

Overview of reporting obligations under CSRD

Undertakings included in the scope for mandatory ESG reporting

EU undertakings*

Single entity

- Large undertaking
- Small and medium-sized entity (SME) with securities traded on the EU-regulated markets



Group

- Parent undertaking of a large group (same size criteria on a consolidated basis)



Issuers of securities

CSRD also imposes obligations on non-European issuers whose securities are traded in the EU.

Third country undertakings

- Consolidated information for a group with non-EU parent which has an EU subsidiary meeting the size criteria or an EU branch with turnover above the specified limit; and
- Net turnover > € 150 m in the EU in each of the last two consecutive years
- Transitional provisions allow the consolidation of only EU entities until 6 January 2030.

Large undertaking / group

Exceeding at least two of three size criteria on the balance sheet date of two consecutive financial years:

- € 25 m balance sheet total
- € 50 m net turnover
- 250 employees (average during the fiscal year)

* Special rules apply to small and non-complex credit institutions, captive insurance and reinsurance undertakings

First-time application of CSRD

for **2024**
(reporting in 2025)

Undertakings already subject to NFRD

for **2025**
(reporting in 2026)

Large undertakings / large groups that are not presently subject to NFRD

for **2026**
(reporting in 2027)

- Listed SMEs (2-year opt-out possibility)
- Small and non-complex credit institutions, captive insurance and reinsurance undertakings

for **2028**
(reporting in 2029)

Non-EU undertakings

Obligations imposed by CSRD

ESRS

European Sustainability Reporting Standards

- Sector-agnostic standards (General requirements and E, S, G topics)
31 July 2023
- Sector-specific standards
Until 30 June 2026
- Standards for small and medium-sized (listed) undertakings
Until 30 June 2026
- Standards for third-country undertakings

CSRD

Corporate Sustainability Reporting Directive

Transposition to national law by July 2024

 Scope of content

 Scope of application

 First-time application

 Assurance

and more...

EU Taxonomy

Article 8 specifying content and presentation of disclosures

- First-time application according to NFRD and CSRD timeline
- Disclosures on taxonomy for:
 - first 2 climate objectives for 2022 and 2023
 - additional 4 environmental objectives for 2023 (eligibility) and 2024 (alignment)
- KPIs for non-financial undertakings: % of activities (turnover, capex, opex)