

Additional datapoints that banks have suggested to include

1. In this paper, EFRAG Secretariat lists the datapoints that the banks have suggested to include in order to have a better coverage of their questionnaires. EFRAG SR TEG will discuss which one of them could be potentially included in a potential advanced module.
2. **Potential Taxonomy submodule:** Include placeholder for Taxonomy disclosures; to be effective only once the Platform for Sustainable Finance has a tool is in place.
3. **List of the datapoints (related to disclosures already included in VSME ED):**
 - a. Environment:
 - i. In case the undertaking's activity is related to energy production, the amount of energy production (split between renewable and non-renewable).
 - ii. Additionally, add "Total consumption of energy from fossil sources (for electricity consider indication in utility bills for part from non-renewable sources i.e. without guarantee of origin); ii) Total consumption of energy considered from renewable sources (i.e. with certificate of origin)" or report Total energy consumption + % renewable (but considering banks' calculation guidance).
 - iii. Require disclosure on whether SMEs already report B4 data (according to law), Percentage of land owned, leased and/or managed within legally protected and internationally recognized areas (e.g. UNESCO World Heritage Sites, UNESCO Biosphere Reserves, Ramsar Sites, Key Biodiversity Areas)
 - iv. Percentage of marine area owned, leased and/or managed within legally protected or internationally recognized areas (e.g. UNESCO World Heritage Sites, UNESCO Biosphere Reserves, Ramsar Sites, Key Biodiversity Areas)
 - v. Annual average amount of water consumed by businesses (in cubic meters) per million EUR of business revenue.
 - vi. Expand the point about human rights violations to include other legal infractions or fines, such as environmental legislation violations or money laundering.
 - vii. Intermediate objectives, GHG emission intensity, GHG emission targets in high impact sectors, GHG removals and avoided emissions in BP3.
 - viii. Include in BP5 the presence of insurance coverage for physical risk events to include the physical risks (earthquake, floods, landslides, floods, other climate linked events).
 - ix. Decide whether to keep scope 3 in the core module or move it to the advanced module.
 - b. Social
 - i. B11, under the new reformulation?
 - ii. Include the percentage of female in managerial roles or employees by type of contract arises from set1, however it is not SFDR nor drives from

existing legislation. To be discussed as part of the ADVANCED module (see separate doc.)

- iii. Suggestion to add compulsorily employed staff (for protected categories).

4. Additional datapoints related to new disclosures (not yet included in VSME ED)

- i. Information about permits is also considered relevant (e.g., discharge permits for water and/or air).
- ii. Does the company collaborate with local associations that promote social, charitable, cultural and recreational initiatives? (if Yes, specify number of initiatives)?
- iii. Does the company stipulate agreements with public or private bodies or local communities to carry out activities in favour of its community (if Yes, specify the number of agreements)?
- iv. Does the company sponsor/support philanthropy projects (if yes, indicate amount)?
- v. Does the company collaborate with training institutions such as high schools and universities to carry out projects with social impact?
- vi. Does the company join school-work alternation programs or promote apprenticeship activities?

Rationale: linked to EBA Consultation Paper (January 2024) Draft Guidelines on the management of ESG risks

- vii. One national banking federation asks that provided that VSME becomes a digital tool with closed questions, several additional questions on environment could be asked related to i) impact reduction (i.e. mobility plan, use of low-carbon vehicles (purchase or leasing, product lifecycle analysis, product eco-design approach), ii) energy consumption (i.e. energy consumption per sqm for each of the company's buildings, total annual cost of the company's energy consumption) iii) biodiversity (i.e. dependence of its activities on natural resources, changing use of sea and land, exploitation of natural and marine resources).