

# MOVING TOWARDS ESRS



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## *Defining the relevant datapoints for financial institutions*

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DISCUSSION PAPER VERSION 1, FEBRUARY 2024

# Contents

<b>Introduction</b> .....	2
<b>Background</b> .....	2
<b>Current Methodology</b> .....	2
<b>Overview of sector-agnostic standards</b> .....	3
<b>Our Approach</b> .....	3
<b>Data types</b> .....	4
<b>Environmental datapoints</b> .....	12
E1 Climate Change .....	12
E2 Pollution .....	16
E3 Water and marine resources .....	16
E4 Biodiversity and ecosystems .....	17
E5 Resource use and circular economy .....	17
<b>Social datapoints</b> .....	17
S1 own workforce .....	17
S2 Workers in the value chain .....	19
S3 Affected communities .....	20
S4 Consumers and end-users .....	20
<b>Governance datapoints</b> .....	21
G1 Business conduct .....	21
<b>Conclusion</b> .....	22
<b>Disclaimer</b> .....	23
<b>Annex 1</b> .....	24
<b>Annex 2</b> .....	29

## Introduction

In December 2023 the European Financial Reporting Advisory Group (EFRAG) published a list of 1178 total datapoints which might become relevant depending on the double materiality assessment to comply with the European Sustainability Reporting Standards (ESRS).

In this paper, Zielke Rating wants to show which datapoints are relevant for us to assess the Environment Social and Governance (ESG)-position of insurance companies, banks, and asset managers. Therefore, we express ourselves as stakeholders (users of sustainability statements). We also address the issues which lack for this particular sectors.

*This paper is open for comments until April 15<sup>th</sup> 2024 close of business. Please respond to [studie@zielke-rc.eu](mailto:studie@zielke-rc.eu)*

## Background

The author, Dr. Carsten Zielke has been holding mandates with EFRAG since 2001 both in the financial reporting field as well as in the sustainability matter. He has been a working group member of the Insurance Working Group since 2001, member of the Technical Expert Group (TEG) from 2006-2012 (maximum duration), vice-chair of the User Panel since 2010, member of the preparatory working group to revise the NFRD and prepare the CSRD and the ESRS between 2020 and 2022, member of the Connectivity Advisory Panel since July 2023 and member of the Insurance Advisory Panel to since February 2024.

His company Zielke Research Consult based in Aachen/Germany has been analysing non-financial declarations of insurance companies and banks since 2007. In January 2024 the rating business has been separated from the consulting business in a new company Zielke Rating.

In this capacity we would like to give the following guidelines:

For us it remains important that only essential information is given which builds around a story line. We do not expect entities to fill out all 1178 datapoint cases. However, we require them as a first step to provide us with SFDR datapoints.

Starting from our current criteria based on key performance indicators on Environment, Social and Governance issues.

## Current Methodology

Our methodology based on three main areas which are Environment, Social and Governance aspects.

### Environment

Our environmental analysis is mainly focused in assessing the following four areas

- Carbon emissions Scope 1, 2 and 3 especially financed emissions
- Concrete measures implemented by financial institution to reduce carbon emissions
- ESG consideration in Investment policies (for insurers) or in lending (for banks)
- ESG aspects in non-life insurance products (particularly for insurers)

## Social

The social dimension is analyzed with the following six criteria:

- Proportion of women in management positions
- Inclusion
- Customer satisfaction surveys with willingness to recommend (Net Promoter Score)
- Childcare and family benefits
- Health management of employees
- Social Initiatives

## Governance

In the area of governance, we focus our analysis on the findability of sustainability reports, the integration of sustainability responsibility in the company, the formulation of a sustainability strategy and the SFCR (Solvency and Financial Condition Report) in case of insurers and CRR (Capital Requirement Regulation) in case of banks.

Therefore, we would like to expand our capacity to analyse key performance indicators on Environment, Social and Governance issues. In order to do that, we have to allocate the different criteria to the standards developed by EFRAG.

## Overview of sector-agnostic standards

Strategy, governance, impacts, Risks, Opportunities (IRO)	Environment	Social	Governance
<b>ESRS 1:</b> General requirements	<b>ESRS E1:</b> Climate change	<b>ESRS S1:</b> Own workforce	<b>ESRS G1:</b> Business conduct
<b>ESRS 2:</b> General disclosures	<b>ESRS E2:</b> Pollution	<b>ESRS S2:</b> Workers in the value chain	
	<b>ESRS E3:</b> Water & marine resources	<b>ESRS S3:</b> Affected communities	
	<b>ESRS E4:</b> Biodiversity & ecosystems	<b>ESRS S4:</b> Consumers & end-users	
	<b>ESRS E5:</b> Resource use & circular economy		

So, we first set the principles of our double materiality assessment.

## Our Approach

- Our materiality assessment sets what is comparable and meaningful to measure ESG performance of insurance entities , banks and asset managers
- Our criteria to determine certain datapoints integrates environmental and social considerations into our assessment framework
- Our aim is to provide a balanced evaluation that encourages continuous improvement while fostering positive environmental and social outcomes along with financial performance

- For the reporting year 2023 we expect to disclose those datapoints which are also reported under SFDR
- For the reporting year 2024: Not only SFDR relevant KPIs but all datapoints that we consider as material topic

## Data types

We would like to define first what kind of datapoints exist.

The category of numerical datapoints includes different types of data (i.e. monetary, volume, percentage, decimal). When referring to “numerical” data types, all quantitative types are considered as below.

- Integer – integral data type, only non-decimal positive numbers.
- Monetary – Decimal number representing currency.
- Percentage
- Date – Date (day, month year)
- Mass – The mass item type represents the mass of an object which can be measured.
- Intensity – represents a ratio with a numerator and denominator.
- Volume – The Volume item type is used to indicate that an element represents a volume and can be used to express the volume of any substance, whether solid, liquid, or gas.
- Energy – The energy item type represents a unit of energy.

Furthermore, the qualitative data types are below.

- The term “semi-narrative” is used to describe data types that can be used to enrich narrative disclosures (textblocks)
- Narrative – used for narrative formatted disclosures (textblocks), not restricted in any way of formatting, length or content (can contain images or tables); can span one sentence, one paragraph, 5 pages or 100 pages.

The most apparent data points are narrative and semi-narrative, meaning they imply some numbers. Of course, as analysts we would love to have standardized tables. But best practice will tell us whether this dream becomes reality.

In the meantime, we encourage financial institutions to deliver 107 datapoints in Excel format for fiscal year 2023, which mainly derive from the SFDR regulation. We understand that the SFDR regulation was firstly conceived to inform financial investors on the ESG exposure of their investments. However, these key performance indicators (KPIs) were integrated into the ESRS framework. Therefore, we think it is a good exercise for financial institutions to start delivering that data for their own operations already for the last reporting year. We are talking here about 107 datapoints.

*For the reporting year 2023 we expect to disclose those datapoints in EXCEL format which are also reported under SFDR in investment and underwriting portfolio including 153 ESRS2 points which is mandatory*

ESRS Datapoints covers SFDR			
ESRS	Quantitative Data	Qualitative Data	Total
E1	40	4	44
E2	3	0	3
E3	2	3	5
E4	0	6	6
E5	4	0	4
S1	4	13	17
S2	0	10	10
S3	0	7	7
S4	0	7	7
G1	2	2	4
<b>Total</b>	<b>55</b>	<b>52</b>	<b>107</b>
<b>Total %</b>	<b>51 %</b>	<b>49%</b>	<b>100%</b>

*For the following year we have identified 411 datapoints relevant to us and we expect from financial institution to disclose and present in Excel format.*

- For those who already report their ESG data, these below all datapoints including under SFDR to be reported onwards reporting year 2024
- ESRS 2 datapoints are mandatory irrespective of the materiality assessment. However further datapoints in Environmental, Social and Governance aspects are subject to the materiality assessment as we consider it is.

ESRS Datapoints Without MDR-PAT & M			
ESRS	Quantitative Data	Qualitative Data	Total
ESRS2	20	133	153
E1	83	53	136
E2	3	1	4
E3	3	3	6
E4	0	7	7
E5	4	4	8
S1	28	22	50
S2	0	10	10
S3	0	7	7
S4	1	19	20
G1	4	6	10
<b>Total</b>	<b>146</b>	<b>265</b>	<b>411</b>
<b>Total %</b>	<b>36 %</b>	<b>64%</b>	<b>100%</b>

However, ESRS 2 (153 datapoints) out of these must be reported irrespective of a materiality assessment.



Datapoints	Data Type	Area
Disclosure of general basis for preparation of sustainability statement	narrative	ESRS 2
Basis for preparation of sustainability statement	semi-narrative	ESRS 2
Scope of consolidation of consolidated sustainability statement is same as for financial statements	narrative	ESRS 2
Indication of subsidiary undertakings included in consolidation that are exempted from individual or consolidated sustainability reporting	narrative	ESRS 2
Disclosure of extent to which sustainability statement covers upstream and downstream value chain	narrative	ESRS 2
Option to omit specific piece of information corresponding to intellectual property, know-how or results of innovation has been used	semi-narrative	ESRS 2
Option allowed by Member State to omit disclosure of impending developments or matters in course of negotiation has been used	semi-narrative	ESRS 2
Disclosures in relation to specific circumstances	narrative	ESRS 2
Medium- or long-term time horizons defined by ESRS 1 have been deviated from	semi-narrative	ESRS 2
Disclosure of definitions of medium- or long-term time horizons	narrative	ESRS 2
Disclosure of reasons for applying different definitions of time horizons	narrative	ESRS 2
Metrics include value chain data estimated using indirect sources	semi-narrative	ESRS 2
Disclosure of metrics that include value chain data estimated using indirect sources	narrative	ESRS 2
Description of basis for preparation of metrics that include value chain data estimated using indirect sources	narrative	ESRS 2
Description of resulting level of accuracy of metrics that include value chain data estimated using indirect sources	narrative	ESRS 2
Description of planned actions to improve accuracy in future of metrics that include value chain data estimated using indirect sources	narrative	ESRS 2
Disclosure of quantitative metrics and monetary amounts disclosed that are subject to high level of measurement uncertainty	narrative	ESRS 2
Disclosure of sources of measurement uncertainty	narrative	ESRS 2
Disclosure of assumptions, approximations and judgements made in measurement	narrative	ESRS 2
Explanation of changes in preparation and presentation of sustainability information and reasons for them	narrative	ESRS 2
Disclosure of revised comparative figures	narrative	ESRS 2
Disclosure of difference between figures disclosed in preceding period and revised comparative figures	narrative	ESRS 2
Disclosure of nature of prior period material errors	narrative	ESRS 2
Disclosure of corrections for prior periods included in sustainability statement	narrative	ESRS 2
Disclosure of why correction of prior period errors is not practicable	narrative	ESRS 2
Disclosure of other legislation or generally accepted sustainability reporting standards and frameworks based on which information has been included in sustainability statement	narrative	ESRS 2
Disclosure of reference to paragraphs of standard or framework applied	narrative	ESRS 2
European standards approved by European Standardization System (ISO/IEC or CEN/CENELEC standards) have been relied on	semi-narrative	ESRS 2
Disclosure of extent to which data and processes that are used for sustainability reporting purposes have been verified by external assurance provider and found to conform to corresponding ISO/IEC or CEN/CENELEC standard	narrative	ESRS 2
List of DRs or DPs mandated by a Disclosure Requirement	narrative	ESRS 2
Topics (E4, S1, S2, S3, S4) have been assessed to be material	semi-narrative	ESRS 2
List of sustainability matters assessed to be material (phase-in)	semi-narrative	ESRS 2
Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)	narrative	ESRS 2
Description of any time-bound targets set related to sustainability matters assessed to be material (phase-in) and progress made towards achieving those targets	narrative	ESRS 2
Description of policies related to sustainability matters assessed to be material (phase-in)	narrative	ESRS 2
Description of actions taken to identify, monitor, prevent, mitigate, remediate or bring end to actual or potential adverse impacts related to sustainability matters assessed to be material (phase-in) and result of such actions	narrative	ESRS 2

Disclosure of metrics related to sustainability matters assessed to be material (phase-in)	narrative	ESRS 2
Information about composition and diversity of members of administrative, management and supervisory bodies	narrative	ESRS 2
Number of executive members	Integer	ESRS 2
Number of non-executive members	Integer	ESRS 2
Information about representation of employees and other workers	narrative	ESRS 2
Information about member's experience relevant to sectors, products and geographic locations of undertaking	narrative	ESRS 2
Percentage of members of administrative, management and supervisory bodies	Percent	ESRS 2
Board's gender diversity ratio	Percent	ESRS 2
Percentage of independent board members	Percent	ESRS 2
Information about roles and responsibilities of administrative, management and supervisory bodies	narrative	ESRS 2
Information about identity of administrative, management and supervisory bodies or individual(s) within body responsible for oversight of impacts, risks and opportunities	narrative	ESRS 2
Disclosure of how body's or individuals within body responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies	narrative	ESRS 2
Description of management's role in governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities	narrative	ESRS 2
Description of how oversight is exercised over management-level position or committee to which management's role is delegated to	narrative	ESRS 2
Information about reporting lines to administrative, management and supervisory bodies	narrative	ESRS 2
Disclosure of how dedicated controls and procedures are integrated with other internal functions	narrative	ESRS 2
Disclosure of how administrative, management and supervisory bodies and senior executive management oversee setting of targets related to material impacts, risks and opportunities and how progress towards them is monitored	narrative	ESRS 2
Disclosure of how administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to oversee sustainability matters	narrative	ESRS 2
Information about sustainability-related expertise that bodies either directly possess or can leverage	narrative	ESRS 2
Disclosure of how sustainability-related skills and expertise relate to material impacts, risks and opportunities	narrative	ESRS 2
Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them	narrative	ESRS 2
Disclosure of how administrative, management and supervisory bodies consider impacts, risks and opportunities when overseeing strategy, decisions on major transactions and risk management process	narrative	ESRS 2
Disclosure of list of material impacts, risks and opportunities addressed by administrative, management and supervisory bodies or their relevant committees	narrative	ESRS 2
Disclosure of how governance bodies ensure that appropriate mechanism for performance monitoring is in place	narrative	ESRS 2
Incentive schemes and remuneration policies linked to sustainability matters for members of administrative, management and supervisory bodies exist	semi-narrative	ESRS 2
Description of key characteristics of incentive schemes	narrative	ESRS 2
Description of specific sustainability-related targets and (or) impacts used to assess performance of members of administrative, management and supervisory bodies	narrative	ESRS 2
Disclosure of how sustainability-related performance metrics are considered as performance benchmarks or included in remuneration policies	narrative	ESRS 2
Percentage of variable remuneration dependent on sustainability-related targets and (or) impacts	Percent	ESRS 2
Description of level in undertaking at which terms of incentive schemes are approved and updated	narrative	ESRS 2
Disclosure of mapping of information provided in sustainability statement about due diligence process	narrative	ESRS 2
Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting	narrative	ESRS 2
Description of risk assessment approach followed	narrative	ESRS 2
Description of main risks identified and their mitigation strategies	narrative	ESRS 2
Description of how findings of risk assessment and internal controls as regards sustainability	narrative	ESRS 2



reporting process have been integrated into relevant internal functions and processes		
Description of periodic reporting of findings of risk assessment and internal controls to administrative, management and supervisory bodies	narrative	ESRS 2
Disclosure of information about key elements of general strategy that relate to or affect sustainability matters	narrative	ESRS 2
Description of significant groups of products and (or) services offered	narrative	ESRS 2
Description of significant markets and (or) customer groups served	narrative	ESRS 2
Total number of employees (head count)	Integer	ESRS 2
Number of employees (head count)	Integer	ESRS 2
Description of products and services that are banned in certain markets	narrative	ESRS 2
Total revenue	Monetary	ESRS 2
Revenue by ESRS Sectors	Table/Monetary	ESRS 2
List of additional significant ESRS sectors in which significant activities are developed or in which undertaking is or may be connected to material impacts	semi-narrative	ESRS 2
Undertaking is active in fossil fuel (coal, oil and gas) sector	semi-narrative	ESRS 2
Revenue from fossil fuel (coal, oil and gas) sector	Monetary	ESRS 2
Revenue from coal	Monetary	ESRS 2
Revenue from oil	Monetary	ESRS 2
Revenue from gas	Monetary	ESRS 2
Revenue from Taxonomy-aligned economic activities related to fossil gas	Monetary	ESRS 2
Undertaking is active in chemicals production	semi-narrative	ESRS 2
Revenue from chemicals production	Monetary	ESRS 2
Undertaking is active in controversial weapons	semi-narrative	ESRS 2
Revenue from controversial weapons	Monetary	ESRS 2
Undertaking is active in cultivation and production of tobacco	semi-narrative	ESRS 2
Revenue from cultivation and production of tobacco	Monetary	ESRS 2
Description of sustainability-related goals in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders	narrative	ESRS 2
Disclosure of assessment of current significant products and (or) services, and significant markets and customer groups, in relation to sustainability-related goals	narrative	ESRS 2
Disclosure of elements of strategy that relate to or impact sustainability matters	narrative	ESRS 2
List of ESRS sectors that are significant for undertaking	semi-narrative	ESRS 2
Description of business model and value chain	narrative	ESRS 2
Description of inputs and approach to gathering, developing and securing inputs	narrative	ESRS 2
Description of outputs and outcomes in terms of current and expected benefits for customers, investors and other stakeholders	narrative	ESRS 2
Description of main features of upstream and downstream value chain and undertakings position in value chain	narrative	ESRS 2
Description of stakeholder engagement	narrative	ESRS 2
Description of key stakeholders	narrative	ESRS 2
Description of categories of stakeholders for which engagement occurs	narrative	ESRS 2
Description of how stakeholder engagement is organized	narrative	ESRS 2
Description of purpose of stakeholder engagement	narrative	ESRS 2
Description of how outcome of stakeholder engagement is taken into account	narrative	ESRS 2
Description of understanding of interests and views of key stakeholders as they relate to undertaking's strategy and business model	narrative	ESRS 2
Description of amendments to strategy and (or) business model	narrative	ESRS 2
Description of how strategy and (or) business model have been amended or are expected to be amended to address interests and views of stakeholders	narrative	ESRS 2
Description of any further steps that are being planned and in what timeline	narrative	ESRS 2
Further steps that are being planned are likely to modify relationship with and views of stakeholders	semi-narrative	ESRS 2

Description of how administrative, management and supervisory bodies are informed about views and interests of affected stakeholders with regard to sustainability-related impacts	narrative	ESRS 2
Description of material impacts resulting from materiality assessment	narrative	ESRS 2
Description of material risks and opportunities resulting from materiality assessment	narrative	ESRS 2
Disclosure of current and anticipated effects of material impacts, risks and opportunities on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects	narrative	ESRS 2
Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	narrative	ESRS 2
Disclosure of how impacts originate from or are connected to strategy and business model	narrative	ESRS 2
Disclosure of reasonably expected time horizons of impacts	narrative	ESRS 2
Description of nature of activities or business relationships through which undertaking is involved with material impacts	narrative	ESRS 2
Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows and material risks and opportunities for which there is significant risk of material adjustment within next annual reporting period to carrying amounts of assets and liabilities reported in related financial statements	narrative/monetary	ESRS 2
Disclosure of anticipated financial effects of material risks and opportunities on financial position, financial performance and cash flows over short-, medium- and long-term	narrative/monetary	ESRS 2
Information about resilience of strategy and business model regarding capacity to address material impacts and risks and to take advantage of material opportunities	narrative	ESRS 2
Disclosure of changes to material impacts, risks and opportunities compared to previous reporting period	narrative	ESRS 2
Disclosure of specification of impacts, risks and opportunities that are covered by ESRS Disclosure Requirements as opposed to those covered by additional entity-specific disclosures	narrative	ESRS 2
Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities	narrative	ESRS 2
Description of process to identify, assess, prioritise and monitor potential and actual impacts on people and environment, informed by due diligence process	narrative	ESRS 2
Description of how process focuses on specific activities, business relationships, geographies or other factors that give rise to heightened risk of adverse impacts	narrative	ESRS 2
Description of how process considers impacts with which undertaking is involved through own operations or as result of business relationships	narrative	ESRS 2
Description of how process includes consultation with affected stakeholders to understand how they may be impacted and with external experts	narrative	ESRS 2
Description of how process prioritises negative impacts based on their relative severity and likelihood and positive impacts based on their relative scale, scope and likelihood and determines which sustainability matters are material for reporting purposes	narrative	ESRS 2
Description of process used to identify, assess, prioritise and monitor risks and opportunities that have or may have financial effects	narrative	ESRS 2
Description of how connections of impacts and dependencies with risks and opportunities that may arise from those impacts and dependencies have been considered	narrative	ESRS 2
Description of how likelihood, magnitude, and nature of effects of identified risks and opportunities have been assessed	narrative	ESRS 2
Description of how sustainability-related risks relative to other types of risks have been prioritised	narrative	ESRS 2
Description of decision-making process and related internal control procedures	narrative	ESRS 2
Description of extent to which and how process to identify, assess and manage impacts and risks is integrated into overall risk management process and used to evaluate overall risk profile and risk management processes	narrative	ESRS 2
Description of extent to which and how process to identify, assess and manage opportunities is integrated into overall management process	narrative	ESRS 2
Description of input parameters used in process to identify, assess and manage material impacts, risks and opportunities	narrative	ESRS 2
Description of how process to identify, assess and manage impacts, risks and opportunities has changed compared to prior reporting period	narrative	ESRS 2
Disclosure of list of data points that derive from other EU legislation and information on their location in sustainability statement	semi-narrative	ESRS 2
Disclosure of list of ESRS Disclosure Requirements complied with in preparing sustainability statement following outcome of materiality assessment	semi-narrative	ESRS 2
Explanation of negative materiality assessment for ESRS E1 Climate change	narrative	ESRS 2
Explanation of negative materiality assessment for ESRS E2 Pollution	narrative	ESRS 2
Explanation of negative materiality assessment for ESRS E3 Water and marine resources	narrative	ESRS 2
Explanation of negative materiality assessment for ESRS E4 Biodiversity and ecosystems	narrative	ESRS 2
Explanation of negative materiality assessment for ESRS E5 Circular economy	narrative	ESRS 2

Explanation of negative materiality assessment for ESRS S1 Own workforce	narrative	ESRS 2
Explanation of negative materiality assessment for ESRS S2 Workers in value chain	narrative	ESRS 2
Explanation of negative materiality assessment for ESRS S3 Affected communities	narrative	ESRS 2
Explanation of negative materiality assessment for ESRS S4 Consumers and end-users	narrative	ESRS 2
Explanation of negative materiality assessment for ESRS G1 Business conduct	narrative	ESRS 2
Explanation of how material information to be disclosed in relation to material impacts, risks and opportunities has been determined	narrative	ESRS 2

Deriving from the answers in ESRS 2 minimum disclosure requirements derive (MDR). It would be helpful if EFRAG made clear which cells are mandatory (without double materiality assessment).

## ESRS 2 MDR

- There are specific Minimum Disclosure Requirements (MDR) on Policies, Actions, Targets and Metrics (PAT&M) in ESRS 2 Chapter 4.2. They have to be considered for disclosure purposes when the undertaking has adopted PAT (Policies, Actions and Targets) or report Metrics related to material sustainability matters.
- The required datapoints per MDR-PAT&M per sustainability matter:

ESRS - DELEGATED ACT (31 JULY 2023)				
Data Type of MDR-PAT&M PER SUSTAINABILITY MATTER AND PER PAT				
ESRS	Narrative	Semi-Narrative	Numerical	Total
MDR-P	6	-	-	6
MDR-A	5	1	4	10
MDR-T	6	3	4	13
MDR-M	3	-	-	3
<b>TOTAL</b>	<b>20</b>	<b>4</b>	<b>8</b>	<b>32</b>
<b>TOTAL DP (%)</b>	<b>63%</b>	<b>13%</b>	<b>25%</b>	<b>100%</b>

ESRS	DR	Name	Data Type
ESRS 2	MDR-P	Description of key contents of policy	narrative
ESRS 2	MDR-P	Description of scope of policy or of its exclusions	narrative
ESRS 2	MDR-P	Description of most senior level in organisation that is accountable for implementation of policy	narrative
ESRS 2	MDR-P	Disclosure of third-party standards or initiatives that are respected through implementation of policy	narrative
ESRS 2	MDR-P	Description of consideration given to interests of key stakeholders in setting policy	narrative
ESRS 2	MDR-P	Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it	narrative
ESRS 2	MDR-A	Disclosure of key action	narrative
ESRS 2	MDR-A	Description of scope of key action	narrative
ESRS 2	MDR-A	Time horizon under which key action is to be completed	semi-narrative
ESRS 2	MDR-A	Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts	narrative
ESRS 2	MDR-A	Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods	narrative
ESRS 2	MDR-A	Disclosure of the type of current and future financial and other resources allocated to the action plan	narrative
ESRS 2	MDR-A	Current financial resources allocated to action plan (Capex)	Monetary
ESRS 2	MDR-A	Current financial resources allocated to action plan (Opex)	Monetary
ESRS 2	MDR-A	Future financial resources allocated to action plan (Capex)	Monetary
ESRS 2	MDR-A	Future financial resources allocated to action plan (Opex)	Monetary
ESRS 2	MDR-M	Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity	narrative
ESRS 2	MDR-M	Disclosure of methodologies and significant assumptions behind metric	narrative
ESRS 2	MDR-M	Type of external body other than assurance provider that provides validation	narrative
ESRS 2	MDR-T	Relationship with policy objectives	Decimal
ESRS 2	MDR-T	Measurable target	Decimal/Percent/narrative
ESRS 2	MDR-T	Nature of target	semi-narrative
ESRS 2	MDR-T	Description of scope of target	narrative
ESRS 2	MDR-T	Baseline value	Integer
ESRS 2	MDR-T	Baseline year	Integer
ESRS 2	MDR-T	Period to which target applies	semi-narrative
ESRS 2	MDR-T	Indication of milestones or interim targets	narrative
ESRS 2	MDR-T	Description of methodologies and significant assumptions used to define target	narrative
ESRS 2	MDR-T	Target related to environmental matters is based on conclusive scientific evidence	semi-narrative
ESRS 2	MDR-T	Disclosure of how stakeholders have been involved in target setting	narrative
ESRS 2	MDR-T	Description of any changes in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data	narrative
ESRS 2	MDR-T	Description of performance against disclosed target	narrative

- **These below Disclosures to be reported in case financial institution has not adopted policies and/or actions or set any measurable outcome-oriented targets**

ESRS 2	MDR-P	Disclosure of reasons for not having adopted policies	narrative
ESRS 2	MDR-P	Disclosure of timeframe in which the undertakings aims to adopt policies	narrative
ESRS 2	MDR-A	Disclosure of reasons for not having adopted actions	narrative
ESRS 2	MDR-A	Disclosure of timeframe in which the undertakings aims to adopt actions	narrative
ESRS 2	MDR-T	Disclosure of timeframe for setting of measurable outcome-oriented targets	narrative
ESRS 2	MDR-T	Description of reasons why there are no plans to set measurable outcome-oriented targets	narrative
ESRS 2	MDR-T	Effectiveness of policies and actions is tracked in relation to material sustainability-related impact, risk and opportunity	semi-narrative
ESRS 2	MDR-T	Description of processes through which effectiveness of policies and actions is tracked in relation to material sustainability-related impact, risk and opportunity	narrative
ESRS 2	MDR-T	Description of defined level of ambition to be achieved and of any qualitative or quantitative indicators used to evaluate effectiveness	narrative
ESRS 2	MDR-T	Base year from which progress is measured	GYear

## Environmental datapoints

For the specific standards we have put an emphasis on E1-environment as it is also done with the whole ESRS framework. The focus is to measure the contribution to the 1.5 degrees path defined by the Paris agreement. This includes own efforts but more importantly that of the investments/loan books and for the insurers of the insured risk. We expect here that commonly accepted metrics such as GHG-Protocol and PCAF-methodology are applied.

For 2023 the following data fields should be provided:

### E1 Climate Change

Covers climate change adaptation and mitigation. For the reporting Year 2023 below datapoints we determine under SFDR.

Datapoints	Data Type	Area	Reporting under
Absolute value of total Greenhouse gas emissions reduction	Table/ghgEmissions	E1	SFDR
Percentage of total Greenhouse gas emissions reduction (as of emissions of base year)	Table/percent	E1	SFDR
Intensity value of total Greenhouse gas emissions reduction	Table/decimal	E1	SFDR
Absolute value of Scope 1 Greenhouse gas emissions reduction	Table/ghgEmissions	E1	SFDR
Percentage of Scope 1 Greenhouse gas emissions reduction (as of emissions of base year)	Table/percent	E1	SFDR
Intensity value of Scope 1 Greenhouse gas emissions reduction	Table/decimal	E1	SFDR
Absolute value of location-based Scope 2 Greenhouse gas emissions reduction	Table/ghgEmissions	E1	SFDR
Percentage of location-based Scope 2 Greenhouse gas emissions reduction (as of emissions of base year)	Table/percent	E1	SFDR
Intensity value of location-based Scope 2 Greenhouse gas emissions reduction	Table/decimal	E1	SFDR
Absolute value of market-based Scope 2 Greenhouse gas emissions reduction	Table/ghgEmissions	E1	SFDR
Percentage of market-based Scope 2 Greenhouse gas emissions reduction (as of emissions of base year)	Table/percent	E1	SFDR
Intensity value of market-based Scope 2 Greenhouse gas emissions reduction	Table/decimal	E1	SFDR
Absolute value of Scope 3 Greenhouse gas emissions reduction	Table/ghgEmissions	E1	SFDR
Percentage of Scope 3 Greenhouse gas emissions reduction (as of emissions of base year)	Table/percent	E1	SFDR
Intensity value of Scope 3 Greenhouse gas emissions reduction	Table/decimal	E1	SFDR
Total energy consumption related to own operations	energy	E1	SFDR
Total energy consumption from fossil sources	energy	E1	SFDR
Total energy consumption from nuclear sources	energy	E1	SFDR
Total energy consumption from renewable sources	energy	E1	SFDR
Fuel consumption from renewable sources	energy	E1	SFDR
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	energy	E1	SFDR
Consumption of self-generated non-fuel renewable energy	energy	E1	SFDR
Fuel consumption from coal and coal products	energy	E1	SFDR
Fuel consumption from crude oil and petroleum products	energy	E1	SFDR
Fuel consumption from natural gas	energy	E1	SFDR
Fuel consumption from other fossil sources	energy	E1	SFDR

Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	energy	E1	SFDR
Energy intensity from activities in high climate impact sectors (total energy consumption per net revenue)	percent	E1	SFDR
Total energy consumption from activities in high climate impact sectors	energy	E1	SFDR
High climate impact sectors used to determine energy intensity	semi-narrative	E1	SFDR
Disclosure of reconciliation to relevant line item or notes in financial statements of net revenue from activities in high climate impact sectors	narrative	E1	SFDR
Gross Scope 1 greenhouse gas emissions	Table/GhgEmissions	E1	SFDR
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	Table/Percent	E1	SFDR
Gross location-based Scope 2 greenhouse gas emissions	Table/GhgEmissions	E1	SFDR
Gross market-based Scope 2 greenhouse gas emissions	Table/GhgEmissions	E1	SFDR
Gross Scope 3 greenhouse gas emissions	Table/GhgEmissions	E1	SFDR
Total GHG emissions	Table/GhgEmissions	E1	SFDR
Total GHG emissions location based	Table/GhgEmissions	E1	SFDR
Total GHG emissionsmarket based	Table/GhgEmissions	E1	SFDR
Scope 2 location-based	Table/GhgEmissions	E1	SFDR
Scope 2 market-based	Table/GhgEmissions	E1	SFDR
GHG emissions intensity, market-based (total GHG emissions per net revenue)	Intensity	E1	SFDR
Disclosure of reconciliation to financial statements of net revenue used for calculation of GHG emissions intensity	narrative	E1	SFDR
Policies to address deforestation have been adopted	semi-narrative	E1	SFDR

For 2024 onwards we would then expect the following fields including datapoints under SFDR:

Datapoints	Data Type	Area
Disclosure of how climate-related considerations are factored into remuneration of members of administrative, management and supervisory bodies	narrative	E1
Percentage of remuneration recognized that is linked to climate related considerations	percent	E1
Disclosure of transition plan for climate change mitigation	narrative	E1
Explanation of how targets are compatible with limiting of global warming to one and half degrees Celsius in line with Paris Agreement	narrative	E1
Disclosure of decarbonization levers and key action	narrative	E1
Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan	narrative	E1
Financial resources allocated to action plan (OpEx)	monetary	E1
Financial resources allocated to action plan (CapEx)	monetary	E1
Explanation of potential locked-in GHG emissions from key assets and products and of how locked-in GHG emissions may jeopardise achievement of GHG emission reduction targets and drive transition risk	narrative	E1
Explanation of any objective or plans (CapEx, CapEx plans, OpEx) for aligning economic activities (revenues, CapEx, OpEx) with criteria established in Commission Delegated Regulation 2021/2139	narrative	E1
Explanation of how transition plan is embedded in and aligned with overall business strategy and financial planning	narrative	E1
Explanation of progress in implementing transition plan	narrative	E1
Description of scope of resilience analysis	narrative	E1
Disclosure of how resilience analysis has been conducted	narrative	E1
Date of resilience analysis	date	E1



Time horizons applied for resilience analysis	semi-narrative	E1
Description of results of resilience analysis	narrative	E1
Description of ability to adjust or adapt strategy and business model to climate change	narrative	E1
Description of process in relation to impacts on climate change	narrative	E1
Description of process in relation to climate-related physical risks in own operations and along value chain	narrative	E1
Climate-related hazards have been identified over short-, medium- and long-term time horizons	semi-narrative	E1
Undertaking has screened whether assets and business activities may be exposed to climate-related hazards	semi-narrative	E1
Short-, medium- and long-term time horizons have been defined	semi-narrative	E1
Extent to which assets and business activities may be exposed and are sensitive to identified climate-related hazards has been assessed	semi-narrative	E1
Identification of climate-related hazards and assessment of exposure and sensitivity are informed by high emissions climate scenarios	semi-narrative	E1
Explanation of how climate-related scenario analysis has been used to inform identification and assessment of physical risks over short, medium and long-term	narrative	E1
Description of process in relation to climate-related transition risks and opportunities in own operations and along value chain	narrative	E1
Transition events have been identified over short-, medium- and long-term time horizons	semi-narrative	E1
Undertaking has screened whether assets and business activities may be exposed to transition events	semi-narrative	E1
Extent to which assets and business activities may be exposed and are sensitive to identified transition events has been assessed	semi-narrative	E1
Identification of transition events and assessment of exposure has been informed by climate-related scenario analysis	semi-narrative	E1
Assets and business activities that are incompatible with or need significant efforts to be compatible with transition to climate-neutral economy have been identified	semi-narrative	E1
Explanation of how climate-related scenario analysis has been used to inform identification and assessment of transition risks and opportunities over short, medium and long-term	narrative	E1
Explanation of how climate scenarios used are compatible with critical climate-related assumptions made in financial statements	narrative	E1
Sustainability matters addressed by policy for climate change	semi-narrative	E1
Achieved GHG emission reductions	ghgEmissions	E1
Expected GHG emission reductions	ghgEmissions	E1
Explanation of how consistency of GHG emission reduction targets with GHG inventory boundaries has been ensured	narrative	E1
GHG emission reduction target is science based and compatible with limiting global warming to one and half degrees Celsius	semi-narrative	E1
Description of expected decarbonization levers and their overall quantitative contributions to achieve GHG emission reduction target	narrative	E1
Diverse range of climate scenarios have been considered to detect relevant environmental, societal, technology, market and policy-related developments and determine decarbonization levers	narrative	E1
Percentage of renewable sources in total energy consumption	percent	E1
Gross Scopes 1, 2, 3 and Total GHG emissions - GHG emissions per scope [table]	Table	E1
Gross Scopes 1, 2, 3 and Total GHG emissions - financial and operational control [table]	Table	E1
GHG emissions - by country, operating segments, economic activity, subsidiary, GHG category or source type	Table	E1
Gross Scopes 1, 2, 3 and Total GHG emissions - Scope 3 GHG emissions (GHG Protocol) [table]	Table	E1
Gross Scopes 1, 2, 3 and Total GHG emissions - Scope 3 GHG emissions (ISO 14064-1) [table]	Table	E1
Gross Scopes 1, 2, 3 and Total GHG emissions - total GHG emissions - value chain [table]	Table	E1
Disclosure of GHG removals and storage resulting from projects developed in own operations or contributed to in upstream and downstream value chain	narrative	E1
Disclosure of GHG emission reductions or removals from climate change mitigation projects outside value chain financed or to be financed through any	narrative	E1

purchase of carbon credits		
Removals and carbon credits are used	semi-narrative	E1
GHG Removals and storage Activity by undertaking scope and by removal and storage activity	TABLE	E1
Total GHG removals and storage	Table/ghgEmissions	E1
GHG emissions associated with removal activity	Table/ghgEmissions	E1
Disclosure of calculation assumptions, methodologies and frameworks applied (GHG removals and storage)	narrative	E1
Removal activity has been converted into carbon credits and sold on to other parties on voluntary market	semi-narrative	E1
Total amount of carbon credits outside value chain that are verified against recognized quality standards and cancelled	ghgEmissions	E1
Total amount of carbon credits outside value chain planned to be cancelled in future	ghgEmissions	E1
Reversals	ghgEmissions	E1
Disclosure of extent of use and quality criteria used for carbon credits	narrative	E1
Percentage of reduction projects	percent	E1
Percentage of removal projects	percent	E1
Type of carbon credits from removal projects	semi-narrative	E1
Explanation of scope, methodologies and frameworks applied and how residual GHG emissions are intended to be neutralized	narrative	E1
Percentage for recognized quality standards	percent	E1
Assets at material physical risk before considering climate change adaptation actions	monetary	E1
Assets at acute material physical risk before considering climate change adaptation actions	monetary	E1
Assets at chronic material physical risk before considering climate change adaptation actions	monetary	E1
Percentage of assets at material physical risk before considering climate change adaptation actions	percent	E1
Disclosure of location of significant assets at material physical risk	narrative	E1
Percentage of assets at material physical risk addressed by climate change adaptation actions	percent	E1
Net revenue from business activities at material physical risk	monetary	E1
Percentage of net revenue from business activities at material physical risk	percent	E1
Disclosure of how anticipated financial effects for assets and business activities at material physical risk have been assessed	narrative	E1
Disclosure of how assessment of assets and business activities considered to be at material physical risk relies on or is part of process to determine material physical risk and to determine climate scenarios	narrative	E1
Disclosure of risk factors for net revenue from business activities at material physical risk	narrative	E1
Disclosure of magnitude of anticipated financial effects in terms of margin erosion for business activities at material physical risk	narrative	E1
Assets at material transition risk before considering climate mitigation actions	monetary	E1
Percentage of assets at material transition risk before considering climate mitigation actions	percent	E1
Percentage of assets at material transition risk addressed by climate change mitigation actions	percent	E1
Total carrying amount of real estate assets by energy efficiency classes	Table/monetary	E1
Disclosure of how potential effects on future financial performance and position for assets and business activities at material transition risk have been assessed	narrative	E1
Estimated amount of potentially stranded assets	monetary	E1
Percentage of estimated share of potentially stranded assets of total assets at material transition risk	percent	E1
Liabilities from material transition risks that may have to be recognized in financial statements	monetary	E1
Percentage of net revenue from customers operating in coal-related activities	percent	E1

Percentage of net revenue from customers operating in oil-related activities	percent	E1
Percentage of net revenue from customers operating in gas-related activities	percent	E1
Percentage of net revenue from business activities at material transition risk	Table/percent	E1
Disclosure of anticipated financial effects in terms of margin erosion for business activities at material transition risk	narrative/monetary	E1
Expected cost savings from climate change mitigation actions	monetary	E1
Expected cost savings from climate change adaptation actions	monetary	E1

Concerning the other environmental objectives, the load of data is much reduced. Here also we see rather the indirect impact as important rather the own use operations. The latter however are important to order to convey to the own staff the culture of sustainable behaviour. In numbers however we would expect more than 90% from indirect impacts through investing or insuring clients. As for E1 we would expect for fiscal year 2023 the SFDR fields, and for 2024 the rest to be filled out.

## E2 Pollution

Datapoints	Data Type	Area	Reporting under
Emissions to air by pollutant	Table/mass	E2	SFDR
Emissions to water by pollutant [+ by sectors/Geographical Area/Type of source/Site location]	Table/mass	E2	SFDR
Emissions to soil by pollutant [+ by sectors/Geographical Area/Type of source/Site location]	Table/mass	E2	SFDR
Disclosure of whether and how policy addresses mitigating negative impacts related to pollution of air, water and soil	narrative	E2	

## E3 Water and marine resources

Datapoints	Data Type	Area	Reporting under
Total water recycled and reused	Volume	E3	SFDR
Water intensity ratio	Percent	E3	SFDR
Disclosure of reasons for not having adopted policies in areas of high-water stress	narrative	E3	SFDR
Disclosure of timeframe in which policies in areas of high-water stress will be adopted	narrative	E3	SFDR
Policies or practices related to sustainable oceans and seas have been adopted	semi-narrative	E3	SFDR
Water consumption - sectors/SEGMENTS [table]	Table/Volume	E3	

## E4 Biodiversity and ecosystems

Datapoints	Data Type	Area	Reporting under
Activities related to sites located in or near biodiversity-sensitive areas negatively affect these areas where conclusions or necessary mitigation measures have not been implemented or are ongoing	narrative	E4	SFDR
Material negative impacts with regards to land degradation, desertification or soil sealing have been identified	semi-narrative	E4	SFDR
Own operations affect threatened species	semi-narrative	E4	SFDR
Disclosure of transition plan to improve and achieve alignment of its business model and value chain	narrative	E4	
Sustainable land or agriculture practices or policies have been adopted	semi-narrative	E4	SFDR
Sustainable oceans or seas practices or policies have been adopted	semi-narrative	E4	SFDR
Policies to address deforestation have been adopted	semi-narrative	E4	SFDR

## E5 Resource use and circular economy

Datapoints	Data Type	Area	Reporting under
Non-recycled waste	Mass	E5	SFDR
Percentage of non-recycled waste	Percent	E5	SFDR
Total amount of hazardous waste	Mass	E5	SFDR
Total amount of radioactive waste	Mass	E5	SFDR
Description of actions taken to prevent waste generation	narrative	E5	
Target relates to waste management	semi-narrative	E5	
Description of whether and how policy addresses waste hierarchy (prevention, preparing for re-use, recycling, other recovery, disposal)	narrative	E5	
Description of whether and how policy addresses prioritisation of strategies to avoid or minimise waste over waste treatment strategies	narrative	E5	

## Social datapoints

Here also we would put focus on the most striking points at the beginning such as respects of human rights, gender pay gap, inclusion. See list below.

### S1 own workforce

Based on following factors we decided certain datapoints of S1

- ✓ Secure employment
- ✓ Adequate wages
- ✓ Social dialogue
- ✓ Freedom of association, the existence of works councils and the information, consultation and participation rights of workers
- ✓ Collective bargaining, including rate of workers covered by collective agreements
- ✓ Work-life balance
- ✓ Health and safety
- ✓ Gender equality and equal pay for work of equal value
- ✓ Training and skills development
- ✓ Employment and inclusion of persons with disabilities
- ✓ Measures against violence and harassment in the workplace
- ✓ Board Gender Diversity

A lot of these items have already been analysed in our current methodology. Therefore, for Social we ask for more than just SFDR indicators.

**Note:** We would like to specify that this standard for our understanding includes only own operations. Therefore, SFDR data would have to be set not for the investments and insured risks but for the own staff only.

Datapoints	Data Type	Area	Reporting under
Information about type of operations at significant risk of incidents of forced labour or compulsory labour	narrative	S1	SFDR
Information about countries or geographic areas with operations considered at significant risk of incidents of forced labour or compulsory labour	narrative	S1	SFDR
Information about type of operations at significant risk of incidents of child labour	narrative	S1	SFDR
Information about countries or geographic areas with operations considered at significant risk of incidents of child labour	narrative	S1	SFDR
Description of relevant human rights policy commitments relevant to own workforce	narrative	S1	SFDR
Disclosure of general approach in relation to respect for human rights including labour rights, of people in its own workforce	narrative	S1	SFDR
Disclosure of general approach in relation to engagement with people in its own workforce	narrative	S1	SFDR
Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts	narrative	S1	SFDR
Disclosure of whether and how policies are aligned with relevant internationally recognised instruments	narrative	S1	SFDR
Policies explicitly address trafficking in human beings, forced labour or compulsory labour and child labour	semi-narrative	S1	SFDR
Workplace accident prevention policy or management system is in place	semi-narrative	S1	SFDR
Grievance or complaints handling mechanisms related to employee matters exist	semi-narrative	S1	SFDR
Gender pay gap	Table H/Percent	S1	SFDR
Number of incidents of discrimination	Table I/Integer	S1	SFDR
Number of severe human rights issues and incidents connected to own workforce	Integer	S1	SFDR
Number of severe human rights issues and incidents connected to own workforce that are cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises	Integer	S1	SFDR
No severe human rights issues and incidents connected to own workforce have occurred	semi-narrative	S1	SFDR

From 2024 onwards we would expect the following fields to be disclosed including datapoints under SFDR:

Datapoints	Data Type
Disclosure of specific policy commitments related to inclusion and (or) positive action for people from groups at particular risk of vulnerability in own workforce	narrative
Adjustments to the physical environment to ensure health and safety for workers, customers and other visitors with disabilities are planned or in place	semi-narrative
Have or plans to have programs to promote access to skills development.	semi-narrative
Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement	narrative
Disclosure of how effectiveness of engagement with its own workforce is assessed	narrative
Description of additional initiatives or actions with primary purpose of delivering positive impacts for own workforce	narrative
Characteristics of undertaking's employees - number of employees by gender [table]	Table A
Number of full-time employees by head count or full time equivalent	Table D Decimal/Integer
Number of non-employees in own workforce	Decimal
Number of non-employees in own workforce - self-employed people	Decimal

Percentage of its employees covered by collective bargaining agreements are within coverage rate by country (in the EEA)	Table/Percent
Percentage of own employees covered by collective bargaining agreements (outside EEA) by region	Table/Percent
Number of employees (head count) at top management level	Integer
Percentage of employees at top management level	Percent
Number of employees (head count) under 30 years old	Integer
Percentage of employees under 30 years old	Percent
Number of employees (head count) between 30 and 50 years old	Integer
Percentage of employees between 30 and 50 years old	Percent
Number of employees (head count) over 50 years old	Integer
Percentage of employees over 50 years old	Percent
Disclosure of own definition of top management used	narrative
Percentage of employees paid below the applicable adequate wage benchmark	Table E/Percent
Percentage of employees with disabilities in own workforce breakdown by gender [table]	Table/numerical
Average number of training hours by gender [table]	Table G
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health related to employees	Integer
Percentage of employees entitled to take family-related leave	Percent
Percentage of entitled employees that took family-related leave	Percent
Percentage of entitled employees that took family-related leave by gender [table]	Table/numerical
All employees are entitled to family-related leaves through social policy and (or) collective bargaining agreements	semi-narrative
Annual total remuneration ratio	Percent
Number of complaints filed through channels for people in own workforce to raise concerns	Integer
Disclosure of the status of incidents and/or complaints and actions taken	narrative
Number of severe human rights cases where undertaking played role securing remedy for those affected	Integer

For the workers in the value chain, and therefore investments and insured risks according to our understanding, we would expect only SFDR information starting from 2023 and limiting to SFDR requirements. This also applies to

## S2 Workers in the value chain

Datapoints	Data Type	Area	Reporting under
Disclosure of geographies or commodities for which there is significant risk of child labour, or of forced or compulsory labour, among workers in undertaking's value chain	narrative	S2	SFDR
Description of relevant human rights policy commitments relevant to value chain workers	narrative	S2	SFDR
Disclosure of general approach in relation to respect for human rights relevant to value chain workers	narrative	S2	SFDR
Disclosure of general approach in relation to engagement with value chain workers	narrative	S2	SFDR
Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts	narrative	S2	SFDR
Policies explicitly address trafficking in human beings, forced labour or compulsory labour and child labour	semi-narrative	S2	SFDR
Undertaking has supplier code of conduct	semi-narrative	S2	SFDR
Disclosure of whether and how policies are aligned with relevant internationally recognised instruments	narrative	S2	SFDR
Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve value chain workers	narrative	S2	SFDR
Disclosure of severe human rights issues and incidents connected to upstream and downstream value chain	narrative	S2	SFDR



### S3 Affected communities

Datapoints	Data Type	Area	Reporting under
Description of relevant human rights policy commitments relevant to affected communities	narrative	S3	SFDR
Disclosure of general approach in relation to respect for human rights of communities, and indigenous peoples specifically	narrative	S3	SFDR
Disclosure of general approach in relation to engagement with affected communities	narrative	S3	SFDR
Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts	narrative	S3	SFDR
Disclosure of whether and how policies are aligned with relevant internationally recognised instruments	narrative	S3	SFDR
Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve affected communities	narrative	S3	SFDR
Disclosure of severe human rights issues and incidents connected to affected communities	narrative	S3	SFDR

### S4 Consumers and end-users

Clients and end users seem very important to us. Financial institutions are responsible for giving basic service to consumers without they could not live a normal life. Also for financial services it is paramount in our view that clients are satisfied given that -especially in insurance- they give away a lot of their personal risk management.

Based on following factors we determine certain datapoints of S4

- Offering quality products and services
- Customer satisfaction through engagement
- Complaint management

Thus, we would like to see the following points being addressed (for 2023 only the SFDR requirements):

Datapoints	Data Type	Area	Reporting under
Policies to manage material impacts, risks and opportunities related to affected communities, including specific groups or all consumers / end-users	narrative	S4	
Description of relevant human rights policy commitments relevant to consumers and/or end-users	narrative	S4	SFDR
Disclosure of general approach in relation to respect for human rights of consumers and end-users	narrative	S4	SFDR
Disclosure of general approach in relation to engagement with consumers and/or end-users	narrative	S4	SFDR
Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts	narrative	S4	SFDR
Description of whether and how policies are aligned with relevant internationally recognized instruments	narrative	S4	SFDR
Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve consumers and/or end-users	narrative	S4	SFDR
Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts	narrative	S4	
Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement	narrative	S4	
Disclosure of how effectiveness of engagement with consumers and end-users is assessed	narrative	S4	
Disclosure of steps taken to gain insight into perspectives of consumers and end-users / consumers and end-users that may be particularly vulnerable to impacts and (or) marginalized	narrative	S4	
Disclosure of timeframe for channel or processes for raising concerns to be in place	narrative	S4	

Disclosure of whether and how consumers and/or end-users can access channels at level of undertaking they are affected by	narrative	S4	
Number of complaints received from consumers and/or end users during the reporting period	Integer	S4	
Description of action planned or underway to prevent, mitigate or remediate material negative impacts on consumers and end-users	narrative	S4	
Disclosure of severe human rights issues and incidents connected to consumers and/or end-users	narrative	S4	SFDR
Disclosure of aims for continued improvement	narrative	S4	
Disclosure of how consumers and end-users were engaged directly in setting targets	narrative	S4	
Disclosure of how consumers and end-users were engaged directly in tracking performance against targets	narrative	S4	
Disclosure of how consumers and end-users were engaged directly in identifying lessons or improvements as result of undertaking's performance	narrative	S4	

## Governance datapoints

For Governance we feel that the majority of points are relevant. Most points have already been treated in the mandatory ESRS 2. However, we feel that in the EFRAG requirements, one aspect is missing which is particularly important for financial institutions: money laundering surveillance. We would expect a description of the procedures.

### G1 Busniess conduct

Here again for 2023 we would limit our requirements to the SFDR indicators.

Datapoints	Data Type	Area	Reporting under
Number of convictions for violation of anti-corruption and anti-bribery laws	Integer	G1	SFDR
Amount of fines for violation of anti-corruption and anti- bribery laws	Monetary	G1	SFDR
No policies on anti-corruption or anti-bribery consistent with United Nations Convention against Corruption are in place	semi-narrative	G1	SFDR
Disclosure of safeguards for reporting irregularities including whistleblowing protection	narrative	G1	
No policies on protection of whistle-blowers are in place	semi-narrative	G1	SFDR
Description of policy to prevent late payments, especially to SMEs	narrative	G1	
Information about procedures in place to prevent, detect, and address allegations or incidents of corruption or bribery	narrative	G1	
Information about nature, scope and depth of anti-corruption or anti-bribery training programmes offered or required	narrative	G1	
Average number of days to pay invoice from date when contractual or statutory term of payment starts to be calculated	Integer	G1	
Number of confirmed incidents of corruption or bribery	Integer	G1	

## Conclusion

Out of nearly 1200 datapoints suggested by the ESRS framework we have identified a bit more than 400 that are relevant for a meaningful analysis of insurance companies, banks, and asset managers. The challenge will be for companies to tell meaningful stories as well as setting targets and showing how they get there. It is our job to measure whether these stories can be believed in and measure the performance.

Added to this document you will find a list of all the relevant datapoints from us. The existing points are marked in blue colour for the reporting year 2023 (Annex 1) and for the reporting year 2024 in green colour (Annex 2: some yellow highlighted cells are already part of our methodology which we expect to disclose for reporting year 2023).

*This paper is open for comments for our clients by April 15<sup>th</sup> 2024 at the latest. Please submit your comments to [studie@zielke-rc.eu](mailto:studie@zielke-rc.eu)*

Thanks for your cooperation.

### For any queries:

Dr Carsten Zielke

CEO at Zielke Research Consult & Zielke Rating

Tel. +49 2408-7199500

E-Mail: [carsten-zielke@zielke-rc.eu](mailto:carsten-zielke@zielke-rc.eu)

Shahid Riaz

ESG Analyst at Zielke Rating

Tel. +49 2408 9378394

E-Mail: [shahid-riaz@zielke-rc.eu](mailto:shahid-riaz@zielke-rc.eu)

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### **Zielke Research Consult GmbH**

Promenade 9

D-52076 Aachen

+49 (2408)7199500

Email: [carsten-zielke@zielke-rc.eu](mailto:carsten-zielke@zielke-rc.eu)

[www.zielke-rc.eu](http://www.zielke-rc.eu)

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## Annex 1

The existing points are marked in blue colour to disclose for the reporting year 2023

which mainly derive from the SFDR regulation.

Datapoints	Data Type	Area	Reporting under
Emissions to air by pollutant	Table/mass	E2	SFDR
Emissions to water by pollutant [+ by sectors/Geographical Area/Type of source/Site location]	Table/mass	E2	SFDR
Emissions to soil by pollutant [+ by sectors/Geographical Area/Type of source/Site location]	Table/mass	E2	SFDR
Total water recycled and reused	Volume	E3	SFDR
Water intensity ratio	Percent	E3	SFDR
Non-recycled waste	Mass	E5	SFDR
Percentage of non-recycled waste	Percent	E5	SFDR
Total amount of hazardous waste	Mass	E5	SFDR
Total amount of radioactive waste	Mass	E5	SFDR
Number of convictions for violation of anti-corruption and anti- bribery laws	Integer	G1	SFDR
Amount of fines for violation of anti-corruption and anti- bribery laws	Monetary	G1	SFDR
Disclosure of reasons for not having adopted policies in areas of high-water stress	narrative	E3	SFDR
Disclosure of timeframe in which policies in areas of high-water stress will be adopted	narrative	E3	SFDR
Policies or practices related to sustainable oceans and seas have been adopted	semi-narrative	E3	SFDR
Activities related to sites located in or near biodiversity-sensitive areas negatively affect these areas where conclusions or necessary mitigation measures have not been implemented or are ongoing	narrative	E4	SFDR
Material negative impacts with regards to land degradation, desertification or soil sealing have been identified	semi-narrative	E4	SFDR
Own operations affect threatened species	semi-narrative	E4	SFDR
Sustainable land or agriculture practices or policies have been adopted	semi-narrative	E4	SFDR
Sustainable oceans or seas practices or policies have been adopted	semi-narrative	E4	SFDR
Policies to address deforestation have been adopted	semi-narrative	E4	SFDR
Disclosure of geographies or commodities for which there is significant risk of child labour, or of forced or compulsory labour, among workers in undertaking's value chain	narrative	S2	SFDR
Description of relevant human rights policy commitments relevant to value chain workers	narrative	S2	SFDR

Disclosure of general approach in relation to respect for human rights relevant to value chain workers	narrative	S2	SFDR
Disclosure of general approach in relation to engagement with value chain workers	narrative	S2	SFDR
Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts	narrative	S2	SFDR
Policies explicitly address trafficking in human beings, forced labour or compulsory labour and child labour	semi-narrative	S2	SFDR
Undertaking has supplier code of conduct	semi-narrative	S2	SFDR
Disclosure of whether and how policies are aligned with relevant internationally recognised instruments	narrative	S2	SFDR
Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve value chain workers	narrative	S2	SFDR
Disclosure of severe human rights issues and incidents connected to upstream and downstream value chain	narrative	S2	SFDR
Description of relevant human rights policy commitments relevant to affected communities	narrative	S3	SFDR
Disclosure of general approach in relation to respect for human rights of communities, and indigenous peoples specifically	narrative	S3	SFDR
Disclosure of general approach in relation to engagement with affected communities	narrative	S3	SFDR
Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts	narrative	S3	SFDR
Disclosure of whether and how policies are aligned with relevant internationally recognised instruments	narrative	S3	SFDR
Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve affected communities	narrative	S3	SFDR
Disclosure of severe human rights issues and incidents connected to affected communities	narrative	S3	SFDR
No policies on anti-corruption or anti-bribery consistent with United Nations Convention against Corruption are in place	semi-narrative	G1	SFDR
No policies on protection of whistle-blowers are in place	semi-narrative	G1	SFDR
Information about type of operations at significant risk of incidents of forced labour or compulsory labour	narrative	S1	SFDR
Information about countries or geographic areas with operations considered at significant risk of incidents of forced labour or compulsory labour	narrative	S1	SFDR
Information about type of operations at significant risk of incidents of child labour	narrative	S1	SFDR
Information about countries or geographic areas with operations considered at significant risk of incidents of child labour	narrative	S1	SFDR



Description of relevant human rights policy commitments relevant to own workforce	narrative	S1	SFDR
Disclosure of general approach in relation to respect for human rights including labour rights, of people in its own workforce	narrative	S1	SFDR
Disclosure of general approach in relation to engagement with people in its own workforce	narrative	S1	SFDR
Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts	narrative	S1	SFDR
Disclosure of whether and how policies are aligned with relevant internationally recognised instruments	narrative	S1	SFDR
Policies explicitly address trafficking in human beings, forced labour or compulsory labour and child labour	semi-narrative	S1	SFDR
Workplace accident prevention policy or management system is in place	semi-narrative	S1	SFDR
Grievance or complaints handling mechanisms related to employee matters exist	semi-narrative	S1	SFDR
Gender pay gap	Table H/Percent	S1	SFDR
Number of incidents of discrimination	Table I/Integer	S1	SFDR
Number of severe human rights issues and incidents connected to own workforce	Integer	S1	SFDR
Number of severe human rights issues and incidents connected to own workforce that are cases of non respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises	Integer	S1	SFDR
No severe human rights issues and incidents connected to own workforce have occurred	semi-narrative	S1	SFDR
Description of relevant human rights policy commitments relevant to consumers and/or end-users	narrative	S4	SFDR
Disclosure of general approach in relation to respect for human rights of consumers and end-users	narrative	S4	SFDR
Disclosure of general approach in relation to engagement with consumers and/or end-users	narrative	S4	SFDR
Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts	narrative	S4	SFDR
Description of whether and how policies are aligned with relevant internationally recognised instruments	narrative	S4	SFDR
Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve consumers and/or end-users	narrative	S4	SFDR
Disclosure of severe human rights issues and incidents connected to consumers and/or end-users	narrative	S4	SFDR
Absolute value of total Greenhouse gas emissions reduction	Table/ghgEmissions	E1	SFDR
Percentage of total Greenhouse gas emissions reduction (as of emissions of base year)	Table/percent	E1	SFDR
Intensity value of total Greenhouse gas emissions reduction	Table/decimal	E1	SFDR

Absolute value of Scope 1 Greenhouse gas emissions reduction	Table/ghgEmissions	E1	SFDR
Percentage of Scope 1 Greenhouse gas emissions reduction (as of emissions of base year)	Table/percent	E1	SFDR
Intensity value of Scope 1 Greenhouse gas emissions reduction	Table/decimal	E1	SFDR
Absolute value of location-based Scope 2 Greenhouse gas emissions reduction	Table/ghgEmissions	E1	SFDR
Percentage of location-based Scope 2 Greenhouse gas emissions reduction (as of emissions of base year)	Table/percent	E1	SFDR
Intensity value of location-based Scope 2 Greenhouse gas emissions reduction	Table/decimal	E1	SFDR
Absolute value of market-based Scope 2 Greenhouse gas emissions reduction	Table/ghgEmissions	E1	SFDR
Percentage of market-based Scope 2 Greenhouse gas emissions reduction (as of emissions of base year)	Table/percent	E1	SFDR
Intensity value of market-based Scope 2 Greenhouse gas emissions reduction	Table/decimal	E1	SFDR
Absolute value of Scope 3 Greenhouse gas emissions reduction	Table/ghgEmissions	E1	SFDR
Percentage of Scope 3 Greenhouse gas emissions reduction (as of emissions of base year)	Table/percent	E1	SFDR
Intensity value of Scope 3 Greenhouse gas emissions reduction	Table/decimal	E1	SFDR
Total energy consumption related to own operations	energy	E1	SFDR
Total energy consumption from fossil sources	energy	E1	SFDR
Total energy consumption from nuclear sources	energy	E1	SFDR
Total energy consumption from renewable sources	energy	E1	SFDR
Fuel consumption from renewable sources	energy	E1	SFDR
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	energy	E1	SFDR
Consumption of self-generated non-fuel renewable energy	energy	E1	SFDR
Fuel consumption from coal and coal products	energy	E1	SFDR
Fuel consumption from crude oil and petroleum products	energy	E1	SFDR
Fuel consumption from natural gas	energy	E1	SFDR
Fuel consumption from other fossil sources	energy	E1	SFDR
Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	energy	E1	SFDR
Energy intensity from activities in high climate impact sectors (total energy consumption per net revenue)	percent	E1	SFDR
Total energy consumption from activities in high climate impact sectors	energy	E1	SFDR
High climate impact sectors used to determine energy intensity	semi-narrative	E1	SFDR
Disclosure of reconciliation to relevant line item or notes in financial statements of net revenue	narrative	E1	SFDR

from activities in high climate impact sectors			
Gross Scope 1 greenhouse gas emissions	Table/GhgEmissions	E1	SFDR
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	Table/Percent	E1	SFDR
Gross location-based Scope 2 greenhouse gas emissions	Table/GhgEmissions	E1	SFDR
Gross market-based Scope 2 greenhouse gas emissions	Table/GhgEmissions	E1	SFDR
Gross Scope 3 greenhouse gas emissions	Table/GhgEmissions	E1	SFDR
Total GHG emissions	Table/GhgEmissions	E1	SFDR
Total GHG emissions location based	Table/GhgEmissions	E1	SFDR
Total GHG emissionsmarket based	Table/GhgEmissions	E1	SFDR
Scope 2 location-based	Table/GhgEmissions	E1	SFDR
Scope 2 market-based	Table/GhgEmissions	E1	SFDR
GHG emissions intensity, market-based (total GHG emissions per net revenue)	Intensity	E1	SFDR
Disclosure of reconciliation to financial statements of net revenue used for calculation of GHG emissions intensity	narrative	E1	SFDR
Policies to address deforestation have been adopted	semi-narrative	E1	SFDR

## Annex 2

The below green marked fields are for those datapoints to disclose for the reporting year 2024

Yellow marked fields are already part of our methodology which we expect to disclose for the reporting year 2023.

Datapoints	Data Type	Area
Disclosure of whether and how policy addresses mitigating negative impacts related to pollution of air, water and soil	narrative	E2
Disclosure of transition plan to improve and achieve alignment of its business model and value chain	narrative	E4
Description of actions taken to prevent waste generation	narrative	E5
Target relates to waste management	semi-narrative	E5
Disclosure of safeguards for reporting irregularities including whistleblowing protection	narrative	G1
Description of policy to prevent late payments, especially to SMEs	narrative	G1
Information about procedures in place to prevent, detect, and address allegations or incidents of corruption or bribery	narrative	G1
Information about nature, scope and depth of anti-corruption or anti-bribery training programmes offered or required	narrative	G1
Water consumption - sectors/SEGMENTS [table]	Table/Volume	E3
Description of whether and how policy addresses waste hierarchy (prevention, preparing for re-use, recycling, other recovery, disposal)	narrative	E5
Description of whether and how policy addresses prioritisation of strategies to avoid or minimise waste over waste treatment strategies	narrative	E5
Average number of days to pay invoice from date when contractual or statutory term of payment starts to be calculated	Integer	G1
Number of confirmed incidents of corruption or bribery	Integer	G1
Disclosure of specific policy commitments related to inclusion and (or) positive action for people from groups at particular risk of vulnerability in own workforce	narrative	S1
Adjustments to the physical environment to ensure health and safety for workers, customers and other visitors with disabilities are planned or in place	semi-narrative	S1
Have or plans to have programs to promote access to skills development.	semi-narrative	S1
Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement	narrative	S1
Disclosure of how effectiveness of engagement with its own workforce is assessed	narrative	S1
Description of additional initiatives or actions with primary purpose of delivering positive impacts for own workforce	narrative	S1
Characteristics of undertaking's employees - number of employees by gender [table]	Table A	S1
Number of full-time employees by head count or full time equivalent	Table D Decimal/Integer	S1
Number of non-employees in own workforce	Decimal	S1
Number of non-employees in own workforce - self-employed people	Decimal	S1
Percentage of its employees covered by collective bargaining agreements are within coverage rate by country (in the EEA)	Table/Percent	S1
Percentage of own employees covered by collective bargaining agreements (outside EEA) by region	Table/Percent	S1
Number of employees (head count) at top management level	Integer	S1
Percentage of employees at top management level	Percent	S1
Number of employees (head count) under 30 years old	Integer	S1
Percentage of employees under 30 years old	Percent	S1
Number of employees (head count) between 30 and 50 years old	Integer	S1
Percentage of employees between 30 and 50 years old	Percent	S1
Number of employees (head count) over 50 years old	Integer	S1
Percentage of employees over 50 years old	Percent	S1

Disclosure of own definition of top management used	narrative	S1
Percentage of employees paid below the applicable adequate wage benchmark	Table E/Percent	S1
Percentage of employees with disabilities in own workforce breakdown by gender [table]	Table/numerical	S1
Average number of training hours by gender [table]	Table G	S1
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health related to employees	Integer	S1
Percentage of employees entitled to take family-related leave	Percent	S1
Percentage of entitled employees that took family-related leave	Percent	S1
Percentage of entitled employees that took family-related leave by gender [table]	Table/numerical	S1
All employees are entitled to family-related leaves through social policy and (or) collective bargaining agreements	semi-narrative	S1
Annual total remuneration ratio	Percent	S1
Number of complaints filed through channels for people in own workforce to raise concerns	Integer	S1
Disclosure of the status of incidents and/or complaints and actions taken	narrative	S1
Number of severe human rights cases where undertaking played role securing remedy for those affected	Integer	S1
Policies to manage material impacts, risks and opportunities related to affected communities, including specific groups or all consumers / end-users	narrative	S4
Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts	narrative	S4
Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement	narrative	S4
Disclosure of how effectiveness of engagement with consumers and end-users is assessed	narrative	S4
Disclosure of steps taken to gain insight into perspectives of consumers and end-users / consumers and end-users that may be particularly vulnerable to impacts and (or) marginalised	narrative	S4
Disclosure of timeframe for channel or processes for raising concerns to be in place	narrative	S4
Disclosure of whether and how consumers and/or end-users are able to access channels at level of undertaking they are affected by	narrative	S4
Number of complaints received from consumers and/or end users during the reporting period	Integer	S4
Description of action planned or underway to prevent, mitigate or remediate material negative impacts on consumers and end-users	narrative	S4
Disclosure of aims for continued improvement	narrative	S4
Disclosure of how consumers and end-users were engaged directly in setting targets	narrative	S4
Disclosure of how consumers and end-users were engaged directly in tracking performance against targets	narrative	S4
Disclosure of how consumers and end-users were engaged directly in identifying lessons or improvements as result of undertaking's performance	narrative	S4
Disclosure of how climate-related considerations are factored into remuneration of members of administrative, management and supervisory bodies	narrative	E1
Percentage of remuneration recognised that is linked to climate related considerations	percent	E1
Disclosure of transition plan for climate change mitigation	narrative	E1
Explanation of how targets are compatible with limiting of global warming to one and half degrees Celsius in line with Paris Agreement	narrative	E1
Disclosure of decarbonisation levers and key action	narrative	E1
Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan	narrative	E1
Financial resources allocated to action plan (OpEx)	monetary	E1
Financial resources allocated to action plan (CapEx)	monetary	E1
Explanation of potential locked-in GHG emissions from key assets and products and of how locked-in GHG emissions may jeopardise achievement of GHG emission reduction targets and drive transition risk	narrative	E1
Explanation of any objective or plans (CapEx, CapEx plans, OpEx) for aligning economic activities (revenues, CapEx, OpEx) with criteria established in Commission Delegated Regulation 2021/2139	narrative	E1
Explanation of how transition plan is embedded in and aligned with overall business strategy and financial planning	narrative	E1
Explanation of progress in implementing transition plan	narrative	E1
Description of scope of resilience analysis	narrative	E1
Disclosure of how resilience analysis has been conducted	narrative	E1
Date of resilience analysis	date	E1

Time horizons applied for resilience analysis	semi-narrative	E1
Description of results of resilience analysis	narrative	E1
Description of ability to adjust or adapt strategy and business model to climate change	narrative	E1
Description of process in relation to impacts on climate change	narrative	E1
Description of process in relation to climate-related physical risks in own operations and along value chain	narrative	E1
Climate-related hazards have been identified over short-, medium- and long-term time horizons	semi-narrative	E1
Undertaking has screened whether assets and business activities may be exposed to climate-related hazards	semi-narrative	E1
Short-, medium- and long-term time horizons have been defined	semi-narrative	E1
Extent to which assets and business activities may be exposed and are sensitive to identified climate-related hazards has been assessed	semi-narrative	E1
Identification of climate-related hazards and assessment of exposure and sensitivity are informed by high emissions climate scenarios	semi-narrative	E1
Explanation of how climate-related scenario analysis has been used to inform identification and assessment of physical risks over short, medium and long-term	narrative	E1
Description of process in relation to climate-related transition risks and opportunities in own operations and along value chain	narrative	E1
Transition events have been identified over short-, medium- and long-term time horizons	semi-narrative	E1
Undertaking has screened whether assets and business activities may be exposed to transition events	semi-narrative	E1
Extent to which assets and business activities may be exposed and are sensitive to identified transition events has been assessed	semi-narrative	E1
Identification of transition events and assessment of exposure has been informed by climate-related scenario analysis	semi-narrative	E1
Assets and business activities that are incompatible with or need significant efforts to be compatible with transition to climate-neutral economy have been identified	semi-narrative	E1
Explanation of how climate-related scenario analysis has been used to inform identification and assessment of transition risks and opportunities over short, medium and long-term	narrative	E1
Explanation of how climate scenarios used are compatible with critical climate-related assumptions made in financial statements	narrative	E1
Sustainability matters addressed by policy for climate change	semi-narrative	E1
Achieved GHG emission reductions	ghgEmissions	E1
Expected GHG emission reductions	ghgEmissions	E1
Explanation of how consistency of GHG emission reduction targets with GHG inventory boundaries has been ensured	narrative	E1
GHG emission reduction target is science based and compatible with limiting global warming to one and half degrees Celsius	semi-narrative	E1
Description of expected decarbonisation levers and their overall quantitative contributions to achieve GHG emission reduction target	narrative	E1
Diverse range of climate scenarios have been considered to detect relevant environmental, societal, technology, market and policy-related developments and determine decarbonisation levers	narrative	E1
Percentage of renewable sources in total energy consumption	percent	E1
Gross Scopes 1, 2, 3 and Total GHG emissions - GHG emissions per scope [table]	Table	E1
Gross Scopes 1, 2, 3 and Total GHG emissions - financial and operational control [table]	Table	E1
GHG emissions - by country, operating segments, economic activity, subsidiary, GHG category or source type	Table	E1
Gross Scopes 1, 2, 3 and Total GHG emissions - Scope 3 GHG emissions (GHG Protocol) [table]	Table	E1
Gross Scopes 1, 2, 3 and Total GHG emissions - Scope 3 GHG emissions (ISO 14064-1) [table]	Table	E1
Gross Scopes 1, 2, 3 and Total GHG emissions - total GHG emissions - value chain [table]	Table	E1
Disclosure of GHG removals and storage resulting from projects developed in own operations or contributed to in upstream and downstream value chain	narrative	E1
Disclosure of GHG emission reductions or removals from climate change mitigation projects outside value chain financed or to be financed through any purchase of carbon credits	narrative	E1
Removals and carbon credits are used	semi-narrative	E1
GHG Removals and storage Activity by undertaking scope and by removal and storage activity	TABLE	E1
Total GHG removals and storage	Table/ghgEmissions	E1
GHG emissions associated with removal activity	Table/ghgEmissions	E1
Disclosure of calculation assumptions, methodologies and frameworks applied (GHG removals and storage)	narrative	E1
Removal activity has been converted into carbon credits and sold on to other parties on voluntary market	semi-narrative	E1



Total amount of carbon credits outside value chain that are verified against recognised quality standards and cancelled	ghgEmissions	E1
Total amount of carbon credits outside value chain planned to be cancelled in future	ghgEmissions	E1
Reversals	ghgEmissions	E1
Disclosure of extent of use and quality criteria used for carbon credits	narrative	E1
Percentage of reduction projects	percent	E1
Percentage of removal projects	percent	E1
Type of carbon credits from removal projects	semi-narrative	E1
Explanation of scope, methodologies and frameworks applied and how residual GHG emissions are intended to be neutralised	narrative	E1
Percentage for recognised quality standards	percent	E1
Assets at material physical risk before considering climate change adaptation actions	monetary	E1
Assets at acute material physical risk before considering climate change adaptation actions	monetary	E1
Assets at chronic material physical risk before considering climate change adaptation actions	monetary	E1
Percentage of assets at material physical risk before considering climate change adaptation actions	percent	E1
Disclosure of location of significant assets at material physical risk	narrative	E1
Percentage of assets at material physical risk addressed by climate change adaptation actions	percent	E1
Net revenue from business activities at material physical risk	monetary	E1
Percentage of net revenue from business activities at material physical risk	percent	E1
Disclosure of how anticipated financial effects for assets and business activities at material physical risk have been assessed	narrative	E1
Disclosure of how assessment of assets and business activities considered to be at material physical risk relies on or is part of process to determine material physical risk and to determine climate scenarios	narrative	E1
Disclosure of risk factors for net revenue from business activities at material physical risk	narrative	E1
Disclosure of magnitude of anticipated financial effects in terms of margin erosion for business activities at material physical risk	narrative	E1
Assets at material transition risk before considering climate mitigation actions	monetary	E1
Percentage of assets at material transition risk before considering climate mitigation actions	percent	E1
Percentage of assets at material transition risk addressed by climate change mitigation actions	percent	E1
Total carrying amount of real estate assets by energy efficiency classes	Table/monetary	E1
Disclosure of how potential effects on future financial performance and position for assets and business activities at material transition risk have been assessed	narrative	E1
Estimated amount of potentially stranded assets	monetary	E1
Percentage of estimated share of potentially stranded assets of total assets at material transition risk	percent	E1
Liabilities from material transition risks that may have to be recognised in financial statements	monetary	E1
Percentage of net revenue from customers operating in coal-related activities	percent	E1
Percentage of net revenue from customers operating in oil-related activities	percent	E1
Percentage of net revenue from customers operating in gas-related activities	percent	E1
Percentage of net revenue from business activities at material transition risk	Table/percent	E1
Disclosure of anticipated financial effects in terms of margin erosion for business activities at material transition risk	narrative/monetary	E1
Expected cost savings from climate change mitigation actions	monetary	E1
Expected cost savings from climate change adaptation actions	monetary	E1