

	Current ED	Kept in Basic	Moved to Basic	Kept in BP (Core)	Deleted	To be significantly changed
B 1 – Basis for preparation	<p>The undertaking shall disclose: (a) which of the following options it has selected in the preparation of its sustainability report using this [draft] Standard: i. OPTION A: Basic Module (only); ii. OPTION B: Basic Module and Narrative-PAT Module; iii. OPTION C: Basic Module and Business Partners Module; or iv. OPTION D: Basic Module, Narrative-PAT Module and Business Partner Module;</p> <p>(b) whether the sustainability report has been prepared on a consolidated basis (i.e., the report includes information of the undertaking and its subsidiaries) or on an individual basis (i.e., the report is limited only to the information of the undertaking); and</p> <p>(c) the list of the subsidiaries, including their registered address covered in the consolidated sustainability report.</p>	YES	NA	NA	NO	<p>Integrate the content of N 1 – Strategy: business model and sustainability – related initiatives:</p> <p>(a) a description of significant groups of products and/or services offered;</p> <p>(b) a description of significant market(s) the undertaking operates in (B2B, wholesale, retail, countries);</p> <p>(c) a description of main business relationships (such as key suppliers, customers distribution channels and consumers); and</p> <p>(d) if applicable, a description of the key elements of its strategy that relate to or affect sustainability matters.</p> <p>Add to B1:</p> <ol style="list-style-type: none"> NACE sector classification code Size of balance sheet Turnover Country of primary operations + location(s) of significant assets ESG labels or certificates if any.
B 2 – Practices for transitioning towards a more sustainable economy	<p>The undertaking may briefly describe specific practices for transitioning towards a more sustainable economy in case it has them in place. Such practices include what the undertaking does to reduce its negative impacts and to enhance its positive impacts on people and on the environment in order to contribute to a more sustainable economy. Practices in this context shall not include philanthropic activities (e.g., donations) but rather, for instance, initiatives to improve working conditions and equal treatment in the workplace, sustainability training for the undertaking’s workforce, collaboration with universities related to sustainability projects, efforts to reduce the undertaking’s water and electricity consumption or to prevent pollution, and initiatives to improve product safety. This disclosure does not apply when the undertaking prepares its sustainability report using the Narrative-PAT Module.</p>	YES	NA	NA	NO	<p>Add the content of N 3 – Management of material sustainability matters and N5 – Governance: responsibilities in relation to sustainability matters reformulated as follows:</p> <p>EFRAG would develop SME IG with a list of illustrative actions/policies to be possibly used as a menu to prepare this disclosure.</p> <ol style="list-style-type: none"> if there is a formal sustainability policy on ESG issues (and if it is publicly available) as well as any separate environmental, social or governance policy for addressing material risks and opportunities. (N3) any future initiatives or forward looking plans the company has identified that are relevant to implement (N3) Any initiatives to either reduce emissions or measures to improve energy efficiency. (N3) When policies/actions are in place indicate who is responsible in the governance body. (N5)

	Current ED	Kept in Basic	Moved to Basic	Kept in BP (Core)	Deleted	To be significantly changed
	23. The undertaking shall report on its impacts on climate by disclosing its energy usage and greenhouse gas emissions as requested in the following paragraphs.					
B 3 – Energy and greenhouse gas emissions	24. The undertaking shall disclose its total energy consumption in MWh, with a breakdown between: (a) fossil fuels; and (b) electricity as reflected in utility billings, along with a breakdown between renewable and non renewable sources if available.	YES	NA	NA	NO	NO
	25. The undertaking shall disclose its estimated gross greenhouse gas (GHG) emissions in tons of CO2 equivalents (tCO2eq) considering the content of the GHG Protocol Corporate Standard, including: (a) the Scope 1 GHG emissions in tCO2eq (from owned or controlled sources); and (b) the location-based Scope 2 emissions in tCO2eq (i.e., emissions from the generation of purchased energy).					
B4 – Pollution of air, water and soil	The undertaking shall disclose, if applicable, the pollutants (with respective amounts) it emits to air, water and soil in its own operations, that it is required by law to report to competent authorities (e.g. under the Industrial Emissions Directive and the European Pollutant Release and Transfer Register) or that it already reports according to an Environmental Management System such as Eco-Management and Audit Scheme (EMAS). If this information is already publicly available, the undertaking may alternatively refer to the document where it is reported, for example, by providing the relevant URL link or embedding a hyperlink.	YES	NA	NA	NO	NO
	27. The undertaking shall disclose, if applicable, metrics related to its impacts on biodiversity, ecosystems and land-use as requested in the following paragraphs.					
B 5 – Biodiversity	28. The undertaking shall disclose the number and area (in hectares) of sites that it owns, has leased, or manages in or near biodiversity sensitive areas.	YES	NA	NA	NO	NO
	29. The undertaking may disclose metrics related to land-use such as: (a) total use of land; (b) total sealed area; (c) total nature-oriented area on-site; and (d) total nature-oriented area off-site.					
B 6 – Water	30. The undertaking shall disclose its total water withdrawal, i.e., the amount of water drawn into the boundaries of the organisation (or facility); in addition, the undertaking shall separately present the amount of water withdrawn at sites located in areas of high water - stress.	YES	NA	NA	NO	NO
	31. If applicable, the undertaking shall disclose its water consumption, calculated as the difference between its water withdrawal and water discharge from its production processes.					

	Current ED	Kept in Basic	Moved to Basic	Kept in BP (Core)	Deleted	To be significantly changed
B 7 – Resource use, circular economy and waste management	32. The undertaking shall disclose how it manages resource use, its waste management practices and whether it applies circular economy principles.					
	33. The disclosure shall include:					
	(a) if the undertaking operates manufacturing, construction and/or packaging processes: the recycled content in the products (goods and materials) and their packaging produced by the undertaking;	YES	NA	NA	NO	NO
	(b) if the undertaking operates manufacturing, construction and/or packaging processes: rates of recyclable content in the products and their packaging produced by the undertaking;					
	(c) the total annual generation of waste in units of weight (preferably) or volume broken down by type (non-hazardous and hazardous); and					
	(d) the total annual waste diverted to recycling or reuse expressed in units of weight (e.g., kg or tonnes).					
B 8 – Workforce – General characteristics	34. The undertaking shall disclose the total number of employees in full-time equivalents or provide a headcount of such employees broken down by:	YES	NA	NA	NO	NO
	(a) type of employment contract (temporary or permanent);					
	(b) gender; and					
	(c) country if applicable.					
B 9 – Workforce – Health and safety	35. The undertaking shall disclose the following information regarding its employees:	YES	NA	NA	NO	NO
	(a) the number and rate of recordable work-related accident; and					
	(b) the number of fatalities as a result of work-related injuries and work-related ill health.					
B 10 – Workforce – Remuneration, collective bargaining and training	36. The undertaking shall disclose:					
	(a) when a significant proportion of employees are compensated based on wages subject to minimum wage rules, the relevant ratio of the entry level wage to the minimum wage;	YES	NA	NA	NO	NO
	(b) the percentage gap in pay between its female and male employees. The undertaking may omit this disclosure when its head count is below 150 employees;					
	(c) the percentage of employees covered by collective bargaining agreements; and					
	(d) the average number of annual training hours per employee, broken down by gender, that are related to the development of skills and competences, whether acquired through formal or informal forms of capacity-building.					

	Current ED	Kept in Basic	Moved to Basic	Kept in BP (Core)	Deleted	To be significantly changed
B 11 – Workers in the value chain, affected communities, consumers and end-users	37. The undertaking may disclose whether it has a process in place for identifying if there are value chain workers, affected communities, or consumers and end-users who are affected or are likely to be affected by severe negative impacts in relation to the undertaking's operations (i.e., its products, services and activities). In that case, the undertaking may describe this process. If identified, the undertaking may also describe the types of impacts, including where they arise and the groups that are affected by them.	NO	NA	YES?	YES?	<p>Secretariat proposed to reformulate this datapoint and move it outside the basic module. It will also include positive impacts in the formulation: Does the undertaking have a process in place to understand and manage its negative or positive impacts on (dropdown menu):</p> <ul style="list-style-type: none"> i) value chain workers ii) affected communities and/or. iii) consumers and end-users? <p>If this is the case, please describe.</p>
B 12 – Convictions and fines for corruption and bribery	38. In case of convictions and fines in the reporting period, the undertaking shall disclose the number of convictions and the total amount of fines incurred for the violation of anti-corruption and anti bribery laws.	YES	NA	NA	NO	NO
N 1 – Strategy: business model and sustainability – related initiatives	58. The undertaking shall disclose the key elements of its strategy and its business model, including: (a) a description of significant groups of products and/or services offered; (b) a description of significant market(s) the undertaking operates in (B2B, wholesale, retail, countries); (c) a description of main business relationships (such as key suppliers, customers distribution channels and consumers); and (d) if applicable, a description of the key elements of its strategy that relate to or affect sustainability matters.	NA	YES	NA	NO	Move N1 to B 1 – Basis for preparation
N 2 – Material sustainability matters	59. The undertaking shall disclose the material sustainability matters resulting from its materiality analysis (see paragraphs 42 through 57), including a brief description of each sustainability matter (listed in accordance with paragraph 43) and of: (a) how each matter has an impact on people or the environment; (b) its actual and potential effects on the undertaking's present or future financial position and performance; and (c) its actual and potential effects on the undertaking's activities and strategy.	NA	NO	NA	YES	Delete (at least until sector list of SMEs are issued as guidance).

	Current ED	Kept in Basic	Moved to Basic	Kept in BP (Core)	Deleted	To be significantly changed
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60. The undertaking shall disclose how it manages its material sustainability matters, including:

(a) whether it has adopted policies or actions to (i) prevent, (ii) mitigate and/or (iii) remediate actual or potential negative impacts and/or to (iv) address financial risks. If applicable, the undertaking may refer to the [due diligence] or risk management processes implemented;

(b) if it has policies in place, it shall describe:

- i. the objective(s) of the policy and which material sustainability matters it addresses;
- ii. the scope of the policy in terms of activities, value chain and countries where the undertaking is active;
- iii. if applicable, affected stakeholder groups addressed by the policy;
- iv. if applicable, a reference to third-party standards or initiatives that the undertaking commits to respect through the implementation of the policy; and
- v. the targets the undertaking uses to monitor the implementation of the policy and the progress achieved;

NA

YES

NA

NO

Move the content of this disclosure into **B 2 – Practices for transitioning towards a more sustainable economy** in the Basic Module

N 3 – Management of material sustainability matters

(c) if it has put actions in place, it shall describe:

- i. the list of key actions taken in the reporting year and of the actions planned for the future;
- ii. the scope of those actions (i.e., whether they also address actors in the value chain, whether they are implemented in different location and geographies or which affected stakeholder groups they address);
- iii. the time horizon under which the undertaking intends to complete each key action; and
- iv. the targets the undertaking uses to monitor the actions implemented and the progress achieved.

61. Where material, the undertaking shall disclose the actions taken in the reporting period to improve its energy efficiency and to reduce its greenhouse gas emissions as well as the related possible implications in terms of financial risks and, if applicable, opportunities.

62. When the undertaking considers that negative impacts are material in relation to (i) workers in the value chain, (ii) consumers and end-users and/or (iii) affected communities, it may disclose:

- (a) the policies that it has adopted to manage those material impacts as well as the associated material risks;
- (b) the actions it has taken on material impacts, its approach to managing material risks, and the effectiveness of those actions; and
- (c) the targets related to managing material negative impacts and managing material risks.

63. These disclosures are limited to the description of the policies, actions and targets that the undertaking has put in place.

64. Where material, the undertaking shall disclose whether it has the following in place to support the prevention of incidents of corruption or bribery:

- (a) separation of duties; and/or
- (b) training for its employees; and
- (c) any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery.

	Current ED	Kept in Basic	Moved to Basic	Kept in BP (Core)	Deleted	To be significantly changed
	65. If the undertaking engages with stakeholders, it may disclose:					
N 4 – Key stakeholders	(a) the categories of key stakeholders being considered (the undertaking can use categories such as investors, lending banks/creditors, business partners, trade unions, NGOs, etc.);and (b) a brief description of the engagement activities.	NA	NO	NA	YES	Delete N4 (also in conjunction with elimination of materiality).
	66. The undertaking shall describe its governance and responsibilities in relation to sustainability matters. If applicable, this disclosure shall cover roles and responsibilities of the highest governance body or of the individual(s) in charge of managing sustainability matters within the undertaking.	NA	YES	NA	NO	Integrate N5 with N3 and move it to B 2 – Practices for transitioning towards a more sustainable economy in the Basic Module, i.e. when policies/actions are in place indicate who is responsible.
N 5 – Governance: responsibilities in relation to sustainability matters						
	74. The undertaking shall include a statement indicating if it is active in one or more of the followingsectors while disclosing its related revenues:					
BP 1 – Revenues from certain sectors	(a) controversial weapons such as anti-personnel mines, cluster munitions, chemical weapons and biological weapons; and/or (b) the cultivation and production of tobacco; and/or (c) fossil fuel (coal, oil and gas) sector (i.e., the undertaking derives revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council 17), including a disaggregation of revenues derived from coal, from oil and from gas); and/or (d) chemicals production, as its activities fall under Division 20.2 of Annex I to Regulation (EC) No 1893/20062.	NA	NA	YES	NO	NO
BP 2 – Gender diversity ratio in governance body	75. If the undertaking has a governance body in place, the undertaking shall disclose the related gender diversity ratio.	NA	NA	YES	NO	NO
BP 3 – GHG emissions reduction target	76. If the undertaking has set GHG emission reduction targets, it shall provide its GHG emission reduction targets for: (a) scope 1 emissions; and (b) scope 2 emissions.	NA	NA	YES	NO	
	77. This disclosure includes Scope 3 emissions, only when they are disclosed under paragraph 71 above and the undertaking has set GHG emission reduction targets for Scope 3 emissions.					Merge BP 3 – GHG emissions reduction target and BP 4 – Transition plan for climate change mitigation
BP 4 – Transition plan for climate change mitigation	78. The undertaking shall provide information about its transition plan for climate change mitigation with an explanation of how GHG emission reduction targets are compatible with the limiting of global warming to 1.5°C in line with the Paris Agreement. This disclosure is applicable only if the undertaking has adopted such a transition plan.	NA	NA	YES	NO	

	Current ED	Kept in Basic	Moved to Basic	Kept in BP (Core)	Deleted	To be significantly changed
BP 5 – Physical risks from climate change	79. The undertaking shall disclose the anticipated financial effects that physical risks from climate change may have on the company. This disclosure is applicable only if the undertaking is exposed to material physical risks. In particular, it shall disclose: (a) the monetary amount and the percentage of the undertaking's total assets that can be subjected to material physical risks over the short-, medium- and long-term before considering climate change adaptation actions disaggregated by acute and chronic physical risk; (b) the proportion of assets at material physical risk addressed by the climate change adaptation actions; (c) the location of the significant assets affected by material physical risks; (d) the monetary amount and proportion (percentage) of net revenue from its business activities at material physical risk over the short-, medium- and long-term; and (e) the breakdown of the undertaking's carrying value of its real estate assets by energy efficiency classes.	NA	NA	YES	NO	NO
Disclosure BP 6 – Hazardous waste and/or radioactive waste ratio	80. If the undertaking generates hazardous and/or radioactive waste, the undertaking shall disclose the total amount of hazardous waste and/or radioactive waste generated (radioactive waste is defined in Article 3(7) of Council Directive 2011/70/Euratom).	NA	NA	YES	NO	NO
Disclosure BP 7 – Alignment with internationally recognised instruments	81. The undertaking shall disclose whether its policies pertaining to its own workforce are aligned with relevant internationally recognised instruments, including the UN Guiding Principles on Business and Human Rights.	NA	NA	YES	NO	Merge BP-7 Alignment with internationally recognised instruments and BP-8 Processes to monitor compliance and mechanisms to address violations Reformulate with a dropdown menu. Refer to the revised text below: 1. Do you have an undertaking's code of conduct or human rights policy for its own workforce? To note: those that have a due diligence process in place shall answer positively. 2. If yes, do these cover (dropdown menu): i) Child labour ii) Forced labour iii) Human trafficking iv) Discrimination v) Accident prevention 3. Do you have a complaints handling mechanism for own workforce? NO SIGNIFICANT CHANGE. Reformulation as follows: Does the undertaking have confirmed cases related: i) child labour; ii) forced labour; iii) human trafficking; or iv) discrimination?
Disclosure BP 8 – Processes to monitor compliance and mechanisms to address violations	82. The undertaking shall disclose whether it has processes in place to monitor compliance with the OECD Guidelines for Multinational Enterprises and with the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the International Bill of Human Rights and the eight fundamental conventions identified in the ILO Declaration or grievance/complaints handling mechanisms, to address violations of the above standards with regard to its own workforce.	NA	NA	YES	NO	
Disclosure BP 9 – Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles (including the principles and rights set out in the eight fundamental conventions of the ILO Declaration and the International Bill of Human Rights)	83. The undertaking shall disclose whether there have been any violations of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises with regard to its own workforce during the reporting year.	NA	NA	YES	NO	If so, the undertaking may describe the actions being taken to address the violations described above.

	Current ED	Kept in Basic	Moved to Basic	Kept in BP (Core)	Deleted	To be significantly changed
Disclosure BP 10 – Work-life balance	84. The undertaking shall disclose the percentage of its employees: (a) who are entitled to take family-related leave with a breakdown by gender; and (b) who took family-related leave with a breakdown by gender. Family-related leave includes maternity, paternity, parental and carers' leave.	NA	NA	NO	YES	Following the responses from the various stakeholder groups, the proposal is to delete
Disclosure BP 11 – Number of apprentices	85. If applicable, the undertaking shall disclose the number of apprentices in the reporting period.	NA	NA	NO	YES	Following the responses from the various stakeholder groups, the proposal is to delete

ORIGINAL TABLE OF CONTENT

BASIC MODULE

- **B1** – Basis for preparation + N1
- **B2** – Practices for transitioning towards a more sustainable economy + N3 + N5 + N2 (depending on the decision on materiality)
- **B3** – Energy and greenhouse gas emissions
- **B4** – Pollution of air, water and soil
- **B5** – Biodiversity
- **B6** – Water
- **B7** – Resource Use, circular economy and waste management
- **B8** – Workforce – General characteristics
- **B9** – Workforce – Health and safety
- **B10** – Workforce – Remuneration, collective bargaining and training.
- **B11** – Workers in value chain, affected communities, consumers and end-users
- **B12** – Convictions and fines for corruption and bribery

NARRATIVE - PAT MODULE

- **N1** – Strategy: business model and sustainability – related initiatives
- **N2** – Material sustainability matters
- **N3** – Management of material sustainability matters
- **N4** – Key stakeholders
- **N5** – Governance: responsibilities in relation to sustainability matters

BUSINESS PARTNERS MODULE

- **BP1** – Revenues from certain sectors
- **BP2** – Gender diversity ratio in governance body
- **BP3** – GHG emissions reduction target
- **BP4** – Transition plan for climate change mitigation
- **BP5** – Physical risks from climate change
- **BP6** – Hazardous waste and/ or radioactive waste ratio
- **BP7** – Alignment with internationally recognised instruments
- **BP8** – Processes to monitor compliance and mechanisms to address violations
- **BP9** – Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles
- **BP10** – Work-life balance
- **BP11** – Number of apprentices

NEW DRAFT TABLE OF CONTENT

BASIC MODULE

- **B1** – Basis for preparation + N1 – Strategy: business model and sustainability – related initiatives
- **B2** – Practices for transitioning towards a more sustainable economy + **N3** – Management of material sustainability matters + **N5** – Governance: responsibilities in relation to sustainability matters
- **B3** – Energy and greenhouse gas emissions
- **B4** – Pollution of air, water and soil
- **B5** – Biodiversity
- **B6** – Water
- **B7** – Resource Use, circular economy and waste management
- **B8** – Workforce – General characteristics
- **B9** – Workforce – Health and safety
- **B10** – Workforce – Remuneration, collective bargaining and training.
- ~~**B11** – Workers in value chain, affected communities, consumers and end-users~~ (moved outside of the BM to the Core or the Advanced module)
- **B12** – Convictions and fines for corruption and bribery

CORE MODULE

- **BP1**: Revenues from certain sectors
- **BP2**: Gender diversity ratio in governance body
- **BP3 + BP4 where: BP3** is GHG emissions reduction target and **BP4** is Transition plan for climate change mitigation
- **BP5**: Physical risks from climate change
- **BP6**: Hazardous waste and/ or radioactive waste ratio
- **BP7 + BP8 where: BP7** is Alignment with internationally recognised instruments and **BP8** is Processes to monitor compliance and mechanisms to address violations
- **BP9**: Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles
- ~~**BP10**: Work-life balance~~
- ~~**BP11**: Number of apprentices~~

ADVANCED MODULE (TBD)

- **Taxonomy** Placeholder (to be effective only once the Platform for Sustainable Finance (PSF) tool is in place
- Additional datapoints requested by banks.