

# European Lab project on risk and opportunities and linkage to the business model (RNFRO)

Outreach Webinar 25 May 2021

Co-Chairs

Dawn Slevin and Mario Abela



European Financial Reporting Advisory Group



# DISCLAIMER

The views expressed in this presentation are those of the presenter, except where indicated otherwise. They are not approved by the European Lab Steering Group nor do they represent the official views of EFRAG.

# Structure of session

1. Introduction and context
2. Key Findings (Good practices, aggregate findings, stakeholder survey)
3. Panel discussion



# 1. INTRODUCTION AND CONTEXT

## Purpose of the PTF RNFRO

The aim of the second project of the European Lab is to **identify good reporting practices** around the theme of the project from a sustainability perspective and **addressing what is commonly known as ESG factors**. The project is expected to consider the **needs and expectations of a wide range of users and other stakeholders**, the extent to which they are **addressed by current reporting practices**, and the **challenges faced by companies in providing that information**.

## Scope of project

- Focus is on business model reporting and how opportunities and risks to it are described (if at all)
- Companies typically do not tag risks as financial/non-financial but some do recognise that some risks are in fact pre-financial (measurement uncertainty/future events)
- Placement/ location of disclosures- will look at the legal filing and voluntary reports (such as sustainability reports)
- Adopting a multi-capital business that includes all the 'capitals' typically reported under Integrated Reporting- but we will remain framework neutral
- Build on existing research including the Alliance of Corporate Transparency Report (2019), the Corporate Reporting Dialogue publications and other publications



## 2. KEY FINDINGS

---

## 2A. ILLUSTRATIVE GOOD PRACTICE EXAMPLES

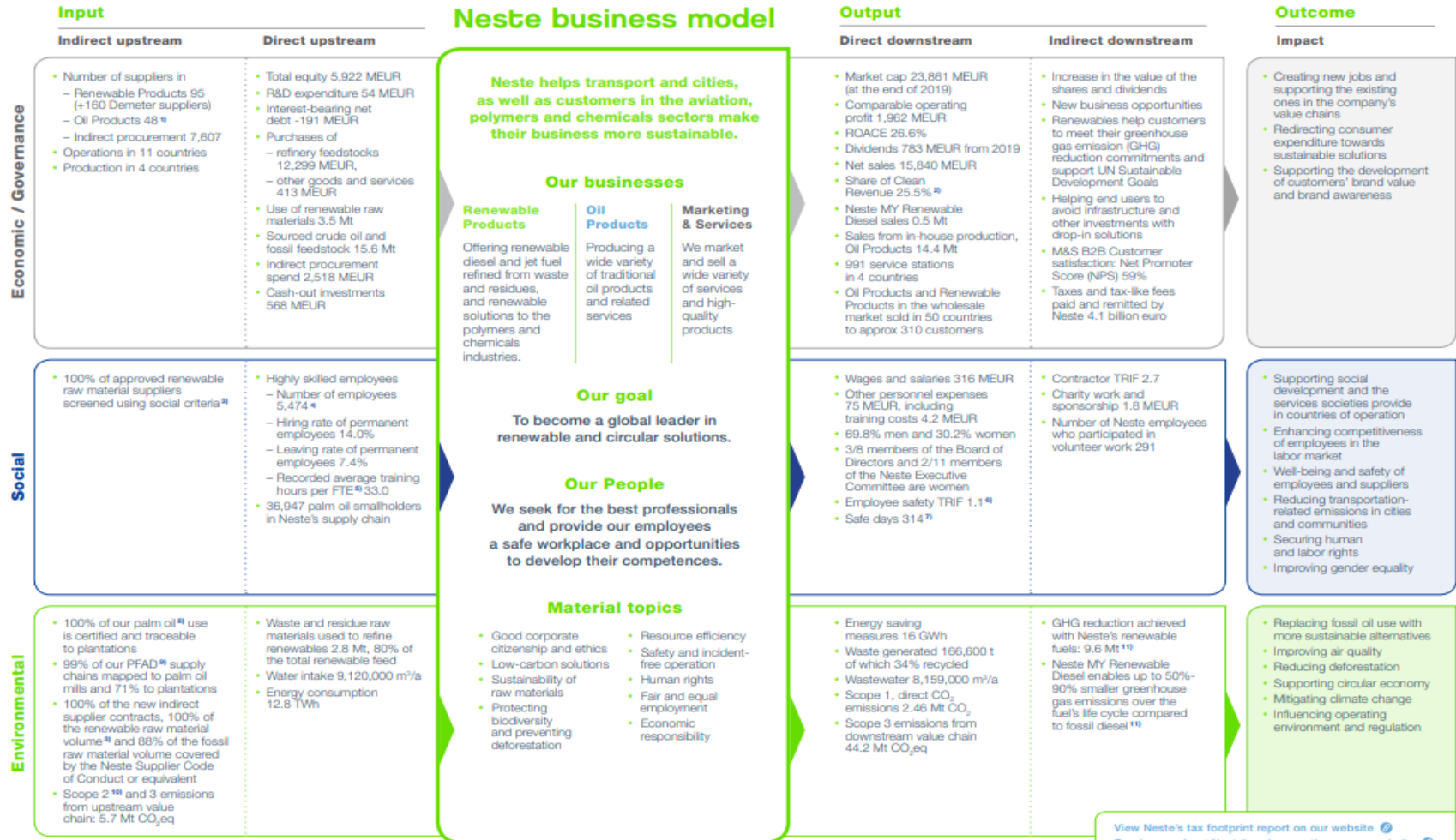


# Overview of good practice selection



- 65 companies considered
- Sample of 43 (from 16 European countries and 19 sectors) considered on the basis of
  - Existing initiatives highlighting recognized good practices (e.g. Alliance for Corporate Transparency)
  - 20% of companies from the EFRAG Stakeholder Survey

# Comprehensive business model description-Neste



View Neste's tax footprint report on our website [Read more about Neste's value creation on our website](#)

<sup>9</sup> Includes also natural gas and industrial gas suppliers. <sup>10</sup> Total revenue of Renewable Products segment divided by Group revenue. <sup>11</sup> Demeter suppliers excluded from the figure due to the integration in progress. <sup>12</sup> Annual average number of employees. <sup>13</sup> Full-time equivalent (FTE). Excluding Russia. <sup>14</sup> Total Recordable Injury Frequency <sup>15</sup> A day without a TRI accident, process safety events, fire or ignition, breach of environmental permit, or traffic

# Short- Medium- and Long- term distinction- Allianz

Asset and Business Value Impact under Transition Scenarios (Source: Allianz 2019, excerpt)

GLOBAL		2°C					1.5°C					
		2020	2025	2030	2035	2040	2020	2025	2030	2035	2040	
ENERGY	Integrated Oil and Gas	(M)	(M)				(M)					T
ENERGY	Oil and Gas Storage and Transportation											
ENERGY	Coal and Consumable Fuels				T, P	T, P				T, P	T, P	
MATERIALS	Fertilizers and Agricultural Chemicals	(T)	(T)	(T)	(T)	(T)	(T)	(T)	(T)	P		
MATERIALS	Aluminium											
MATERIALS	Steel											
INDUSTRIALS	Industrial Conglomerates											
INDUSTRIALS	Airlines	(T)	P				(T)	P				
CONSUMER DISCRETIONARY	Auto Components											
CONSUMER DISCRETIONARY	Automobiles			P	P, T	T		P	P	P, T	P, T	
UTILITIES	Electric Utilities	P	(M)		P	P	P	(M)		P	P	
UTILITIES	Renewable Electricity				T	T				T	T	

**Risk enhancer:**

P = policy

T = substitution technology

M = related market forces

**Risk mitigator:**

(P) = policy

(T) = little substitution technology

(M) = countering market forces

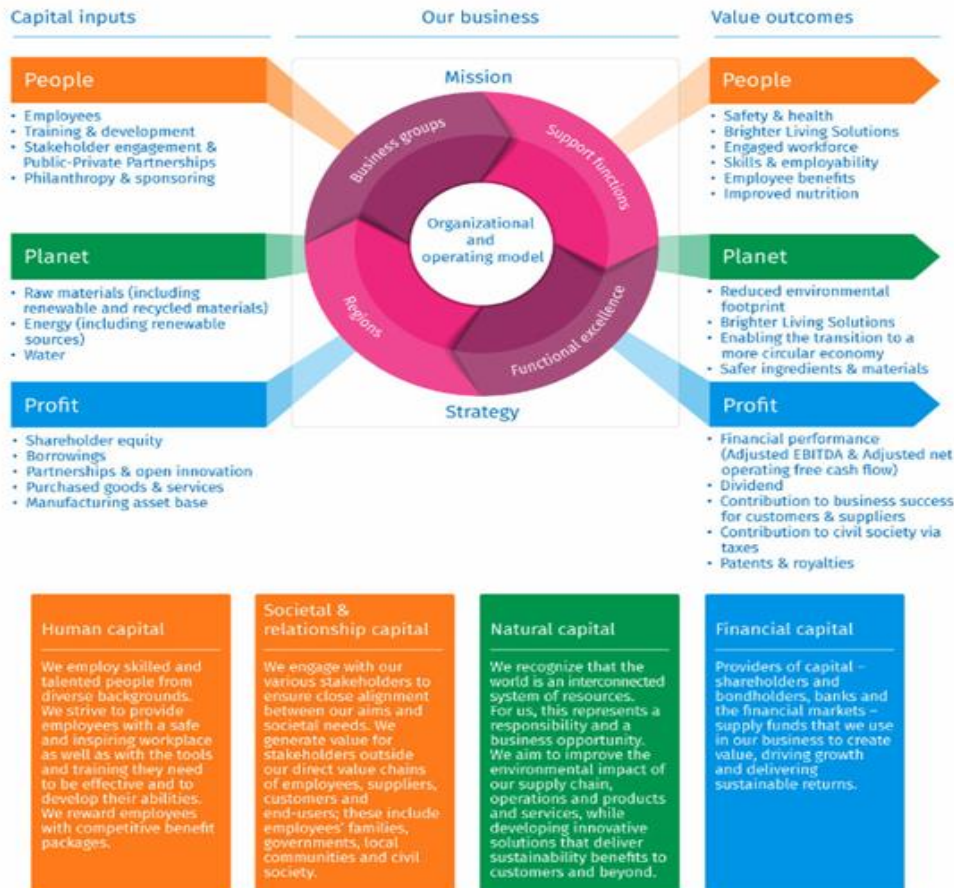
**Risk:**

Low
Medium
High
Very high

Clear picture of short-, medium- and long-term asset and business value impact (risk) by industry.

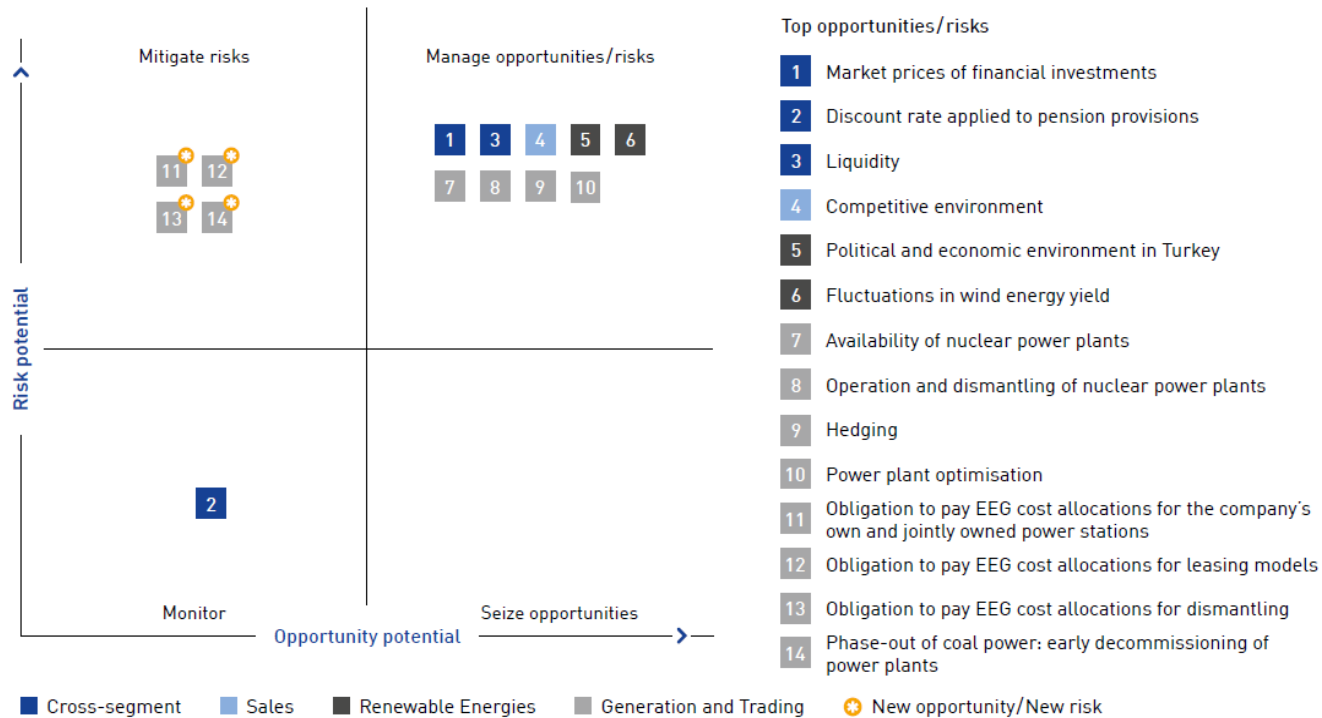
# Dependencies and impacts- DSM

How we create value for our stakeholders



# Sustainability factors impact on performance (EnBW)

Top opportunities/risks as of 31/12/2019



# Sustainability factors impact on performance- continued (EnBW)

Linking the top opportunities/risks with the key performance indicators

Top opportunities/risks		Key performance indicators													
		Financial performance indicators			Strategic performance indicators				Non-financial performance indicators						
		A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Market prices of financial investments														
2	Discount rate applied to pension provisions														
3	Liquidity		●	●											
4	Competitive environment	●	●	●	●			○	○	○	○				
5	Political and economic environment in Turkey			●				○							
6	Fluctuations in wind energy yield	●	●	●		●									○
7	Availability of nuclear power plants	●	●	●			●	○							
8	Operation and dismantling of nuclear power plants														
9	Hedging	●	●	●			●								
10	Power plant optimisation	●	●	●			●								○
11	Obligation to pay EEG cost allocations for the company's own and jointly owned power stations	●	●	●			●								
12	Obligation to pay EEG cost allocations for leasing models	●	●	●			●								
13	Obligation to pay EEG cost allocations for dismantling														
14	Phase-out of coal power: early decommissioning of power plants	○	○	○			○	○	○						○

■ Cross-segment	A Adjusted EBITDA	Total share of adjusted EBITDA:	H Reputation Index	L LTIF for companies controlled by the Group/ LTIF overall
■ Sales	B Internal financing capability	D "Customer proximity"/ Sales	I EnBW/Yello Customer Satisfaction Index	M Installed output of RE and share of generation capacity accounted for by RE
■ Renewable Energies	C ROCE	E Grids	J SAIDI (electricity)	N CO <sub>2</sub> intensity
■ Generation and Trading		F Renewable Energies	K Employee Commitment Index (ECI)	
● Direct effect		G Generation and Trading		
○ Potential/long-term effect				

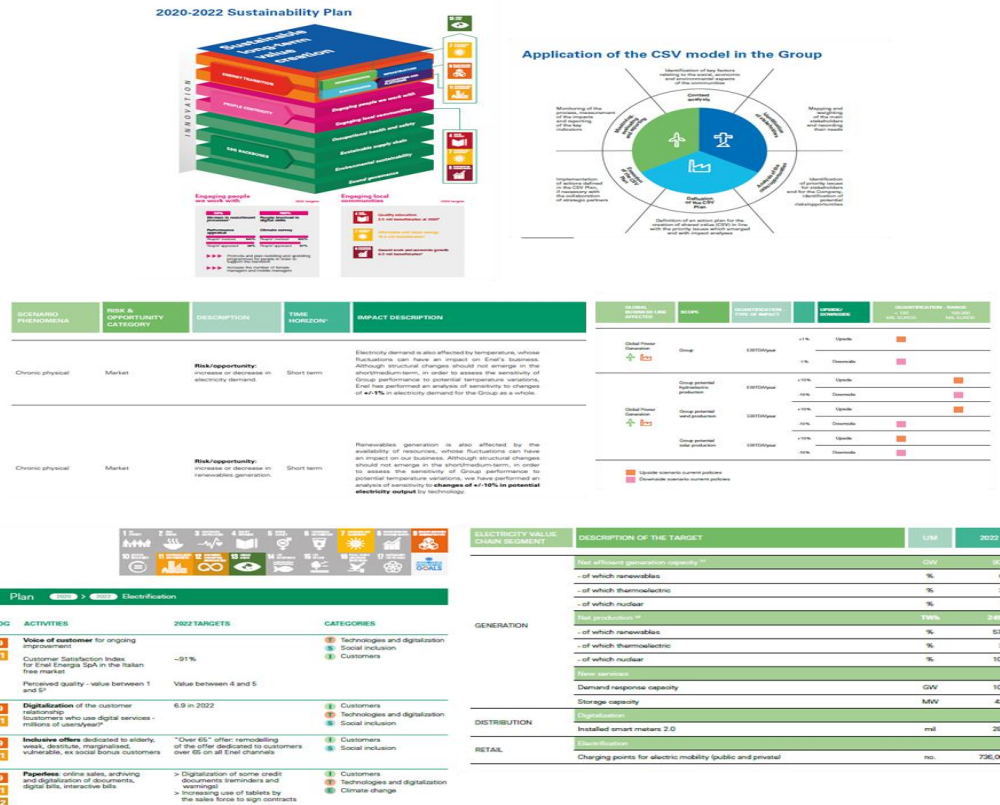
EnBW gives a clear view on interdependencies, opportunities, and risks, linked to strategic financial and non-financial KPIs. EnBW links the top opportunities/risks with the key performance indicators, making distinction between 'Direct effect' and 'Potential/long-term effect'.

# Sustainability risks- AB Volvo

	Policies	Essential risks	Mitigation activities	KPI's
<b>Environment</b>	<ul style="list-style-type: none"> <li>Environmental Policy</li> <li>Volvo Group Code of Conduct</li> <li>Supplier Code of Conduct</li> </ul>	<ul style="list-style-type: none"> <li>Environmental impact by our products</li> <li>Environmental impact by our operations</li> <li>Environmental impact by our value chain (suppliers, business partners and customers)</li> <li>Scarce materials and minerals</li> </ul>	<ul style="list-style-type: none"> <li>Product development and new technologies: 20–31, 48–49</li> <li>Resource efficiency and increased circularity: 62–63</li> <li>Environmental governance of our own operations: 56–59</li> <li>Sustainable Purchasing Program: 54–55</li> <li>Responsible sales: 61</li> <li>Training: 55, 66</li> <li>Partnerships: 55</li> </ul>	<ul style="list-style-type: none"> <li>Product emissions: 35, 58</li> <li>Product recyclability rate: 62</li> <li>Energy use and sources: 56–58</li> <li>Energy efficiency: 35, 57–58</li> <li>CO2 emissions scope 1 and 2: 57–58</li> <li>Supplier self-assessments and audits: 54–55</li> <li>ISO Certifications: 54, 56</li> </ul>
<b>Employees &amp; Social Factors</b>	<ul style="list-style-type: none"> <li>Volvo Group Code of Conduct</li> <li>Health and Safety Policy</li> </ul>	<ul style="list-style-type: none"> <li>Health and Safety</li> <li>Diversity and inclusion</li> <li>Competence development and employment</li> </ul>	<ul style="list-style-type: none"> <li>Employee management: 65–66</li> <li>Health and Safety: 66–68</li> <li>Labor Relations: 68</li> <li>Inclusion and diversity: 69</li> <li>Grievance mechanisms: 40</li> <li>Training: 40, 66</li> </ul>	<ul style="list-style-type: none"> <li>Employee turnover: 65</li> <li>Gender diversity: 69</li> <li>Lost time accident rate (LTAR): 66</li> <li>Whistle blower cases: 40</li> </ul>
<b>Human Rights</b>	<ul style="list-style-type: none"> <li>Health and Safety Policy</li> <li>Supplier Code of Conduct</li> <li>Compliance Policy</li> </ul>	<ul style="list-style-type: none"> <li>Adverse human rights impacts in our own operations</li> <li>Adverse human rights impacts in our supply chain or linked to our business partners</li> <li>Adverse human rights impacts linked to the use of our products</li> </ul>	<ul style="list-style-type: none"> <li>Human rights management: 42–43</li> <li>Sustainable purchasing Process: 54–55</li> <li>Sustainable minerals Program: 55</li> <li>Responsible sales: 61</li> <li>Grievance mechanisms: 40</li> <li>Training: 55, 61, 66</li> <li>Societal engagement and partnerships: 35, 37, 46</li> </ul>	<ul style="list-style-type: none"> <li>Supplier self-assessments and audits: 54–55</li> <li>Whistle blower cases: 40</li> </ul>
<b>Anti-corruption</b>	<ul style="list-style-type: none"> <li>Code of Conduct</li> <li>Compliance Policy</li> <li>Anti-Corruption Due Diligence Policy</li> </ul>	<ul style="list-style-type: none"> <li>Corrupt practices in relation to suppliers, business partners customers and others</li> </ul>	<ul style="list-style-type: none"> <li>Compliance program: 40</li> <li>Due diligence of business partners: 40</li> <li>Whistleblower process: 40</li> <li>Training: 40</li> </ul>	<ul style="list-style-type: none"> <li>Whistle blower cases: 40</li> </ul>

Risks are well detailed, as well as their impact and responses taken. Therefore, the company disclosure and description of its business model in relation to its sustainability-related issues risks. Covers the breadth of ESG risks.

# Sustainability opportunities- Enel



Enel provides a detailed description of opportunities and their impact related to climate change. Each opportunity is classified according to a timeframe (short, medium and long term). The link between the business model and sustainability opportunities results clearly defined since the company links its business activities with sustainability opportunities both in terms of operational and financial impact. Moreover, the process of defining Enel's strategies itself is accompanied by an analysis of the risks and opportunities connected with those strategies.



## 2B. KEY FINDINGS: AGGREGATE FINDINGS PTF-RNFRO REVIEW OF A SAMPLE OF PRACTICES

# Key Findings

## Business Model

- There are front-runners in this space, however, even leaders do not show a high level of sophistication on all aspects of reporting on their business model.
- Value creating aspects of the business model have found their way into corporate reporting, although in early development stage where focus remains on qualitative disclosures about the business model.
- Destruction of value is also not adequately demonstrated. New methods of “value” and “impact” assessment are more inclusive to risks related to social and governance issues (factors). Opportunities should be addressed in view of “avoidance of value destruction” otherwise it will be difficult to relate with “direct” and “indirect” impacts of decisions either these are “taking action” or “ignore issue”.

## Risks and Opportunities

- Sustainability-related risks are disclosed in various places of corporate reporting and lack coherence. Current practices lack a structured approach where risks are clearly linked to the business model. For example, companies rarely explain if and how their business model and strategy are resilient to climate risk .
- Sustainability opportunities are disclosed as part of material themes identified in sustainability reporting. Hence, opportunities are often difficult to connect to the business model.
- The value of non-financial risks and opportunities related to the business model is in most cases not disclosed.

# Key Findings

## Performance and Viability

- Poor development of sustainability-related opportunities compared to sustainability-related risks, suggesting that sustainability is seen as restraint on business rather an opportunity for growth.
- The business model is not holistically developed, and itself lacks sufficient information to allow for linkage to sustainability-related risks and opportunities over relevant timelines, necessary for users to assess its longer term viability.

## Presentation

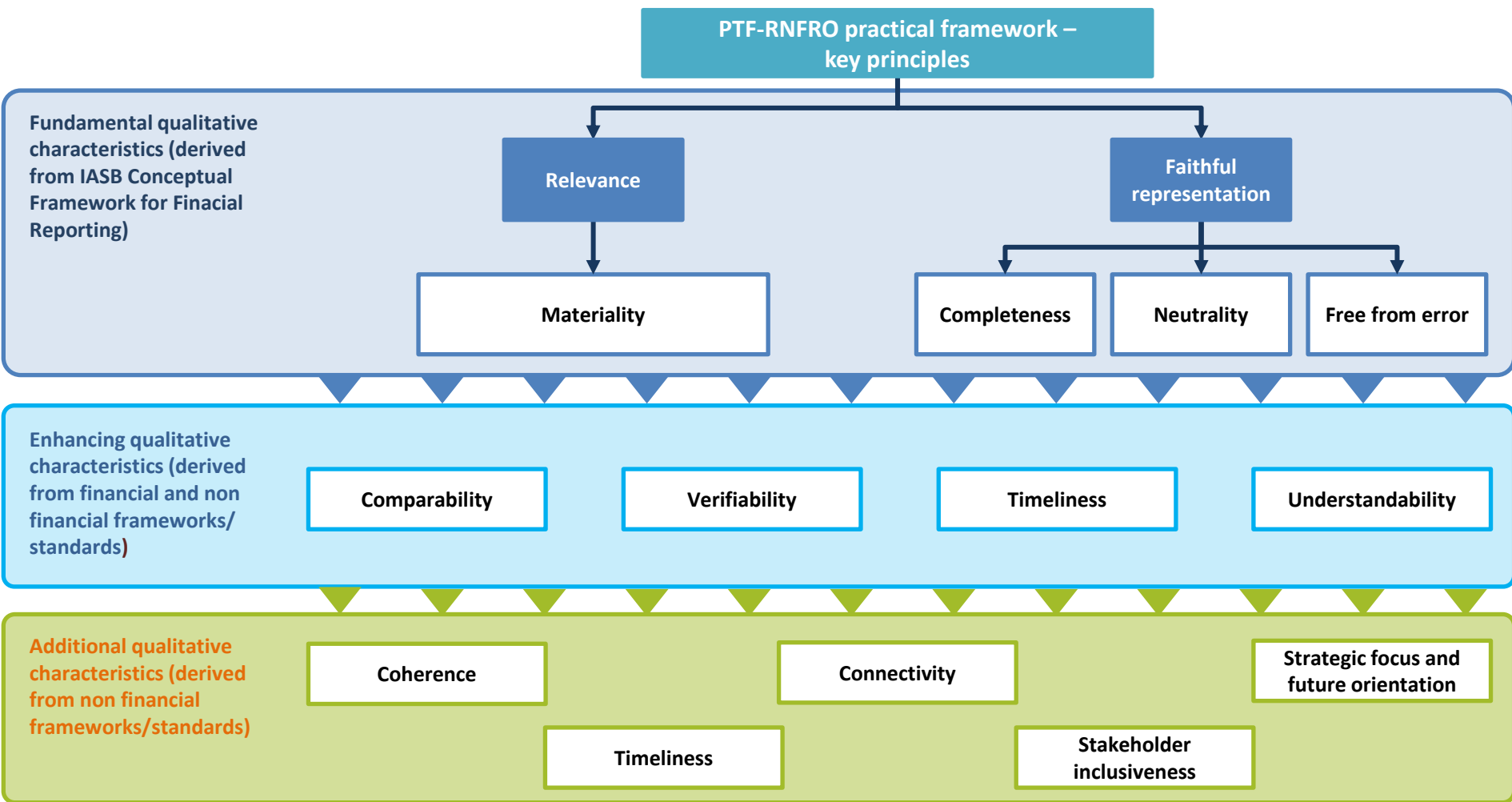
- Disclosures are mainly positive; more balance could be brought by also disclosing the negative impact of the company
- Poor linkage of sustainability-related risks and opportunities to the business model..
- Inconsistent use of existing standards, guidance and frameworks was observed by the PTF-RNFRO.
- Variation in the use of terms and definitions – this arises from the variation across existing reporting standards, guidance and frameworks.
- Poor development of intangibles-related risks and opportunities

# Key Findings

## Credibility

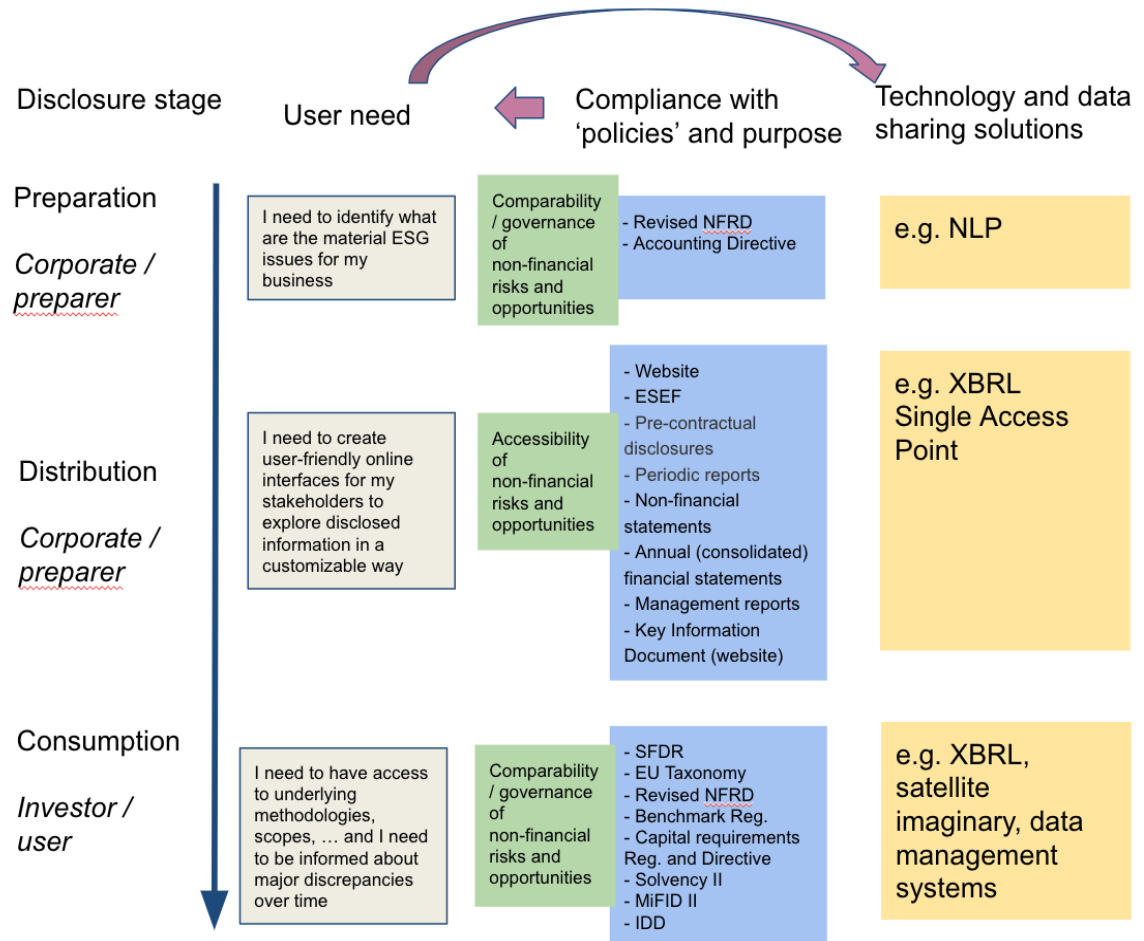
- Absence or patchy application of science-based targets when reporting on sustainability outcomes and impacts.
- Inconsistent use of assurance necessary to help ensure that the corporate reporting system value chain is reliable, factual, in line with science-based targets and implemented according to relevant principles as specified by the reporting standards, guidance and frameworks.
- Lack of understanding and insufficient deployment of technology which has the potential to play a significant role in minimizing the reporting burden and issues of data collection and data verification.

# Key Findings- Practical Framework



# Key Findings- Use of Technology

- Overall, there is limited evidence in corporate disclosures of the description of technological solutions directly applied for reporting.
- This finding suggests that company's deploy technologies in an ad-hoc manner
- These findings indicate a need for transparency on the methodologies and techniques used to prepare the disclosures and ensure they are free from errors or omissions.



# Path to Improvement

- **Clearer description** of the business model and **linkage** to risks and opportunities
- More emphasis on **opportunities**
- Application of **evidence-based** and science-based targets
- Better **connectivity of financial and non-financial information**
- Optimising the **use of available technologies**
- Credibility through third-party independent **assurance**

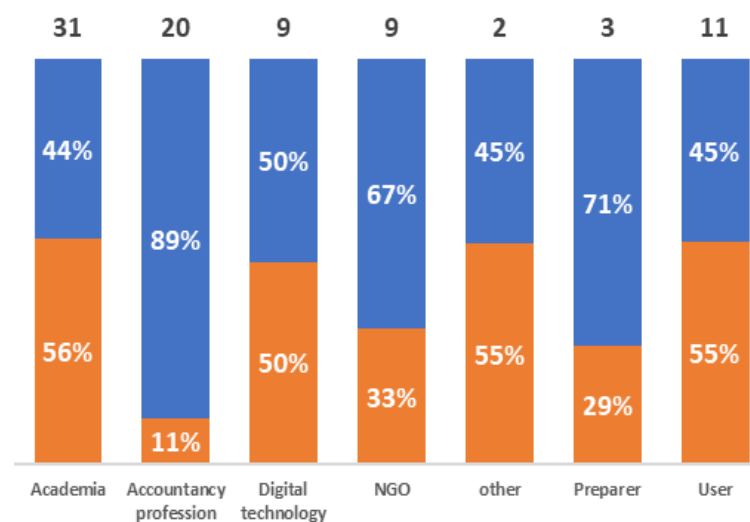
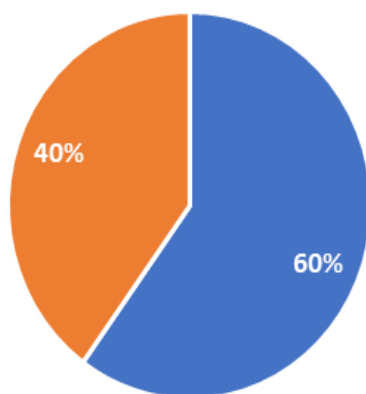
## 2C. KEY FINDINGS: STAKEHOLDER SURVEY



# Approach to business model

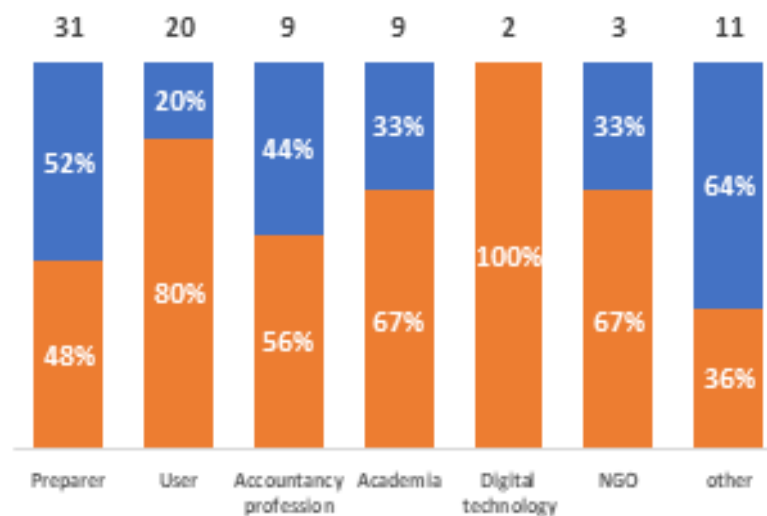
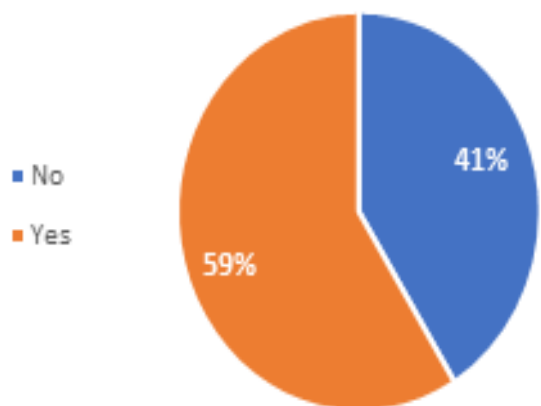
With regards to describing the business model, have you developed your own approach or are you using existing non-financial reporting framework/standards/methodology/guidance?

- Existing non-financial reporting framework/ standards/ methodology/ guidance
- Own approach



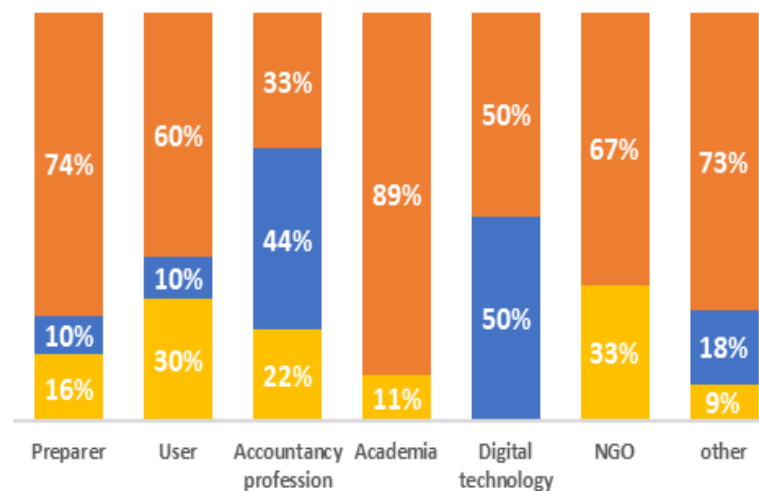
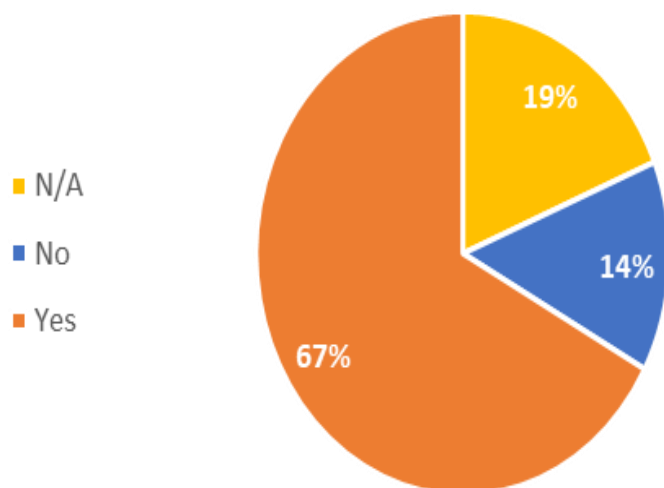
# Linkage

Do you connect non-financial and financial information in your disclosure/analysis on business model and non-financial risks and opportunities?



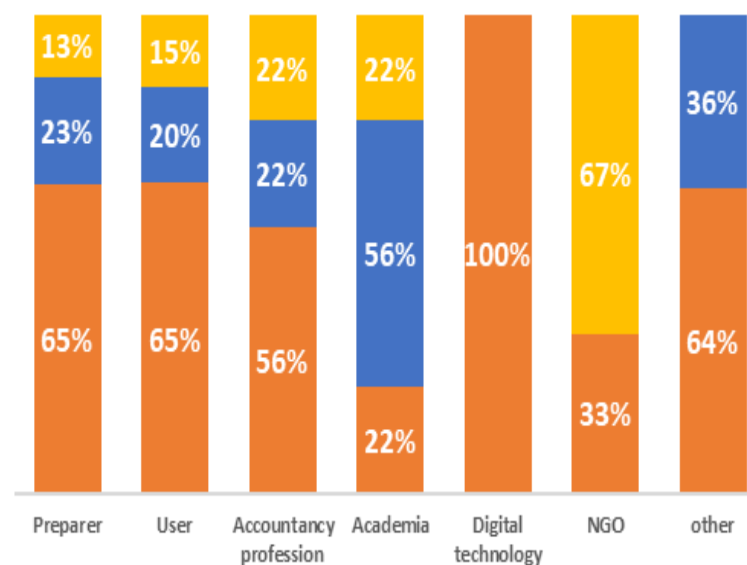
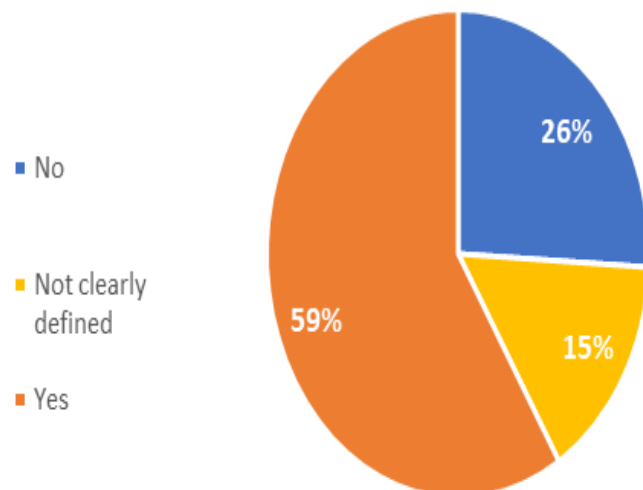
# EU Taxonomy impacts

Do you see the application of the EU Taxonomy to environmentally sustainable activities or investments as an opportunity to review/ enhance business models?



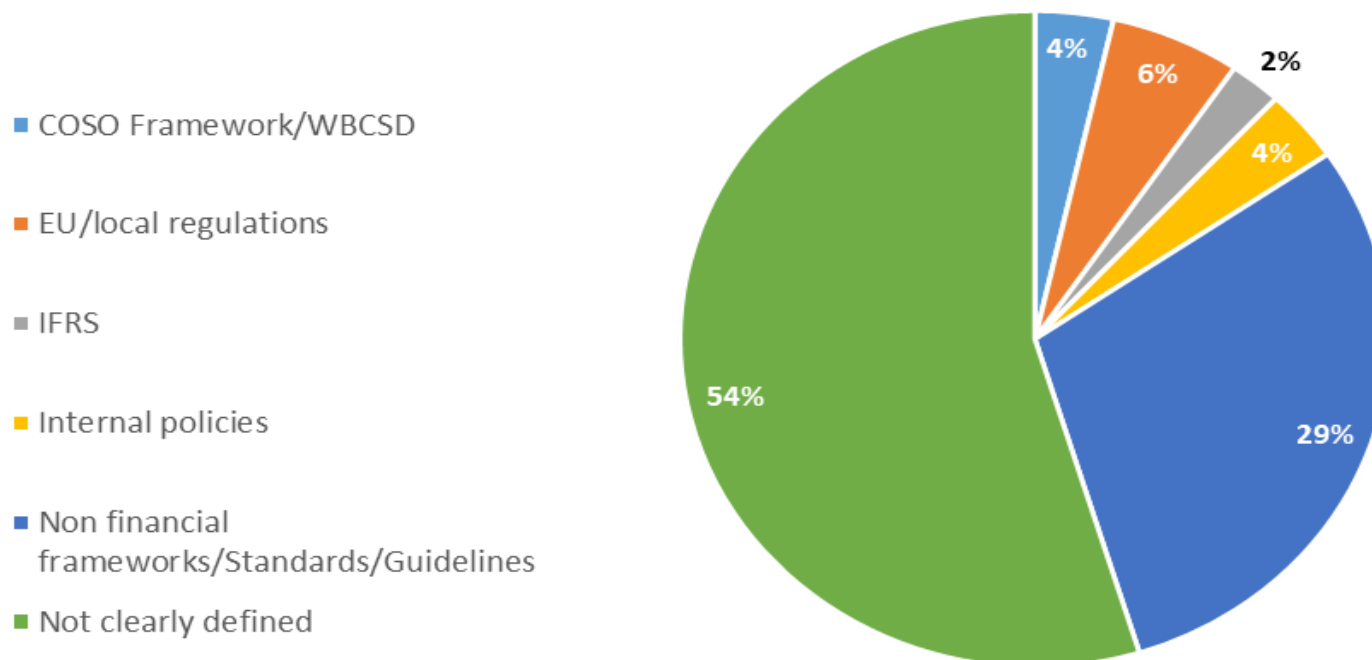
# Definitions

Do you have a commonly agreed definition of non-financial risks and opportunities that is shared internally to your organization?



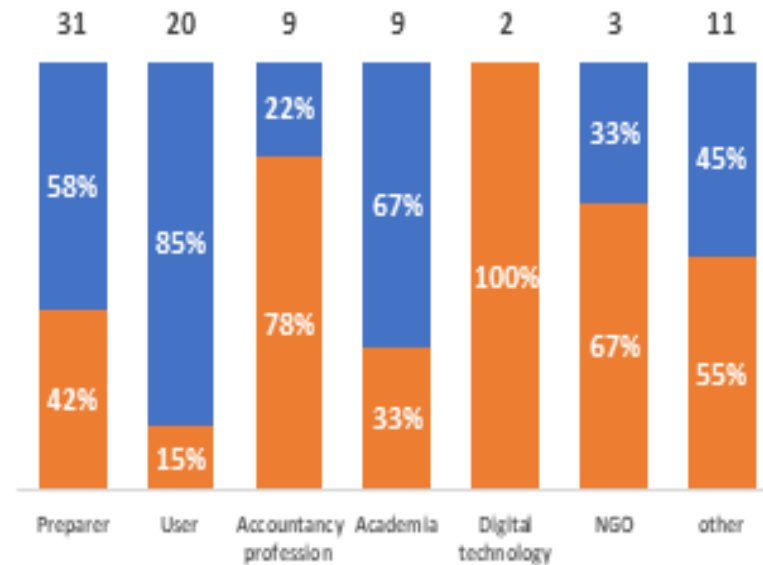
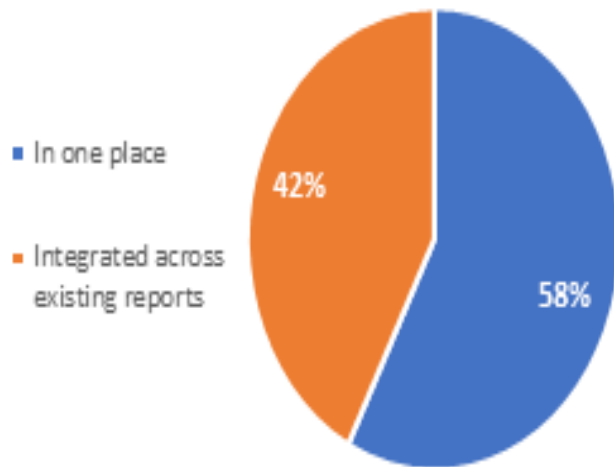
# Use of frameworks

Is it aligned with any main frameworks/ standards/ methodologies/ guidance, and if yes, which one(s)?



# Location

Would you prefer to have all ESG-related information in one place, or integrated across existing report(s)?



# Viewpoints from stakeholders...

‘Information not balanced, uniquely or mostly oriented towards positive impacts generated by the organization activities’

Biased reporting...

‘Qualitative, no leadership, not at a strategic level, not part of the business model, not material, communication exercise’

‘Report should be balanced, Green is allowed (even if it is a small initiative) but also then ‘Grey’ should be mentioned’

Greenwashing...

Statements made that are not supported by other evidence.  
Statements made without appropriate signoff/buy-in from the senior management of the business’

## 3. PANEL DISCUSSION



# THEMATIC FOCUS OF PANEL DISCUSSION

1. BUSINESS MODEL REPORTING
2. REPORTING ON SUSTAINABILITY-RELATED RISKS AND OPPORTUNITIES
3. USE OF TECHNOLOGY

# APPENDIX- PROJECT DETAILS FOR REFERENCE PURPOSE ONLY

## Membership

- Mario Abela, not-for-profit organisation (Malta)
- Maria Alexiou, preparer (Greece)
- Estelle Aymard-Young, financial institution (France)
- Emilie Beral, user (France)
- Donato Calace, digital tools (Italy)
- Daniela Cholakova, preparer (Bulgaria)
- Jean-Philippe Desmartin, user (France)
- Laura Girella, not-for-profit organisation/ academia (Italy)
- Michael Goebbels, preparer (Germany)
- Ulrika Hasselgren, user (Denmark)
- Christian Hell, accountancy profession (Germany)
- Marcus Looijenga, accountancy profession (Netherlands)
- Gloria Mazzocco, preparer (Italy)
- Giuseppe Milici, accountancy profession (Italy)
- Tegwen Le Berthe, user (France)
- Isabel Gavín Pérez, financial institution (Spain)
- Eckhard Plinke, user (Germany)
- Gunnar Rimmel, academia (Sweden)
- Dawn Slevin, other stakeholder (Ireland)
- Mirjam Wolfrum, not-for-profit organisation (Germany)

## Reporting on Non-Financial Risks and Opportunities and Linkage to the Business Model Project Overview

- Project task force on reporting of non-financial risks and opportunities and linkage to the business model (PTF-RNFRO) is made up of 19 experts with diverse backgrounds (users, preparers, accountancy firms) representing; more details of PTF-RNFRO members are available [through this link](#)
- PTF-RNFRO is co-chaired by Mario Abela and Dawn Slevin
- It held its first operational meeting held on 8 September
- It is a 12-month project with completion expected in 2021
- The project seeks to find good reporting practices that allow stakeholders to understand how risks and opportunities that arise from the external operating environment impact companies. But also, how the companies' business and operations may have environmental or social impacts and how companies are mitigating these risks.

# Project Workplan

---

- **Workstream 1 (a)- understanding practice:** *Evaluate relevant existing reporting initiatives & key characteristics relevant to NFRD*
- **Workstream 1 (b)- assessment framework:** *Develop a practical framework for assessing the qualities of good non-financial reporting disclosure **practices***
- **Workstream 2- stakeholder outreach:** *Understand stakeholder needs and expectations on **good reporting practices***
- **Workstream 3- data sharing and technology:** ***Good practice examples (use cases) on** how information may be presented at source to maximise technology use*

## Project Workplan-continued

---

- **Workstream 4- reporting back on findings:** *Determine How best to structure the PTF-RNFRO Deliverable*
- **Workstream 5- due diligence of regulatory landscape:** *Ensure identified good reporting practices are in alignment with regulatory requirements*
- **Workstream 6-good reporting practice:** *Good reporting practice selection and recommendations based on assessment framework and stakeholder input obtained in other workstreams*



EFRAG receives financial support of the European Union - DG Financial Stability, Financial Services and Capital Markets Union. The contents of this presentation is the sole responsibility of EFRAG and can under no circumstances be regarded as reflecting the position of the European Union.

# THANK YOU

EFRAG  
Aisbl - ivzw  
35 Square de Meeüs  
B-1000 Brussel  
Tel. +32 (0)2 207 93 00  
[www.efrag.org](http://www.efrag.org)

