

CSRD Lookbook

Illustrative sustainability statement: structure & content

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pwc

Welcome to our **CSRD Lookbook!**

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The new requirements on sustainability reporting through the EU Corporate Sustainability Reporting Directive (CSRD), applying both mandatory reporting standards (ESRS - European Sustainability Reporting Standards) and the EU Taxonomy, is raising the bar significantly and creates new demands on companies.

The paradigm shift that companies face mean that sustainability work, and its reporting, can no longer be something separate, but rather needs to be integrated into the business and its processes, as well as in the annual report. This lookbook has the purpose of showcasing how the integration into the annual report can be structured and designed and will give you a feeling of how the new annual- and sustainability report will evolve.

The first few pages are for introduction and background purposes. Starting at page 11, you will find a glimpse of the new sustainability statements structure and content in line with the CSRD applying ESRS and the EU-Taxonomy regulation. The last pages in this publication are appendices to give further insights. The updates done in this 2.0 version are found on page 3

We hope you find it useful in your continued journey.

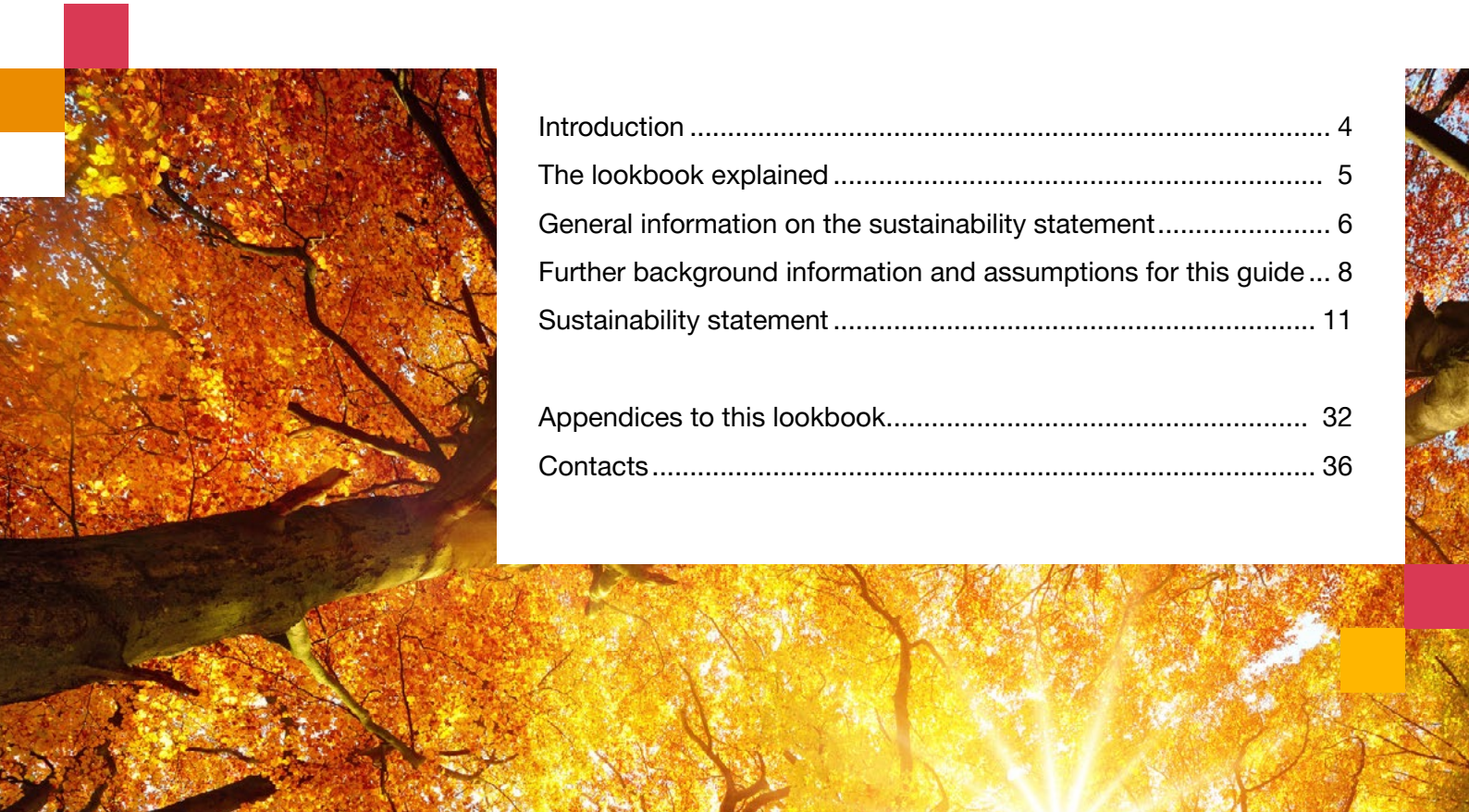
Best Regards from PwC,
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Updates in version 2.0 (Oct 2024)

- The headings and structure has been updated to reflect the latest guidance from EFRAGs Q&As about required presentation of a sustainability statement (report) as four parts, thus the notes section is renamed to display that it is a continuation of the first four parts (general, E, S and G).
- Clarification that all ESRS 2 mandatory disclosures must be presented in the general part of the report except for certain SBM-disclosures that can be presented in the E, S and G-parts.
- Editorial adjustments.

This publication is not a template for a CSRD report and does not constitute any form of a checklist for completeness of a sustainability statement under the directive (as transposed and endorsed in the EU member states various national laws). The publication cannot be used as a template to prepare a report under the CSRD but only serves as an inspiration for a preparer. The requirements under CSRD must be interpreted by each reporting entity and the disclosures provided are the responsibility of the preparing company. PwC assumes no responsibility related to the use of this publication for reporting purposes.

Introduction to this CSRD Lookbook

This CSRD lookbook is meant to **give inspiration and to initiate further internal discussions** on the requirements from the European Sustainability Reporting Standards (ESRS). In doing so, **it does not present a complete ESRS sustainability statement** but focuses on the overall design and on providing certain examples for inspirational purposes. All of the qualitative characteristics defined by the ESRS are therefore not met since this lookbook does not cover every aspect of a full ESRS sustainability statement.

The actual disclosures should be adapted by each company depending on its size, material topics, complexity and nature of business. In any case, relevant interpretations and policy choices should be disclosed.

For the preparation of this lookbook, we have considered additional publications from the European Commission and EFRAG to further clarify the content of the new reporting standards.

Please note:

The Corporate Sustainability Reporting Directive (CSRD) and the related European Sustainability Reporting Standards (ESRS) are rather new and have not yet been applied in practice to a large extent. New sector standards will be issued and various interpretations on the application of both the directive and the standards are under constant development.

Please note that the CSRD will be incorporated into various national legislations in the EU (29th of May in Sweden with an application date of July 1st, 2024) and it is important when drafting a sustainability statement to also consider national law, such as the Swedish Annual Accounts Act.

Moreover, the CSRD and the corresponding delegated acts (ESRS) and the EU Taxonomy regulation contain terms and criteria that are subject to considerable uncertainties of interpretation. It should be noted that, in view of the remaining uncertainties of interpretation even after the publication of Implementation Guidelines (IGs) and Q&As by EFRAG and FAQs from the EC (related to application of the EU Taxonomy and the CSRD as such), it can be assumed that the assessment, interpretation and presentation of the disclosure requirements will require gradual adjustments over time. Thus, this lookbook might be subject to further

change and new versions released based on all these developments.

According to the CSRD, a reporting entity must also apply digital reporting; marking up the report applying a certain taxonomy and submitting the sustainability statement in digital format. At the time version 2.0 of this lookbook is published, it is still unclear when guidelines and legal requirements for the digital reporting will be available. Thus, this illustration does not contain any examples or guidelines on how to approach the digital reporting aspect.

The **lookbook** explained

Content

Introduction and background information p 2

This section introduces you to some of the structural requirements defined by the ESRS and provides you with an overview on how this lookbook is structured.

Sustainability Statement..... p 11

This section illustrates the actual chapters of the sustainability statement and provides you with some guidance and examples on how a company could structure it.

Appendix p 33

This section provides you with some additional information on the ESRS that will be helpful when creating a sustainability statement for a company or group.

Scope of the lookbook

Please note that this lookbook focuses on the mandatory disclosure requirements (“shall”) of the ESRS and does not make use of sector-/entity-specific disclosures, but only includes supporting commentary. The lookbook does not include every disclosure requirement specified within the ESRS but rather indicates on a high-level the content that could be presented in individual chapters (parts) or sections of the sustainability statement.

It focuses on the first-year application and thus makes use of the transitional period as well as phased-in disclosure requirements (e.g. no anticipated financial effects taken into consideration) defined within the ESRS. Ref: ESRS 1 - Chapter 10 Transitional provisions including ESRS 1 Appendix C: List of phased-in Disclosure Requirements (illustrated in an appendix to this lookbook).

How to read the lookbook

GOV-1

To provide you with some additional guidance, references to relevant ESRS disclosure requirements are added in little grey boxes. Using these type of references could also be an option when creating and illustrating your sustainability statement.

GOV-2



This symbol introduces the individual chapter and/or topic to you and provides some background information on how it fits within the sustainability statement.



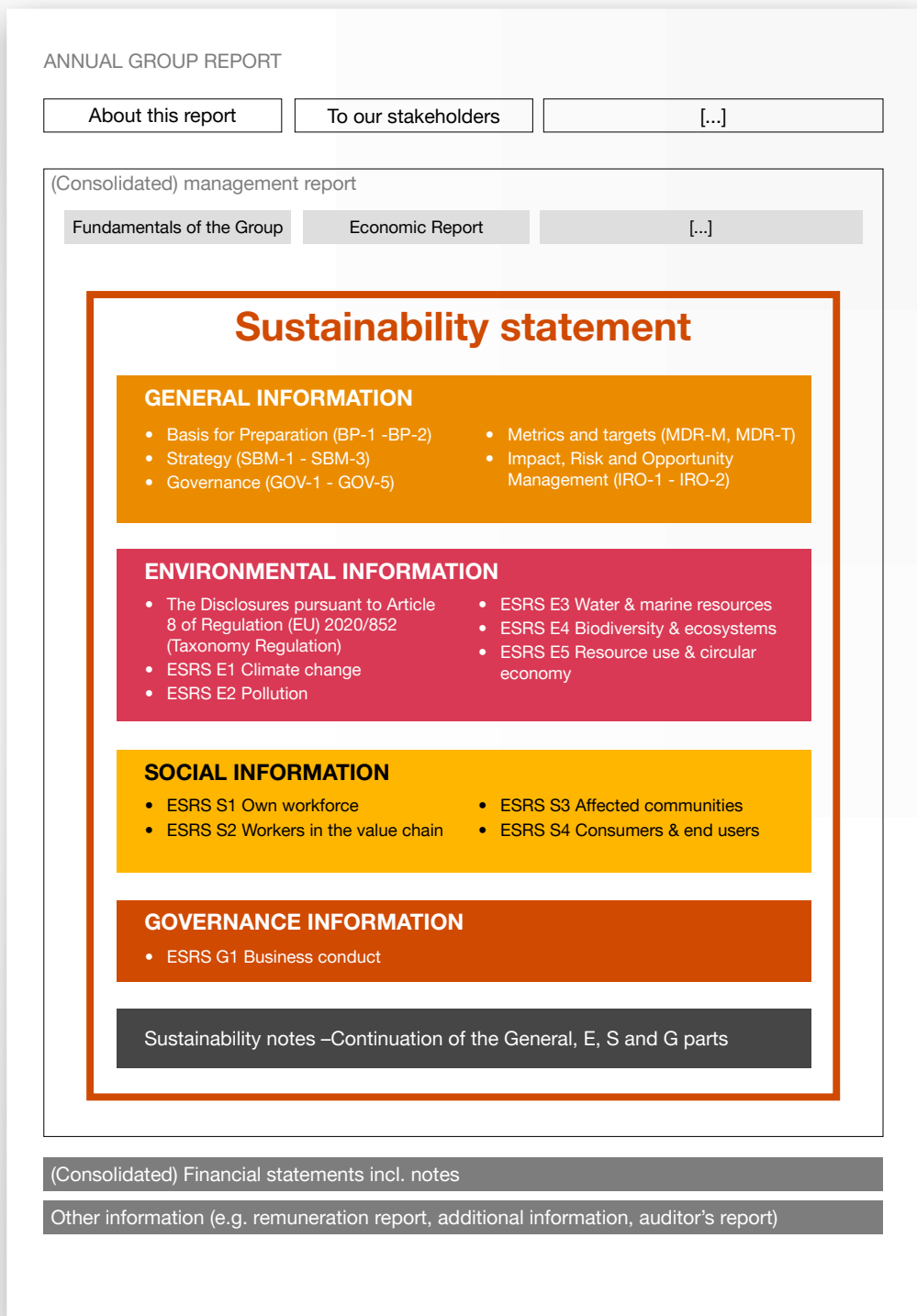
This symbol provides you with some additional points to consider when creating a sustainability statement.



Within the “General information” chapter of this lookbook, this symbol indicates topical ESRS that should be taken into consideration when reporting on the Disclosure Requirements (DR) in ESRS 2 (see Appendix C of ESRS 2).

In this lookbook a *topic* refers to an ESRS standard for E, S or G and a sustainability *matter* refers to either the main topic or the sub topics or sub sub topics within any of those sector agnostic ESRS. If a matter is material depends on an assessment of an applicable Impact, and/or the financial Risk or Opportunity (IRO) for the matter, i.e. materiality deriving from a double materiality assessment.

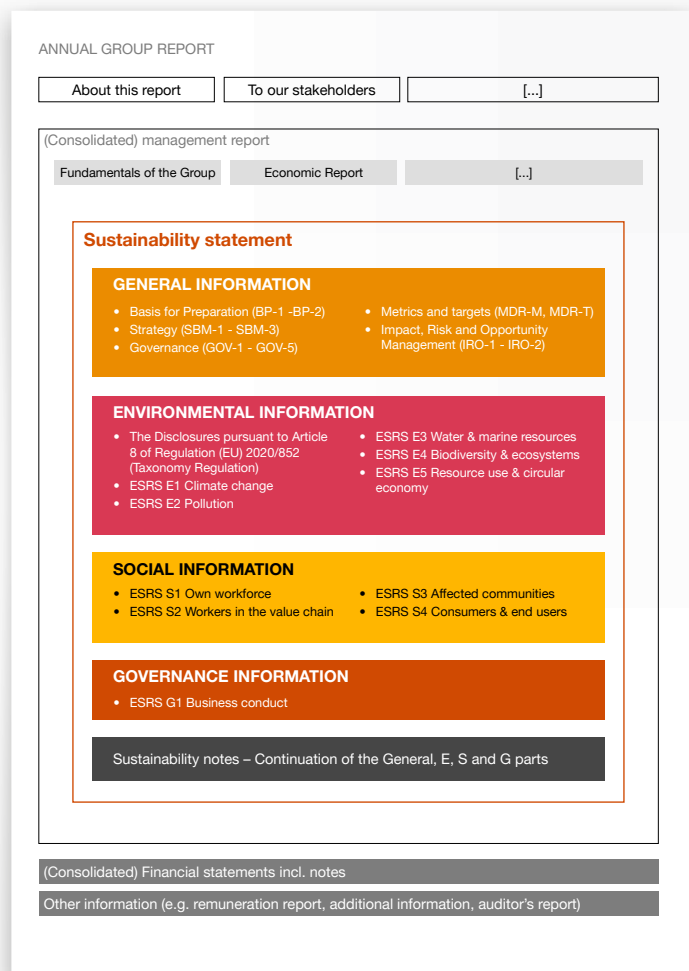
General information on the sustainability statement



Companies applying CSRD/ESRS need to disclose their sustainability report within a dedicated section of the management report. This section is called “sustainability statement”. The ESRS require companies to structure the sustainability statement in the following parts and order:

- **general information,**
- **environmental information,**
- **social information and**
- **governance information.**

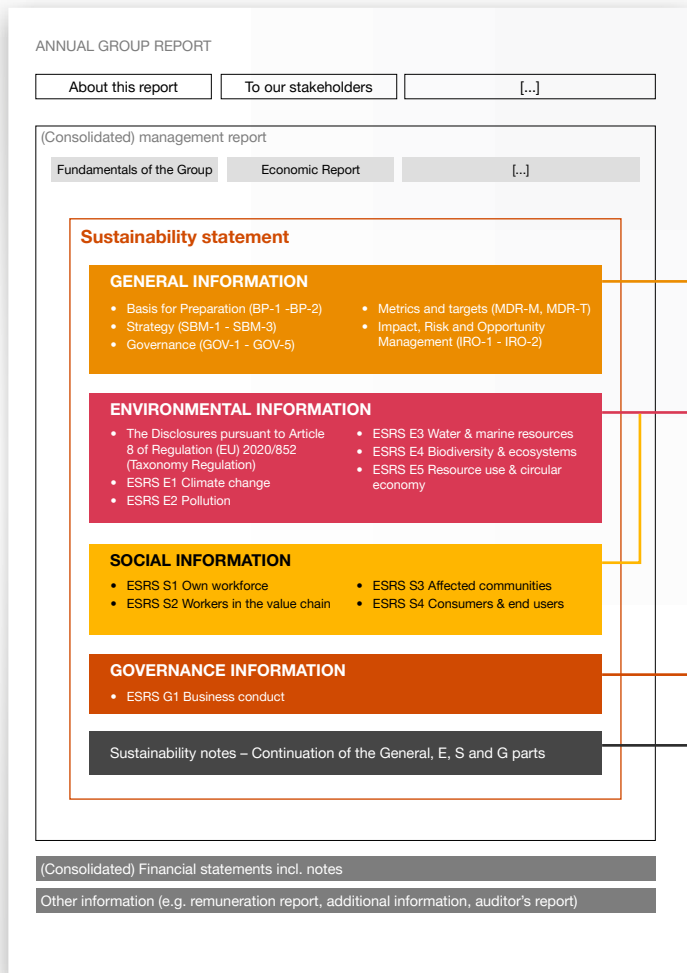
General information on the sustainability statement



Method and structure of reporting

- The general requirements standard (ESRS 1) states how to prepare sustainability-related information, including definitions of key concepts.
- Additionally, it defines a **reporting architecture with four reporting pillars (Governance; Strategy; Impact, risk and opportunity management; Metrics & targets)**, applicable across both the general disclosures (found in ESRS 2) as well as topical standards, such as Climate Change (ESRS E1) and Own Workforce (ESRS S1).
- ESRS 1 prescribes that the reporting company has to conduct a double materiality assessment to identify sustainability matters to report on. This is based on the two perspectives impact and financial materiality (risks and opportunities). Only the sustainability matters that are identified as material (i.e. the material IROs) should be reported upon. The topical standards are applied to the extent that they cover the matters that a company has deemed material.
- If some of the reporting metrics in a topical standard defined for the material matters are considered to be not material, a company may omit this datapoint (an application of the so called “Materiality of information” concept in ESRS 1). This does not however apply to the reporting of policies, actions and targets for the matter.
- A company must also disclose entity-specific disclosures, if the impact, risk or opportunity is not covered (sufficiently) by an ESRS and if it is considered to be material (refer to ESRS 1, paragraph 11).
- Information to be disclosed per topic according to the four reporting pillar approach:
 - » **Policies & actions (IRO management):** How are the material sustainability matters managed through policies and actions?
 - » **Metrics and targets:** How does the company measure its performance with regards to sustainability matters, including progress towards the targets it has set.
- The Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) need to be included in the environmental section of the statement and need to be clearly identifiable.

Further background information and assumptions for this guide



In the lookbook, we will focus on:

- The mandatory disclosure and application requirements from ESRS 2 (General information)
- Selected disclosures from the topical standards:
 - » “Environment” and “Social” are described on a very high level to illustrate a possible way to structure a report
 - » For “Governance” we give an example of more details for ESRS G1 - Business Conduct assuming that the sub-topics Corporate culture and Corruption and bribery were identified as material for ESRS G1.

	Topic	Sub-topic	Sub-sub-topic
G1	Business Conduct	<ul style="list-style-type: none"> • Corporate culture • Protection of whistleblowers • Animal welfare • Political engagement and lobbying activities • Management of relationships with suppliers including payment practices 	
		<ul style="list-style-type: none"> • Corruption and bribery 	<ul style="list-style-type: none"> • Prevention and detection including training • Incidents

To make the sustainability statement more reader friendly, we have introduced in this lookbook a structure where the General, E, S and G-parts continue in a section called “Sustainability notes - continuation of the General, E, S, and G-parts”. We have introduced this here as a possibility, similar to a common structure in financial reporting where notes supplement the main statement. This allows the reader to focus on the most important information in the mandatory four parts and to find detailed information (if needed) in the continuation in the back. The continuation of the four parts (the “notes”) includes more detailed information on e.g. reporting policies as well as the reported metrics. Please note that this is not something defined by the ESRS, but is introduced here for inspirational purposes*. An alternative way of doing this is to put such information at the end of each part, i.e. having a “notes section” at the end of the E, S and G-parts consisting of tables and detailed metrics.

* EFRAG has in its so called Explanations (Q&As) where they interpret ESRS stated that a sustainability report under ESRS must consist of four parts (refer to “Compilation of explanations, January to July 2024”). In ESRS 1, it is also mandated what information must sit in which part. However, the structure within the parts is not mandated. Thus, in order to be explicitly compliant with the ESRS, the “notes section” in the example in the Lookbook, is a continuation of each of the four parts and does not constitute a fifth stand alone part. It is also important to have cross references from the General, E, S and G-parts to and from the additional notes so that it constitutes a whole.

Suggested structure and headings

In the following, you will find an overview on a suggested structure and potential headings that could be used to structure the sustainability statement in a more consistent way along with the respective disclosure requirements.

Please note that this is just for illustrative purposes showing a potential outline of the statement. The actual structure and headings should be adapted by each company depending on its material sustainability matters and based on the respective disclosure requirements.

Illustrative structure for part 1. General information (ESRS 2)*

Chapter	Example of ESRS information content	DR
1.1 Basis for preparation	How information is prepared with possible cross references to the additional information which is found in the continuation of the General part (in the sustainability notes section)	BP-1 BP-2
1.2 Business model and strategy	Our business model and value chain	SBM-1
	Our engagement with stakeholders	SBM-2
1.3 Material sustainability matters	Materiality assessment process	IRO-1
	Material impacts, risks and opportunities	SBM-3
	List of material Disclosure Requirements	IRO-2
1.4 Sustainability governance	Board and Management's role and responsibilities	GOV-1 GOV-2
	Sustainability-related performance in incentive schemes	GOV-3
	Statement of Due diligence	GOV-4
	Risk management and internal controls	GOV-5

*All the Disclosure Requirements (DRs) in ESRS 2 related to Governance (GOV), Impact, Risk and Opportunity (IRO), and Strategy and Business Model (SBM) (except for SBM-3 for which there are options) and related DRs in the topical standards must be presented in the General part of the sustainability report. Refer to Appendix C of ESRS 2 for an overview on which disclosure requirements in various topical standards that must be applied together with GOV, IRO and SBM in ESRS 2 and reported in the General part of the sustainability report. It is only for SBM-3 where information can be presented in the topical part rather than the general part.

An application of the generic Policies, Actions and Metrics/Targets (PAT) DRs in ESRS 2 should be presented under the respective applicable topic headings in the E, S and G parts, complemented with the specific applicable DRs for a topic.

Illustrative structure for each topical ESRS* presented in the E, S and G-parts

Heading	Explanation	Relevant DR**
Governance	A company must disclose the governance and strategy aspects for a topic in the general part of the sustainability statement. However, consider to have a section on responsibilities and organization for every topic and/or sub-topic in the statement reporting on who is responsible for managing the topic, impacts, risks and opportunities within the company even though this is not a specific disclosure requirement. A cross reference from the topic to the General chapter (part) ties the information together.	(GOV-1)
Strategy	The only strategic/business model disclosure that might be presented for a topic within the E, S or G-parts (all other should be in the General part) is the SBM-3: <i>“Material impacts, risks and opportunities and their interaction with strategy and business model”</i> Some topical standards require additional strategic or business model disclosures related to material IROs. These can be either reported under the topic in the E, S or G-parts or in the General part. Even if a company chooses to present all SBM-3 disclosures in the General part, consider anyway to introduce the topic to the reader of the chapter (part) explaining why it is important to the company, what the material impacts, risks and opportunities for the sustainability matter along the value chain are, how they are identified and how they might influence the business model and strategy.	SBM-3
Impact, risk and opportunity management	In this section the company should describe the policies adopted to manage the material sustainability matters as well as (where required) the processes implemented.	(MDR-P) Topical DR
	This section would serve to inform the reader about actions a company have taken to manage the respective sustainability matter, its impacts, risks and opportunities and what resources are allocated/planned.	MDR-A Topical DR
Metrics and targets	The objective of this section is to provide an understanding of, among other, the metrics used to track the effectiveness of actions to manage material sustainability matters as well as the targets set to meet the policy objectives.	MDR-M MDR-T Topical DR

Sustainability notes – continuation of the General, Environmental, Social and Governance parts

- Basis for preparation and additional information
- Accounting policies
- List of material Disclosure Requirements (ESRS Content Index)
- List of disclosure requirements and data points deriving from other EU-regulations
- Detailed tables for E, S, G and EU Taxonomy

*Please note that this structure does not apply to the EU Taxonomy disclosure requirements and that additional sub-headings might need to be introduced depending on the individual topics and disclosure requirements.

**Please note: there are additional DRs in some of the topical standards (refer to Appendix C of ESRS 2 for an overview of these) that must be applied together with GOV, IRO and SBM in ESRS 2. Those disclosures should also be reported in the General section (except for additional SBM-3 DRs where presentation choice is given) even though they are found in the topical standards. In order to guide the reader some of that information may be repeated under a specific topic in the E, S or G-parts; a cross reference to the General part might then also be suitable.

Sustainability Statement

This section illustrates the actual parts and sub-chapters of the sustainability statement and provides you with some guidance and examples on how a company could structure it.

Example

Table of contents

1. General information

1.1 Basis for preparation and accounting policies	x
1.2 Business model and strategy	x
1.3 Material sustainability matters	x
1.4 Sustainability governance	x

2. Environmental information

2.1 EU Taxonomy disclosures	x
2.2 Climate change	x
2.3 Pollution	x
2.4 Water and marine resources	x
2.5 Biodiversity and ecosystem	x
2.6 Circular economy	x
2.7 [Entity-specific disclosure]	x

3. Social information

3.1 Own workforce	x
3.2 Workers in the value chain	x
3.3 Affected communities	x
3.4 Consumers and end-users	x
3.5 [Entity-specific disclosure]	x

4. Governance information

4.1 Business conduct	x
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5. Sustainability notes –

Continuation of the General, E, S and G parts	x
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General information

1.1 Basis for preparation and accounting policies



This chapter of the statement serves as an introduction to the sustainability statement and gives the reader an overview of the technical details, accounting policies and specific circumstances of the statement. It can be compared to sections such as “About this report” or “Basis of preparation” section included within the financial statement or management report explaining the structure, legal requirements, scope and changes to previous years.



In this lookbook we have chosen to have most of the basis for preparation information in the continuation of the General part, in the “Sustainability Notes” at the end of the Sustainability statement.

Information on applied accounting policies is for example put in a specific note in the continuation section of the General part. The reporting company could choose to have a very short introduction here and for the majority of the information refer the reader to the continuation of the General part in the Sustainability notes (SN). Another way to present the policies would be at the back of the General part.



Under ESRS 2, BP 2, specific measurement or estimates applied for a metric or other data point can be explained and presented in the respective topical sections in the E, S or G parts.

BASIS FOR PREPARATION

BP-1

BP-2

Similar to a financial statement, this section provides details on the accounting and reporting scope applied for the sustainability statement according to the requirements defined within ESRS 1 and 2. Refer to the continuation of the General part in the Sustainability notes (SN) for more information about the basis for preparation.

General information

1.2 Business model and strategy



This chapter of the statement further introduces the company and its business to the reader. It specifies the key elements (e.g. significant groups of products or services offered) that are related to the company's strategy, sustainability matters, business model and value chain. Additionally, it provides insight into how the company engages with its key stakeholders and to what extent the organization takes into account their interests.



Since a lot of the information on the business model and strategy is already disclosed somewhere else (e.g. in the management report), using references will avoid double reporting (see also ESRS 1, Section 9.1 "Incorporation by reference" for what a company must consider and under which conditions cross-referencing is allowed).

Adding graphical elements such as illustrations and other figures will help make the sustainability statement more interesting for the reader.



ESRS 2, AR 14 further specifies what the company shall consider when disclosing the company's business model and value chain.



EFRAG has published a Value chain implementation guidance document. It is recommended to use this when companies are considering various aspects of the value chain both during its Double Materiality Assessment and when preparing the presentation in the sustainability statement.

It is possible to get further inspiration from the [International <Integrated Reporting> Framework](#) which specifies the concept of value creation and can provide some additional guidance.

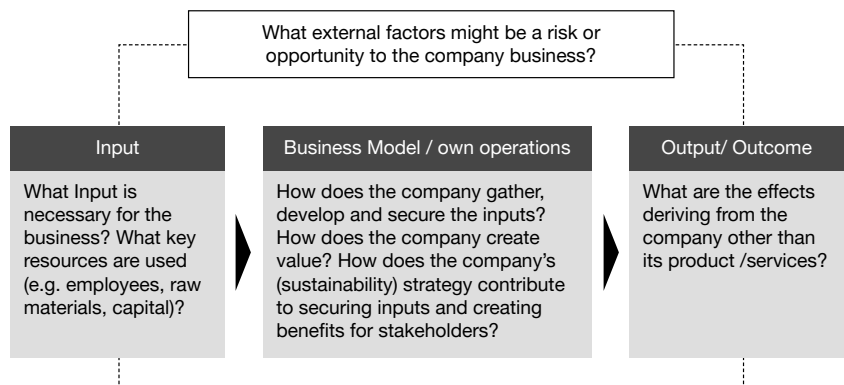
OUR BUSINESS MODEL AND VALUE CHAIN

SBM-1

Example of information to disclose in this sub-chapter:

- Description of business model (incl. inputs and output/outcomes)
- Description of the main features of the value chain
- Description of products and/or services offered (as well as changes), major markets and customer groups, headcount by geography, and products/services banned in certain markets (if applicable)
- Reporting on revenue related to fossil fuel sector, chemical production, controversial weapon, cultivation and production of tobacco (if applicable)
- Sustainability-related targets in terms of products and services, customer groups, geographic areas or stakeholders
- Current market position in relation to targets

Connecting **business model and strategy with sustainability** is a main aspect of CSRD and the reporting company need to assess and disclose what inputs it uses and how they are incorporated in the business model and strategy as well as what (beneficial) outputs it generates. The following is a high-level illustration of what to take into consideration:



General information

1.2 Business model and strategy, cont.



Value chain links throughout the sustainability statement

A company could structure its reporting by including the value chain illustration rather early on in the general information section. If the illustration displays activities upstream, in the own operations and in the downstream, the reporting entity can insert references pointing to where in the value chain material IROs arise and show that they connect to the activities. Further, it can illustrate how an IRO is related to the E, the S and/or the G-chapters of the report (including page or section references).

The reporting entity should describe the value chain in a more granular way than only through upstream, own operations and downstream which are to be seen as generic terms and should be adapted according to business model.



In accordance with SBM-3 the undertaking shall explain their IRO's in relation to its value chain. It is therefore important to be able to explain the value chain in a granular manner consistent with the business model in order for the reader to understand the IRO in relation to the value chain, i.e. where in the value chain does a specific IRO appear.

Additionally, the Company need to disclose the key features of the value chain and the Company's position in the value chain, including a description of the main business actors (e.g. key suppliers) and their relationship with the company.

A very simplified value chain is disclosed below. As described to the left, the value chain should be described in a more granular way.

Think about how the key features presented in an illustration of the value chain can create value and more insights for the reader. By developing the value chain with more granular information and activities the undertaking can map IROs directly in the illustration which will enhance the understanding of the reader.

From the value chain illustration a cross reference could be given to a specific section and page within the relevant E, S or G-parts in the report. By structuring the statement from the perspective of the elements of the value chain the user of the report can easily understand and see where activities in the value chain, for example, creates negative impacts.



General information

1.2 Business model and strategy, cont.



When disclosing the engagement with stakeholders, special consideration should be given to the interests, views, and rights of the affected stakeholders defined as part of the ESRS S1-S4 as this is a separate disclosure requirement.



If the company has already reported in accordance with GRI Standards or the Integrated Reporting Framework the company may have information on stakeholder engagement available in previous reports.

Think about how the company could make use of illustrations to describe the engagement with stakeholders to make it more reader-friendly.

OUR ENGAGEMENT WITH STAKEHOLDERS

SBM-2

Example of information to disclose in this sub-chapter:

- Description of stakeholder engagement, including list of key stakeholders, how it's organised and with what purpose;
- to which extent the stakeholders' interests and views were analysed during the company's due diligence process and/or materiality assessment process
- how stakeholders' interests and views have been analysed and potentially led to amendments of the company's strategy and business model
- how the administrative, management and supervisory bodies are informed about the views and interests of affected stakeholders with regard to sustainability-related impacts

Common categories of stakeholders that can be affected by the company (defined by ESRS 1): nature (silent stakeholder), employees and other workers, suppliers, consumers, customers, end-users, local communities, persons in vulnerable situations, and public authorities, including regulators, supervisors and central banks.

General information

1.3 Material sustainability matters



This chapter provides the reader with an overview and understanding on how the process for defining the material sustainability matters was designed, the type of methodology applied and what the outcome of the double materiality assessment is (i.e. which material sustainability matters are reported on in the following chapters).



For some of the topical ESRS (e.g. ESRS E1 Climate change), the standards require specific disclosures related to the identification and assessment of material impacts, risks and opportunities. This should be disclosed in the general part.



The company could consider including a detailed description on methodology and outcome in the continuation of the General, E, S and G parts (Sustainability Notes) and only have an “executive summary” here. Refer to SN2 in the notes section.

For guidance on how to conduct a double materiality assessment see also the IG1 “Materiality Assessment Implementation Guidance (MAIG) document published by EFRAG”.



When reporting on the methodology of the materiality assessment, consider also the requirements from ESRS 1, section

3.7 “Level of disaggregation” and ESRS 1, section 7.6 “Consolidated reporting and subsidiary exemption” by describing how the company disaggregated their business model and value chain (e.g. by subsidiary, product line) to identify and assess the impacts, risks and opportunities.

MATERIALITY ASSESSMENT PROCESS

IRO-1

Example of information to disclose in this sub-chapter:

- Overview on how the company designed the process to identify their material impacts, risks and opportunities related to sustainability matters including amongst others the disclosure of the methodological approach, the use of assumptions, quantitative or qualitative criteria applied and internal controls
- Description if and how the process is integrated in the overall risk management processes



ESRS 1 also requires companies to disclose “significant differences between material impacts, risks or opportunities at group level and material impacts, risks or opportunities of one or more of its subsidiaries, the undertaking shall provide an adequate description of the impacts, risks and opportunities, as appropriate, of the subsidiary or subsidiaries concerned”. ESRS 1 p. 104 provides further guidance on this. We believe that these IROs can be presented here, in a separate sub-chapter in the general part to distinguish them from the overall group material IROs or in the “notes section” in the continuation of the four parts with a cross reference from this chapter.

1.3 Material sustainability matters, cont.



For some of the topical ESRS (e.g. ESRS S1 Own workforce),

SBM-3 defines additional disclosure requirements. Since SBM-3 requires also detailed information on the company's material impacts, risks and opportunities, consider disclosing all of this information as part of the topical ESRS chapters and only disclose a summary of the results on Group level here with a reference on where the information is described in more detail. SBM-3 is the only DR in ESRS 2 that may be presented alongside the topical parts.



Keep in mind to align the company's description of the identified material impacts, risks and opportunities with the information it has disclosed previously in the value chain preferably with an illustration of the value chain and the material IROs pointed out.

A more detailed overview on the material sustainability matters and the respective disclosure requirements will also be provided to the reader as part of the ESRS Content Index. In this example sustainability statement, the Content Index is put in the continuation (notes section) but it could also be presented here. However, information that the company could cover as part of this sub-chapter or present with a reference in the notes section (the continuation), include:

- A description on how the company assessed the materiality of information (i.e. what specific metrics that have been deemed material).
- If ESRS E1 is assessed to be not material: Detailed explanation on how the company came to the conclusion that it is not material and specific disclosures apply, e.g. a climate scenario analysis has to be provided.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

SBM-3

Example of information to disclose in this sub-chapter:

- Outcome of the double materiality analysis describing what the material impacts, risks and opportunities are and where they are concentrated in the value chain considering also geographical areas, facilities or types of assets, inputs, outputs and distribution channels (refer to the value chain in section 1.2)
- Details on the company's material impacts such as how the impacts affect people or the environment
- Current and anticipated effects of impacts, risks and opportunities on the company's business model, value chain, strategy and decision making and how the company (plans to) address them
- Current financial effects of the company's material risks and opportunities on their financial position, financial performance and cash flows (future effects are phased in, refer to the Appendix)

1.4 Sustainability governance



This chapter provides the reader with an overview of how sustainability is embedded in the organization from a governance and risk perspective. Some of the information can already be found in existing sustainability reports as some of the ESRS requirements are similar to the “GRI 2: General Disclosures Standard”. General information on the organization’s governing bodies are often already disclosed within existing management, annual and/or corporate governance reports.



If the company has a Corporate governance report that also covers the monitoring of the Sustainability statement and the related processes, a reference could be made to that statement. Please bear in mind that all cross referenced documents have to be assured to the same level as the sustainability statement itself. There are also some other conditions that must be fulfilled (refer to ESRS 1, section 9.1) in order for a company to be allowed to cross-refer.



Based on topical ESRS E1, the reporting on incentive schemes needs to specifically consider and mention incentive systems in relation to climate change strategy and targets and with reference to GHG emission reduction targets (E1-4).



If the company discloses sustainability-related incentive schemes already in other parts of the management report or in a separate remuneration report, make use of references (relevant especially for listed companies; see also ESRS 2, AR 7). Bear in mind that the requirements mentioned in ESRS 1 (section 9.1) must be met in order for a company to cross-refer.

If the company does not have any incentive schemes linked to sustainability matters, the company also need to disclose this.

Even though this is not specifically required by the disclosure requirement,

BOARD AND MANAGEMENT’S ROLE AND RESPONSIBILITIES

GOV-1

GOV-2

Example of information to disclose in this sub-chapter related to the role of the administrative, management and supervisory bodies:

- Composition & diversity
- Roles & responsibilities in the oversight of processes to manage material Impacts, Risks and Opportunities
- Level of expertise on material sustainability matters and/or access thereof
- Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies

SUSTAINABILITY RELATED PERFORMANCE IN INCENTIVE SCHEMES

GOV-3

Example of information to disclose in this sub-chapter:

- Potential incentive schemes linked to sustainability matters offered to members of the administrative, management and supervisory bodies
- Details of potential incentive schemes and remunerations policies such as KPIs and terms

consider explaining to the reader how the incentive schemes relate to the company’s overall sustainability strategy, business model and value creation described in the earlier chapters.

General information

1.4 Sustainability governance, cont.



Companies must transparently report where in the sustainability statement they describe their due diligence (DD) processes, but the CSRD does not set any specific requirements on how the processes must be carried out. CSRD do not impose any conduct requirements in relation to due diligence; nor do it extend or modify the role of the administrative, management or supervisory bodies of the company with regard to the conduct of due diligence.

However, ESRS states that the materiality assessment, including Impacts, Risks and Opportunities (IROs) could be informed by the company's DD processes, in accordance with the definition in the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

The Corporate Sustainability Due Diligence Directive, CSDDD, will supplement CSRD with clear requirements on how a DD process should be carried out. The CSDDD also refers to the UN Guiding Principles on Business and Human Rights and the OECD's Guidelines for Multinational Enterprises.

In order to be aligned with an environmental objective under the EU Taxonomy, a company must comply with "Minimum safeguards". The requirements in the Taxonomy points to the above frameworks. A company could consider to integrate the information required under the Taxonomy with the ESRS requirements.

STATEMENT ON DUE DILIGENCE

GOV-4

Example of information to disclose in this sub-chapter:

- A mapping and explanation on how and where application of the main aspects and steps of the sustainability due diligence process are reflected in the sustainability statement. This can be provided in a table, see below, which works as a "content index" for the core elements of the due diligence.
- If the core elements are not covered in the sustainability statement, the company needs to be transparent about the status.

Core elements of due diligence	Paragraphs in the sustainability statement
a) Embedding due diligence in governance, strategy and business model	
b) Engaging with affected stakeholders in all key steps of the due diligence	
c) Identifying and assessing adverse impacts	
d) Taking actions to address those adverse impacts	
e) Tracking the effectiveness of these efforts and communicating	

RISK MANAGEMENT AND INTERNAL CONTROLS

GOV-5

Example of information to disclose in this sub-chapter:

- Scope, main features and components of relevant processes and systems for risk management and internal controls
- Approach and risk prioritisation methodology in relation to the sustainability reporting process, incl. main risks identified and mitigation strategies
- Integration of findings into relevant internal functions and processes
- Reporting to relevant bodies

Environmental information

2.1 EU Taxonomy disclosures



The topics covered within the environmental ESRS are: Climate change, Pollution, Water and marine resources, Biodiversity and ecosystems as well as Circular economy. Depending on the material topics, sub-topics or sub-sub-topics assessed as relevant for the reporting entity, related disclosure requirements from the standards need to be taken into consideration. Additionally, a separate section within the chapter needs to be dedicated to the disclosures of the EU Taxonomy Regulation.



Integrate the EU Taxonomy tables and accounting principles within the continuation of general, E, S, G parts ("Sustainability Notes") at the end of the Sustainability statement.

Support the reader of the report by explaining the outcome of the taxonomy tables in a narrative format related to your sustainability story.

Additional illustrations might be added to the taxonomy reporting, e.g. circle diagrams or similar.



Different disclosure and application requirements throughout the environmental ESRS make references to the EU Taxonomy Regulation and its Delegated Acts. This includes for example ESRS E1-1 Transition plan for climate change mitigation; E2-2 Actions and resources related to pollution and E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model. When applicable cross references to this section could be used.

EU TAXONOMY DISCLOSURES

CSRD does not only include reporting metrics in line with the new standards (ESRS) but also the existing EU Taxonomy regulation with key metrics showcasing the share of the business being assessed as environmentally sustainable. The EU Taxonomy defines criterias for determining if an economic activity can be classified as environmentally sustainable or not. Companies must disclose the share of environmentally sustainable turnover, capex and opex in their taxonomy disclosures*.

While the ESRS specify the reporting architecture with four reporting pillars (Governance; Strategy; Impact, risk and opportunity management; Metrics & targets), the EU Taxonomy Regulation has other disclosure requirements defined.

Within the sustainability statement, the disclosures pursuant to [Article 8 of Regulation \(EU\) 2020/852 \(Taxonomy Regulation\)](#) need to be presented in a clearly identifiable part of the environmental section of the sustainability statement.

Example of information to disclose in this sub-chapter:

- Mandatory templates for all three KPIs; turnover, capex and opex.
- Qualitative information regarding what activities are eligible, policy choices, how assessment of alignment has been done, key drivers of change with the comparative figure, how has the allocation been done etc.

Some guidance on what and how to disclose the information can be found in the PwCs 'EU Taxonomy - Illustrative disclosures publication.

*Turnover, capex and opex in accordance with the EU Taxonomy's definition

Environmental information

2.2 Climate change



When preparing the information for the Sustainability statement, please keep in mind that all Disclosure Requirements and data points on Policies, Actions and Targets have to be reported if the topic is material. Metrics are subject to the materiality of information.



This information is in several regards overlapping the Recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). Consider introducing a separate sub-heading for disclosing this information. Keep in mind that climate-related risks also play an important part in the Delegated Acts of the EU Taxonomy Regulation.



If a company considers to include information in the sustainability statement that is not material based on the Double Materiality Assessment, there are specific requirements to apply in ESRS 1. The information must be “clearly identified with an appropriate reference to the related legislation, standard or framework...” and “meet the requirements for qualitative characteristics of information” which are specified in chapter 2 and Appendix B of ESRS 1. (Ref ESRS 1, p. 114)

CLIMATE CHANGE

SBM-3

The following information highlights some (but is not to be regarded as a complete list, this is always subject to the specific facts and circumstances of the reporting entity) important aspects and requirements to take into consideration when disclosing information about ESRS E1 Climate change:

- IRO-2 specifies that if climate change is considered not material, the company needs to disclose why this is the case. This is unique for the climate change standard. This information should then be included in the general part.
- The core concept of double materiality for climate change means that companies need to disclose how their operations affect climate change in terms of scope 1, 2, 3 emissions, but also which financial risks and opportunities that arise as a result of climate change.
- SBM-3 and IRO-1 requires companies to disclose information about physical and transition climate risks and opportunities, based on scenario analysis utilizing low- and high-emission scenarios. Keep in mind that only SBM-3 can be presented in the E-part instead of the general part.
- ESRS E1-1 requires companies to disclose a transition plan for climate change mitigation as part of the strategy pillar. The information must be presented in the strategic information in the “General information” part. However, in order to explain the policies, actions and targets for the company related to climate change, repeating some of the strategies and the plan also in this chapter might be useful for the reader.
- The Appendix of ESRS-E1 specifies different technical requirements for preparing the information (e.g. formulas) and defines in some cases mandatory tables that need to be applied when disclosing certain metrics. A possible way to disclose all the required details and specific tables, are to use the continuation of the general, E, S, G parts (Sustainability Notes) concept introduced in this Lookbook. Refer to the last chapter and SN.4 - SN.14.

2.3 POLLUTION

2.4 WATER AND MARINE RESOURCES

2.5 BIODIVERSITY AND ECOSYSTEMS

2.6 CIRCULAR ECONOMY

2.7 [ENTITY-SPECIFIC DISCLOSURE]



Keep the ESRS Disclosure requirements on policies, actions, metrics and targets in mind when preparing the information for the company’s material environmental topics.

Add entity-specific material sustainable topics to the environment section, if the company has identified any.

Social information

3.1 Own workforce



When preparing the information for the sustainability statement, please keep in mind that all disclosure requirements and data points on Policies, Actions and Targets have to be reported if the topic is material. Metrics are subject to the materiality of information.



Each social ESRS includes specific disclosure requirement related to ESRS 2 SBM-2 and SBM-3. Based on the disclosure requirements, a company must for example specify who in the value chain is likely to be impacted.

When preparing the information for the company’s material social sustainability matters, consider especially the application requirements defined within the Appendices of the individual social ESRS. Next to mandatory requirements, they also provide supportive information and guidance on policies, processes, actions, metrics and targets for the respective social matters.

The disclosure requirements of the social topics are strongly guided by due diligence elements. The key issue is transparency, but it is up to the company to decide how to present this.

OWN WORKFORCE

The following information highlights some important aspects and requirements to take into consideration when disclosing information about ESRS S1 Own Workforce:

- The standard covers the entity’s own employees as well as co-workers who work in direct connection with the entity (e.g. self-employed consultants or workers who are contracted via staffing agencies). The standard does not cover employees of suppliers or customers, they are covered by ESRS S2 Employees in the value chain.
- Health & safety is a part of the sub-topic “Working conditions”. It could be worth disclosing Health & Safety under a separate headline if this sub- sub-topic is very relevant.
- Whenever workforce is considered a material topic the entity shall disclose the requested disclosures in specific tabular formats listed in ESRS S1-6 (AR 55). Consider to include detailed tables in the continuation (Sustainability Notes).
- ESRS S1 Own Workforce, Appendix A.1 to A.4 specifically include additional examples and information on the different disclosure requirements.

3.2 WORKERS IN THE VALUE CHAIN

3.3 AFFECTED COMMUNITIES

3.4 CONSUMERS AND END-USERS

3.5 [ENTITY-SPECIFIC DISCLOSURE]



Keep the ESRS Disclosure requirements on policies, actions, metrics and targets in mind when preparing the information for the company’s material social topics.

Add entity-specific material sustainable topics to the social section, if the company has identified any.

Governance information

4.1 Business conduct

ESRS2 and G1 both includes information connected to the Company's governance. ESRS2 includes mandatory information and should be presented in the General part, with the exception of information included in SBM-3. G1 includes specific topics that relates to governance and should be subject to the materiality assessment.

When preparing the information for the sustainability statement, please keep in mind that all Disclosure Requirements and data points in the G1 standard plus Policies, Actions and Targets (from the minimum requirements in ESRS 2) have to be considered for reporting if the topic is material (based on the company assessments of material IROs).

However, ESRS also have a materiality of information-concept that gives guidance on what to report on in the applicable standard (see decision tree in this lookbook appendix 1). In this example of content regarding the G1 Business conduct topic,

the materiality assessment for the example company concluded the following two sub-topics not to be material: Political influence and lobbying activities, as well as

Payment practices. No disclosures are therefore required on Disclosure requirement G1-5 or G1-6.

The Governance area of the ESRS, as of now, includes only one topical standard - "ESRS G1 Business Conduct" focusing on business ethics and corporate culture incl. supplier relationship management as well as political influence. The sub-topics covered here are often addressed by the compliance department of a company (e.g. anti-corruption and anti-bribery). Additional material entity-specific topics could for example include anti-competitive behavior or data protection and privacy, depending on the industry and value chain of the company.

BUSINESS CONDUCT

SBM-3

The company could start the chapter by introducing the material topics regarding business conduct to the reader and describing why topics regarding Business Conduct are material. The process through which the company identified the IROs and assessed them as material should be presented in the general part (refer to IRO-1).

If the company haven't already reported the following information in earlier chapters, in the general part of the Sustainability statement, this is the place to disclose the following: where the material impacts, risks and opportunities occur along the value chain, how they affect people or the environment and how they might influence the company business model and strategy. If IROs relevant for the governance are already presented earlier, cross referencing to and from this chapter helps the reader understand the context.

GOVERNANCE

GOV-1

For this topic specifically, some mandatory information is presented in the General part. In this section, the company can make use of references and develop the description of the company's governance in order to provide information regarding the material matters and IRO's connected to the disclosure requirements i G1.

Governance information

4.1 Business conduct, cont.



Remember to read each disclosure requirements thoroughly so that the company includes all required information.

Remember to consider all of the requirements that are specified within the minimum disclosure requirements on policies in ESRS 2 (MDR-P)

MANAGEMENT OF BUSINESS CONDUCT

G1-1

In G1-1, the company shall disclose policies with respect to business conduct matters (e.g. anti-corruption policies), information on how the company fosters its corporate culture, mechanisms for identifying, reporting and investigating concerns about unlawful behaviour or behaviour in contradiction of its code of conduct, how they protect whistleblowers, their policy for training within the organisation on business conduct, functions within the company that are most at risk in respect of corruption and bribery etc. An example on how information on trainings may be presented can be found in the Appendix (ESRS G1, AR 8). Consider to place the table in the continuation (“Sustainability Notes”).

G1-2

In G1-2 the company shall provide information about their approach to and management of their relationships with suppliers and their impacts on the supply chain, a description of the company’s policy to prevent late payments, whether and how they take into account social and environmental criteria for the selection of its suppliers etc.

G1-3

In G1-3 the company shall provide information about their system to prevent and detect, investigate, and respond to allegations or incidents relating to corruption and bribery including the related training.

Governance information

4.1 Business conduct, cont.



ESRS 2 sets out minimum disclosure requirements (MDR) to be applied for all material matters and reporting on topical standards. The MDR covers policies, action plans, metrics and targets. Here we provide an example for how to consider the MDR when reporting on G1.



If the company does **not** have a policy or have taken actions in relation to a material sustainability matter, it shall disclose this to be the case, and provide **reasons** for not having adopted policies and/or actions. The company may disclose a **timeframe** in which it aims to adopt them.

If the company has not set targets with regards to the specific sustainability matter, this shall be disclosed and also the reasons for not having adopted targets. The company may then disclose if it will set targets going forward and if so when. If the company has decided to not set any targets in the future, it may disclose why it does not plan to set such targets.

TARGETS AND METRICS

MDR-T

MDR-M

ESRS 2 (MDR-M) explains that a company uses metrics to disclose the targets set for an IRO. For each material matter, a company must disclose those material metrics (refer to the materiality of information concept on page 23) that are found under the disclosure requirements heading metrics and targets. A company might also have material matters without any prescribed disclosure requirements or metrics and might therefore have identified so called entity-specific measures. These are also disclosed.

There are no specific disclosure requirements defined related to targets for G1. Other standards prescribe required content of targets (if the company does have a target). However, keep in mind that a company need to disclose whether it has targets and metrics for all material sustainability matters. If targets, and metrics to track progress on targets, are applied, the company must report on them.

Disclose the company's set **targets** regarding business conduct. The targets need to be measurable, time-bound and outcome-oriented. For more information on Minimum Disclosure Requirement regarding Targets, see ESRS2 (MDR-T).

Describe key **actions** to achieve the objectives and targets of related policies, including but not limited to:

- List of key actions taken and planned for the future, their expected outcomes and contribution to the achievement of policy objectives and targets
- Scope of the key actions (i.e., coverage in terms of activities, value chain, geographies and, affected stakeholder groups)
- Time horizons under which the company intends to complete each key action
- The amount of current/future financial expenditures (Capex/Opex) (if significant)

Note: if the company does not have a policy (s), related target (s), action (s) and metric (s) to track effectiveness of actions and progress towards targets, this must be disclosed.

This is an example of a section where the Company can choose to refer to the continuation of general, E, S, G parts (Sustainability notes) section for additional information on specificities of metrics and targets. Refer to SN25 in the Sustainability notes section.

G1-4


For the G1-4 sub topic, where the company in this example has a material sustainability matter, information is disclosed related to Incidents of corruption and bribery. The metrics that are required to be reported are:

- the number of convictions and the amount of fines for violation of anti-corruption and anti-bribery laws; and
- any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery.

Sustainability Notes (SN)

Continuation of the General, E, S and G parts

The ESRS-report must consist of four parts. However, the structure within the parts is not mandated. Thus, in order to be explicitly compliant with the ESRS, the “notes section” in the example in the Lookbook is a continuation of each of the four parts and does not constitute a fifth stand alone part. It is also important to have cross references from the General, E, S and G-parts to and from the additional notes so that it constitutes a whole.



This continuation of the General, E, S, G parts (sustainability notes) is not something specified by the ESRS but is introduced here to reduce the amount of information within the main section of the statement.

The chapter can include for example methodological explanations on metrics, sources of estimations and the disclosure of detailed tables that are required by the ESRS (e.g. list of data points that derive from other EU legislations, EU Taxonomy tables). It does not need to follow a specific order, but the main section needs to include the corresponding references.

Please note that the company could also integrate this information already directly as part of the “General information” or in each topical E, S and G part.

SN.1 BASIS FOR PREPARATION

This section of the continuation of the General, E, S, G parts (Sustainability notes) completes the introduction to the sustainability statement and gives the reader the technical details, accounting policies and specific circumstances of the statement. The specific sustainability accounting policies (for example judgments made about treatment of newly acquired subsidiaries) could also be provided in a separate note (SN. X) after this more general basis for preparation introduction.

Similar to a financial statement, this section provides details on the accounting and reporting scope applied for the sustainability statement according to the requirements defined within ESRS 1 and 2. This information can include details about:

- Reporting boundaries
- Judgement, uncertainties, exemptions as well as applied materiality for collecting data
- Specific circumstances on applied time horizons and value chain estimations
- Qualitative characteristics
- Phase in provisions used
- Other information discussed in ESRS 1 section 7
 - » 7.1 Presenting comparative information,
 - » 7.2 Sources of estimation and outcome uncertainty,
 - » 7.3 Updating disclosures about events after the end of the reporting period,
 - » 7.4 Changes in preparation or presentation of sustainability information,
 - » 7.5 Reporting errors in prior periods,
 - » 7.6 Consolidated reporting and subsidiary exemption,
 - » 7.7 Omission of classified and sensitive information

Sustainability Notes (SN)



The following example gives some insights on how the section could theoretically be written. Please note that the information disclosed here has to be adapted to the circumstances of each company.

Only some **requirements** defined by BP-2 **are covered** in this text example.

BASIS FOR PREPARATION

BP-1

BP-2

For the reporting year 2024, the company reports its sustainability information for the first time in accordance with the requirements from the European Sustainability Reporting Standards (in the following: “ESRS”).

The contents of the sustainability statement were subject to an external assurance with limited assurance in accordance with ISAE 3000 (Revised). The Independent Practitioner’s Report on a Limited Assurance Engagement can be found on page xyz.

SN.1 ACCOUNTING POLICIES

The sustainability statement was prepared on a consolidated basis and covers the same reporting scope as the financial statement. All statements on strategies, policies, actions, metrics and targets refer to the consolidated group and, where not shown separately, also to the parent company. The report covers the company’s entire value chain and, where material, provides information on upstream and downstream activities in accordance with ESRS 1.

As it is the first year of reporting based on the ESRS standards, the company does not report any changes in preparation or presentation of the sustainability statement and no errors in prior periods. Where metrics have been reported previously, comparative information is presented. However, for newly introduced metrics, the company makes use of the transitional provisions for the first year in accordance with ESRS 1. No information on intellectual property, know-how or the results of innovation were omitted in the statement.

Where information has been published in other parts of the report, the company has made use of the incorporation by reference concept, cross references have been inserted where relevant.

In case estimations have been used or in case there are outcome uncertainties related to the metrics disclosed in the statement, this is disclosed along with the respective metrics within each topical chapter. Information on value chain estimations can be found in the continuation (Sustainability Notes) SNXX.

[...]

Sustainability Notes (SN)



The order of, the structure of, and the amount of needed notes depends on the reporting companies needs. This example shows separate notes for example on the EU taxonomy reporting tables and accounting principles, a note for the double materiality assessment and a number of environmental and social notes.

SN.2 DOUBLE MATERIALITY ASSESSMENT

Depending on how detailed the company wants to report about the double materiality assessment process and the results in chapter “1.3 Our Material Sustainability Matters”, consider describing the company’s methodological approach and the results in more detail in this section instead. See ESRS 2 IRO-1 on what is required to disclose.

SN.3 EU TAXONOMY REGULATION

The taxonomy tables and accounting principles are mandatory for all companies in scope for CSRD. It is recommended to have them in the continuation (notes) sections since they take up a lot of space in the reporting.

[SN.4 - SN.14 NOTES ON ENVIRONMENTAL TOPICS]

Depending on which environmental disclosure requirements and topics are material, respective notes could be added to further specify the methodological approach that has been applied for preparing the information and required tables from the standards with detailed information instead of disclosing it as part of the topical chapters. This could be specifically of relevance when disclosing information on ESRS E1 due to the extensive nature of the requirements.

Please note that we have not further specified the continuation (notes) as this is very dependent on the reporting scope and accounting approach of each company.

[SN.15 - SN.24 NOTES ON SOCIAL TOPICS]

Depending on which social disclosure requirements and topics are material, respective notes could be added to further specify the methodological approach that has been applied for preparing the information and required tables from the standards with detailed information instead of disclosing it as part of the topical chapters. This could be specifically of relevance when disclosing information on ESRS S1 due to the extensive nature of the requirements.

Please note that we have not further specified the continuation (notes) as this is very dependent on the reporting scope and accounting approach of each company.

Sustainability Notes (SN)



In addition to reporting only incidents on corruption and bribery, the company could also consider disclosing an overview of all reported and/or confirmed cases that relate to business conduct and corporate culture on a more general level (depending how the company defines the terms). This could for example include incidents that are contradictory to internal rules or the Code of Conduct (e.g. related to health and safety or fraud).

SN.25 BUSINESS CONDUCT

Depending on the information and metrics the company wants to disclose, detailed information on for example trainings conducted or the number of grievances reported and/or (confirmed) incidents could be disclosed as part of this section.

The ESRS mentions the following metrics as voluntary disclosures:

- the total number and nature of confirmed incidents of corruption or bribery;
- the number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents;
- the number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery; and
- details of public legal cases regarding corruption or bribery brought against the company and its own workers during the reporting period and the outcomes of such cases. This includes cases that were initiated in previous years where the outcome was only established in the current reporting period.

ESRS G1, AR 8 further includes an illustrative example on how the information on trainings could be illustrated. The table is presented below, but can be adjusted to the circumstances of the company as this is only a suggestion by the ESRS.

	At-risk functions	Managers	Administrative, management and supervisory bodies	Other own workers
Training coverage				
Total	20,000	200	16	70,000
Total receiving training	19,500	150	8	5,000
Delivery method and duration				
Classroom training	5 hours			
Computer-based training	1 hour	2 hours	1 hour	
Voluntary computer-based training				1 hour
Frequency				
How often training is required	Annually	Annually	Bi-annually	-
Topics covered				
Definition of corruption	X	X	X	X
Policy	X	X	X	X
Etc.	X			

Sustainability Notes (SN)



The ESRS content index will be a central piece within the sustainability statement as it provides the reader guidance on where to find relevant information. Many companies have already made use of a GRI content index in the past as part of their GRI reports. Hence, the company could use their GRI content index or other companies as inspiration on how to illustrate the table in line with their circumstance.

However, remember that the ESRS comes with requirements on presentation that is not found in GRI where the ESRS-report must be structured in accordance with ESRS1 chapter 8.

SN 26. LIST OF MATERIAL DISCLOSURE REQUIREMENTS (ESRS CONTENT INDEX)

IRO-2

ESRS	Disclosure requirement	Full name of the disclosure requirement	Page
General information			
ESRS 2	BP-1	General basis for preparation of sustainability statements	x
ESRS 2	BP-2	Disclosures in relation to specific circumstances	x
ESRS 2	GOV-1	The role of the administrative, management and supervisory bodies	x
ESRS 2	GOV-2	Information provided to and sustainability matters addressed by the company's administrative, management and supervisory bodies	x
Environmental information			
<i>Not applicable</i>		EU Taxonomy Disclosures	x
ESRS E1	E1-1	Transition plan for climate change mitigation	x
Entity-specific disclosure		<i>To be specified</i>	x
Social information			
ESRS S1	S1-1	Policies related to own workforce	x
Governance information			
ESRS G1	G1-1	Business conduct policies and corporate culture	x
ESRS G1	G1-3	Prevention and detection of corruption and bribery	x
ESRS G1	G1-4	Incidents of corruption or bribery	x

Sustainability Notes (SN)



The following EU-legislation should be considered:

SFDR: 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)

Pillar 3: 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”)

Benchmark Regulation: 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

EU Climate Law: 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’)

SN.27 LIST OF REFERENCES

ESRS 2 BP-1 requires the company to disclose a list of disclosure requirements or specific data points that are incorporated in the statement by reference. This can be for example when referencing to the Corporate Governance Report, Remuneration Report or other. In this illustrative we have not made any such references. An illustration on what type of information should be included can be found in ESRS 1 Appendix G.

SN.28 DATA POINTS FROM OTHER EU LEGISLATIONS

ESRS 2 IRO-2 requires the company to disclose a table of all the data points that derive from other EU legislation as listed in Appendix B of ESRS 2 indicating where to find the data points in the sustainability statement and their materiality. Please note that all of the data points listed in the Appendix have to be listed, even the ones that are not material.

Disclosure Requirement and related datapoint	SFDR reference	Pillar reference	Benchmark Regulation reference	EU Climate Law reference	Page in the sustainability statement*	Not material
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		p.11	
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		p.11	
...						Not material

Appendices to this lookbook

Appendix 1: Flowchart for determining disclosures under ESRS

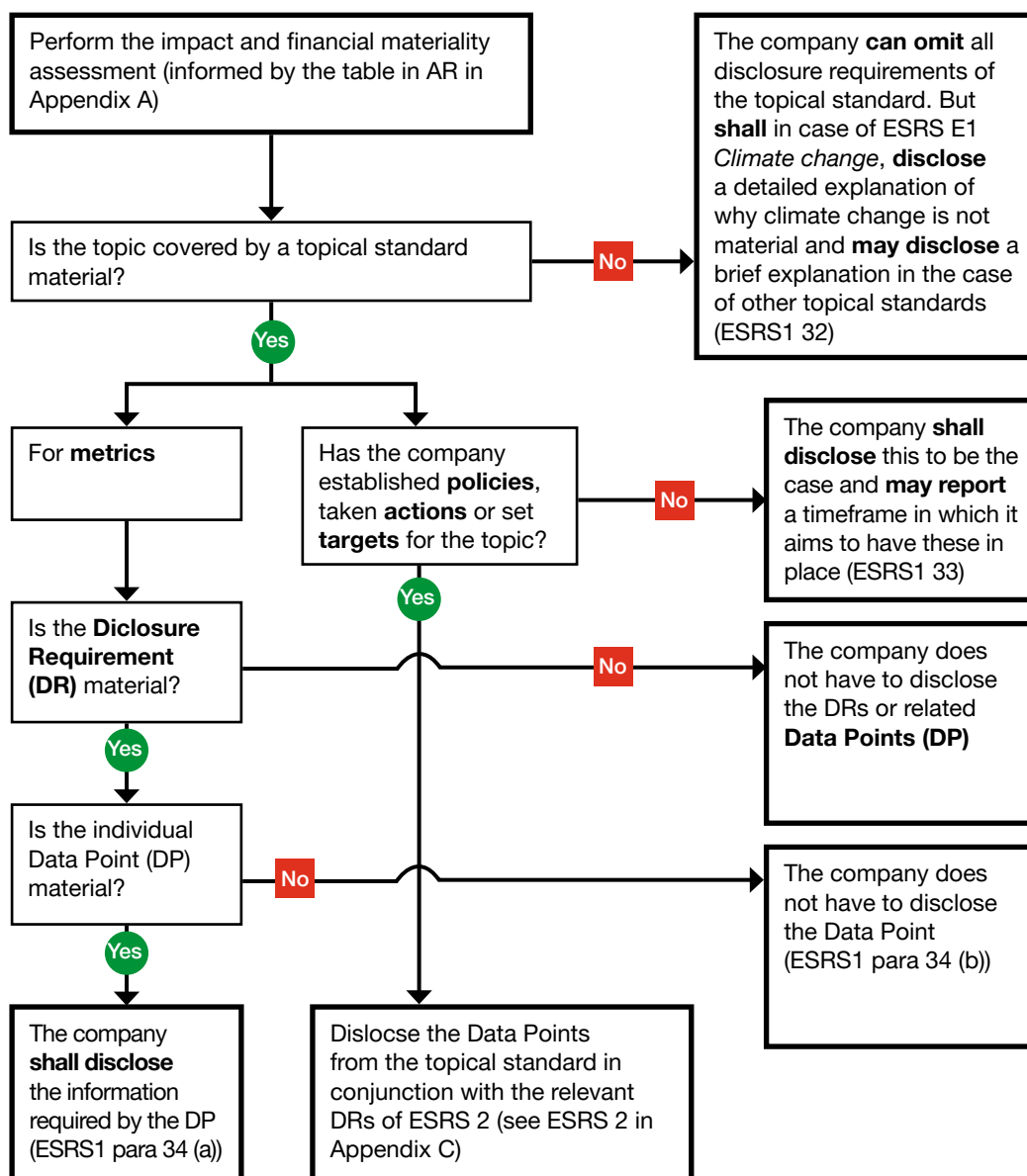
Appendix 2: Transitional provision

Appendix 3: Regulatory overview links

Appendix 1:

Flowchart* for determining disclosures under ESRS

- Applying “materiality of information”



*) Refer to Appendix E in ESRS 1. The flowchart is an integrated part of the standard.

Appendix 2:

Transitional provisions

Entity-specific disclosures

When defining its entity-specific disclosures, the company may adopt transitional measures for their preparation in *the first 3 annual sustainability statements*.

(e.g. entity-specific disclosures from prior periods...
+ cover sustainability matters that are material for the company in its sector(s), using available best practice and/or available frameworks or reporting standards...)

Value chain

For the *first 3 years*:

If information regarding the value chain is not available, the company *shall* explain:

- the efforts made to obtain the information,
- the reasons why this information could not be obtained, and
- the plans to obtain such information in the future.

Information *may* be limited to available in-house information when applying ESRS 2 and DRs on policies, actions and targets in topical standards.

When disclosing metrics, value chain information is not required, except for datapoints derived from other EU legislation, as listed in ESRS 2 Appendix B.

Comparative information

Presentation of comparative information may be deferred by *1 year*.

Phased in disclosure requirements

Progressivity on specified DRs **between 1 and 3 years**.

The table below shows *some examples* of phased-in disclosure requirements. The full list of phase-in provisions is included in ESRS 1, Appendix C

Please note that even though phase-in provisions are used the company *shall* describe which material matters that have been identified and provide some information regarding the matters as such. The **minimum requirement** for this is described in ESRS 2 BP-2 §17.

Standard	Disclosure Requirement	For all companies	For companies and groups with ≤ 750 employees	
			Year 1	Year 2
E1-E5	Anticipated financial effects	Year 1: may be omitted (year 1-3 may be expressed in qualitative terms)		
E1	Datapoints on scope 3 and total GHG emissions	Year 1-3: qualitative information only*	May be omitted	
E4	All disclosure requirements		May be omitted**	May be omitted**
S1	Selected disclosure requirements and datapoints			
S1	All disclosure requirements		May be omitted**	
S2-S4	All disclosure requirements		May be omitted**	May be omitted**

* With limited exceptions and for E1 only if it is impracticable to prepare quantitative disclosures.

** The sustainability matters covered by the ESRS are still to be included in the materiality assessment. A brief description of any time-bound targets, policies, and actions as well as the disclosure of relevant metrics are still required.

Appendix 3:

Regulatory overview links

For your information, we have listed below the main documents that form the regulatory framework of the CSRD as well as additional information materials published by EFRAG and PwCs Sustainability Reporting Guide. We have also provided links to access these documents online:



Corporate Sustainability Reporting Directive

Links to regulation and guidance:

[CSRD main regulation >> link to the directive](#)

[ESRS Delegated act](#)

[CSRD integration in Swedish laws](#)

EFRAG Guidance papers (published in May 2024)

1) [materiality assessment](#)

2) [value chain](#)

3) ESRS datapoints – [Implementation Guidance Methodology](#) + [list](#)

EFRAG Q&A Platform

[EFRAG Q&A Platform](#)



Taxonomy Regulation

Link to the EU-commission's site for EU taxonomy plus guidance tools:

[EU taxonomy for sustainable activities](#)

PwC Sustainability Reporting Guide (SRG)

Link to access the SRG:

[Sustainability reporting guide](#)

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