

**CONFIDENTIAL - NOT FOR PUBLIC**

This document is intended for private upload, and it provides further details on the Exposure Draft presented to SRB on 17 September 2024 and its respective datapoints.

The datapoints identification exercise presented is still subject to quality control with both, third parties as well as EFRAG XBRL team and will be continuously improved and reviewed in the coming weeks and months (including during the future public consultation).

In the meanwhile, the EFRAG Secretariat considers this material as additional support to streamline EFRAG SRB approval of the consultation document.

**Exposure Draft ESRS Oil and Gas**

**17 September 2024**

**Presentation of datapoints**

**[draft is still subject to editorial review]**

# Disclosure requirements

---

## ESRS 2 General disclosures

### ESRS 2.SBM1.0G – Activity indicators

---

#### EU Regulations [EBA]

17. The undertaking shall provide a breakdown of its net revenue for the reporting period (both in monetary amount and as a percentage of its total revenue) into the following NACE-code activities<sup>1</sup>:
- (a) B.06.10 Extraction of crude petroleum
  - (b) B.06.20 Extraction of natural gas
  - (c) G.46.71 Wholesale of solid, liquid and gaseous fuels and related products
  - (d) G.47.30 Retail sale of automotive fuel in specialised stores
  - (e) H.49.50 Transport via pipeline
  - (f) other NACE codes. [EFRAG TEG]
18. The undertaking shall disclose the following, with amounts referred to the reporting period<sup>2</sup>:

---

#### EU Regulations [EBA]

#### SASB EM-EP-000.A

- (a) **Upstream undertaking** that extracts crude petroleum shall disclose its total crude oil production, in barrels (bbl), with breakdown into:
- i. oil sands or other extra heavy oil extracted;
  - ii. shale oil extracted via hydraulic fracturing;
  - iii. crude oil extracted **near** or in biodiversity sensitive areas.

---

#### EU Regulations [EBA]

#### SASB EM-EP-000.A

- (b) **Upstream undertaking** that extracts natural gas shall disclose its total natural gas production, in normal cubic meters (Nm<sup>3</sup>), with breakdown into:
- i. natural gas extracted and processed into Liquefied Natural Gas (LNG);
  - ii. shale gas extracted via hydraulic fracturing;
  - iii. natural gas extracted **near** or in biodiversity sensitive areas.

---

#### EU Regulations [EBA]

#### SASB EM-EP-000.A

- (c) **Midstream undertaking** that distributes oil products shall disclose its total oil products distribution volume, in megalitres (Ml);

---

#### EU Regulations [EBA]

#### SASB EM-RM-000.B

- (d) **Downstream undertaking** that refines products shall disclose its total refined volume, in barrels (bbl), with breakdown into:
- i. oil sands or other extra heavy oil;
  - ii. shale oil extracted via hydraulic fracturing

---

<sup>1</sup> This disclosure requirement is consistent with the requirements included in EBA Pillar 3 ITS Template 1 [Banking book – Climate change transition risk – Credit quality of exposures by sector, emissions and residual maturity](#).

<sup>2</sup> This disclosure requirement is consistent with the requirements included in EBA Pillar 3 ITS Template 4 [Banking book – Climate change transition risk – Alignment risks](#)

---

**EU Regulations [EBA]**

- (e) **Downstream undertaking** that sells power in retail stations (electric vehicle chargers) shall disclose its total sales of electricity, in megawatt hour (MWh), including:
  - i. the share of electricity with a GHG intensity of less than 100 gCO<sub>2</sub>e/kWh

---

**SASB EM-RM-410a.3**

- 19. The undertaking shall disclose its volumes of renewable fuels for fuel blending, by including the following indicators expressed in net volume of barrels of oil equivalent (bbl):
  - (a) renewable fuels produced;
  - (b) renewable fuels purchased.

---

**SASB EM-RM-410a.2**

- 20. The undertaking shall provide an estimation of the total addressable market and the share of market for advanced biofuels and associated infrastructure.

---

**EFRAG TEG IIGCC Net Zero Standard for Oil & Gas**

- 21. The undertaking shall disclose its production targets corresponding to the years specified in its GHG emission reduction targets disclosed according to E1-4. This disclosure shall include:
  - (a) production forecast of crude oil (bbl)
  - (b) production forecast of natural gas (Nm<sup>3</sup>)

## Cross-topical sector disclosures

### ***OG 1. Mapping of business sites***

---

- 22. **The undertaking shall disclose a list of its significant *business sites* connected to material sustainability matters**
- 23. The objective of this Disclosure Requirement is to enable an understanding of which significant ***business sites*** are connected with specific material ***sustainability matters***.

#### ***Metrics***

- 24. For each significant business site that is material to:

---

**SASB EM-MD-160a.2 GRI 11.4.2 IPIECA ENV-4 C10**

- (a) biodiversity, the undertaking shall specify whether the site is located in or ***near*** the ***biodiversity sensitive areas***. If so, the undertaking shall specify the impacts to the affected habitats and ***ecosystems*** and describe ***biodiversity*** management and adaptive management activities in place;

---

**IPIECA ENV-1 C3**

- (b) water and marine resources, the undertaking shall specify whether the site is located in ***areas of high-water stress***.

---

**GRI 11.15.3, 11.16.2, 11.17.3**

- (c) affected communities and/or own workforce, the undertaking shall specify:
  - i. whether the material impacts on the local community are connected to;
    - 1. ***indigenous peoples***;
    - 2. land rights;
    - 3. adequate housing, adequate food, water and sanitation;
    - 4. ***pollution***;
    - 5. ***hazardous waste*** storage or disposal;

6. voluntary or involuntary resettlements that have been taking place or are ongoing **near** the site, subject to legal restrictions on the disclosure;

---

GRI 11.18.1

- ii. whether the site is located in or **near** the **conflict-affected** or **high-risk areas**; and

---

GRI 11.9.5, 11.15.2

IPIECA SHS-1 C1

- iii. whether the site has implemented works councils, occupational health and safety committees and/or other worker representation bodies to deal with impacts.

24.1 For each of the significant **business sites** listed according to the paragraphs above, the undertaking shall include:

---

GRI 11.4.2

- (a) basic description, including name and a description of the activities and main characteristics of each site;

---

GRI 11.4.2

- (b) location (NUTS region in the EU, country + region outside EU);

---

EFRAG

- (c) type of control: financial or **operational control**;

---

GRI 11.7.4

- (d) status of site (active; undergoing closure; closed and rehabilitated; or closed and not rehabilitated);

---

## OG 2. Oil and gas reserves

25. **The undertaking shall disclose its proven oil and gas reserves.**

26. The objective of this Disclosure Requirement is to enable an understanding of an undertaking's **proven reserves**.

**Metrics**

---

US SEC Rule

EFRAG

27. The undertaking shall disclose the total **proven reserves** of oil (bbl) and gas (Nm<sup>3</sup>) with a breakdown into proven reserves (percentage):

---

SASB EM-EP-160a.3

- (a) in or **near** the **biodiversity sensitive areas**; and

---

IPIECA ENV-1 C3

- (b) in areas of **high-water stress**.

---

SASB EM-EP-510a.1

EFRAG TEG

- (c) in countries with high-risks of corruption, money laundering and financing of terrorism;

---

EM-EP-210a.1

- (d) in or **near** conflict-affected or high-risk areas;

---

SASB EM-EP-210a.2

- (e) in or **near** the indigenous land.

28. The undertaking shall disclose for each line item of paragraph 27 the corresponding countries where it has 15% or more **reserves**.

### OG 3. Industrial hazards

29. **The undertaking shall disclose information related to industrial hazards.**
30. The objective of this Disclosure Requirement is to enable an understanding of the material impacts, risks and opportunities related to industrial hazards connected to the undertaking's operations, as well as how the undertaking manages them.

#### *Policies, actions and targets*

31. When reporting its **policies, actions** and **targets** related to industrial hazards according to ESRs E2-1, E2-2 and E2-3, the undertaking shall specify whether and how they address:
- (a) spills and loss of containment events for hydrocarbons and for other chemicals used in operations;
  - (b) management of **tailings** from oil sands mining and structural safety of tailing ponds or dams;
  - (c) managing impacts from past accidents for which environmental remediation may still be on-going, including any actions that are planned for short, mid and long-term, if applicable.
32. When reporting its **policies, actions** and **targets** related to **occupational health services** according to ESRs S1-1, S1-4 and S1-5, the undertaking shall describe whether and how they contribute to the minimisation of **impacts and risks** and identification and elimination of hazards; and how it ensures the quality of health services and facilitates workers' access to them.

#### **ESRS E2 -Metrics**

33. The undertaking shall disclose the following **metrics** related to pollution during the reporting period:
- (a) for **water** pollution:

---

SASB EM-EP-160a.2

GRI 11.6.5

IPIECA ENV-2

- i. total number and volume (in barrels) of **hydrocarbon spills** to water;

---

IPIECA ENV-6

- ii. total number and volume (in m<sup>3</sup>) of other chemical **spills** to water.

---

SASB EM-EP-160a.2

- (b) for **soil** emissions:

- i. total number and volume (in barrels) of hydrocarbon spills to soil;

---

SASB EM-EP-160a.2

IPIECA ENV-6

- ii. total number and volume (in m<sup>3</sup>) of other chemical **discharges** to soil.

---

SASB EM-MD-540a.1

- (c) for number spills during transportation:

- i. pipeline incidents and percentage of significant spills;

---

SASB EM-MD-540a.3

- ii. rail and truck transportation incidents and percentage of significant spills.

---

GRI 11.8.2

IPIECA ENV-6

- iii. the total number of significant spills that occurred and volume by substance, as well as how it defines significant spill;

---

**SASB EM-RM 150a.2**

- (d) number of underground storage tanks (UST) for petroleum and hazardous substances;

---

**SASB EM-RM 150a.2**

- (e) number of UST releases requiring clean up.

34. The undertaking shall disclose the following **metrics** on the process safety events occurred during the reporting period, as defined by the International Association of Oil & Gas Producers (IOGP), including:

---

**SASB EM-EP-540a.1****GRI 11.8.3****IPIECA SHS-6 C1**

- (a) number of Tier 1 events reported separately for each major business activity, such as refining or upstream;

---

**IPIECA SHS-6 C2**

- (b) qualitative descriptions of any significant events that occurred during the reporting year, including the undertakings' response and lessons learned to prevent recurrence;

---

**IPIECA SHS-6 C3**

- (c) explanation of how the undertaking reviews the assessment and management of process safety risks.

**ESRS S1 -Metrics**

35. The undertaking shall disclose the following information if its workforce is exposed to respectively chemical, physical or ergonomic hazards:

---

**EU Regulation****IPIECA SHS-3 C4****GRI 11.9**

- (a) for chemical hazards, a list of the **substances of very high concern (SVHCs)**, as identified in E2-5, that workers are exposed to in its own operations;

---

**EU Regulation****EFRAG****IPIECA SHS-3 C4****GRI 11.9**

- (b) a list of key physical or ergonomic hazards that affect its workforce and whether these are included in the undertaking's health and safety management system.

---

**EFRAG**

36. The undertaking shall disclose the following **metrics** related to health and safety matters as a result of being exposed to chemicals (including to crystalline silica, hydrogen sulphide, hydrocarbons exposure, harmful or carcinogenic hydrocarbon gases and vapours); and provide a breakdown between **employees** and **non-employee** in **own workforce** for (a) and (b) below:

---

**EU Regulation****GRI 11.9.10/11.9.11****IPIECA SHS-3 C1, SHS-3 C4**

- (a) the number of work-related fatalities,  
(b) the number of **work-related injuries**; and  
(c) the number of cases of **recordable work-related ill health** for the undertaking's **employees**.

---

**EU Regulation****SASB EM-SV (EM-EP) -320a1****GRI 11.9.6****IPIECA SHS-1 C2**

37. The undertaking shall disclose the average number of hours of **training** per worker received by its own workforce on health, safety and emergency preparedness, with respect to occupational risks or hazards to which its own workforce is reasonably likely to be exposed. Such information shall be broken down by **employees** and **non-employees**.

---

**OG 4. Closure of assets**

38. The undertaking shall disclose information related to the closure of assets.

39. The objective of this Disclosure Requirement is to enable an understanding of the material impacts, risks and opportunities related to closure of assets in the undertaking's operations, as well as how the undertaking manages them and the financial effects associated.

***Policies, actions and targets***

40. When reporting its ***policies, actions*** and ***targets*** related to the closure of assets, the undertaking shall specify whether and how they address the adoption of closure plans (including site restoration plans) for its ***business sites***.
41. In addition, when reporting its ***policies, actions*** and ***targets*** related to the closure of assets according to ESRS S1/3-1, S1/3-4 and S1/3-5, the undertaking shall specify how its ***policies, actions*** and ***targets*** address impacts on ***own workforce*** and ***affected communities*** related to the closure, rehabilitation and/or restoration plans.

***Metrics***

---

**GRI 11.7.4**

42. The undertaking shall list the material ***business sites*** for which there is no existing or foreseen site rehabilitation plan.

---

**SASB EM-EP-210b.1**    **EFRAG**

43. Where applicable, the undertaking shall disclose whether it developed the post-closure plans in consultation with ***affected communities*** and ***employees***.

---

**EFRAG Financial effects**    **GRI 11.7.6**    **IPIECA ENV-8**

44. With regard to liabilities for closure and rehabilitation, the undertaking shall disclose per each material business site:
- (a) the financial liabilities recognised on balance sheet, including:
    - i. undiscounted monetary value of (a) split by time horizon;
    - ii. discount rate used to calculate (a);
  - (b) contingent liabilities, that do not meet the accounting recognition criteria at the reporting date, it expects to incur, including environmental and social post-closure monitoring and aftercare; and
  - (c) whether the business site has been sold to a third party.
45. If the relevant information is already disclosed in the financial statements, the undertaking may incorporate by reference to the relevant paragraph in the financial statements.

## **Environmental disclosures**

---

### ***ESRS E1 – OG Climate change***

***Policies, actions and targets***

46. When reporting its ***policies, actions*** and ***targets*** related to climate change mitigation according to ESRS E1-2, E1-3, E1-4 and E1-6, the undertaking shall specify whether and how they address:
- (a) implementation of Leak Detection & Repair (LDAR) programmes;
  - (b) addressing the methane leakages found as a result of the regular monitoring surveys;
  - (c) managing and abatement of methane emissions
  - (d) GHG emissions from Scope 3 category 11 'Use of sold products'.

***Metrics related to E1-1 transition plan for climate change mitigation***

47. The undertaking shall provide its CapEx monetary amounts for the reporting period and its future CapEx, disaggregated in short and medium-term, in relation to:

---

**GRI 11.2.2 EFRAG**

- (a) development of reserves into production (CapEx to convert **proven reserves** into production), split by:
  - i. **undeveloped reserves;**
  - ii. **developed reserves;**

---

**EFRAG**

- (b) development of new infrastructure projects related to **fossil fuel** transportation and distribution;

---

**GRI 11.2.2 SASB EM-EP-420a.3**

- (c) other CapEx, including capitalized research and development initiatives that can address the undertaking's **risks** related to climate change.

48. The undertaking shall disclose its:

---

**GRI 11.2.2**

- (a) monetary expenditures for the reporting year on research and development of technologies, solutions and business models that can address the undertaking's **risks** related to climate change ('transition-related R&D expenditures');

---

**EFRAG**

- (b) its definition of transition-related R&D expenditures;
- (c) breakdown of its revenues and CapEx pertaining to:
  - i. conventional oil and gas activities;
  - ii. unconventional oil and gas activities;
- (d) CapEx plans (mid-term and long-term) to ensure compatibility with the transition to a sustainable economy and with the limiting of global warming to 1.5°C in line with the Paris Agreement;
- (e) price of oil barrel used on impairment testing;
- (f) provisions recognised on balance sheet for on-going lawsuits related to climate change.

---

**GRI 11.2.2 EFRAG\***

49. When disclosing information in accordance with ESRS E1-1 paragraph 16 (d), the undertaking shall disclose a quantitative assessment of **locked-in GHG emissions** related to its **proven reserves**, in MtCO<sub>2</sub>, as well as a breakdown of those emissions by the following categories:

- (a) **undeveloped reserves;**
- (b) **developed reserves.**

**Metrics related to E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions**

50. The undertaking shall disclose a breakdown of (total), for the reporting period:

---

**SASB EM-EP-110a.1, a2 GRI 11.1.5 IPIECA CCE-7 C4, A3**

- (a) total Scope 1 **GHG emissions** into total CO<sub>2</sub> and methane emissions;
- (b) **Scope 1 GHG emissions** by type of source, namely:
  - i. stationary combustion, excluding **flaring**;
  - ii. **flaring**;
  - iii. **venting**;
  - iv. **fugitive emissions**; and
  - v. other.

51. The undertaking shall disclose its **GHG emissions** intensity per unit of energy produced during the reporting period:

---

**EU Regulation [EBA]**

- (a) upstream undertakings shall disclose the GHG intensity of its energy production (CO<sub>2</sub>e/unit of energy)<sup>3</sup>;

---

**EFRAG\***

- (b) undertakings operating refineries shall disclose their CO<sub>2</sub>/CWT (Complexity Weighted Tonne);

---

**IPECA CCE-7 A2**

**EFRAG\***

- (c) undertakings with marketing activities shall disclose GHG intensity of the final energy it sells (CO<sub>2</sub>e/unit of energy).

52. The undertaking with integrated operations shall separately report **Scope 3** GHG emissions category, 'Use of sold products emissions' associated with each segment (upstream, midstream, and downstream) of its integrated operations.

---

**EU Regulation**

**IPECA CCE-7 C2**

**IPECA CCE-7 A2**

53. In addition to the information provided following ESRS E1-6, with regards to its methane emissions, the undertaking shall disclose:

- (a) the geographical location (country) of any significant **flaring** or **venting** emissions;
- (b) the percentage of routine and non-routine flaring, and the efficiency of combustion.

---

**EFRAG Financial Effects**

**SASB EM-EP-420a.1**

***Metrics related to E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities***

54. The undertaking shall disclose how it expects the management of climate change-related **risks** and **opportunities** to affect the medium and long-term financial position, performance and development. Limited to plans approved by the relevant governance bodies or delegated management, this shall include:

- (a) CapEx plans in relation to development of reserves into production (paragraph 47);
- (b) expected changes in investments (monetary amount) from the current levels for development of low-carbon products and services or adaptation solutions;
- (c) CapEx plans in relation to development of new infrastructure projects related to fossil fuel transportation and distribution (paragraph 47);
- (d) potential write-off situations that do not meet the accounting recognition criteria at the balance sheet date; and
- (e) anticipated early closure of existing assets and consequent effects on useful life of the existing assets.

55. If the relevant information is already disclosed in the financial statements, the undertaking may incorporate by reference to the relevant paragraph in the financial statements.

---

**OG 5. Carbon capture and storage**

56. The undertaking shall disclose its activities related to carbon capture and storage technologies.

57. The objective of this Disclosure Requirement is to provide an understanding of the extent to which the undertaking is implementing **carbon capture and storage technologies** at scale on its own sources, or providing it as a service to others. It also enables the understanding

---

<sup>3</sup> This disclosure requirement is consistent with the requirements included in EBA Pillar 3 ITS Template 1 [Banking book – Climate change transition risk – Credit quality of exposures by sector, emissions and residual maturity](#).

of how issues related to potential liabilities for transported and stored CO<sub>2</sub> leakage are being dealt and reported following Disclosure Requirement E1-6.

*Policies, actions and targets*

58. When reporting its *policies, actions* and *targets* related to climate change mitigation, the undertaking shall specify whether and how they address the risk of non-permanence of carbon capture and storage, including determining and monitoring the leakage and reversal events.

**Metrics**

59. The undertaking shall disclose the following metrics (total):

---

**EFRAG**

- (a) CO<sub>2</sub> captured for the reporting period and % from own sources;

---

**GRI 11.2.2**

- (b) CO<sub>2</sub> stored at the end of the reporting period; broken down by:

---

**EFRAG**

- i. own sources  
ii. other sources (CO<sub>2</sub> received or transferred from third parties)
- (c) CO<sub>2</sub> transported through its pipelines for the reporting period;  
(d) CO<sub>2</sub> leakage from transport and storage of CO<sub>2</sub> for the reporting period  
(e) energy use associated with carbon capture and storage activities for the reporting period.

---

**ESRS E2 – OG Pollution**

*Policies, actions and targets*

60. When reporting its *policies, actions* and *targets* related to pollution, the undertaking shall specify whether and how they address:
- (a) inspecting and maintaining critical infrastructure (e.g., pipelines and valves);  
(b) monitoring the quality of the environment around its *business sites*;  
(c) identifying and implementing Best Available Techniques, as established by the Commission Implementing Decision 2014/738/EU and mandated by Directive 2010/75/EU, and in accordance with the indications provided in ESRS E2.

---

**SASB EM-EP-140a.3**

**Metrics**

61. The undertaking shall disclose the following metrics:
- (a) percentage of hydraulically fractured wells for which there is public disclosure of all fracturing fluid chemicals used;

---

**SASB EM-EP-140a.4**

- (b) percentage of hydraulic fracturing sites where ground or **surface water** quality are deteriorated compared to a baseline;

---

**SASB EM-EP-150a.1**

- (c) volume of **hydraulic fracturing fluid** used in cubic meters during the reporting period.

---

**ESRS E3 – OG Water and marine resources**

*Policies, actions and targets*

62. When reporting its **policies, actions** and **targets** related to the water and marine resources, the undertaking shall specify whether and how they address:
- (a) management of water as a shared resource, particularly in areas at of **high-water stress** and where conflicts between different water uses may emerge;
  - (b) improving the quality of the water discharged.

---

### **OG 6. Water and marine resources metrics**

---

63. The undertaking shall disclose its metrics related to water withdrawals, discharges, and exploration of deposits in the ocean areas.
64. The objective of this disclosure requirement is to enable an understanding of the **water withdrawals** and water **discharges** and, for undertakings active in upstream and services sub-sectors, of the extent to which the undertaking is involved in exploration of oil and gas deposits in ocean areas.

---

**EM-EP-140a.1**      **GRI 11.6.4, 11.6.5**      **IPIECA ENV-1 C1/C2/C4**

**Metrics – withdrawals and discharges**

65. The undertaking shall disclose the total volume of **water withdrawals** and **water discharges**, in cubic meters (m3), disaggregated into:
- (a) surface water;
  - (b) groundwater;
  - (c) **other water**.
66. With regards to the **water withdrawals** disclosed according to paragraph 65 points (a), (b) and (c), the undertaking shall disclose the share (percentage) of water withdrawn from the **areas of high-water stress**.

---

**EM-RM-140a.2**

67. The undertaking shall disclose the number of non-compliances in the reporting period with respect to local regulatory or discharge limits and indicate exceeded parameters.

**Metrics – impacts on local water conditions**

---

**IPIECA ENV-1 C3**      **EFRAG**

68. The undertaking shall disclose in which water basin its operations significantly impact hydrological conditions (e.g. surface water flow, groundwater levels, etc) and what measures are put in place to prevent and mitigate the impacts.

**Metrics – marine resources-related activity indicators**

69. The undertaking that is active in the upstream and services sub-sectors shall disclose the following information on the sites located at the oceans:

---

**EM-EP-000.B**

- (a) total number of sites; and

---

**EFRAG\***

- (b) total area of the exploitation.

---

### **ESRS E4 – OG Biodiversity and ecosystems**

---

**Policies, actions and targets**

70. When reporting its **policies, actions** and **targets** related to the biodiversity and ecosystems, the undertaking shall specify whether and how they address:
- (a) phasing-out existing operations and/or stopping operational investments in or **near biodiversity sensitive areas**;
  - (b) minimising biodiversity and ecosystem impacts from current and future operations in or near biodiversity sensitive areas (including from tailings waste);

- (c) achieving no net loss or achieve a net gain to biodiversity on **business sites**;
- (d) managing average direct land-use change of oil and gas wells;
- (e) managing direct land-use change from oil sands mining activity;
- (f) managing percentage of impacted area rehabilitated or restored.

---

SASB EM-SV-160a.1

EFRAG

**Metrics**

71. The undertaking shall disclose significant impacts on **biodiversity** and **ecosystems** change for the reporting period:
- (a) average **land-use change** per oil and per gas on-shore well site;
  - (b) average sea-use change per oil and per gas off-shore well site;

---

SASB EM-MD-160a.3

- (c) percentage of land-use change area rehabilitated or restored during the reporting period, broken down between on-shore and off-shore operations, and the percentage of land-use change area rehabilitated or restored in **biodiversity sensitive areas**;

---

GRI 11.4.5

- (d) metrics on state of species.

---

GRI 11.4.2.

72. The undertaking shall report **metrics** related to material impacts resulting from **biodiversity** and **ecosystem** change in accordance with ESRS E4-5, per each significant business site located in or **near** the **biodiversity sensitive areas** that is listed according to the disclosure OG 1. *Mapping of business sites*.

---

## **ESRS E5 – OG Circular economy**

**Policies, actions and targets**

73. When reporting its **policies, actions** and **targets** related to the circular economy, the undertaking shall specify whether and how they address:
- (a) application of circular economy principles to equipment and machinery assets;
  - (b) drilling waste (muds and cuttings, scale, sludges) and tailings;
  - (c) materials resulting from decommissioning activities for offshore and onshore assets, facilities and infrastructure.

---

IPIECA ENV-8 C2

**Metrics**

74. The undertaking shall disclose the percentage of materials resulting from decommissioning activities for offshore and onshore assets, facilities and infrastructure that are re-used or recycled.
75. The undertaking shall also disclose the following volumes referred to the reporting period:

---

SASB EM-RM-000.A

EFRAG

- (a) volume (in cubic meters) and percent of crude oil and gas that is traded for the following activities:
  - i. petrochemicals;
  - ii. petroleum products;
  - iii. unknown;

---

SASB EM-EP-160a.2

GRI 11.8.2

- (b) tonnes oil recovered from oil spills;

---

**GRI 11.5.4** **IPIECA ENV-7**

- (c) tonnes of drilling waste;

---

**GRI 11.5.4**

- (d) tonnes of sludges;

- (e) tonnes of **tailings**;

---

**IPIECA ENV-8**

- (f) tonnes of decommissioned materials.

---

**IPIECA ENV-8** **EFRAG**

76. In addition to reporting resource outflows according to Disclosure Requirement E5-5 (paragraph 38 (b)), the undertaking shall disclose the amount of machinery and equipment, by weight, that has been diverted from disposal during the reporting period, by **recovery** operation type as stipulated under Disclosure Requirement E5-5 37 (b) i-iii.

## Social disclosures

---

### ESRS S1 – OG Own workforce

*Policies, actions and targets*

77. When reporting its **policies, actions and targets** related to its **own workforce** according to ESRS S1-1, S1-4, S1-5, the undertaking shall specify whether and how they address:
- (a) housing facilities for own workers and their access to basic services such as clean water, sanitation and electricity as well as recreational facilities and social spaces;
  - (b) working time and **work-life balance** when operating round-the-clock or in remote locations.

---

### OG 7. Work stoppages

78. **The undertaking shall disclose the number of major work stoppages during the reporting period, including number of employees involved and their length.**
79. The objective of this Disclosure Requirement is to enable an understanding of the extent of major work stoppages and their effects on the undertaking.

*Policies, actions and targets*

80. When reporting its **actions** according to ESRS S1-4, the undertaking shall describe whether and how taken or agreed actions resolve the major work stoppages.

**Metrics**

81. The undertaking shall disclose the number of major work stoppages during the reporting period and, for each of them:

---

**EFRAG**

- (a) the number of employees involved; and

---

**SASB EM-EP-210b.2**

- (b) the length in days of the stoppage.

---

### ESRS S2 – OG Workers in the value chain

*Policies, actions and targets*

82. When reporting its **policies, actions and targets** related to **value chain workers**<sup>4</sup> health and safety according to ESRS S2-1, S2-4, S2-5, the undertaking shall specify whether and how they address the applicability of its own health and safety management system to value chain workers and whether and how the undertakings monitors the health and safety metrics for the value chain workers whilst working on site.

---

### **ESRS S3 – OG Affected communities**

---

#### ***Policies, actions and targets***

83. When reporting its **policies, actions** and **targets** related to the engagement with **indigenous peoples**, including through the tailings facility lifecycle, according to ESRS S3-1, S3-4, S3-5, the undertaking shall describe whether and how they address:
- (a) engagement with **indigenous peoples** in building knowledge and in decisions that may have a bearing on public safety;
  - (b) land and resources rights:
    - i. recognition of legitimate tenure rights holders when acquiring, leasing or making other arrangements to use, or restrict the use of land, including involuntary resettlement;
    - ii. process for establishing compensation for loss of assets and other assistance to improve or restore standards of living or livelihoods; and
    - iii. use of the land after the closure of the business site;
  - (c) respecting and protecting **environmental** and **human rights defenders**.

---

**GRI 413**    **EFRAG**

84. The undertaking shall disclose the definition of **affected communities** applied when preparing its sustainability statement.

#### ***Metrics***

---

**GRI 11.17.4**    **PIECA SOC-10 C1**

85. The undertaking shall disclose the following **metrics** in relation to seeking **free, prior and informed consent (FPIC)**:
- (a) whether it has been involved during the reporting period in a process of seeking FPIC from **indigenous peoples** for any of its activities;

---

**GRI 11.17.4**

- (b) if the undertaking has been involved in such processes, the following information for each of the business sites in question:
  - i. whether the process has been mutually accepted by the undertaking and the affected **indigenous peoples**; and
  - ii. whether an agreement has been reached, and if so, if the agreement is publicly available.

---

**GRI 11.17.2**    **EFRAG**

86. The undertaking shall disclose the number of **confirmed incidents** during the reporting period related to **environmental** and **human rights defenders**, specifying those that relate to vulnerable groups, including indigenous people.

---

<sup>4</sup> ESRS S1 *Own Workforce* includes employees and non-employees (individual contractors supplying labour to the undertaking, and people provided by undertakings primarily engaged in 'employment activities' (NACE Code N78). Workers not in scope of *Own Workforce* are considered workers in the value chain (and are defined as individuals performing work in the value chain of the undertaking, regardless of the existence or nature of any contractual relationship with the undertaking).

## **OG 8. Security personnel**

---

87. The undertaking shall disclose the percentage of security personnel within *own workforce* that has received *training* about the undertaking's human rights *policies*.
88. The objective of this Disclosure Requirement is to enable an understanding of the extent to which the undertaking's security personnel are trained on the undertaking's human rights *policies* and an understanding of how these are respected when engaging with *affected communities*.

---

GRI 11.18.2 IPECA SOC-3 C1, SHS-7 C2, SOC-1 C4

89. The undertaking shall disclose:
- (a) the percentage of security personnel that has received *training* in the undertaking's human rights *policies*;

---

GRI 11.17.2 EFRAG

- (b) where applicable, the number of the identified *incidents* during the reporting period of violations of human rights of *affected communities*, including *indigenous people* directly linked to its security personnel and a description of the type of violation.

## **OG 9. Engagement with affected communities and grievance mechanisms**

---

90. The undertaking shall disclose *metrics* regarding engagement with *affected communities* and the performance of its grievance mechanisms.
91. The objective of this Disclosure Requirement is to enable an understanding of the engagement with *affected communities* and grievance mechanisms on impacts connected to the undertaking.

---

GRI 11.15.2 IPECA SOC-9 A1

92. The undertaking shall disclose the number of sites with grievance mechanisms or similar conflict resolution procedures for the business sites listed in OG 1, *Mapping of business sites*. If the undertaking does not operate local grievance mechanisms at the business site level as these are managed at group or subsidiary level, it may fulfil this requirement by stating this to be the case. It may disclose its plans to develop grievance mechanisms at business site level, if applicable.

---

GRI 11.15.2 IPECA SOC-9 C2

93. The undertaking shall disclose the percentage of business sites that have implemented development programs and/or the following:
- (a) affected community engagement;
- (b) impact assessments, including:

---

SASB EM-EP-210b1

GRI 11.15.2

- i. social impact assessments, including gender impact assessments, based on participatory processes;

---

GRI 11.15.2

- ii. environmental impact assessments and ongoing monitoring.

94. In addition, for (b) above, the undertaking shall disclose whether the results of environmental and social impact assessments have been made public.

## **ESRS S4 – OG Consumers**

---

95. The undertaking shall disclose:

---

EU Regulation

- (a) the number of open cases before courts or other competent authorities at the end of the reporting period that concern misleading business-to-consumer commercial practices, in particular misleading environmental claims, or general public

communication related to sustainability. This includes the use of sustainability labels that are not based on a certification scheme or established by public authorities;

- (b) in relation to (a) above, the number of cases resolved during the reporting period and the outcomes of such cases.

## Governance disclosures

### **ESRS G1 - OG. Business conduct**

---

#### *Policies, actions and targets*

96. When reporting its **policies, actions** and **targets** related to the management of relationships with suppliers and payment practices according to ESRS G1-2 and G1-6, the undertaking shall specify whether and how they take into account the procurement spending on local suppliers.
97. When disclosing according to paragraph 96, the undertaking shall disclose its definition of local suppliers, in case where it deviates from ESRS definition.

#### **Metrics**

---

**EFRAG**      **GRI 11.22.1**      **IPIECA GOV5.C1, C2**

98. When reporting according to ESRS G1-5 paragraph 29, the undertaking shall disclose the amount it spent (as a reporting entity) during the reporting period on **lobbying activities** with contents covering its material **impacts, risks** and **opportunities** identified in its **materiality** assessment.

### **OG 11. Transparency about contracts and licenses**

---

99. **The undertaking shall provide information about the transparency with respect to contracts and licenses with governments setting the terms and conditions for the exploitation of oil and gas resources.**
100. The objective of this Disclosure Requirement is to provide an understanding of the transparency of the undertaking about its contracts concluded and licences received.

#### **Metrics**

101. For any material **contract** or **license** the undertaking shall disclose:

---

**GRI 11.20.5**      **IPIECA GOV-4 C1**

- (a) whether these are made publicly available and where they can be found;
- (b) for those **contracts** or **licenses** not publicly available, the reason for this and, if applicable, **actions** taken to publish in the future and the timetable to do so.

### **OG 12. State-aid and competition**

---

102. **The undertaking shall provide information concerning possible anti-competitive behaviour, the abuse of dominance, or the receipt of state aid during the reporting period.**
103. The objective of this Disclosure Requirement is to enable an understanding of possible anti-competitive behaviour of the undertaking during the reporting period, as well as any **state aid** received.

#### **Metrics**

104. The disclosure shall include the following information:

---

**GRI 11.19.2**

- (a) publicly announced notifications, preliminary investigations, investigations, proceedings or commitments and remedies relating to violations of antitrust and

monopoly legislation or the receipt of state-aid where the undertaking was named as a participant by a competent authority; and

- (b) the main outcomes of legal proceedings against the undertaking concluded during the reporting period, including sanctions, fines, commitments and remedies;

---

**GRI 11.21.3**

- (c) the total amount received with respect to **state aid** or financial assistance received from any government during the reporting period on a country-by-country basis.

---

**OG 13. Beneficial ownership**

---

105. The undertaking shall provide information about its beneficial ownership and how it identifies the beneficial owners of business partners, including joint ventures and suppliers.

106. The objective of this Disclosure Requirement is to provide transparency about the undertakings beneficial owner(s) and to how the undertaking manages issues related to the beneficial owners of its business partners, and how these are identified.

***Policies, actions and targets***

107. When reporting its **policies, actions** and **targets** related to the prevention and detection of corruption and bribery according to ESRS G1-1 and G1-3, the undertaking shall specify whether and how they cover guidelines and screening processes regarding politically exposed persons ('PEPs') and beneficial owners of business partners, including joint ventures and suppliers.

***Metrics***

---

**GRI 11.20.6**

108. The undertaking shall disclose a list of its parent undertaking's beneficial owner(s) (as defined in article 3(6) of Directive (EU) 2015/849).

---

**OG 14. Oil and gas purchased from states**

---

109. The undertaking shall provide information about oil and gas purchased from states or a third party appointed on the behalf of such states during the reporting period.

110. The objective of this disclosure requirement is to enable transparency about oil and gas purchases from **the state** and to provide insights amounts paid to the state under such transactions.

***Metrics***

---

**GRI 11.21.8****IPIECA GOV-4 C3**

111. For oil and gas purchased during the reporting period from the state or from third parties appointed by the state to sell on their behalf, the undertaking shall disclose:

- (a) volumes and types of oil and gas purchased from the state;
- (b) full names of the buying undertaking(s) and the recipient of the payment; and
- (c) payments made for the purchase.

---

**OG 15. Cybersecurity**

---

112. The undertaking shall provide information about the management of its **cybersecurity** as well as on **cyber incidents** during the reporting period.

113. The objective of this Disclosure Requirement is to enable an understanding of the undertaking's policies and management of risks regarding **cybersecurity** and to provide transparency on failures related to cybersecurity.

***Policies, actions and targets***

114. When reporting its *policies, actions* and *targets* related to *cybersecurity*, the undertaking shall specify whether and how they address cyber-related incident management for existing operations, projects planned or underway and new locations for business activities.
- 

**EFRAG**

***Metrics***

115. For the incidents during the reporting period that were made public, the undertaking shall disclose:
- (a) the number of incidents;
  - (b) the number of business sites impacted; and
  - (c) whether this involved restricted or ***classified information***.