p>
	<p>AR 6 for para. 11 <u>Fines issued for the violation of anti-corruption and anti-bribery laws refer to mandatory monetary penalties resulting from violations of anti-<b>corruption</b> and anti-<b>bribery</b> laws imposed by a court, administrative or regulatory 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><b>[NEW]</b> Guidance added to ensure consistency in reporting. Information gathering from stakeholders pointed to a need for more guidance on this term.</p>

Disclosure Requirement G1-5 – Political influence and lobbying activities	Disclosure Requirement G1-5 – <i>Metrics related to political influence, including lobbying activities</i>	Comment/Rationale
ESRS Set 1 as per Delegated Act 2023	[Draft] Amended G1 <i>Business conduct</i>	
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.	<del>AR 9.</del> <u>7 for para. 13</u> 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.	<del>AR 10</del> <u>8 for para. 14</u> 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.	<del>AR 11</del> <u>9 for para. 16</u> When determining ‘comparable position’ in this Standard, the undertaking shall <del>consider factor in the level of responsibility and scope of activities undertaken</del> <u>consider factor in the level of responsibility and scope of activities undertaken</u> <del>various factors, including level of responsibility and scope of activities undertaken.</del>	[UNCHANGED]
AR 12. The undertaking may provide the following information on its financial or in-kind contributions with regard to its lobbying expenses: <ul style="list-style-type: none"> <li>a. the total monetary amount of such internal and external expenses; and</li> <li>b. the total amount paid for membership to lobbying associations.</li> </ul>	<del>AR 12</del> The undertaking may provide the following information on its financial or in-kind contributions with regard to its lobbying expenses: <ul style="list-style-type: none"> <li><del>a. the total monetary amount of such internal and external expenses; and</del></li> <li><del>b. the total amount paid for membership to lobbying associations.</del></li> </ul>	[DELETED] For simplification purposes.

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	<del>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</del>	<b>[DELETED]</b> Same as above.
AR 14. In meeting the requirement in paragraph 29(c) the undertaking shall consider the alignment between its public statements on its material impacts, risks and opportunities and its lobbying activities.	<del>AR 14. In meeting the requirement in paragraph 29(c) the undertaking shall consider the alignment between its public statements on its material impacts, risks and opportunities and its lobbying activities.</del> –	<b>[DELETED]</b> Same as above.
AR 15. An example of what such disclosures could look like: Political engagement (including lobbying activities) illustrative example	<del>AR 15. An example of what such disclosures could look like: Political engagement (including lobbying activities) illustrative example</del>	<b>[DELETED]</b> Same as above.
<b>Disclosure Requirement G1-6 – Payment practices</b>	<b>Disclosure Requirement G1-6 – <u>Metrics related to payment practices</u></b>	<b>Comment/Rationale</b>
<b>ESRS Set 1 as per Delegated Act 2023</b>	<b>[Draft] Amended G1 <i>Business conduct</i></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).	<del>AR 16 In some cases, the undertaking’s standard contractual payment terms may differ significantly depending on country or type of supplier . In such cases, information about the standard terms per main categories of suppliers or country or geographical region could be examples of additional contextual information to explain the disclosures in paragraph 33(b).</del>	<b>[DELETED]</b> Same as above.
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 within 30 days after receipt of the invoice which are about 5% of its annual invoices. The remainder of its invoices are paid within 60 days of receipt except for those in country X which in accordance with the marketplace standards are paid within 90 days of receipt.	<del>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 within 30 days after receipt of the invoice which are about 5% of its annual invoices. The remainder of its invoices are paid within 60 days of receipt except for those in country X which in accordance with the marketplace standards are paid within 90 days of receipt.</del>	<b>[DELETED]</b> Same as above.

	AR 10 for para. 17(b) If late payment to SMEs is a material <u><b>topic</b></u> for the undertaking, paragraph 11 of ESRS 1 <i>General Requirements</i> applies; therefore, the undertaking shall provide an entity-specific metric, if material.	<b>[NEW]</b> Considering the absence of a standardised metric dedicated to payments to SMEs, this AR was added, emphasizing the provisions of Amended ESRS 1, that this topic should be addressed through an entity-specific metric.
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