

 EXPOSURE DRAFT

ESRS 2

GENERAL DISCLOSURES

 JULY 2025

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The questionnaire for submitting comments is available [here](#) in both online and PDF formats. Comments must be received by end of day CEST on 29 September 2025. All comments will be on the public record and posted on our website at www.efrag.org unless the respondent requests confidentiality.

About EFRAG

EFRAG's mission is to serve the European public interest in both financial and sustainability reporting by developing and promoting European views in the field of corporate reporting. EFRAG builds on and contributes to the progress in corporate reporting. In its sustainability reporting activities, EFRAG provides technical advice to the European Commission in the form of draft European Sustainability Reporting Standards ('ESRS') elaborated under a robust due process and supports the effective implementation of the ESRS. EFRAG seeks input from all stakeholders and obtains evidence about specific European circumstances throughout the standard setting process. Its legitimacy is built on excellence, transparency, governance, due process, public accountability and thought leadership. This enables EFRAG to speak convincingly, clearly, and consistently, and be recognised as the European voice in corporate reporting and a contributor to global progress in corporate reporting.



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Revised structure and drafting conventions

As compared to ESRS Set 1 (Delegated Regulation (EU) 2023/2772 adopted by the European Commission in July 2023), the structure of the Standards has been revised and streamlined.

- All the ‘shall disclose/shall include/shall report/shall describe/shall explain’ are presented in the main body of the Standard. They have been counted as separate datapoints.
- Below the text of each Disclosure Requirement (‘DR’) in topical standards (or chapter for ESRS 1), boxed content presents the streamlined corresponding mandatory methodological guidance, which is still named ‘Application Requirements’ (‘ARs’). This includes ‘shall consider’ as element of methodology for preparing the disclosure, and ‘may (present)’ for presentation options – which does not represent voluntary disclosure but brings flexibility on how to present the disclosure.
- All the ‘may’ disclosures have been either eliminated or redrafted as application requirements (which do not include separate datapoints but methodology content).
- A minority of the deleted datapoints is gathered in a document named ‘Non-Mandatory Illustrative Guidance’ (‘NMIG’) and has been redrafted to fit this classification. While the content of ‘shall disclose’ datapoints in the main body of the standard and of application requirements are drafted to become part of the delegated act, the legal status of the NMIG (either as appendices in the Delegated Act or as document to be issued by EFRAG independently of the Delegated Act) will be considered by the European Commission (‘EC’) in due course. EFRAG recommends NMIG not to be part of the Delegated Act.
- The ESRS use several terms to indicate similar concepts: matters, topic, sub-topic, sub-subtopic. In Amended ESRS ‘sub-subtopics’ have been eliminated. In addition, to simplify the content and eliminate one term (matter), the Standards only refer to topics and sub-topics. For this reason, in all the documents the term ‘matter’ has been replaced by ‘topic’ where ‘topic’ is meant to refer either to topic or sub-topic depending on the context of the relevant disclosure. When used in this way, the bold italic format is used (topic), as this is a defined term. When used to express one of the 10 topics in Appendix A of [Draft] Amended ESRS 1, a normal font is used.
- The paragraph numbering has been revised to reflect the draft amendments. Where applicable, the paragraph number of the 2023 Delegated Act is indicated in brackets—for example, ‘4 (5 amended)’ in [Draft] Amended ESRS 2.

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Objective

1. (1) This Standard ESRS 2 *General disclosures* sets out the **General Disclosure Requirements** ('GDRs') that apply across sustainability **topics** (i.e. cross-cutting). It covers the reporting areas defined in ESRS 1 *General requirements*, Chapter 1.1.
2. (new) This Standard refers to disclosing on **material impacts, risks** and **opportunities** and disclosing on the **topics** related to them. In accordance with ESRS 1, in preparing the information prescribed by each DR of this Standard, the undertaking shall adopt the level of disaggregation that provides the most relevant information, i.e. at impacts, risks and opportunities level, at group of them, or at **topic** level, reflecting their nature and how the undertaking manages them.

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 provide an understanding of the basis for preparation of the **sustainability statement**, including the disclosures required by ESRS 1 in specific circumstances, and information about the use of phasing-in options and reliefs.
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 is different from the one adopted in the consolidated financial statements, a description of and the reasons for these circumstances; 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 the general requirements of ESRS 1 have been applied for the preparation of its **sustainability statement** with an indication of either (i) that none of the provisions listed in ESRS 2, paragraph 5 apply, or (ii) which of the provisions listed in ESRS 2, paragraph 5 have been applied, leading to the disclosure of information required in the relevant paragraphs of ESRS 1:
 - (a) deviation from pre-defined time horizons (ESRS 1, paragraph 78);
 - (b) adjustments to comparative information (ESRS 1, paragraphs 83, 84 and 85);
 - (c) application of material judgement, and information subject to significant uncertainties (ESRS 1, paragraph 86);
 - (d) use of relief when the undertaking discloses **metrics** with a partial scope (ESRS 1, paragraph 91);
 - (e) update of disclosures for events after the end of the reporting period (ESRS 1, paragraph 94);
 - (f) changes in preparation or presentation of sustainability information (ESRS 1, paragraph 95);
 - (g) reporting errors in prior periods (ESRS 1, paragraphs 96 and 97);
 - (h) use of the option to omit **classified** and **sensitive information** or information about impending developments or matters in the course of negotiation (ESRS 1, paragraphs 99 and 101);
 - (i) presentation of additional information (ESRS 1, paragraphs 108 and 109);
 - (j) use of relief for metrics in the **value chain** (ESRS 1, paragraph 92); and
 - (k) use of relief for acquisitions and disposals (ESRS 1, paragraph 74).

Disclosure requirement BP-2 – Specific information if the undertaking uses phasing-in options

6. If an undertaking or group not exceeding on its balance sheet date the average number of 750 employees during the financial year decides to omit the information required by ESRS E4, ESRS S1, ESRS S2, ESRS S3 or ESRS S4 in accordance with Appendix C of ESRS 1, it shall nevertheless disclose whether the sustainability topics covered respectively by ESRS E4, ESRS S1, ESRS S2, ESRS S3 and ESRS S4 have been assessed to be material as a result of the undertaking's materiality assessment.

7. In addition, for each **topic** that relates to **material impacts, risks** and **opportunities**, the undertaking shall:
- (a) disclose the topic or sub-topic(s) in Appendix A of ESRS 1 that relate to the undertaking's material impacts, risks and opportunities, and briefly describe how the undertaking's **business model** and strategy interact with them. 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** adverse **impacts** related to the **topic** in question, and the result of such actions; and
 - (e) disclose **metrics** relevant to the **topic** in question.

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AR 1 for BP-1	(new) The undertaking may present the information stemming from BP-1 in the General information Section of its sustainability statement , or alongside the relevant disclosures / metrics to which the information pertains.
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Governance

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

8. (20 amended) The objective of this DR is to provide an understanding of the roles and responsibilities of the **administrative, management and supervisory bodies**, as well as the processes, controls and procedures, to monitor, manage and oversee **material impacts, risks** and **opportunities**, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related **topics**).
9. The undertaking shall disclose:
- (a) (21(d), (e) and (b)) with respect to specific aspects of the composition of its **administrative, management and supervisory bodies**, the percentage of **independent board members**¹, where it exists, the representation of **employees** and other workers, 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 oversee strategies and other measures designed to respond to **material impacts, risks and opportunities** (or groups of them / related topics);
 - (c) (22(a)(b), (former 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 oversight of material impacts, risks and opportunities (or groups of them / related topics), with an indication, if relevant, of those for which the administrative, management and supervisory bodies have not delegated the key decisions to another body;
 - (d) (22(d)) how the administrative, management and supervisory bodies oversee the setting of **targets** related to material impacts, risks and opportunities (or groups of them / related topics), and how they monitor progress towards them; and

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.

- (e) (26(b)) how the administrative, management and supervisory bodies take into account material impacts, risks and opportunities (or groups of them / related topics) when 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.

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AR 2 for para. 9(a)	(21(d)) The board's gender diversity shall be calculated as an average ratio of female to male board members ² .
AR 3 for para. 9(b)	Sustainability-related expertise refers to the one that the bodies either directly possess or can leverage (for example through access to experts, training or other educational initiatives)
AR 4 for para. 9(c)	(new) The description of the responsibilities shall consist in an overview of how each body's or individual's responsibilities for material impacts, risks and opportunities and related topics are reflected in the undertaking's terms of reference, board mandates and other related policies .

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

10. (28) The objective of this DR is to provide an understanding of whether incentive schemes that are linked to sustainability **topics** are offered to members of the **administrative, management and supervisory bodies**.
11. (29) Where they exist, the undertaking shall disclose the following information about the incentive schemes and remuneration **policies** linked to sustainability **topics** for members of the **administrative, management and supervisory bodies**:
- (a) a description of the key characteristics of the incentive schemes;
 - (b) (29(b)) when performance is assessed against specific sustainability-related **targets** and/or impacts, the targets or **metrics** used; and
 - (c) (29(d)) the proportion of variable remuneration dependent on sustainability-related targets and/or impacts' performance.

Disclosure requirement GOV-3 – Statement on due diligence

12. (31) The objective of this DR is to facilitate an understanding of the main aspects and steps of the due diligence process (see chapter 4, ESRS1) that the undertaking has applied with regard to sustainability **topics** reported in its **sustainability statement**.
13. (32) The undertaking shall explain where its application of the main aspects and steps of the due diligence process are reflected in its **sustainability statement**³.

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.

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').

APPLICATION REQUIREMENTS

AR 5 for para. 13	(AR 8) The undertaking may present the description required by paragraph 13 in the form of a table, cross-referencing the core elements of due diligence for impacts on people and the environment- to the relevant disclosures in its sustainability statement .
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Disclosure requirement GOV-4 – Risk management and internal controls over sustainability reporting

14. (35) The objective of this DR is to provide an understanding of the undertaking's **risk** management and internal control processes and systems in relation to sustainability reporting.

15. (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

AR 6 for para. 15	(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 risks associated to the reporting process.
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Strategy**Disclosure requirement SBM-1 – Strategy, business model and value chain**

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

17. (40 amended) The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect **material impacts**, **risks** and **opportunities**, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related **topics**):

- (a) a description of:
 - i. the significant groups of products and/or services offered, significant markets and/or customer groups served, and the sustainability-related goals that it has associated to them, including significant changes in the reporting period (new/removed products, services, markets and/or customer groups);
 - ii. where applicable and material, products and services banned in certain markets;
- (b) the list of its significant sectors including activities that are internal to the group, when those activities are significant and/or are connected or may be connected to materials impacts, risk and opportunities, and the sector classification system adopted for this disclosure;
- (c) where applicable, a statement indicating, along with the respective revenues, whether the undertaking is active in:
 - i. the **fossil fuel** (coal, oil and gas) sector⁴;

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").

- 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/or
 - iv. the cultivation and production of tobacco⁷.
18. (42 amended) The undertaking shall disclose a description of its **business model** and **value chain**, covering the main features of them, as well as its position in the latter.

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AR 7 for para. 17(b)	(new) Disclosing the list of significant sectors is relevant for users , as it supports the understanding of the material impacts (and as a consequence risks and opportunities) to which the undertaking is potentially connected, as they 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 or common in a given sector.
AR 8 for para. 17(b)	The undertaking is not considered to be active in the sectors of operations of its counterparts in the upstream and downstream value chain .
AR 9. for para. 17(c)(i)	(40 (d)(i)) In preparing the disclosure of its revenues derived from the fossil fuel sector, the calculation shall be based on revenues from the exploration, mining, extraction, production, processing, storage, refining and/or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council). The undertaking may present a disaggregation of revenues derived from coal, oil and gas.
AR 10. for para. 17(a)(b)	(AR 13 amended) When disclosing information on a group of products and/or services, a group of markets and/or customers, and on a sector, the undertaking shall apply the following criteria to assess if they are significant: <ul style="list-style-type: none"> (a) whether it accounts for more than 10 per cent of the undertaking's revenue or is a reportable sector in accordance with IFRS 8 / local generally accepted accounting principles; or (b) whether it is connected with its actual material impacts or potential material negative impacts.

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

19. (44 amended) The objective of this DR is to provide an understanding of the undertaking's **stakeholder engagement** and whether and how **stakeholders'** interests and views are brought to the attention of its **administrative, management and supervisory bodies** and inform its strategy and **business model**.
20. (45 amended) The undertaking shall disclose:

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.

- (a) a summarised description of its **stakeholder engagement**, including information about the key stakeholders with which it engaged;
- (b) its understanding of the interests and views of its key stakeholders as they relate to its strategy and **business model**;
- (c) whether and 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**, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related **topics**).

APPLICATION REQUIREMENTS

AR 11 for para. 20(a)	(new) Key stakeholders refer to key categories of affected stakeholders (as defined in ESRS 1 AR 10).
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Disclosure requirement SBM-3 – *Interaction of material impacts risks and opportunities with strategy and business model, and financial effects*

- 21. (47 amended) The objective of this DR is to provide an understanding of the interactions between the undertaking's **material impacts, risks** and **opportunities**, and its strategy and **business model**, at the appropriate level of aggregation, i.e. individually, aggregated or at topic level, including **financial effects**.
- 22. (48 amended) The undertaking shall provide a high-level description of the interaction of the **material impacts, risks** and **opportunities**, with its **business model, value chain**, strategy and decision-making. This includes how material impacts originate from its strategy and business model, and how material risks and opportunities affect or may affect substantially its strategy and business model, as well as how the undertaking has addressed or plans to address them.
- 23. The undertaking shall disclose **current** and **anticipated financial effects** of its **material risks** and **opportunities**. This includes:
 - (a) the effects on its financial position, financial performance and cash flows for the reporting period (**current financial effects**), by reference to the financial statements where this information is presented;

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- (b) the anticipated effects on its financial position, financial performance and cash flows, including the time horizons (short, medium or long term) for which those effects could reasonably be expected to occur. This shall be done by taking into consideration how risks and opportunities are included in the undertaking's financial planning for the various time horizons used for strategic management purposes. This shall be done by separately disclosing those 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;
- (c) if the undertaking cannot provide quantitative information about the current or anticipated financial effects of a risk or opportunity applying the criteria set out in AR 17, it shall:
 - i. explain why it has not provided quantitative information;
 - ii. 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
 - iii. 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.

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(b) qualitative information about anticipated financial effects on its financial position, financial performance and cash flows, including the time horizons (short, medium or long term) for which those effects could reasonably be expected to occur. This shall be done by taking into consideration how risks and opportunities are included in the undertaking's financial planning and how they relate to the various time-horizons the undertaking uses for management and strategic purposes. This shall be done by separately disclosing those 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. In addition, the undertaking may present quantitative information about anticipated financial effects.

24. The undertaking shall disclose information about the resilience of its strategy and **business model** regarding its capacity to address its **material risks**, either individually or at a higher level (i.e. groups of risks or related **topics**). The undertaking shall disclose a qualitative analysis of its resilience to the material risks disclosed in accordance with paragraph 22, including how the analysis was conducted and the time horizons considered. Topical ESRS may set specific requirements about resilience.

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AR 12 for para. 22	(new) The description of the interaction of impacts , risks and opportunities with the undertaking's business model , value chain , strategy and decision-making shall be provided at the appropriate level of aggregation, either individually or at a higher level (groups of impacts, risks and opportunities or related topics) to reflect the level at which the undertaking manages them.
AR 13 for para. 22	This DR is focused on the explanation of the interaction between material impacts , risks and opportunities on the one hand and business model and strategy, on the other hand. A description of them is required in accordance with IRO-2, paragraph 28(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 , targets and metrics through which it addresses them, in order to avoid duplication and support a coherent narrative.
AR 14 for para. 22	(new) Information on how the undertaking addresses or plans to address its material impacts , risks and opportunities , which interact with its business model or strategy, includes a clear reference to the specific policies , actions , targets and other measures it implemented during the reporting period to manage them, as disclosed in line with the GDRs and the relevant topical standards.
AR 15 for para. 23	(new) In preparing disclosures about its anticipated financial effects , an undertaking shall use reasonable and supportable information available to it at the reporting date without undue cost or effort (see paragraphs 88, 89 and 90 of ESRS 1).
AR 16 for para. 23(b)	<p>(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:</p> <ul style="list-style-type: none"> (a) its announced investment and disposal plans (for example, capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas and asset retirements), including plans to which the undertaking is not contractually committed; and (b) its planned sources of funding to implement its strategy.

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AR 17 for para. 23(b)	<p>Option 1</p> <p>(new) An undertaking need not provide quantitative information about the current or anticipated financial effects if it determines that:</p> <ul style="list-style-type: none"> (a) the effects related to a specific topic (or its impact(s), risk(s) and opportunities) are not separately identifiable from those related to another topic or impact, risk or, opportunity; 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 paragraphs 86 and 87 of ESRS 1), such as when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects.
AR 18 for para. 23	(48(f) amended) When providing quantitative information, the undertaking may present single amounts or ranges.

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

25. (52) The objective of this DR is to provide an understanding of the process through which the undertaking identifies **impacts, risks, opportunities** and the related **topic**, and assesses their **materiality**, as the basis for determining the disclosures to be made in its **sustainability statement** (see ESRS 1, Chapter 3).

26. (53 amended) The undertaking shall disclose the following

- (a) an overview of the process, the key methodologies applied, the input parameters used and key data sources, and how it determines qualitative or quantitative thresholds;
- (b) the scope of operations and **value chain** covered, with an indication of whether it focuses on specific activities, **business relationships**, geographies or other factors that give rise to heightened risk of adverse **impacts**;
- (c) whether and how the undertaking prioritises negative impacts based on their relative severity and likelihood, and whether this is informed by the undertaking's due diligence process;
- (d) whether and how the process includes consultations with affected **stakeholders** and external experts to understand the impacts;
- (e) the approach used to consider impacts and **dependencies** in identifying and assessing its **risks** and **opportunities**;
- (f) whether and how the undertaking prioritises sustainability risks relative to other types of business risks, including its use of risk assessment tools;
- (g) a description of the decision-making procedures; and
- (h) whether and how the process has changed compared to the prior reporting period.

APPLICATION REQUIREMENTS

AR 19 for para. 26(a)	(new) Input parameters may include – where relevant and beyond generic information – due diligence processes leveraged , specific data sources, sector benchmark analysis, and key inputs.
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APPLICATION REQUIREMENTS

AR 20. for para. 26(b)–(g)	(new) Information outlined under (b)–(g) specifies, rather than expand the disclosures outlined under (a). The undertaking shall focus on information that is specific to its own process. It shall avoid standardised, generic disclosures, sometimes referred to as ‘boilerplate’, such as information describing in detail that the undertaking applied the criteria outlined in ESRS 1 and/or followed the recommended process.
AR 21. for para. 26(d)	<p>(new) Information concerning engagement with affected stakeholders is addressed in IRO-1 and SBM-2, and in ESRS S1-S4..</p> <p>Relevant disclosures under IRO-1, paragraph 26(d), include whether and how the materiality process includes consultation with affected stakeholders and external experts.</p> <p>Information on ongoing engagement with affected stakeholders (as defined in [Draft] Amended ESRS 1 AR 10) is addressed in the respective social standards.</p> <p>Disclosures related to whether and 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 SBM-2.</p>
AR 22 for para. 26 (a)–(e)	<p>When the undertaking screens site locations, assets and business activities in its own operations and, where appropriate, in its upstream and downstream value chain, to evaluate heightened risks of adverse environmental impacts, the approach to such screening is a relevant aspect of disclosures addressed in (a) to (e).</p> <p>Location-specific considerations include how a site or asset interacts with local context, taking into account, for example:</p> <ul style="list-style-type: none"> (a) local air, water and soil quality; (b) water availability in areas at water risk; and (c) threatened species and ecosystems in biodiversity-sensitive areas. <p>The first three phases of the LEAP approach, as outlined in the guidance provided by the Taskforce on Nature-related Financial Disclosures (‘TNFD’), offer a useful reference for how to (i) locate where in own operations and along the value chain the interface with nature takes place, (ii) evaluate the dependencies and impacts, and (iii) assess risks and opportunities.</p>

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

27. (55) The objective of this DR is to provide 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 DRs.

28. (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, as well as its **material risks** and **opportunities**, specifying the related **topics** and how and where impacts, risks and opportunities are connected to its **business model**, its own operations and its upstream and downstream **value chain**;
- (b) (57 amended) if it concludes that climate change is not material and therefore omits all DRs in [Draft] Amended ESRS E1 *Climate change*, the basis for that conclusion;

- (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 to identify where the related disclosures are located in the sustainability statement and giving a separate indication of those that are incorporated by reference ([Draft] Amended ESRS 1, Chapter 9.3);
- (e) if the undertaking is connected through its own operations or upstream and downstream value chain to material impacts, risks and opportunities related to **forced** or compulsory **labour** or **child labour**, it shall disclose its exposure to the heightened risk of **incidents** related to child labour and forced or compulsory labour by type of operations (such as manufacturing plant), or by countries or geographies with operations⁸. This disclosure relates to [Draft] Amended ESRS S1 and [Draft] Amended ESRS S2; 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’.

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AR 23 for para. 28(a)	(new) The description of its material impacts, risks and opportunities shall be provided at the appropriate level of aggregation, either individually or for group(s) of impacts, risks and opportunities, or for the related topic(s) , depending on the nature of the impacts, risks and opportunities and reflecting the level at which the undertaking manages them.
AR 24 for para. 28(a)	The undertaking may present the description of its material impact, risk or opportunity in the same location as its disclosures on the related policies, actions, targets and metrics through which it addresses 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.
AR 25 for para. 28(d)	(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 28(d).

General Disclosure Requirements for **policies, actions, metrics and targets**

- 29. (new) Information about **policies, actions** and **targets** shall enable an understanding of the level at which the undertaking is addressing its **material impacts, risks** and **opportunities**, i.e. at **topic** or sub-topic level. In instances where the undertaking has adopted policies or put in place actions or set targets for certain aspects only, this shall be reflected in the way the disclosure is prepared and presented, enabling an understanding of how the covered aspects relate to the corresponding material impacts, risks and opportunities.
- 30. (62 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.

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”).

31. If the undertaking categorises its **material impacts**, **risks** and **opportunities** in accordance with a set of management priorities, reflecting their relevance to the undertaking's strategy and **business model**, the way disclosures are structured and presented may reflect this approach .
32. (56) The undertaking shall apply the requirements provided in this section, when it discloses either in accordance with a topical standard or on an entity-specific basis, on **policies**, **actions**, **targets** and **metrics** related to **material impacts**, **risks** and **opportunities**, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related **topics**), covering:
- (a) its policies, actions and targets which address the prevention, mitigation and **remediation** of actual and **potential** material impacts to address material risks and/or to pursue material opportunities; or
 - (b) the metrics to assess progress over time in relation to its material impacts, risks and opportunities.

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AR 26 for para. 29	(new) Where the undertaking applies the same policies , actions , metrics and/or targets across more than one material impact , risk and/or opportunity (or topic), it may disclose the information just 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.
AR 27 for para. 30	(new) When the undertaking uses a tabular form for presenting its material impacts , risks and opportunities (IRO-2 paragraph 28(a)) and the related topics , it can indicate the material topics and/or material impacts, risks and opportunities for which it has not in place policies , actions or targets , by using a check mark in the table.
AR 28 for para. 29	<p>(new) The information provided may vary in the level of detail provided with regard to each DR, depending on the nature of material impacts, risks and opportunities, and on differences in the undertaking's current approach to their management. The information should, wherever possible, be specific to the reporting period and avoid generic descriptions except where necessary to enable an understanding of the undertaking's current approach to manage its material impacts, risks and opportunities.</p> <p>(new) When reporting on policies, actions and targets, the undertaking shall report relevant information, avoiding information that is boilerplate, and therefore not relevant for users for example when policies and actions have been implemented to comply with law and regulation, or when the necessary information is already provided in accordance with [Draft] Amended ESRS 2 SBM-1.</p>
AR 29 for para. 32	(new) The undertaking may present the description of its material impacts , risks and opportunities , as required under IRO-2, paragraph 28(a), alongside information about the policies , actions , targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative.

General Disclosure Requirement for policies – GDR-P

33. (64) The objective of this GDR is to provide an understanding of the **policies** that the undertaking has in place to address the prevention, mitigation and **remediation** of material **actual** and **potential material impacts**, manage **material risks** and pursue **material opportunities**, either individually or at a higher level (i.e. groups of them or related **topics**), including an understanding of significant changes to the policies adopted during the reporting period.
34. (65 amended) The undertaking shall disclose the following information about **policies** adopted to manage **material impacts**, **risks** and **opportunities**:
- (a) a description of the key contents of the policy, including its general objectives and material impacts, risks or opportunities to which the policy relates;

- (b) a description of the scope of the policy, or of its exclusions, in terms of the undertaking's own operations, upstream and/or downstream **value chain** and geographies and, if relevant, affected **stakeholder** groups;
 - (c) when the policy refers to third party-standards or initiatives the undertaking commits to respect through the implementation of the policy, a reference to such third-party standard or initiative; and
 - (d) for social **topics**, a description of the consideration given to the interest of affected stakeholders in setting this policy, when applicable.
35. (new from 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, 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 according to the provision defined in paragraph 34. The human rights policy shall specify which groups of affected **stakeholders** are covered (for example, **own workforce** and workers in the **value chain** being distinct from **consumers** and **end-users**).

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<p>AR 30 for para. 35 (moved from Social AR as indicated in the Social PAT version zero)</p>	<p>When disclosing on 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.</p>
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General Disclosure Requirement for actions and resources – GDR-A

36. (67) The objective of this GDR is to provide an understanding of the undertaking's key **actions** taken and/or planned to manage its **material impacts, risks and opportunities**, either individually or at a higher level (i.e. groups of them or related **topics**), so as to prevent, mitigate and remediate its material **actual and potential impacts** and to address its material risks and opportunities, and where applicable, achieve the objectives of related **policies**.
37. (68 amended) When the undertaking implements key **actions** to manage **material impacts, risks and opportunities**, it shall disclose:
- (a) the description of the key actions taken in the reporting year and planned for the future, including their scope and timeframe; and
 - (b) the expected outcomes and, where applicable, how their implementation contributes to the achievement of the related **policy** objectives.
38. (69 amended) Where significant resources (operational and/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 financial resources and other 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 financial resources allocated to the key actions in the reporting period (if any), and indicate the corresponding line items and/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).

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AR 31 for para. 37	<p>(AR 22) Key actions in the context of this DR are those actions that play a significant role in addressing the undertaking's material impacts, risks and opportunities related to a reported topic, including the actions taken to support the provision for remedy.</p> <p>For the sake of understandability, key actions may be aggregated where appropriate. Conversely, when key actions cover more than one material impact, risk or opportunity, this can be indicated and cross-referenced if necessary.</p>
AR 32 for para. 37	<p>(new) Actions can be individual or taken in collaboration with other undertakings, especially when actual or potential impacts are systemic or widespread in nature and cannot be addressed by the undertaking alone.</p> <p>Whether a key action is collaborative is a useful information when describing it.</p>
AR 33 for para. 37	<p>(new) Environmental actions can be classified according to the mitigation hierarchy (i.e. contributing to avoidance, minimisation, restoration and compensation). Such information is a possible aspect to cover in the description of the actions, which may be provided implicitly or explicitly.</p>
AR 34 for para. 38(a)	<p>(68(a)(b) amended) The scope of the key actions refers to coverage in terms of activities within own operations, upstream/downstream value chain, (group of) subsidiaries, geographies and, if applicable, affected stakeholder groups. These include actions that are part of the undertaking's business practices, overall management and risk management. The timeframe refers to the time horizons over which the undertaking intends to complete each action.</p>
AR 35 for para. 38 (AR 23)	<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 36 for para. 38(a)(c)	<p>(new) Examples of other non-monetary resources that may be included are human capital (full-time equivalent allocation) or natural resources allocated.</p>

General Disclosure Requirement for metrics– GDR-M

39. (74) The objective of this GDR is to provide an understanding of the **metrics** the undertaking discloses, which include those used to evaluate its performance and to track the effectiveness of its **actions** to manage its **material impacts, risks** and **opportunities**, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related **topics**).
40. (75 amended) The undertaking shall disclose the **metrics** that it uses to evaluate its performance, as well as those required by topical ESRS, in relation to **material impacts, risks** and **opportunities** including those defined on an entity-specific basis.
41. (77 amended) For each **metric**, the undertaking shall disclose:
- (a) the metric itself, its unit of measurement, the calculation methodology, data types and sources used as input to the calculation, and where relevant, the estimation methodology, including significant assumptions and limitations;
 - (b) for environmental metrics, the specific environmental conditions and characteristics of the area where the impact is occurring;
 - (c) for **value chain** metrics, the reliance on data from indirect sources or proxies, and where applicable, the planned **actions** to improve the data quality in the future (see [Draft] Amended ESRS 1 Chapter 5); and

- (d) contextual information about the metric and an explanation of significant changes in the performance compared to the previous reporting periods.

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AR 37 for para. 41	(76 amended) The metrics include those defined in the 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 [Draft] Amended ESRS S2-S4 topical standards that do not contain metrics at sector agnostic level.
AR 38 for para. 41(a)	(77(d) amended) When a currency is specified as the unit of measurement, the undertaking shall use the presentation currency of the financial statements.

General Disclosure Requirement for targets – GDR-T

42. (79 amended) The objective of this GDR is to provide an understanding of how the undertaking sets **targets**, as defined in terms of expected results for people, the environment or the undertaking, and of how it tracks the effectiveness of its **policies** and **actions** in relation to its **material impacts, risks** and **opportunities**, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related **topics**) and of the overall progress and effectiveness towards the adopted targets over time. This includes – where applicable – whether the progress is aligned with related action plan and/or whether any significant facts and circumstances related to the action plan affect the achievement of the target.
43. (80 amended) The undertaking shall disclose the measurable, time-bound, outcome-oriented qualitative or quantitative **targets** it has set related to its **impacts, risks** and **opportunities**, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related **topics**). 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 when qualitative) to be achieved, including, where applicable, whether the target is absolute or relative and in which unit it is measured;
 - (c) the scope of the target, in terms of the undertaking's activities within own operations and/or upstream and/or downstream **value chain**, as well as geographical boundaries;
 - (d) where applicable, the baseline value (or level when the target is qualitative) and base year from which progress is measured;
 - (e) the target year or period to which the target applies and, if applicable, any milestones or interim targets set;
 - (f) the methodologies, significant assumptions used to define targets, whether the target is required by law, the selected **scenarios** on which it is based, the key data sources and the level 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 and, if this is the case, how the target considers **ecological thresholds**.
44. (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**, either individually or at a higher level (groups of impacts, risks and opportunities or related **topics**).

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AR 39 for para. 43	(AR 24 amended) When disclosing targets related to the prevention or mitigation of environmental impacts , a clarification may be provided on whether targets related to the reduction of the impacts are in absolute or relative terms. When targets address the prevention or mitigation of social impacts, they can be specified in terms of the effects on outcomes for affected stakeholders .
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Appendix A: List of datapoints in cross-cutting and topical standards that derive from other EU legislation

This Appendix is an integral part of [Draft] Amended ESRS 2. The table below illustrates the datapoints in [Draft] Amended ESRS 2 and topical ESRS that derive from other EU legislation.

[THIS MAPPING DOES NOT TAKE INTO ACCOUNT CHANGES TO PILLAR 3 POTENTIALLY ARISING FROM THE PILLAR 3 CONSULTATION IN PROGRESS]

Table 1: datapoints in the main body of the standard

Disclosure Requirement and related datapoint in [Draft] Amended 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 fossil fuel activities	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 ¹⁴ Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II	
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	

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') (OJ L 176, 27.6.2013, p. 1).

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) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards the disclosure of environmental, social and governance risks (OJ L 324, 19.12.2022, p.1.).

Disclosure Requirement and related datapoint in [Draft] Amended ESRS	SFDR¹⁰ reference	Pillar 3¹¹ reference	Benchmark Regulation¹² reference	EU Climate Law¹³ reference
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) 2022/2453 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			
ESRS E1-7 Energy consumption and mix	Indicator number 5 Table #1 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 [Draft] Amended ESRS	SFDR ¹⁰ reference	Pillar 3 ¹¹ reference	Benchmark Regulation ¹² reference	EU Climate Law ¹³ reference
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) 2022/2453 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) 2022/2453 paragraphs 46 and 47; 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) 2022/2453 paragraph 34; Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral		

Disclosure Requirement and related datapoint in [Draft] Amended ESRS	SFDR¹⁰ reference	Pillar 3¹¹ reference	Benchmark Regulation¹² reference	EU Climate Law¹³ 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 at water risk, including areas of high-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	Indicator number 14.2 Table #2 of Annex 1			

Disclosure Requirement and related datapoint in [Draft] Amended ESRS	SFDR¹⁰ reference	Pillar 3¹¹ reference	Benchmark Regulation¹² reference	EU Climate Law¹³ reference
biodiversity-sensitive areas				
ESRS E5-5 Non-recycled waste	Indicator number 13 Table #2 of Annex 1		Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives	
ESRS E5-5 Hazardous waste and radioactive waste	Indicator number 9 Table #1 of Annex 1		According to Council Directive 2011/70/Euratom of 19 July 2011 establishing a community framework for the responsible and safe management of spent fuel and radioactive waste.	
ESRS 2- IRO-2 Risk of incidents of forced labour	Indicator number 13 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			

Disclosure Requirement and related datapoint in [Draft] Amended ESRS	SFDR¹⁰ reference	Pillar 3¹¹ reference	Benchmark Regulation¹² reference	EU Climate Law¹³ reference
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 Annual total remuneration ratio	Indicator number 8 Table #3 of Annex I			
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			

Disclosure Requirement and related datapoint in [Draft] Amended ESRS	SFDR¹⁰ reference	Pillar 3¹¹ reference	Benchmark Regulation¹² reference	EU Climate Law¹³ reference
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 14 Table #3 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			
ESRS S4-3 Human rights incidents	Indicator number 14 Table #3 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		Delegated Regulation (EU) 2022/1288	
ESRS G1-1 Protection of whistle- blowers	Indicator number 6 Table #3 of Annex 1		Delegated Regulation (EU) 2022/1288	
ESRS G1-4 Convictions and Fines for violation of anti-corruption and anti-bribery laws	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2022/1288	

Disclosure Requirement and related datapoint in [Draft] Amended ESRS	SFDR ¹⁰ reference	Pillar 3 ¹¹ reference	Benchmark Regulation ¹² reference	EU Climate Law ¹³ reference
ESRS G1-4 Actions to address breaches of Standards of anti-corruption and anti-bribery	Indicator number 16 Table #3 of Annex 1		Delegated Regulation (EU) 2022/1288	

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		Delegated Regulation (EU) 2022/1288	
ESRS E4-5 Land degradation, desertification, soil sealing	Indicator number 10 Table #2 of Annex 1			
ESRS E4-5 Operations that affect threatened species	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	Indicator number 12			

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).

Application Requirement in [Draft] Amended ESRS	SFDR¹⁶ reference	Pillar 3¹⁷ reference	Benchmark Regulation¹⁸ reference	EU Climate Law¹⁹ reference
Sustainable oceans / seas practices or policies	Table #2 of Annex 1			
ESRS E4-2 Policies to address deforestation	Indicator number 15 Table #2 of Annex 1			