European Sustainability Reporting Standards

Brussels, 10 November 2023

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The views expressed in this presentation are those of the presenter, except where indicated otherwise. EFRAG positions, as approved by the EFRAG SRB, are published as comment letters, discussion or position papers, or in any other form considered appropriate in the circumstances.

PRESENTATION OVERVIEW

• Implementation support :

• Q&A platform

o MAIG

o VCIG

- Detailed list of requirements (XL)
- o Interoperability GRI
- Interoperability IFRS SS
- Upcoming consultations (expected by January 2024 at the latest):
 - o LSME
 - o VSME
 - Digitalisation
- Other deliverables in 2024:
 - Non-EU groups Exposure Draft
 - Sectors



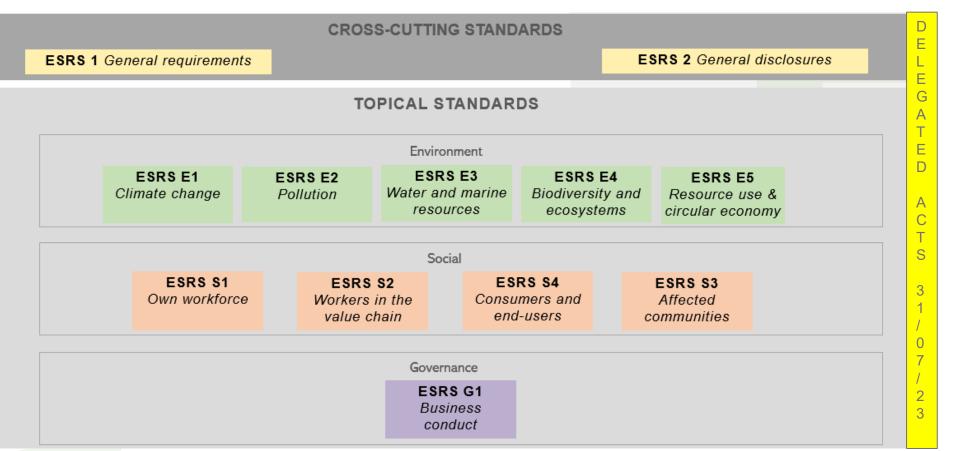




Current status

The First Set of Sector agnostic ESRS developed by EFRAG





84 Disclosure Requirements

Qualitative or quantitative

Double materiality

- Financial materiality
- Impact materiality

4 pillars

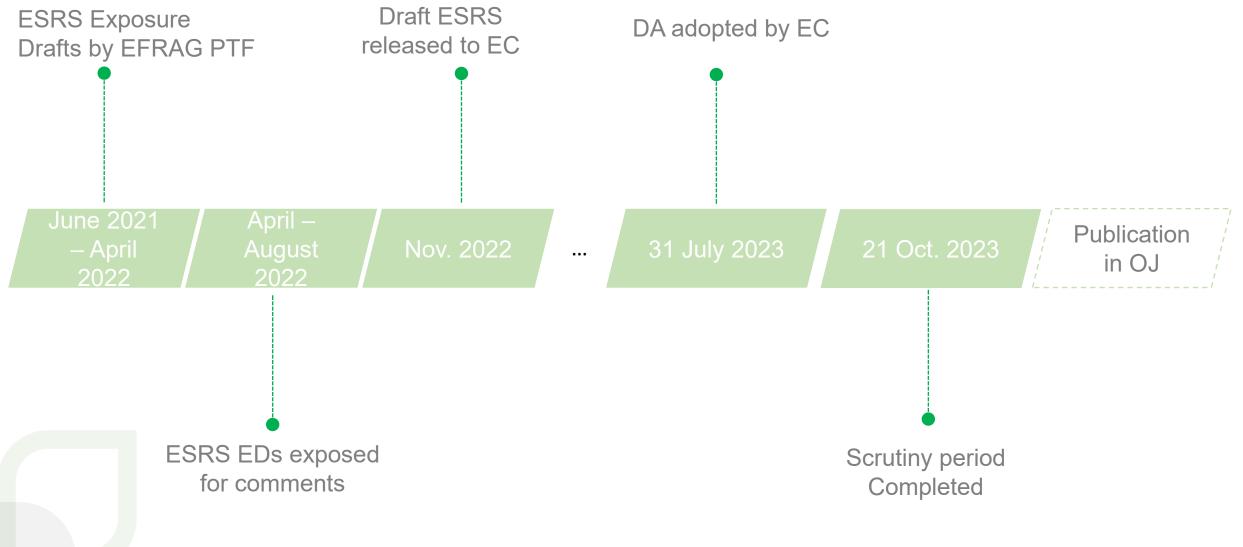
- Governance
- Strategy
- Impact, risk and opportunity management
- Metrics and targets

... to be complemented by sector specific standards + SME standards

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The sector agnostic standards on the finish line









Implementation support



- Based on feedback received during the EC's consultation on the draft DA (June July 2023), as well as inquiries received in recent months, it is anticipated that stakeholders will have numerous questions regarding the ESRS in 2024.
- Starting from mid-October 2023, EFRAG has launched the ESRS implementation Q&A platform, a centralised platform to systematically address these stakeholder inquiries and issue answers. The ESRS implementation Q&A will play a relevant role in educating stakeholders about ESRS requirements and helping them in implementing the standards. By supporting companies in their ESRS reporting, the ESRS implementation Q&A can help enhance the quality of the information provided in ESRS sustainability statements, ultimately fostering greater support for the objectives of the CSRD and ESRS.
- Regarding implementation Q&A, EFRAG will follow a specific due process which will be reflected in EFRAG due process procedures in due course. The internal procedure has been agreed by the EFRAG SRB.

ESRS Q&A platform (continued)



To address the implementation questions and depending on the type of question, EFRAG will issue:

- (a) **Clarifications:** ESRS content already provides an appropriate answer, without adding illustrations nor introduce new guidance;
- (b) **Rejections:** (i) question is peculiar to the submitter or is not widespread; or (ii) the issue is too broad to be answered effectively; or (iii) the content of the submission is non-conclusive;
- (c) Implementation Guidance (see below);
- (d) **Possible amendments to ESRS:** new requirements or a modification of the existing requirements required as the issue is not covered in the issued ESRS. New requirements are to be issued as EFRAG Advice to the EC and could subsequently be adopted by the Commission as Delegated Act. EFRAG does not expect to issue proposed Amendments to ESRS in 2024, except if very urgent matters arise. However, potential amendments to be addressed in the future years may be identified, if applicable, as part of the implementation support (Q&A) in 2024.

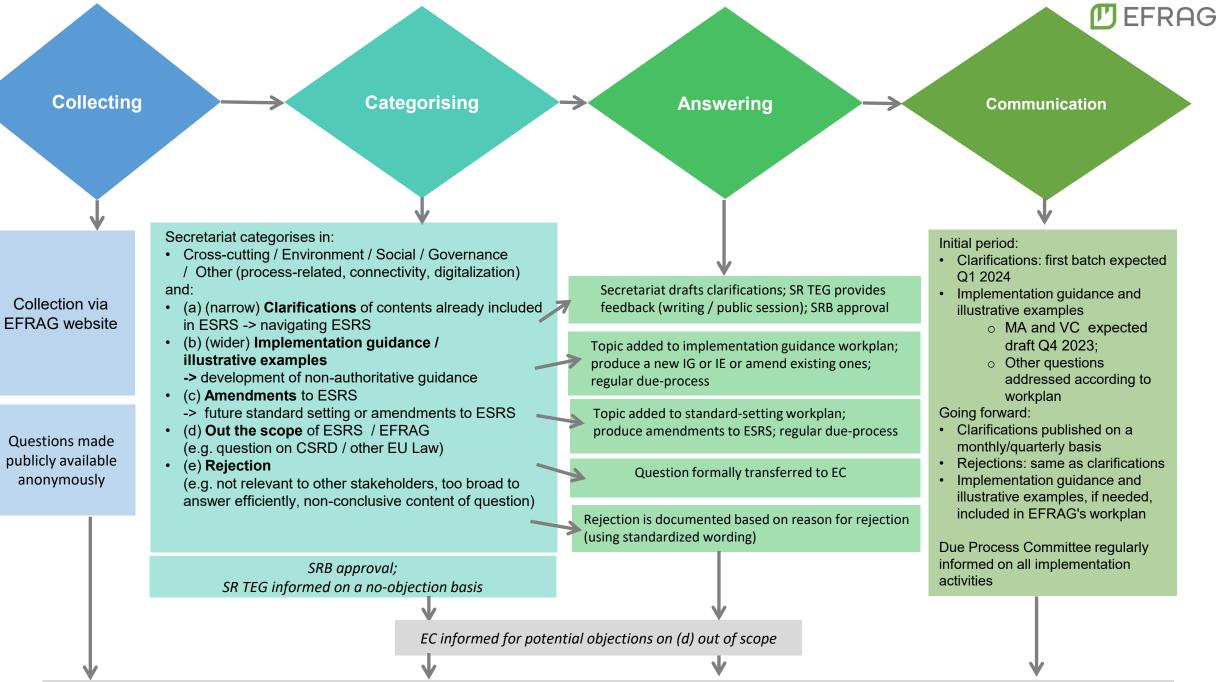
Clarifications Rejections Implementation Guidance Possible

amendments

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The Clarifications and Rejections are issued by EFRAG as non-authoritative material.

In all the quarters of 2024, EFRAG expects to collect questions and process the answers. A series of Clarifications and Rejections will be produced each quarter in 2024.



Step-by-step rolling issue-log (operational and due-process documentation tool, made public on the successive stages for each question)

ESRS Implementation Guidance

EFRAG will issue implementation guidance (EFRAG IG) as non-authoritative material to illustrate how the ESRS requirements may be implemented, without introducing new provisions and without amending the requirements in ESRS. New provisions can only result from standardsetting activities (e.g., future amendments to draft ESRS).

EFRAG has drafted the first IG's in 2023

EFRAG is intending to issue the approved draft versions in Q4 2023 subject to a thirty-day public feedback period.

Q1-2024: EFRAG expects to issue the final versions of these documents.

EFRAG

EFRAG IG 1 – Materiality Assessment

EFRAG IG 2 – Value chain

EFRAG IG 3 – Detailed requirements (XLS)

ESRS Implementation Guidance: MAIG

- 1. Materiality assessment determines **material information** on sustainability impacts, risks and opportunities (IROs); based on objective criteria to determine relevant and faithful information about material IROs across ESG.
- 2. The assessment includes the undertaking's upstream and downstream VC, with its own operations.
- 3. For **policies**, **actions and targets**, information shall be disclosed according to the Disclosure Requirements, or it if the undertaking does not have such policies, actions and/or targets, it shall state this.
- 4. Metrics are subject to materiality assessment, so these are omitted if assessed as not material
- **5.** No defined process under ESRS judgement of reporter to the process that reflects its facts and circumstances. As illustration, an ESRS-compliant materiality assessment could include the following steps:
 - a. understanding the context;
 - b. identification of actual and potential IROs related to sustainability matters;
 - c. assessment and determination of the material IROs related to sustainability matters; and
 - d. reporting.
- 6. Engagement with affected stakeholders informs the process, but the ESRS do not mandate specific behaviour.
- 7. The materiality of impacts for reporting purposes, depends on **severity and likelihood**. Severity is based on the scale, scope and irremediable character of negative impacts and the scale and scope of positive impacts.
- 8. International standards such as the **GRI Universal Standards** constitutes a good basis. The **due diligence** process can also help.
- 9. An assessment under ESRS is expected to be able to comply with the identification of the sustainability related information on risks and opportunities under **IFRS Sustainability Disclosure Standards**.

(AL3)

EFRAG

EFRAG IG 1 –

Materiality

Assessment

ESRS Implementation Guidance: VCIG

- 1. Sustainability statement shall include information about **all material impacts, risks and opportunities** (IROs) including the VC. Business relationships are **not limited** to direct contractual relationships.
- 2. The materiality assessment covers the identification of material IROs in the VC.
- 3. Topical standards require disclosures about **policies, targets and actions** for material matters, where these cover the VC, the disclosure needs to include them. If not, state that.
- 4. Topical standards require VC data for a **few metrics**, but the undertaking should disclose **entity-specific disclosures**, including metrics where required.
- 5. If not primary VC information after making reasonable efforts, it shall **estimate** the missing information, using **all reasonable and supportable information available without undue cost and effort**, including proxies.
- 6. Reporting boundary determines what is own operations and what is VC.

Latest draft version – approval expected on 15 November 2023.

EFRAG

EFRAG IG 2 –

Value chain

VC coverage map of set 1 ESRS



Level of VC coverage	Disclosure F	Requirements w	vith this level of V	C coverage		
1. The undertaking shall assess	. The undertaking shall assess its material IROs across its VC					
2.The undertaking shall describ	2.The undertaking shall describe its VC					
3.The undertaking shall describe	.The undertaking shall describe its material IROs and report where in the VC they arise					
4.The undertaking shall reflect w policies, actions or targets (PAT)		 <i>BP-1/2</i>ⁿ, SBM-2, GOV-4/5 E1-2/E1-4 	 E2-6, E3-1/E3-3 	 E4-1/E4-4, E4-6, E5-1/E5-3, 	 S1-1/S1-5 S2-1/S2-5 S3-1/S3-5 S4-1/S4-5 	
5. The disclosure only reflects own operations , as no coverage of VC is required in HRO-2, his disclosure			• E1-8/E1-9, • <i>E2-4</i> ■			
6.Disclosure of procured materials • E2-5 ⁿ		● <i>E2-5</i> ª	● E5-5 □			

Notes on DR [•]

BP-1	To what extent the sustainability statement covers the undertaking's upstream and downstream VC.
BP-2	When metrics include VC data estimated using indirect sources, such as sector-average data or other proxies, ESRS 2 par. 10
SBM-1	Requires that value chain is covered but is not expected to trigger data requests to actors in the value chain.
SBM-3	For each material IRO identified in the materiality assessment, the undertaking shall report whether the undertaking is involved with the
	negative or positive impact through its activities or because of its business relationships.
E2-4	AR 20 refers to procurement of microplastics
E2-5	Relates to the products/materials and/or substances procured which ends up in products / manufacturing.
E5-5	Includes supplied material but does not expand to suppliers



Level of VC coverage	re Requirements with this level of VC coverage			
7. The standard covers PAT for IROs that people in the VC. The undertaking shall disclosure whether and how PAT cover the		ESRS S3	ESRS S4	
· · · · · · · · · · · · · · · · · · ·			 E4 IRO 1 par 17(a) E4-4 par 32(c) 	• E5-4 par 30
9. SFDR indicators listed in ESRS 2 VC to be covered to the extent that foreseen in the relevant technical standards				
10. Other EU law (excluding SFDR) in ESRS 2 Appendix B	VC to be cove	ered		



ESRS Implementation Guidance: Detailed requirements

- 1. Excel workbook with additional information to navigate and filter Disclosure Requirements and related Application Requirements (including, the corresponding paragraph and sub-paragraphs of each item).
- 2. For current ESG reporters, this list can be used as a basis for a gap analysis of information already available. This list provides a structure to organise the data requirements to comply with the ESRS.
- 3. This [draft] list does not represent the ESRS Digital taxonomy and cannot be used as basis for the preparation of the machine-readable sustainability reporting. However, as further explained by the accompanying methodology, it may support the preparation of human readable reports that will be easier to digitalize, as they have been built considering the detailed structure of the requirements (paragraphs, subparagraphs).

Latest draft version – approval expected on 15 November 2023.

DISCLAIMER

Prefinal Draft subject to Approval from EFRAG SRB [still subject to change]

INSTRUCTIONS

1)The "shall disclose" DPs reported in ESRS 2 are to be disclosed irrespective of the outcome of its materiality assessment [ESRS 1 par. 29].

Undertakings or groups <u>not exceeding on their balance sheet dates the average number of 750 employees during the financial year</u> (on a consolidated basis where applicable) may omit the information required by ESRS E4, ESRS S1, ESRS S2, ESRS S3 or ESRS S4 in accordance with Appendix C of ESRS 1. In this case, the undertaking shall nevertheless disclose DPs reported under par. 17-BP2 of ESRS 2 if one or more of these topics have been assessed to be material [see Column G].
 Column H identifies DPs related to SBM-1 and SBM-3 subject to phased in according to Appendix C of ESRS 1.

E	ESRS	DR	Paragraph	Name	Data Type	Appendix B - ESRS 2 (SFDR + PILLAR 3 + Benchmark + CL)	DPs to be disclosed in case of phased-in [Appendix C - ESRS 1] Undertaking less than 750 employees	Appendix C - ESRS 1 [DPs subject to phased-in]	May [V]
E	SRS 2	BP-1	3	Disclosure of general basis for preparation of sustainability statement	narrative				
E	ESRS 2	BP-1	5 a	Basis for preparation of sustainability statement	semi-narrative				
E	ESRS 2	BP-1	5 b i	Scope of consolidation of consolidated sustainability statement is same as for financial statements	narrative				
	ESRS 2	BP-1	5 b ii	Indication of subsidiary undertakings included in consolidation that are exempted from individual or consolidated sustai	narrative				
E	ESRS 2	BP-1	5 c	Disclosure of extent to which sustainability statement covers upstream and downstream value chain	narrative				
E	ESRS 2	BP-1	5 d	Option to omit specific piece of information corresponding to intellectual property, know-how or results of innovation h	semi-narrative				
E	SRS 2	BP-1	5 e	Option allowed by Member State to omit disclosure of impending developments or matters in course of negotiation has	semi-narrative				

EFRAG

EFRAG IG 1 -Materiality Assessment

EFRAG IG 2 – Value chain

EFRAG IG 3 – Detailed requirements (XLS)

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Key interoperability steps achieved in practice



International Sustainability Standards Board (ISSB)

IFRS*

- Meetings of the JWG, bilateral meetings at management level and bilateral meetings of climate experts: continued dialogue and cooperation
- Comments received: great desire for interoperability ESRS and IFRS S
- Final decisions (delegated act):
 - Alignment of concepts: financial materiality and value chain in ESRS 1
 - Alignment of content of disclosure objectives in ESRS 2
 - Confirmation of additions to IFRS S2 in ESRS E1
 - Changes to the Architecture
- Differences in timeline and scope at this stage

EFRAG's interim assessment of interoperability:

EFRAG assesses a very high degree of interoperability between the two sets of standards:

ESRS preparers will to a very large extent report the same information as companies that use ISSB standards; and

This significantly reduces the risk that ESRS reporters will have to report the same information twice.

EFRAG has published a mapping table working document which illustrates the above

Key interoperability steps achieved in practice



Global Reporting Initiative (GRI)



- Technical cooperation from the beginning to seek alignment on key concepts: impact materiality, due diligence approach ...
- Reconciliation of ESRS disclosures with GRI disclosures
 underway
- Digital taxonomy coordination underway

EFRAG and GRI agreement:

A high level of interoperability has been achieved in respect to impact reporting

Entities complying with ESRS considered reporting *with reference* to GRI Standard (as defined by GRI 1)

EFRAG and GRI have issued on 4 September a joint statement of interoperability





Upcoming consultations: LSME ED

ESRS for listed SMEs Exposure Draft (LSME ED)



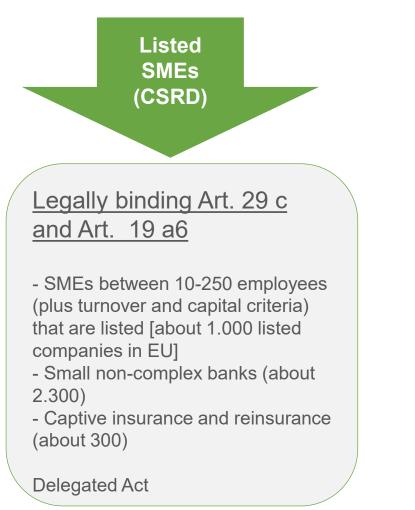
- EFRAG received a mandate for technical advice for a simplified ESRS to be used by listed SMEs, small and non-complex banks (SNCI) and captive insurers and reinsurers based on art 29c of CSRD, known as LSME.
- Companies in scope are estimated indicative estimate as it does not include also the listed bonds by EFRAG to be:
 - (i) listed SMEs about 700,
 - (ii) SNCI about 2.300,
 - (iii) captive insurers and reinsurers about 300.

Effective date is January 2026, but a 2 years derogation is foreseen until January 2028 for listed SMEs (derogation does not apply to SNCI and captives).

- Companies in scope are required to disclose information on ESG matters (including Taxonomy and SFDR PAIs) also to provide information to financial market participants.
- According to art 29b 4) of the CSRD, the disclosures in ESRS LSME determine the maximum detail of information that EFRAG can require from large undertakings to collect from SMEs in their value chain for the sustainability statement.
- EFRAG expects to issue ESRS LSME Exposure Draft for four months of public consultation in January 2024 at the latest and to issue its technical advice, draft ESRS LSME, to the EC in November 2024.

Sustainability reporting for LSMEs: Q4-23/Q1-24





CSRD specifies reporting requirements for listed SMEs. Art 19 a(6) by *way of derogation.* This is a reduced list from the requirements that will apply to other companies under scope:

- a) A brief description of the undertaking's <u>business model and strategy</u>
- b) A description of the undertaking's policies in relation to sustainability matters
- c) The principal actual or potential <u>adverse impacts</u> of the undertaking with regard to sustainability matters, and any <u>actions taken</u> to identify, monitor, prevent, mitigate or remediate such actual or potential adverse impacts
- d) The principal <u>risks</u> to the undertaking related to sustainability matters and how the undertaking manages those risks
- e) Key indicators necessary to the disclosures referred to in points (a) to (d).





Upcoming consultations: VSME





- EFRAG's work on a voluntary standard for non-listed micro, small and medium companies (VSME) is outside the mandate defined in the CSRD and will not be adopted by the Commission as a Delegated Act
- Derives from the market need to have a common point of reference to be used by counterparties in the value chain of SMEs and by lenders in their data requests to non-listed SMEs and to support these SMEs in their sustainability journey.
- Market need was also recognized by EC and Commissioner Mc Guinness and the European Commission recommended EFRAG to work on a [draft] VSME. This is also a measure included in the recent SME relief package.
- EFRAG SR TEG, SRB and VSME and LSME communities and Expert Working Group SMEs **confirmed** the need of a voluntary standard for micro, small and medium sized non-listed companies in Europe to enable them in facing growing stakeholders request for ESG data and to lower the entry barrier to reporting. Covering 23.2 million companies in Europe.
- <u>EFRAG will issue an Exposure Draft of VSME in January 2024 at the latest, for four months of public consultation and to</u> issue its technical advice, draft VSME, to the EC by November 2024.

Context – market driven voluntary standard



Two objectives

- 1. To provide a simple reporting guidance for SMEs that want to start their sustainability journey and monitor their sustainability performance with few indicators
- 2. Replace the multitude of questionnaires from lenders, investors and corporate clients:
- due to ESRS reporting of large companies
- sustainability data needed to manage the sustainability risks in the lending and investment portfolios or in the supply chain
- No additional burden for SMEs, on the contrary, VSME intended to reduce the number of different data requests
- VSME will be used only if there is market acceptance, i.e. if lenders, investors and corporate clients accept to replace (substantial parts of) their questionnaires to VSMEs

VSME: Table of contents

Table of Contents Objective of this Standard and to which companies it applies Modules that constitute this Standard Principles for the preparation of the sustainability report (Basic Module, PAT, Busin Partners) Principles for the preparation of the sustainability report (PAT, Business Partners) Basic Module	3 3 1ess 4 5 6
 Disclosure – 1 - Basis for Preparation Disclosure B 2 – Practices for transitioning towards a more sustainable econom Basic Metr–cs - Environment B 3 – Energy and greenhouse gas emissions B 4 – Pollution of air, water and soil B 5 – Biodiversity B 6 – Water B 7 – Resource use, circular economy, and waste management Basic Metrics – Social matters B 8 – Workforce – General characteristics B 9 – Workforce – Health and Safety B 10 – Workforce – Remuneration, collective bargaining, and training Basic Metrics - Business conduct B 11 – Convictions and fines for corruption and bribery 	6 7 7 7 7 8 8 8 8 8 8 9 9
Principles of Materiality to be applied for the Narrative-PAT and Business Parti Modules	ners 10
Impact materiality Financial materiality Stakeholders and their relevance to the materiality assessment process	10 11 11
Narrative – Policies, Actions and Targets (PAT) Module	12
Disclosure N 1 – Strategy: business model and sustainability related initiatives Disclosure N 2 – Material sustainability matters Disclosure N 3 – Management of material sustainability matters Disclosure N 4 – Key stakeholders Disclosure N 5 – Governance: responsibilities in relation to sustainability matter	12 12 13 s13
Business Partners Module	1/

Latest draft available here

EFRAG

VSME: Business Partner module contents



Торіс	DR number and Title
Governance	Disclosure BP 1 – Revenues from certain sectors
Governance	Disclosure BP 2 – Responsibilities in relation to sustainability matters
	Disclosure BP 3 – GHG emissions reduction target
	Disclosure BP 4 – Transition plan for climate change mitigation
Environment	Disclosure BP 5 – Sector EU Paris Aligned Benchmarks
	Disclosure BP 6 – Physical Risks from climate change
	Disclosure BP 7 – Hazardous waste and radioactive waste ratio
	Disclosure BP 8 – Alignment with internationally recognized instruments
	Disclosure BP 9 – Processes to monitor compliance and mechanisms to address violations
Social	Disclosure BP 10 – Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles (including the principles and rights set out in the 8 fundamental conventions of the ILO Declaration and the
	International Bill of Human Rights)
	Disclosure BP 11 – Work-life balance
	Disclosure BP 12 – Number of apprentices

Latest draft available here

VSME – Choice of three modules



BASIC

Entry level for non listed SMEs

Target for micro-undertakings

Simplified language

[11] Disclosure Requirements Simplification: all required (no omissions) BUT whenever it is appropriate the language is 'IF APPLICABLE'

NARRATIVE – Policies, Actions and Targets

Small and Medium undertakings that have already PAT in place and to report

Simplified language (including for materiality)

List of material matters (out of AR 16)

Narrative info on Policies and Actions in place and, if applicable, Targets

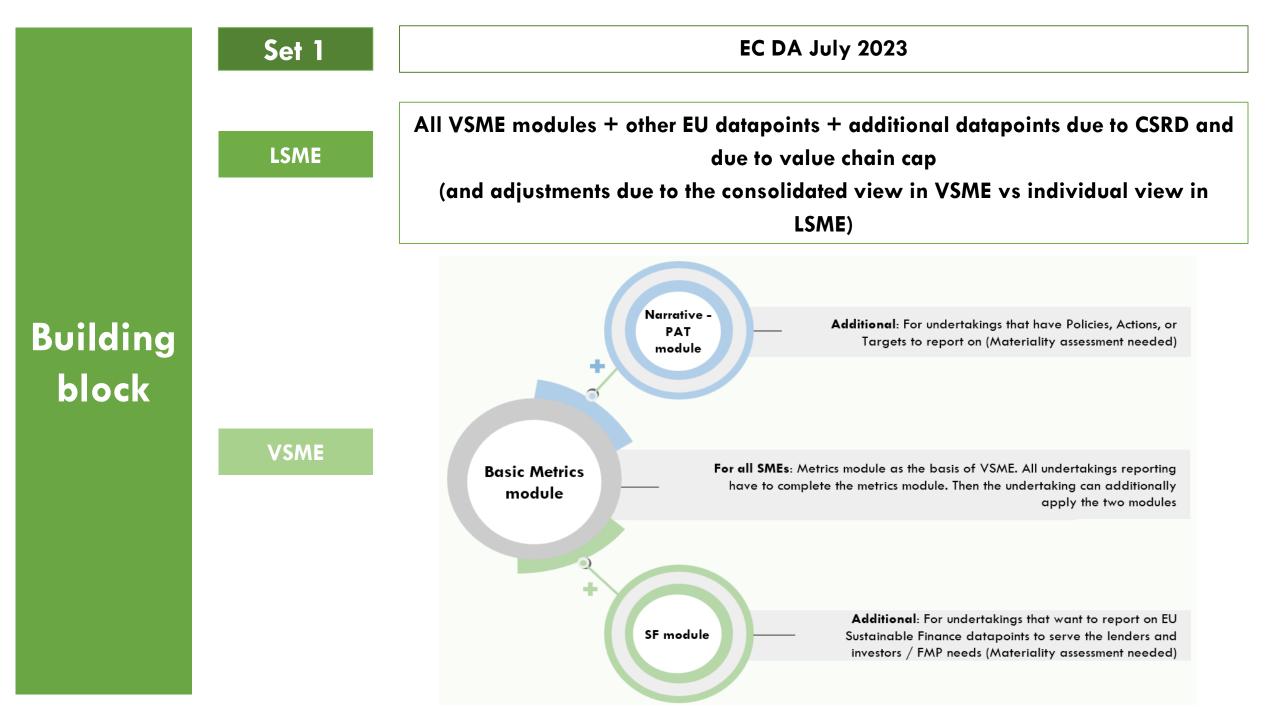
BUSINESS PARTNERS (BP)

When SME receive questionnaires from banks or others Sustainable Finance datapoints – as a conventional starting point

- Table 1 SFDR, Pillar 3, Benchmark regulation
- Same approach as in Set 1 ('not material for the undertaking')

VSME Terminology / simplification vs. consistency with ESRS Explain the 'Defined Terms' in simplified language

Building block Reconciliation of the MODULE-BASIC with LSME and ESRS Set 1







Upcoming consultations: ESRS XBRL Taxonomy

ESRS XBRL Taxonomy



- EFRAG to develop the draft XBRL taxonomy for ESRS as adopted by delegated act and as well for Art 8 of the EC Taxonomy Regulation.
- As per the CSRD, a digital taxonomy is necessary to allow the reported information to be tagged in accordance with ESRS. The XBRL taxonomy will complement the creation of a European single access point (ESAP) for public corporate.
- In Q1-2024 EFRAG will issue for consultation for sixty days the draft XBRL taxonomy of
 - i. the ESRS that have been issued in July 2023 as Delegated Act and
 - ii. Art 8 disclosure.
- In the second half of 2024 EFRAG will issue its final advice. This deliverable constitutes a technical recommendation to the European Commission on the digitalization rules of ESRS. ESMA will subsequently consult on the final digitalization rules and effective date.

ESRS XBRL taxonomy – public consultation Q1-24



A clear structure for each disclosure requirement in ESRS....

- First paragraph -> the description of the Disclosure Requirement
- Second paragraph: -> the objective of the disclosure requirement (principles-based approach)
- Following paragraphs: the specific datapoints to be included (« shall ») under a, b, c..., subdivided, if need be, as (i), (ii), (iii)... (non-limitative list)
- + Application requirements

... facilitating digitisation

- Digital XBRL taxonomy underway at EFRAG, facilitating usability and comparability of ESRS statements in the ESAP
- Draft version will be available <u>for public consultation in Q4-2023 or Q1-2024</u>, enabling digital tagging and « taxonomy-centric » report preparation
- Tagging aligned with standard structure allowing for 3 levels of reading:
 - ✓ Level 1: Disclosure requirement level
 - ✓ Level 2 (« nested »): a, b, c ...
 - ✓ Level 3 (« nested »): (i), (ii), (iii) ... (when required by ESRS)
 - ✓ Quantitative (numerical) and semi-narrative tags (Yes/No, Dropdowns) on all levels





Other deliverables: ESRS for non-EU groups ED

ESRS for non-EU groups



- Scope A. article 40a(1): Large subsidiaries including unlisted and public interest SME subsidiaries:
 - ✓ they are in the CSRD scope in their own right
 - ✓ in addition, information on group level to be provided if net Group turnover in the EU > €150 million
- Scope B. article 40a(1): If no subsidiary in scope A, information on group level if a branch generating more than €40 million if net Group turnover in the EU > €150 million
- Adoption of separate standards specially for non-EU companies foreseen
- Deadline proposed to postpone to June 2026 -> EFRAG to deliver its advice to the EC by November 2025.
- The consultation on an Exposure Draft will start in **Q4-2024 or Q1-2025 at the latest.**





Other deliverables: Sector ESRS

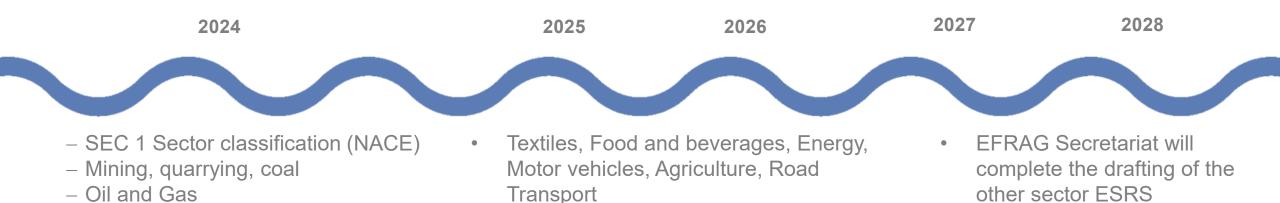
Sector ESRS - background



- CSRD requires sector-specific ESRS to complement the information provided under the sector-agnostic ESRS issued in July 2023 as delegated act.
- EFRAG has started a multi-annual standard setting program for approximately 40 draft standards, considering the SASB and GRI material as well as any relevant sector reporting guidelines and regulation.
- The initial deadline for the adoption of a first set of sector standards was June 2024 but has been proposed to be
 postponed for two years, to allow companies to focus on the implementation of the first set of ESRS adopted in July 2023.
 EFRAG is working on the assumption that the new deadline is June 2026 for the delegated act concerning the first batch of
 sector ESRS.

This implies that **EFRAG delivers its technical advice by November 2025 (first batch)** and that public the consultation on the ED's is launched in November 2024 or early 2025 at the latest.

Sector update – 39 Exposure Drafts in the coming years



Financial institutions (banking, insurance, asset management) to address also value chain specificities

Sector standards are being developed over a period of 4/5 years and are **complementary to sector-agnostic**

Illustrative timeline – timetable to be confirmed

Transitional period (i.e., before the issuance of the relevant sector specific standards): development of sector-specific reporting best practices under characteristics of quality that will inform the standard setting process

EFRAG



- In 2024 EFRAG expects to finalise and launch the consultation of the first batch of sector Exposure Drafts, including:
- (i) the general approach to sector ESRS,
- (ii) the ESRS Sector classification approach, based on the statistical classification of economic activities in the European Community (NACE), and
- (iii) two ESRS ED's for high-impact sectors, respectively Oil and Gas, covering activities from upstream to downstream, and Mining, Quarrying and Coal.

The timing for public consultation(s) in relation to those Exposure Drafts will be considered in due course. Field testing with corporates could also start before the public consultation.

Sector ESRS – 2024 continued



- EFRAG plans to start in the last quarter of 2023 the standard setting research process for the three standards dedicated to Financial Institutions (Banking, Insurance and Capital markets), which are considered a priority together with high-impact sectors, due to the role they play to reach the sustainable finance policy goals. In 2024, EFRAG plans to complete the standard setting research and to progress on drafting the three Exposure Drafts for Financial Institutions, that would be put in consultation in 2025.
- The standard setting research for the following other high-impact sectors is ongoing: Agriculture-Farming-Fishing, Road Transport, Food and Beverage, Motor Vehicles, Energy, Production-Utilities, Textile-Accessories-Footwear-Jewellery.
- Compatible with the priorities described above (implementation support and SMEs as well as the work on non-EU
 groups (see next slides)), depending on the availability of resources and the capacity of EFRAG SR TEG and EFRAG SRB,
 EFRAG may put in consultation one or more additional ESRS Sector Exposure Drafts already in 2024.



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