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Assessing the corporate readiness for sustainability reporting

An analysis of companies subject to the Non-Financial Reporting Directive (NFRD) in anticipation of the forthcoming Corporate Sustainability Reporting Directive (CSRD)

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Foreword

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Table of Contents

1 Introduction 1

2 Literature Review 3

2.1 Voluntary approach 3

2.1.1 First definitions and usage of CSR and Sustainability 3

2.1.2 Development of different concepts by the EU 4

2.1.2.1 Responsible Business Conduct 4

2.1.2.2 Business and Human Rights (UNGPs) 4

2.1.2.3 UN 2030 Agenda 5

2.1.2.4 The EU's holistic approach 5

2.1.3 Other voluntary reporting standards 6

2.1.3.1 Global Reporting Initiative (GRI) 6

2.1.3.2 Sustainability Accounting Standards Board (SASB) 6

2.1.3.3 Other standards 7

2.1.4 The emergence of the ESG metrics 8

2.1.5 Will ESG reporting replace CSR reporting? 9

2.1.6 Evolution of 'CSR/Sustainability Reporting' in the US 11

2.1.7 CSR reporting relative to financial reporting 12

2.2 Mandatory approach 14

2.2.1 The Non-Financial Reporting Directive / Directive 2014/95: 15

2.2.2 Growing Climate Change Awareness in the Reporting Perspective 16

2.2.3 Adaptation of Directive 2014/95 and definition of the principle of materiality 18

2.2.4 The Corporate Sustainability Reporting Directive (CSRD) 20

2.2.4.1 The elaboration and overview 20

2.2.4.2 Implementation period of the CSRD 22

2.2.4.3 Extent of coverage 22

2.2.4.4 Reporting requirements 23

2.2.4.5 Uniformity 24

2.2.4.6 Format of the report 25

2.2.4.7 Company governance under CSRD 26

2.2.5 Benefits of disclosing CSR information for companies 26

2.2.6 Negative terminology often associated with sustainability reporting 27

2.2.7 The Corporate Sustainability Due Diligence Directive (CS3D) 28

3 Sample Selection and Methodology 30

3.1 Selection of the companies 30

3.2 Selection of the criteria 30
3.3 Explanation of the different criteria 31
3.3.1 ESRS 1 General requirements and ESRS 2 General disclosures 31
3.3.2 Topical standards 32
3.3.2.1 Environmental topical standards 32
3.3.2.2 Social topical standards 33
3.3.2.3 Governance topical standards 33
4 Interpretations of the analysis of the reports 34
5 Conclusion 37
6 Bibliography 40
7 Appendix 46

1 Introduction

Corporate sustainability reporting has evolved significantly over the past few decades, reflecting the changing understanding of the role of business in society and the environment. In the 1970s and 1980s, corporate sustainability reporting began to gain traction, focusing primarily on environmental issues in response to growing concerns about pollution and environmental degradation (Michalak et al., 2017). In the 1990s, corporate social responsibility expanded to include social and economic aspects as well as environmental concerns, known as the 'triple bottom line' of 'people, planet, profit'. The Global Reporting Initiative (GRI) was established in 1997 to provide a comprehensive sustainability reporting framework for companies to assess and disclose their economic, environmental, and social performance (GRI,2023).

In the late 2000s, integrated reporting emerged, combining financial and sustainability reporting to provide a comprehensive view of corporate performance. Materiality grew in importance, focusing on the sustainability issues relevant to a company and its stakeholders. The Sustainability Accounting Standards Board (SASB) was formed in 2011 to develop industry-specific disclosure standards for material sustainability issues. Corporate sustainability reporting is currently moving towards greater regulation and standardisation, with initiatives such as the European Union's Corporate Sustainability Reporting Directive (CSRD) requiring comprehensive sustainability disclosures. In addition, the International Financial Reporting Standards (IFRS) Foundation is working to establish a global standard for sustainability reporting. It can therefore be argued that corporate sustainability reporting practices have changed progressively over recent decades.

Previous research has shown that corporate sustainability reporting plays a significant role in the modern business environment for several compelling reasons. Such reporting enhances stakeholders' understanding of a company's environmental, social and governance (ESG) performance and promotes transparency and accountability. This in turn builds trust and stronger relationships with investors, employees, and the wider community (Watts, 2015). Furthermore, a comprehensive sustainability report can also give a company a competitive edge. By demonstrating an unwavering commitment to sustainability, companies can enhance their brand reputation, attract investment, and retain highly skilled employees (Koskela, 2022). Finally, sustainability reports serve as an important source for stakeholders to make informed

decisions. For investors, they provide valuable insights into a company's risk management, operational efficiency, and long-term sustainability. For consumers, they can guide purchasing decisions, often favouring companies aligned with their ethical and environmental values. (Petrescu et al., 2020).

The primary objective of this paper is to assess the readiness of those companies required to publish sustainability reports under the Non-Financial Reporting Directive (NFRD) in relation to the forthcoming Corporate Sustainability Reporting Directive (CSRD). An important timing consideration is that these companies are expected to publish their first reports under the CSRD in 2025, using data collected during the 2024 financial year.

The main body of this paper is divided into three sections. The first includes a comprehensive review of the relevant literature, further divided into two subsections: the voluntary approach and the mandatory approach. The subsection on the voluntary approach highlights the evolution of different concepts and the various reporting standards that exist, culminating in an examination of the progress of sustainability reporting in the United States. In the mandatory approach subsection, the paper outlines the chronological development of the European Union Directive. This section also includes a discussion of both the potential downsides (expressed through negative terminology) and the benefits that can be derived from corporate sustainability reporting.

The second section involves the identification and selection of ten relevant companies, and the delineation and explanation of the various criteria used for the analysis. The third section presents the analysis and interprets the results (see **Appendix 7.6** for full reference). Ten companies were assessed against the twelve European Single Reporting Standards (ESRS) developed by the European Financial Reporting Advisory Group (EFRAG). The ESRS are a key component and disclosure tool of the CSRD. An interpretation is then provided to determine the level of preparedness of these entities for the forthcoming CSRD or, alternatively, the extent of the undertakings necessary to ensure compliance with the forthcoming legislation due to come into force in 2024.

The main body of the research is followed by the concluding remarks, which provide a summary and reflection of the research findings.

2 Literature Review

2.1 Voluntary approach

This section begins with an explanation of the evolution of the various definitions of non-mandatory sustainability reporting. It goes on to outline recent advances in the field of voluntary sustainability reporting, covering developments in Europe, the US, and the international context. All of this is explained in a chronological order. Finally, the relationship between corporate social responsibility (CSR) reporting and financial reporting is explored and contextualised.

2.1.1 First definitions and usage of CSR and Sustainability

There are several interpretations of the definition of these two terms in the literature to date. First, it can be said that the two terms 'CSR' and 'Sustainability ‘are close in their meaning and are often used in a similar way (H. B. Christensen et al., 2021). However, some authors consider the two terms to be completely different concepts (Strand et al., 2014).

In the latter case, it is often assumed that 'CSR' concentrates on social issues, while 'Sustainability' focuses on environmental issues (Schwartz & Carroll, 2008). But it is important to understand that the term ‘social’ is not limited to social law. It's about a company's impact on society as a whole. "The Economist" would seem to support the first approach, as evidenced by the phrase 'corporate responsibility - or sustainability or whatever' in reference to the efforts made by companies to address societal concerns. The inclusion of the term 'whatever' in this statement serves as a reference to the inherent lack of precision and frequent interchangeability of terms such as corporate (social) responsibility, sustainability, and various other related terms (The Economist, 2008).

In addition, the use of the two terms is shifting over time, with 'Sustainability' seeming to be gaining ground over 'CSR'. This is probably due, at least in part, to the demand from managers for a more formally rational language. The language of 'Sustainability' is more formally rational than the language of 'CSR', which is more normative (Strand et al., 2014). Moreover, according to the "KPMG Study on Corporate Responsibility Reporting 2013', the use of the term 'Sustainability' is increasing, especially among companies (KPMG, 2013, p.6). On the other hand, 'CSR' is still the dominant term in the academic literature (Huang & Watson, 2015).

The European Union's definition of the term 'CSR' is the following: *"CSR is defined as the responsibility of enterprises for their impact on society, and therefore it should be company led". Businesses can act in a socially responsible way by*

- *integrating social, environmental, ethical, consumer and human rights concerns into their business strategy and operations*
- *compliance with the law"* (European Commission, 2011).

The term 'Sustainability' is derived from the Latin word 'sustinere', where 'tenere' means to keep and 'sus' means upwards. The United Nations Brundtland Commission of 1987 defines this term as follows: "*Development that meets the needs of the present without compromising the ability of future generations to meet their own needs".*

2.1.2 Development of different concepts by the EU

2.1.2.1 Responsible Business Conduct

Responsible Business Conduct (RBC) is a concept, introduced as an alternative term by the Organisation for Economic Co-operation and Development (OECD) in collaboration with business, trade unions and non-governmental organisations. The OECD has provided a definition of RBC that includes two main elements: a) a constructive contribution to the advancement of economic, environmental, and social aspects, ultimately leading to sustainable development, and b) the prevention and effective management of adverse consequences arising from the direct and indirect actions, products and services of a company or service provider (OECD, 2019).

The OECD uses the principles and guidelines of the RBC to inform and shape government policy, thereby helping companies to mitigate the negative impacts of their operations and supply chains. It also provides a forum for the resolution of alleged violations of corporate governance, social justice, environmental protection, labour relations and human rights. In doing so, they serve as a powerful catalyst for the successful achievement of the Sustainable Development Goals (OECD, 2019).

2.1.2.2 Business and Human Rights (UNGPs)

In parallel, a significant development took place in 2011 when the United Nations Human Rights Council unanimously endorsed a comprehensive framework of 31 Guiding Principles on

Business and Human Rights (UNGPs). These principles are organized around three interrelated pillars. First, there is a state obligation to protect people against human rights abuses by third parties, including business enterprises. This obligation is fulfilled through the implementation of appropriate policies, regulations and legal frameworks. Second, companies have a responsibility to respect human rights, which includes exercising due diligence to prevent violations of the rights of others. This responsibility includes a proactive approach to prevent and address any adverse human rights impacts from business activities. Finally, the UNGPs emphasise the need to provide effective access to remedy, both judicial and non-judicial, for individuals or communities who have been victims of human rights abuses by business enterprises. Such access to remedy is critical to addressing and repairing the harm caused by corporate misconduct. Moreover, the importance of implementing the UNGPs was strongly underlined in the European Union (EU) Action Plan on Human Rights and Democracy for the period of 2015-2019. The Action Plan served as a strategic framework highlighting the EU's commitment to the promotion and protection of human rights, with a particular focus on the implementation of the UNGPs (European Commission, 2019).

2.1.2.3 UN 2030 Agenda

One final development of note is that, in 2015, the UN 2030 Agenda and its SDGs were finally adopted. The European Union (EU) has made a profound commitment to sustainable development through its adoption of the 2030 Agenda and the Sustainable Development Goals (SDGs) representing the EU's most significant international undertaking in this domain. Reflecting the 2030 Agenda, the EU introduced the new European Consensus on development in June 2017. The Consensus is firmly grounded on the "5 P's" of the Agenda 2030, namely People, Planet, Prosperity, Peace, and Partnership, effectively integrating the social, economic, and environmental dimensions of sustainable development. One notable aspect of the Consensus is its promotion of the integration of Corporate Social Responsibility (CSR) principles into collaborative efforts with the private sector, including employers' and workers' organizations (European Commission, 2019).

2.1.2.4 The EU’s holistic approach

Recognizing the interlinkages between Corporate Social Responsibility (CSR)/Responsible Business Conduct (RBC), the Sustainable Development Goals (SDGs) and the United Nations

Guiding Principles on Business and Human Rights (UNGPs), the European Commission has adopted a comprehensive and integrated approach, prioritising concrete actions over terminological distinctions. The Commission recognises that the labels 'CSR', 'RBC', 'Business and Human Rights', 'SDGs' or their collective usage may vary, but remains committed to a holistic perspective embracing the commonalities and differences between these agendas. In doing so, the Commission seeks to ensure practical progress while respecting the nuanced focus inherent in each agenda.

2.1.3 Other voluntary reporting standards

2.1.3.1 Global Reporting Initiative (GRI)

The Global Reporting Initiative (GRI) is an internationally recognised organisation that has developed the world's most widely used sustainability reporting framework. Through this framework, the GRI provides guidelines and principles that enable organisations to report on their environmental, social and governance (ESG) performance. The GRI was founded in 1997 with the primary objective of promoting sustainability reporting as a mechanism for increasing transparency and accountability within organisations. The GRI framework provides a structured approach for organisations to identify, assess and communicate their sustainability impacts, risks and opportunities. The framework includes a comprehensive set of reporting principles, standard disclosures and performance indicators that serve as a basis for structuring sustainability reports. The GRI framework covers a wide range of topics, including environmental issues, labour practices, human rights, product stewardship, community involvement and governance, ensuring comprehensive coverage of sustainability issues. The GRI Standards undergo periodic reviews to ensure their alignment with prevailing global best practices in sustainability reporting. This iterative process enables the GRI to incorporate the latest developments and emerging information demands posed by stakeholders and regulatory bodies (GRI, 2023).

2.1.3.2 Sustainability Accounting Standards Board (SASB)

The Sustainability Accounting Standards Board (SASB) is an organisation dedicated to the development of industry-specific sustainability accounting standards. Its primary objective is to provide a standardised and comparable framework for companies to disclose financially material sustainability information. SASB's focus is on providing specific guidance tailored to

different industries to ensure that the information disclosed is relevant, consistent, and material to the financial performance of companies operating in those sectors. The SASB standards cover 77 industries and identify the sustainability-related risks, opportunities, disclosure topics and metrics most relevant to an organisation's cash flows, access to finance and cost of capital over different time horizons. They provide investors with valuable information for assessing financial performance (SASB, 2023).

Within each industry, SASB identifies a comprehensive set of sustainability topics that are considered material to the industry's financial performance. These topics are then broken down into specific disclosure requirements and metrics that companies can use to report on their performance in these areas. By taking this industry-specific approach, SASB ensures that companies can effectively communicate their sustainability-related activities and results, enabling stakeholders to accurately assess the financial impact of these factors (SASB, 2023).

In response to the increasing complexity of corporate sustainability reporting, the International Integrated Reporting Council (IIRC) and the Sustainability Accounting Standards Board (SASB) announced their merger in November 2020. This led to the formation of the Value Reporting Foundation, officially launched in June 2021. The merger is a significant step towards simplifying the reporting landscape, bringing together two organisations dedicated to creating value for companies. Since August 2022, the IFRS Foundation's International Sustainability Standards Board (ISSB) has been responsible for the SASB standards. The ISSB is committed to preserving, enhancing, and developing the SASB standards. It strongly encourages preparers and investors to continue to use the SASB standards, signalling the continued relevance and importance of these standards in sustainability reporting practices.

2.1.3.3 Other standards

Among the various sustainability reporting standards, the Task Force on Climate-related Financial Disclosures (TCFD) focuses on providing recommendations for the disclosure of climate-related risks and opportunities. It emphasises the importance of companies reporting on their climate governance, strategy, risk management and climate change metrics and targets. Another notable standard is the Carbon Disclosure Project (CDP), which collects environmental data from companies and promotes disclosure of information regarding climate change, water security, and deforestation. It serves as a platform for companies to disclose

their environmental impacts and performance, facilitating transparency and accountability in these areas. A further prominent sustainability reporting standard is the United Nations Global Compact (UNGC), a voluntary initiative that encourages companies to align their operations and strategies with ten principles covering human rights, labour, the environment and anti-corruption. Participants in the UNGC are expected to report on their progress in implementing these principles, thereby promoting transparency and accountability.

2.1.4 The emergence of the ESG metrics

To succeed in the forthcoming era, organisations are required to cultivate resilience and reinforce their social acceptance by demonstrating a heightened dedication to generating enduring, sustainable value. This necessitates a comprehensive approach recognising the well-being of both individuals and the environment, thereby addressing the needs of both stakeholders and the planet. The International Business Council (IBC) of the World Economic Forum has played a pivotal role in advancing the concept of stakeholder capitalism. In 2017, it endorsed the Compact for Responsive and Responsible Leadership committing of over 140 global business leaders to align their organisational objectives with the long-term interests of society. During their summer meeting in 2019, IBC members reaffirmed the significance of environmental, social, and governance (ESG) factors in shaping corporate performance and risk for the purpose of generating sustainable value over time (World Economic Forum, 2020).

They identified challenges associated with ESG reporting frameworks, such as the lack of consistency and comparability of metrics, which hinder companies from effectively demonstrating their sustainability progress and contribution to the Sustainable Development Goals (SDGs) to all stakeholders. Consequently, the International Business Council (IBC) sought the expertise of the forum, in collaboration with prominent accounting firms such as Deloitte, EY, KPMG, and PwC, to identify a comprehensive set of universally applicable and material environmental, social, and governance (ESG) metrics. These metrics, along with recommended disclosures, were intended to be consistently integrated into companies' standard annual reports across industries and countries. The paramount objectives of this endeavour were to enhance transparency, facilitate alignment between companies, investors, and various stakeholders, and ensure the verifiability of reported data. The ultimate aspiration was for IBC member companies to collectively adopt these metrics and report on them, fostering greater

cooperation and alignment among existing standards, while progressing towards a systemic solution (World Economic Forum,2020).

The proposed metrics are categorized into four pillars aligned with the Sustainable Development Goals (SDGs) and key Environmental, Social, and Governance (ESG) domains. These pillars are as follows: Principles of Governance, Planet, People, and Prosperity. Among these metrics, 21 are considered core metrics holding significant importance across various industries. Additionally, there are 34 expanded metrics providing a more advanced means of measuring and communicating long-term value creation. These metrics are derived from established standards such as the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB), the Task Force on Climate-related Financial Disclosures (TCFD), the Science Based Targets initiative (SBTi), World Development Indicators (WDI), CDP, the UN's Universal Declaration of Human Rights (UDHR), and Principles for Responsible Investment (PRI) (KMPG, 2022).

By including these recommended metrics in reporting and integrating them into governance, business strategy and performance management, a company demonstrates its consideration of relevant risks and opportunities within its operational framework. By aligning their objectives with society's long-term goals, such as those outlined in the Sustainable Development Goals (SDGs), companies can create enduring, sustainable value, thereby delivering favourable outcomes for the company itself, the economy, society, and the planet. This embodiment of stakeholder capitalism represents the authentic manifestation of business success encompassing the interests of all relevant stakeholders (World Economic Forum, 2020).

2.1.5 Will ESG reporting replace CSR reporting?

The concepts behind Corporate Social Responsibility (CSR) and Environmental, Social, and Governance (ESG) reporting represent distinct frameworks employed by companies to evaluate their sustainability practices. In summary, CSR is often utilized as an internal framework within organisations, whereas ESG reporting used by investors to assess sustainability performance. ESG metrics are seen to be progressively superseding CSR as the predominant benchmark for measuring sustainability within the corporate realm. The greater quantifiability of ESG metrics gives them an advantage in becoming a more widely adopted

measure. While CSR initiatives are valuable in raising awareness of various efforts, ESG frameworks provide concrete numerical data to support these efforts. These policies play a key role in informing the public about a company's values and goals. CSR practices typically rely on self-regulation and exhibit significant variation, making them more qualitative and difficult to define. Conversely, ESG metrics provide investors with tangible criteria against which to assess and select suitable investment opportunities. It is possible for companies to use both CSR and ESG frameworks simultaneously, with CSR serving as an internal communication tool with employees, while ESG sets measurable targets. As a result, CSR excels at raising awareness of initiatives, while ESG provides a quantifiable basis for them. ESG frameworks cover a range of issues, including carbon emissions, deforestation, waste management, water use, diversity and inclusion, fair labour practices, executive compensation, internal corruption, and lobbying. As a result, there are both similarities and differences between the terms CSR and ESG. These concepts can be used synergistically as strategies within a company, although the prevailing view is that ESG is an evolution of CSR due to its greater measurability. Put in a nutshell, CSR serves as a mechanism for raising awareness and emphasising goals within a company, relying more on qualitative assessments, while ESG provides quantifiable metrics that build investor and market confidence (O'Neill, 2022).

Sustainability serves as the overarching concept encompassing both ESG and CSR concepts, with both contributing to its realisation. ESG and CSR reporting represent distinct approaches adopted by companies to demonstrate their dedication to sustainable business practices. CSR reporting can be viewed as the idealistic and holistic perspective on sustainability, encompassing broad societal impacts, while ESG reporting provides a pragmatic and detail-oriented viewpoint. In this context, CSR reporting can be regarded as a precursor to ESG reporting. Companies engage in self-regulation and commit to sustainable practices to generate positive societal outcomes. Consequently, the endeavours pursued within a CSR strategy can be refined and integrated into ESG metrics. The resulting ESG data can be subsequently disclosed and disseminated through ESG reports. By doing so, ESG imparts a quantifiable mark of credibility to the comprehensive management philosophy underlying CSR. Hence, to achieve true sustainability, a company must adopt of both practices (Lutkevich, 2023).

2.1.6 Evolution of 'CSR/Sustainability Reporting' in the US

Non-financial reporting began to develop in the US in the 1980s. At that time, the spotlight was on environmental reporting as external stakeholders were concerned with the impact of organisations on a variety of community resources. In addition, in 1998 Elkington developed the concept of the 'triple bottom line' (profit, people and planet) for reporting environmental and social performance together with economic performance. The triple bottom line concept implies that economic, environmental, and social performance should be balanced and of equal importance (Burhan & Rahmanti, 2012).

Sustainability reporting is thus often associated with the 'triple bottom line'. As such, sustainability reporting is a new term widely used to communicate a company's impact on social, environmental, and economic performance. Many large companies publish these types of reports, particularly in socially and environmentally sensitive industries such as oil and gas, mining, chemicals, automotive, computer and electronics (Choi, 2008). Thes reports are published because there is a need for various stakeholders to receive them. Stakeholders are not limited to investors and creditors, but also include employees, customers, suppliers, governments, activist groups and ultimately the public (Burhan & Rahmanti, 2012).

Sustainability reporting and corporate social responsibility reporting are closely connected. While CSR reporting focuses solely on disclosing information related to the environment and social aspects, sustainability reporting is broader in scope and includes not only environmental and social performance but also economic performance. With the growing emphasis on sustainable development, many corporate non-financial reports and CSR reports have now been transformed into sustainability reports, encompassing a wider range of considerations (Lopez et al, 2007).

In the US, companies have the option to include CSR information within their annual report or provide a separate CSR report, which may also be referred to as a sustainability report, corporate accountability report, or nonfinancial report. These reports, or the relevant sections in the annual report, contain a wide range of qualitative and quantitative information, which may or may not be expressed in monetary terms. To ensure credibility, companies may engage an external assurance provider such as an auditor or consultant to certify their CSR reports and disclosures (H. B. Christensen et al., 2021).

Sustainability reporting is not mandatory at federal level for companies in the United States. level. In March 2022, the US Securities and Exchange Commission (SEC) tabled a proposal for climate-risk disclosure requirements that would extend the existing annual reporting obligations for publicly traded companies. These requirements would necessitate companies to address climate-related risks that are financially significant and align their disclosures with the recommendations provided by the Task Force on Climate-related Financial Disclosures (TCFD) in their SEC filings. The proposed rule remains open for public comments as of June 2022. Once the feedback has been reviewed and incorporated, large companies would commence reporting in 2024 according to the finalized requirements (VinciWorks, 2022).

2.1.7 CSR reporting relative to financial reporting

Corporate Social Responsibility (CSR) encompasses an extensive array of Environmental, Social, and Governance (ESG) topics, some of which may have indirect or peripheral connections to the core operational activities of companies. Consequently, CSR reporting diverges from conventional financial reporting with its primary focus on the financial ramifications of a company's primary and routine business operations (H. B. Christensen et al., 2021).

According to the authors H.B. Christensen et al. (2021) CSR reporting differs from financial reporting in seven aspects:

1) The diversity of stakeholders and the multifaceted applications of Corporate Social Responsibility (CSR) reporting distinguish it from financial reporting. While financial reporting primarily targets investors, CSR reporting caters to a wider range of users. Users of CSR information encompass not only experienced readers of corporate disclosures, such as investors, but also groups with limited familiarity in interpreting such reports, including consumers. These diverse user groups utilize CSR information for purposes going beyond traditional financial analysis. For instance, they may utilize it to evaluate a company's broader societal contributions or assess its adherence to policies aligned with specific norms and ethical values.
2) The distinctiveness of subject matters: Due to the inherent ambiguity surrounding Corporate Social Responsibility (CSR) and sustainability, they encompass a wide spectrum of Environmental, Social, and Governance (ESG) topics, activities, and

policies. The specific topics addressed in CSR reporting exhibit significant variations among companies, industries and countries. Consequently, CSR reporting possesses a multidimensional nature, giving rise to a multitude of disclosure types and reporting formats. This diversity poses challenges in terms of making comparisons and achieving standardization in CSR reporting, as highlighted by studies conducted by Liang and Renneboog (2017), and Amel-Zadeh and Serafeim (2018).

3) The diversity of underlying motivations: CSR reporting serves multiple objectives and caters to a broad array of interests and preferences originating from both a company's internal and external stakeholders. These interests and preferences exhibit a dynamic nature, susceptible to rapid changes over time. For example, a company may be subject to the influence of social activist campaigns, as observed in the study by Baron (2001), or external events such as accidents or natural disasters, as demonstrated by the research conducted by Blacconiere and Patten (1994) and Bonetti et al. (2018). These circumstances prompt shifts in the motivations behind CSR reporting, reflecting the evolving concerns and circumstances faced by the company.
4) Diversifying measurement approaches: Many corporate social responsibility (CSR) activities manifest themselves through observable and quantifiable behaviours or technical outputs, such as CO2 emissions or the number of trees preserved. However, these activities do not necessarily lend themselves to monetary measurement, as noted by Kitzmueller and Shimshack (2012). The lack of uniformity in measurement practices poses challenges in applying traditional accounting conventions, including double-entry bookkeeping, as well as fundamental accounting principles such as materiality, matching, and relevance to CSR reporting. As highlighted by Cohen and Simnett (2015) and Moroney and Trotman (2016), the diverse nature of CSR activities impedes the application of conventional accounting methodologies and principles in CSR reporting.
5) The discretionary nature of CSR initiatives: In most cases, CSR activities and policies are voluntary in nature (this is the case in the US), surpassing the confines of legal, regulatory, and contractual obligations. For example, a company may undertake pollution reduction measures that exceed the statutory requirements or contribute to the well-being of the local community as a public good. Thus, the reporting obligations imposed on companies are contingent upon their own voluntary CSR choices or the

absence thereof. The extent of mandated reporting is directly influenced by the extent of a company's voluntary CSR commitments.

6) Emphasis on the long-term perspective: CSR is commonly regarded as a strategic endeavour that involves a company sacrificing short-term profits in exchange for long-term advantages, as observed in the study by Bénabou and Tirole (2010). As a result, CSR reporting often encounters the challenge of addressing long-term prospects that are challenging to quantify and intangible in nature. Examples of such prospects include consumer goodwill and employee relations - aspects difficult to measure in concrete terms.
7) The importance of externalities: Corporate social responsibility frequently encompasses the examination of externalities, referring to the impacts that companies have on the environment and society. One notable example of such externalities are CO2 emissions. The inclusion of these externalities serves as a primary motivation behind the implementation of a CSR reporting framework that adopts a double materiality approach. Furthermore, CSR reporting may extend its scope to encompass topics and activities going beyond a company's conventional boundaries, for instance when a company enforces restrictions on child labour within its supply chain.

It can therefore be concluded that the salient features of corporate social responsibility (CSR) reporting show significant differences in reporting methodologies. As a result, the introduction of mandatory CSR standards aimed at standardising CSR reporting has the potential to bring significant benefits. However, it is important to recognise that these characteristics also present significant barriers to measurement and comparability, particularly when compared to financial reporting. The components of CSR reporting thus add complexity to the measurement of the economic impact of a CSR reporting mandate when contrasted with the impact of financial reporting standards.

2.2 Mandatory approach

This section explains the evolution of mandatory corporate sustainability reporting in the EU. It also discusses the benefits and negative aspects of such reporting.

2.2.1 The Non-Financial Reporting Directive / Directive 2014/95:

On April 15, 2014, Directive 2014/95, commonly known as the Non-Financial Reporting Directive (NFRD), was enacted by the European Parliament. The incorporation of the term "non-financial information" into the EU accounting framework was introduced through the Modernization Directive (2003/51/EC). The primary objective was to provide member states with the opportunity to harmonise their national accounting regulations with the International Financial Reporting Standards (IFRS), recently adopted as an integral component of the EU's accounting framework under Regulation (European Commission, 2021).

The NFRD imposes an obligation on large "public interest entities," specifically listed companies with over 500 employees, to produce annual non-financial (corporate social responsibility - CSR) reports commencing from fiscal year 2017. Consequently, the first mandatory CSR reports were published in 2018, four years after implementation of the NFRD. Acknowledging the diverse nature of current corporate social responsibility (CSR) disclosures, the regulatory authority emphasizes the need for a uniform and elevated level of transparency regarding social and environmental information across all sectors within the Member States (Directive 2014/95, recital 1). Therefore, the rationale behind the NFRD, as stated in the basis for conclusions of the Directive, is to improve the transparency and comparability of CSR disclosures of European Union (EU) companies.

This initial reporting obligation covers a substantial number of entities, approximately 11,700 in total, consisting of large companies and groups operating within the European Union (EU). The entities subject to this requirement include publicly listed companies as well as other entities identified by national authorities as public interest entities (European Commission, 2014). According to Directive 2014/95, companies are required to produce annual CSR reports encompassing, at the very least, information pertaining to policies, key risks, and outcomes associated with environmental considerations, social and employee factors, respect for human rights, anti-corruption concerns, as well as diversity within the board of directors (KPMG, 2021).

The provision of such information facilitates the evaluation of the non-financial performance of large companies by stakeholders including customers, investors, managers, and other interested parties. This evaluation, in turn, encourages organisations to formulate sustainable

business strategies aligned with the expectations of these diverse stakeholders (YouMatter, 2019). Furthermore, Article 1 of the directive explicitly stipulates that companies have the option to prepare their non-financial reports using established national or international reporting frameworks, including recognized standards such as those developed by the Global Reporting Initiative (GRI).

The transposition of the NFRD into the national laws of Member States was required to be completed by 6 December 2016. As with the mandatory reporting of financial information, the directive requires that member states establish appropriate mechanisms to ensure compliance with the provisions of the Directive (Fiechter et al., 2022). The underlying objectives of the NFRD underscore the European Union (EU) regulator's view that increased transparency in CSR matters serves as a catalyst for enhancing companies' CSR endeavours. In line with this objective of achieving a real-world impact, the EU legislature posits that the disclosure of non-financial information plays a pivotal role in measuring, monitoring, and managing companies' performance and their societal impact (Directive 2014/95, recital 3). Moreover, the Directive recognises that the disclosure of non-financial information is essential for navigating the transition towards a sustainable global economy, which entails integrating long-term profitability, social equity, and environmental protection (Directive 2014/95, recital 3).

Regarding independent mandatory third-party assurance of CSR reports, it was not mandatory in most EU countries. In some it is part of the statutory audit requirements (e.g., in the Netherlands under NVCOS 720 requirements). Lastly, the format should be equivalent to an online version or a PDF version in accordance with Directive 2014/95 (KPMG, 2021).

2.2.2 Growing Climate Change Awareness in the Reporting Perspective

In recent years, there has been a significant paradigm shift regarding the interrelationships among climate change, the real economy, and financial markets. The adoption of the Non-Financial Reporting Directive (NFRD) has played a pivotal role in raising awareness about the correlation between the short-term perspectives of financial markets and the long-term consequences of global warming. Hence, market participants and regulators have increasingly considered environmental, social and governance (ESG) risks. For instance, notable institutions such as the European Central Bank (ECB) and the G-20 Financial Stability Board have

acknowledged the potential threats climate change poses to the stability of the financial system (Bossult et al., 2021).

At the same time, the Paris Agreement signed in December 2015 has revitalized worldwide efforts to combat climate change, emphasizing the redirection of capital flows towards climate change mitigation and adaptation measures as a primary objective. A legally binding international agreement on climate change, the Paris Agreement was adopted by 196 parties at the UN Climate Change Conference (COP21) in Paris on 12 December 2015. Its overall objective is to "hold the global average temperature increase to well below 2°C above pre-industrial levels" and to "pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels" (United Nations Climate Change, 2015).

The growing recognition of the significant impact finance can have on attaining climate and broader sustainable development objectives is manifested in subsequent European policy initiatives and reforms. Notably, the 2018 Action Plan on financing sustainable growth and the 2019 European Green Deal seek to enhance sustainable investment practices and foster a more sustainable financial system. These undertakings encompass the enhancement of the "management of sustainability risks" and the promotion of "transparency and long-term orientation" in financial and economic endeavours (Bossult et al., 2021). The EU Climate Law was one of the first legislative initiatives following the introduction of the Green Deal. Enshrining the objective of climate neutrality in law with effect from 2021, it sets the legally binding target of achieving net zero greenhouse gas emissions by 2050. This legislation obliges the EU institutions and Member States to take significant action at both EU and national level to achieve this ambitious goal (PWC, n.d.).

Furthermore, the EU Taxonomy package encompasses several key regulations affecting businesses in Europe. It serves as a classification framework, providing explicit definitions and guidelines to determine the eligibility of economic activities for sustainability categorisation. It establishes the pioneering 'green list' of sustainable business activities, with the aim of facilitating the identification of sustainable projects and channelling investment into them, thereby indirectly combating the practice of 'greenwashing'. The first EU Climate Taxonomy Delegated Act, which identifies activities that significantly contribute to climate change adaptation and mitigation, and six amending Delegated Acts are already in force. The Taxonomy thus provides investors and other stakeholders such as employees, government,

and civil society with a universally applicable set of sustainability metrics. Its primary objective is to enable direct comparisons between companies and to provide information for investment decisions on the social and environmental impact of companies (PWC, n.d.).

2.2.3 Adaptation of Directive 2014/95 and definition of the principle of materiality

Certain concerns emerged regarding Directive 2014/95, specifically in relation to the EU Commission's "Fitness Check on the EU Framework for Public Reporting by Companies." This evaluation raised questions regarding the extent and alignment of financial and non-financial information within the directive. The fitness check's purpose is to evaluate the adequacy of the existing body of accounting and reporting legislation, determining its efficacy in achieving its designated objectives and assessing the potential for modernization to serve new objectives (EU Commision,2018).

In response to the concerns, the EU Commission's initial step was to release its "guidelines on non-financial reporting: Supplement on reporting climate-related information" (2019/C 209/01) in June 2019. Notably, these guidelines integrated the Task Force on Climate-related Financial Disclosures' (TCFD) recommendations and linked them to the concept of non-financial reporting as employed in the Non-Financial Reporting Directive. Of particular significance, the guidelines included a "clarification" pertaining to the proper interpretation of the materiality principle in non-financial reporting. The Commission utilized the term "double materiality" to elucidate its understanding of the reporting obligations, thereby emphasizing the consideration of both financial and non-financial material aspects (Baumüller & Sopp, 2021).

In fact, the Non-Financial Reporting Directive has a double materiality perspective (EU Commission, 2022):

(1) The inclusion of the terms "development, performance, and position" in reference to a company implies a focus on financial materiality, encompassing factors that can impact its overall value. In this regard, climate-related information should be reported if it is deemed essential for comprehending the company's development, performance, and position. This perspective primarily pertains to investors, as they typically demonstrate the greatest interest in such information.

(2) The mention of the "impact of the company's activities" indicates the significance of environmental and social materiality. In this context, reporting climate-related information is warranted when it is crucial for comprehending a company's external impacts. This perspective is particularly relevant to citizens, consumers, employees, business partners, communities and civil society organisations, all of whom exhibit a notable interest in this aspect. Moreover, with the cohort of investors expanding, knowledge is needed on the climate impacts of investee companies to enhance investors' understanding and measurement of climate effects within their investment portfolios.

This perspective contrasts with the concept of "single materiality" which would require information to be simultaneously material from both a financial and non-financial perspective for it to be subject to the reporting obligation outlined in the NFRD. However, the existing challenges associated with the wording of the NFRD and the historically documented variations in interpretation, such as the concept of single materiality, were left unaddressed in the newly issued guidelines. Consequently, this supplementary definition, which lacks normative authority and is not an inherent consequence of the legally binding text of the NFRD, attracted substantial criticism (Sopp & Baumüller, 2021).

Moreover, the European Commission utilized this clarified definition as a foundation for its review of the Non-Financial Reporting Directive, which commenced in the early months of 2020. In alignment with its Green New Deal initiatives, the European Commission sought to enhance the level of climate and other environmental reporting by companies (EU Commission, 2020). The subsequent consultation presented several proposals on how to actualize these objectives. Of particular significance, the Commission incorporated the definition of the double materiality perspective as outlined in its 2019 guidelines (EU Commission, 2020). However, it is worth noting that this definition was not open to consultation but was instead employed as the foundation for addressing specific reporting content-related inquiries (Sopp & Baumüller, 2021).

The outcomes of the consultation also prompted the European Commission to emphasize that, while there was broad support for the concept of double materiality, two areas needed attention. Firstly, the necessity for further elucidation within the NFRD itself, and secondly the need for additional guidelines to facilitate the practical application of this principle.

Nevertheless, the findings of the consultation also indicate that companies, particularly those subject to the existing non-financial reporting requirements, expressed a preference for maintaining the status quo and avoiding additional onerous obligations (EU Commission, 2020).

2.2.4 The Corporate Sustainability Reporting Directive (CSRD)

2.2.4.1 The elaboration and overview

As already mentioned, the pronouncements of the Green New Deal included the intention to enhance the provisions of the NFRD (European Commission, 2019). Prior research and consultations conducted by the EU Commission had identified several critical areas requiring improvements within the European non-financial reporting framework. Following the above-mentioned consultation on the NFRD in the first half of 2020, the Commission embarked on the development of the new directive. Furthermore, the European Lab of the European Financial Reporting Advisory Group (EFRAG) was tasked with commencing preliminary work on formulating European Non-Financial Reporting Standards (European Commission, 2020).

On 21 April 2021, the European Commission unveiled its proposal for a CSRD in accordance with the commitment made under the European Green Deal. As it had become evident that the provisions enshrined in the NFRD were inadequate in terms of their comprehensiveness and substantive alignment with the dynamic regulatory framework, the aim of the CSRD was to revise and significantly enhance reporting obligations for companies falling within its purview, as part of an endeavour to augment the availability of sustainability information for stakeholders (KPMG, 2022).

One initial noteworthy aspect is the change in scope and purpose, and the transition from 'non-financial' to 'sustainability' reporting. This modification stemmed from the growing criticism surrounding the ambiguous nature of the term "non-financial," considered as merely denoting a negation without encompassing a well-defined, positive content (Baumüller & Grbenic, 2021). Moreover, the provisions enshrined in the CSRD are designed to harmonize the EU regulations governing corporate sustainability reporting with the additional obligations stipulated in other sustainability-oriented legislative. Notably, two other acts, adopted in 2019 and 2020 respectively, compel companies to expand their reporting obligations. First, the Sustainable Finance Disclosure Regulation (SFDR) (2019/2088) requires specific disclosures

related to sustainability for companies operating in the financial services sector. Companies are required to provide quantified information on the degree of sustainability associated with their financial products and investments. Second, the Taxonomy Regulation (2020/852) establishes key definitions pertaining to environmental sustainability within the European Union and modifies the reporting requirements of the SFDR (Baumüller & Grbenic, 2021). In addition, financial institutions are now obliged to disclose their "green asset ratio", necessitating enhanced transparency regarding the environmental impacts of their lending activities (EBA[1], 2021).

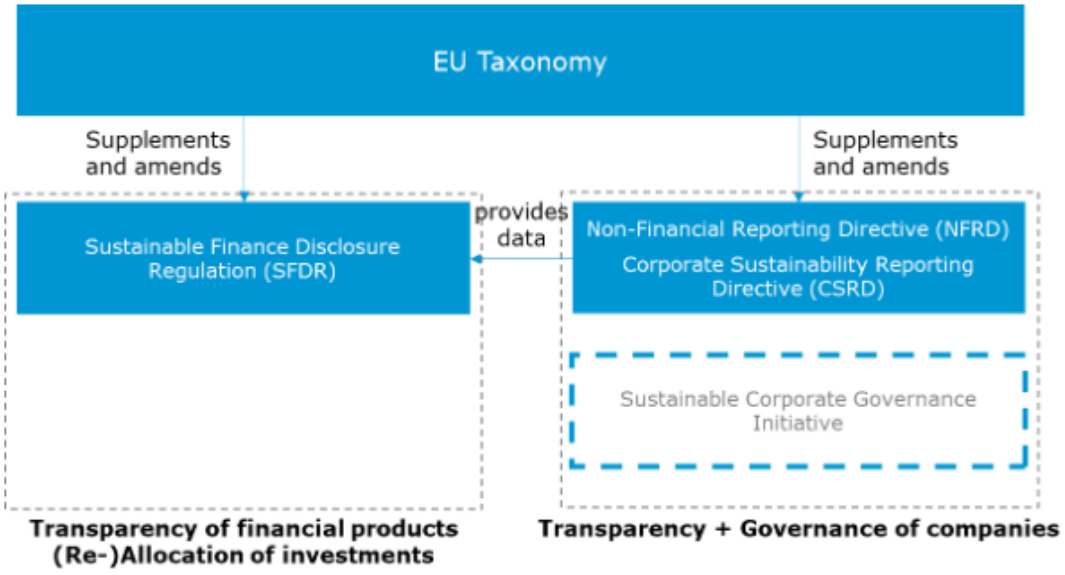

Figure 1: Regulations addressing the transparency of European companies (Baumüller & Grbenic, 2021).

The EU Taxonomy Regulation, the Corporate Sustainability Reporting Diretive (CSRD) and the Sustainable Finance Disclosure Regulation (SFDR) together form a coherent framework for European economies in their pursuit of a 'green transition'. They pursue several key objectives (Yosifova & Petrova-Kirova 2022):

1) Consistent definition: The framework establishes a single definition for identifying "green" activities, ensuring clarity and consistency across different sectors and industries.
2) Assessment and Disclosure Standardisation: It promotes the standardization of both quantitative and qualitative information, enabling companies to effectively assess and

[1] European Banking Authority

disclose their environmental and social performance. This standardized approach facilitates comparability and transparency in reporting practices.

3) Capital Allocation: The framework seeks to steer financial resources towards environmentally sustainable economic activities, encouraging the redirection of capital towards investments supporting the green agenda.

2.2.4.2 Implementation period of the CSRD

On 5 January 2023, the CSRD entered into force (EU Commission, n.d.). Reporting entities already subject to the Non-Financial Reporting Directive (NFRD) will apply the new rules for the first time for financial year 2024, with reporting taking place in 2025. Large reporting entities currently not subject to the NFRD will report in 2026 on financial year 2025, while listed small and medium-sized enterprises (SMEs), as well as small and non-complex credit institutions and captive insurance entities, will report in 2027 on data from financial year 2026 (KPMG, 2022).

2.2.4.3 Extent of coverage

One of the most substantial changes introduced by the CSRD pertains to the companies covered. The following categories of EU companies are now required to prepare sustainability reports (Baumüller & Grbenic, 2021):

- All publicly traded companies operating as limited liability entities, except for micro-sized entities. Small and medium-sized entities will be granted additional time for their preparations, as the proposed reporting obligations necessitate the preparation of initial reports starting on 1 January 2026.
- All large companies operating as limited liability entities, irrespective of whether they are publicly traded or not.
- All large insurance companies and banks, regardless of the legal form they adopt (e.g., cooperatives). In terms of consolidated sustainability reporting, the CSRD applies to all parent companies of large groups. Consequently, unlike the NFRD, the requirement to prepare consolidated financial reports becomes irrelevant, as exemptions may apply. However, it is important to note that if the parent company is situated in a third country, its sustainability report must adhere to the requirements specified for sustainability reports published by European companies. This provision ensures

consistency and alignment in sustainability reporting standards between European entities and parent companies located outside the European Union

The more specific criteria for determining the inclusion of companies are as follows: Large companies, whether listed or non-listed, are subject to the reporting obligations if they meet at least two out of the three specified criteria (KPMG, 2022):

- Employing more than 250 individuals.
- Generating an annual turnover exceeding €40 million.
- Possessing total assets surpassing €20 million.

According to the initial evaluations conducted by the European Commission, the expanded scope of the CSRD is expected to significantly augment the number of companies required to publish sustainability reports. Estimates indicate that the figure will rise from approximately 11,600 to 49,000 companies (European Commission, 2021).

2.2.4.4 Reporting requirements

The principle of materiality serves as a fundamental pillar for the non-financial reporting obligations prescribed by the NFRD, as well as for numerous other frameworks and standards focusing on sustainability-related information. One significant change introduced within the European sustainability reporting framework is the explicit inclusion of the principle of "double materiality". This principle, as elucidated by Baumüller and Sopp (2021), represents a noteworthy development in the reporting regime.

Nevertheless, research on the implementation of the ambiguous principle of materiality set forth in the NFRD reveals that European companies face difficulties in comprehending and operationalizing the concept of double materiality. This may be attributed, at least in part, to the specific challenges associated with translating the principle into practical applications. A study conducted by CEPS (2020) suggests that the lack of clarity persists even after the introduction of the CSRD proposals, as they fail to provide definitive guidance on how to apply the principle of double materiality.

Moreover, the CSRD introduces enhanced reporting obligations for topics identified as material. In addition to the information already required by the NFRD, the CSRD introduces new requirements covering the following aspects: Expanded reporting on aims and strategies,

specific time frames necessitating the inclusion of both retrospective and forward-looking information, and restructured and broadened reporting considerations, including governance matters and a heightened focus on the value chain. These significant changes in reporting requirements are evidently a response to the criticism directed towards the current NFRD provisions. It has been noted that existing reporting practices are deemed inadequate, often lacking in depth, and frequently failing to establish a clear connection with a company's strategy and governance processes. This observation was emphasized by the Alliance for Corporate Transparency (2020), prompting the need for substantial changes to improve the effectiveness and comprehensiveness of sustainability reporting (Baumüller & Grbenic, 2021).

Furthermore, the CSRD introduces a novel reporting requirement pertaining to intangible assets not typically included in the financial statements. It specifically highlights intellectual, human, social, and relationship capital as areas of focus, while also emphasizing the significance of reporting on research and development activities. However, the precise nature of this requirement remains somewhat ambiguous, particularly as the initial definitions presented in the European Commission's proposals associate this reporting obligation with the value creation process of companies (European Commission, 2021, Article 1, paragraph 2).

Lastly, as part of the CSRD, all companies within its scope are required to comply with the provisions of Article 8 of the Taxonomy Regulation. This specific regulation requires companies to report on the extent to which their revenues, capital expenditure (Capex) and operating expenditure (Opex) are in line with the environmental sustainability criteria set out in the Taxonomy Regulation (European Commission, 2021).

2.2.4.5 Uniformity

A notable addition to the sustainability reporting introduced by the CSRD is the introduction of standardised reporting requirements. In addition to the basic obligations set out in the CSRD, the European Commission has mandated the European Financial Reporting Advisory Group (EFRAG) to play a comprehensive standard-setting role, tasking it with developing rigorous standards applicable to all companies covered by the Directive (McGuinness, 2021).

Given the "private nature" of the European Financial Reporting Advisory Group (EFRAG), the standards it develops are subject to endorsement by the European Commission. This endorsement process is facilitated by delegated acts, which use a pre-defined endorsement

mechanism following the systematic criteria set out in the CSRD. Delegated acts have the characteristic of being directly applicable in all Member States of the European Union (EU), thus eliminating the need for additional transposition measures (Baumüller & Grbenic, 2021).

Despite this, the current provision remains somewhat ambiguous and requires further clarification as the CSRD enters into force and the first delegated acts are adopted. This aspect of the proposed Directive has attracted considerable attention, with many companies and stakeholders questioning the effectiveness of a European approach to sustainability reporting, given the global nature of European companies' activities. As highlighted by the DRSC[2] (2021a), this concern underlines the need for careful consideration and resolution of potential challenges related to the international scope of activities of European companies.

Moreover, the CSRD includes provisions to assess the comparability of standards applied by non-EU companies. This is important not only because of the extended scope of the proposed reporting requirements, but also because of the exemptions for European subsidiaries of third-country parent companies. Unfortunately, the CSRD lacks detailed clarification in this respect, probably due to ongoing developments in the construction of European sustainability reporting standards. As a result, it is currently difficult to assess the potential equivalence of alternative standards.

2.2.4.6 Format of the report

Regarding the publication of sustainability reports, the CSRD proposes that they be included in the annual report. To improve the integration of financial and sustainability information, the CSRD proposes that it should be included in the management report. (KPMG,2022).

Moreover, the CSRD imposes a requirement for companies to prepare their sustainability information using a standardized electronic reporting format, akin to the format outlined in the European Single Electronic Format (ESEF) Regulation. This directive holds significant importance in line with the European Commission's intention to establish the European Single Access Point (ESAP), as outlined in the Capital Markets Union Action Plan. The ESAP aims to facilitate universal accessibility to information pertaining to the financial and sustainability performance of companies (European Commission, 2021).

[2] Deutsches Rechnungslegungs Standards Committee e. V.

2.2.4.7 Company governance under CSRD

The CSRD centres its attention on the governance mechanisms underpinning the sustainability reporting practices of companies. This encompasses a comprehensive examination of both internal and external mechanisms. This emphasis is a response to the criticism surrounding the insufficient reliability of information disclosed by companies (KPMG, 2021).

In terms of internal governance mechanisms, the CSRD addresses the roles and responsibilities of the Board of Directors and the Supervisory Board. Firstly, the board members' declaration of responsibility has been extended to include sustainability information. Secondly, the responsibilities of a company's audit committee are extended to include corporate sustainability reporting. The introduction of new reporting requirements prompts the board, management, and supervisory bodies to consider their role in sustainability matters and their alignment with corporate strategies, thereby requiring a deeper engagement with relevant issues.

As regards external governance mechanisms, the CSRD introduces mandatory assurance of sustainability reports, with a company's statutory auditor responsible for assessing their compliance with CSRD requirements. Specifically, the Directive emphasises four areas of focus for an auditor's assessment: Compliance with the European Sustainability Reporting Standards developed by EFRAG; appropriateness of the materiality analysis performed; compliance with the requirement to mark-up sustainability reporting in accordance with the ESEF Regulation, and lastly, compliance with the reporting requirements set out in Article 8 of the Taxonomy Regulation (Baumüller & Grbenic, 2021).

2.2.5 Benefits of disclosing CSR information for companies

Sustainability reporting offers significant benefits outweighing the associated efforts and provides opportunities for reporting companies to improve their environmental, social and governance (ESG) performance. Disclosure fosters investor confidence and ensures that stakeholders can make informed decisions. In addition, sustainability reporting fosters employee loyalty by demonstrating a commitment to responsible practices. When assessing the quality and effectiveness of management, analysts prioritise the assessment of sustainability information. This prioritisation is justified by the fact that sustainability reporting improves access to capital and helps identify key stakeholders. Responsible investors seek

comprehensive information regarding the risks tied to their investments. Investors, particularly those focused on sustainable investment, therefore favour companies providing transparent information on ESG information. By presenting a comprehensive package of easily accessible data, companies can improve their prospects of securing the desired capital investment necessary for sustainable growth and development (Petrescu et al., 2020).

A further benefit is the competitive advantage. Sustainability reporting provides a competitive advantage by transparently communicating a company's sustainability efforts, which is now essential to stakeholders such as customers, employees, investors, and society at large. This reporting differentiates the company, reduces costs, attracts skilled employees, and appeals to consumers. Early adoption of sustainability reporting will position a company more favourably than its competitors in the long term (Koskela, 2022).

Moreover, through the process of gathering information and producing sustainability reports, companies can broaden their perspectives and explore innovative approaches to environmental practices, such as waste reduction and technological advances. These reports also provide valuable insights into areas of economic and social growth, providing companies with opportunities for further development. In addition, companies that have already implemented sustainable practices can use their social or environmental initiatives as learning opportunities. By effectively communicating their sustainability efforts, companies can demonstrate their commitment to quality and responsible business practices. This, in turn, can enhance their reputation and credibility and ultimately lead to a reduction in the cost of capital, particularly in highly competitive markets. (Petrescu et al., 2020).

2.2.6 Negative terminology often associated with sustainability reporting

From the time of the initial adoption of the NFRD in 2014 to the present day in 2023, two specific terms with negative connotations have gained prominence and expanded their influence globally, extending beyond the European context. These two similar phenomena are 'cherry picking' in reference to the UN Sustainable Development Goals and 'greenwashing'. These two terms serve to summarise the consequent inability to make meaningful comparisons between a company's performance and its impact on sustainable development due to the multitude of variations and options in accounting and reporting that are officially permitted and regulated. Within this domain, reporting practices are frequently utilized as a

means for strategic management and the enhancement of corporate reputation, possibly even involving the deliberate dissemination of misleading information to stakeholders to gain a competitive edge (Yosifova & Petrova-Kirova 2022).

The term ‘cherry-picking’ refers to the selective disclosure of sustainability measures by companies, allowing them to present favourable and positive information to interested parties while omitting or neglecting other pertinent (negative) data about their activities. The second term, ‘greenwashing’, in a more specific sense, pertains to the practice of companies disseminating misleading environmental information regarding their activities. It is employed when a company's claims of being environmentally friendly or "green" do not align with the reality of its practices. As a result, greenwashing is recognized as a deceptive technique within integrated reporting, employed for the purposes of environmental marketing and public relations (Yosifova & Petrova-Kirova 2022).

2.2.7 The Corporate Sustainability Due Diligence Directive (CS3D)

The adoption by the Commission on 23 February of the Directive on Corporate Sustainability Due Diligence represents a notable step forward in current developments. This Directive is designed to promote sustainable and responsible business practices and aims to integrate human rights and environmental considerations into the operational and governance framework of companies. Its main objective is to hold companies accountable for recognising and addressing the negative impacts of their activities throughout their value chains, both within and beyond Europe's borders (European Commission, 2022).

The CS3D was officially adopted by the European Parliament on the 1st of June 2023. The forthcoming development of the CS3D will involve trialogue dialogues between the European Parliament, the European Council and the Commission, with the aim of refining the legislative text by the end of 2023. The formal adoption of the Directive by the European Union is expected to take place in 2024. Therefore, potential changes or amendments to the Directive can be expected between now and 2024. (PWC, 2023).

It also requires large companies to formulate strategies in line with the Paris Agreement's goal of limiting global warming to 1.5°C. The Directive incentivises directors to engage in climate change mitigation and sustainability initiatives. The duties of directors in relevant EU companies introduced by the Directive include establishing and overseeing due diligence

processes and their integration into corporate strategy. In discharging their fiduciary duties to the company, directors must consider the impact of their decisions on human rights, climate change and the environment (KPMG,2023).

Large limited liability companies in the European Union, belonging to Group 1 and Group 2, will have to comply with the new rules. Group 1, consisting of approximately 9,400 companies with more than 500 employees and a global turnover of more than €150 million, and Group 2, consisting of approximately 3,400 companies operating in high-impact sectors with more than 250 employees and a global turnover of more than €40 million, will have to comply with the prescribed rules. Moreover, it should be noted that Group 2 companies are subject to the new rules two years later than Group 1 companies. These rules apply not only to EU companies but also to non-EU companies falling within Group 1 (approximately 2,600 companies) and Group 2 (approximately 1,400 companies), provided that their turnover thresholds align with those of the respective groups and are generated within the EU. However, it is important to stress that micro-enterprises and SMEs are excluded from the proposed rules. Nevertheless, the proposal includes support measures to help SMEs that may be indirectly affected by the new rules (European Commission, 2022).

Finally, the CS3D is intended to enhance the effectiveness and comprehensiveness of reporting under the CSRD. While ESRS 1 (European Sustainability Reporting Standards) expands the scope of reporting and emphasises the importance of due diligence throughout the value chain, it falls short in providing explicit guidance on implementation. This is where the CS3D plays a key role, complementing the approach and methodology for meeting due diligence requirements and helping organisations to identify negative impacts (PWC, 2023).

3 Sample Selection and Methodology

In this section, a representative sample of 10 corporate sustainability reports or annual reports from the year 2022 are carefully selected from listed companies in Europe. These reports, written in accordance with the current NFRD, are then subjected to a comprehensive comparative analysis against the recently proposed CSRD regulations, using a specific pre-defined set of criteria (**7.6 Analysis of the reports**). The criteria selected reflect the draft of 12 European Sustainability Reporting Standards (ESRS) proposed by the European Financial Reporting Advisory Group (EFRAG). Through this evaluation process, we aim to determine the level of readiness of European companies in anticipation of the upcoming phase in 2024, when compliance with the CSRD will become mandatory (**4 Interpretations of the analysis of the reports**).

3.1 Selection of the companies

The reports of the following ten companies were analysed: Engie (ENGI), TotalEnergies (TTE), Siemens (SIE), ING Group (INGA), Colruyt Group (COLR), Volkswagen Group (VOW3), Solvay (SOLB), KBC Group (KBC), AB InBev (ABI), and Ageas (AGS). All these enterprises fulfil the three criteria mentioned in section **2.4.4.3 Extent of coverage**, as specified: They have more than 250 employees and/or, a turnover of more than €40 million and/or, a balance sheet total of more than €20 million. In the analysis, the stock exchange abbreviations of the various companies are used (**Appendix 7.1**).

3.2 Selection of the criteria

The selected criteria for examination are derived from the draft set of the European Single Reporting Standards (ESRS) developed by EFRAG. 12 sustainability reporting standards were proposed at the EFRAG General Assembly and submitted to the European Commission at the end of November 2022. The first two standards in the initial set provide overarching principles and guidance: ESRS 1, which relates to general requirements, and ESRS 2, which focuses on general disclosures. These two standards are called cross-cutting standards **(Appendix 7.2)**. The topical standards **(Appendix 7.2)** are grouped into three domains: environmental, social and governance. The environmental domain includes ESRS E1 Climate Change, ESRS E2 Pollution, ESRS E3 Water and Marine Resources, ESRS E4 Biodiversity and Ecosystems, and ESRS E5 Resources and Circular Economy. The social domain consists of ESRS S1 Own

Workforce, ESRS S2 Workers in the Value Chain, ESRS S3 Affected Communities, and ESRS S4 Customers and End-Users. The only standard that falls under the governance domain is ESRS G1 Business Conduct (EFRAG,2022). These draft standards will be complemented by sector-specific standards at a later stage.

3.3 Explanation of the different criteria

3.3.1 ESRS 1 General requirements and ESRS 2 General disclosures

ESRS 1 and ESRS 2 are cross-cutting standards with broad application to all sustainability issues. Two main groups of stakeholders are identified:

1) Affected stakeholders: These are individuals or groups whose interests are or may be affected, positively or negatively, by the company's activities and its value chain.
2) Users of sustainability reporting: These are stakeholders with an interest in the organisation, such as primary users of general financial reports: existing and potential investors, lenders, and other creditors, including asset managers, credit institutions and insurance companies. Other users include the company's business partners, trade unions, social partners, civil society organisations and non-governmental organisations.

ESRS 1 outlines the mandatory concepts and principles governing the preparation of sustainability statements within the framework of the CSRD. Under the prescribed ESRS, companies are required to divulge all pertinent details concerning their sustainability-related impacts, risks, and opportunities. Compliance with ESRS 1 mandates the disclosure of specific sustainability information, regardless of the company's subjective assessment of its materiality. This includes information pertaining to governance, strategic approaches, management of impacts, risks and opportunities, as well as metrics and targets related to climate change. However, it is acknowledged that certain disclosure requirements and data points (excluding those addressed in ESRS 2 and ESRS E1) may be omitted, as long as the overarching objective of the Disclosure Regulation (DR) is achieved.

ESRS 2 outlines specific areas for which the Disclosure Requirements (DRs) and disclosure contents (DCs) have been formulated:

a. Governance: This includes the management processes, controls and procedures used to influence, monitor, and manage risks and opportunities within the organisation.
b. Strategy: This addresses the current status of the entity's strategy and business model(s), considering their key impacts, risks, and opportunities. This includes outlining the strategy for managing these factors effectively.
c. Management of impacts, risks, and opportunities: This refers to the process(es) by which impacts, risks and opportunities are identified, assessed and managed using appropriate strategies and measures.
d. Metrics and targets: This DC area focuses on how the organisation measures its performance, including progress against set objectives.

ESRS 2 outlines high-level disclosure requirements for sustainability reporting. It includes general corporate characteristics, operational overviews, and specific compliance disclosures such as value chain approximations, estimation uncertainty, changes in preparation, and materiality assessment.

3.3.2 Topical standards

The topical standards include disclosure requirements relating to environmental, social and governance (ESG) issues. These requirements are not sector-specific but are intended to provide users of a company's sustainability report with insights into the company's impact on these dimensions. The thematic standards prescribe disclosure requirements that include a) a description of the processes used to identify and assess material impacts, risks, and opportunities; b) details of the management of these impacts, risks, and opportunities, including relevant policies, objectives, action plans and allocated resources; and c) disclosure of metrics and targets related to specific topics. It is important to note that these thematic standards complement the cross-cutting standards, which serve as overarching guidelines for sustainability reporting.

3.3.2.1 Environmental topical standards

The Environmental subject matter standards (ESRS E1-E5) outline mandatory transparency requirements for commercial entities, requiring the provision of information on a range of environmental issues such as climate change, pollution, use and conservation of water and marine resources, biodiversity and related ecosystems, and resource use linked to the

principles of circular economy. Complementary to these overarching objectives, the draft environmental standards are designed to provide those involved in sustainability reporting with an in-depth understanding of a given company's strategic and operational adaptation plans to achieve a sustainable economic model. In addition, these standards illustrate the company's contribution to the range of environmental objectives listed in the European Green Deal, while aligning with additional strategic and regulatory frameworks within the European Union. A presentation of the different topics falling under the 5 categories of the Environmental Standards is provided in the Appendix (**Appendix 7.3**).

3.3.2.2 Social topical standards

The thematic social standards, denoted as ESRS S1-S4, offer a systematic blueprint for companies to disclose matters pertaining to their direct workforce, the labour pool within their supply chains, the communities impacted by their operational activities, and the consumers and ultimate beneficiaries of their goods or services. This framework extends the need for transparency and accountability outside the confines of the company itself to the broader network influenced by its business operations and its deliverables. A presentation of the different topics falling under the 4 categories of the Social Standards is provided in the Appendix (**Appendix 7.4**).

3.3.2.3 Governance topical standards

The current standard for corporate governance, identified as ESRS G1, lists explicit disclosure requirements aimed at enhancing stakeholders' comprehension of a company's strategic orientation and methodology. Furthermore, they provide insight into its operational systems, processes, and performance metrics with respect to organizational behaviour and business conduct. This is designed to promote transparency and a full understanding of a company's operating ethics and their impact on business performance. A presentation of the different topics falling under the Governance Standard is provided in the Appendix (**Appendix 7.5**).

4 Interpretations of the analysis of the reports

It is important to clarify at the outset that the following is an interpretative assessment of the range of reports considered. Not all of the criteria established by the European Financial Reporting Advisory Group (EFRAG) were applied uniformly for each standard due to their extensive and complex nature. Instead, a targeted approach was adopted, with a careful identification of the relevant topics for each standard (as referred to in **Appendix 7.3 to 7.5**). It should be recognised that there is an inherent subjectivity in this process, suggesting the potential for divergent assessments by other experts in the field of sustainability reporting. A comprehensive summary of the analysis is provided in **Appendix 7.6 'Analysis of Reports'**, presented in tabular form for ease of understanding and reference.

At first glance, the majority of the twelve standards have been satisfactorily met by the companies, as symbolised by the positive tick marks. Nevertheless, certain standards show areas for improvement by 2024, in particular 'ESRS S4: Customers and End-Users' and 'ESRS 2: General Disclosures'. Of the companies reviewed, only COLR has managed to comply with ESRS S4 and only INGA has complied with ESRS 2. INGA and KBC have the highest number of non-compliances, with three standards each. It can therefore be concluded that within the selected scope of analysis, companies in the financial sector appear to be the least prepared for meeting the requirements of the Corporate Sustainability Reporting Directive.

Another discrepancy observed in the analysis is the different use of 'annual reports' and 'sustainability reports' in the analysis. This is due to the fact that the sustainability report is sometimes excluded from the annual report, instead published as a separate report. For example, three different reports were issued by INGA: the annual report, the human rights report, and the climate report. This practice needs to be changed in line with the CSRD, which requires the inclusion of the sustainability report in the in the management report belonging to the annual report.

With regard to the thematic environmental standards (ESRS E1-E5), it is noteworthy that each of them has been formulated in a well-structured and comprehensive manner, covering almost all the required topics. This indicates that considerable work has been done in anticipation of these future standards. However, there are still differences in the level of detail provided by different companies. For example, TTE and SOLB provide exceptionally thorough descriptions

of the five different criteria included in the environmental standards. These reports are more comprehensive than their counterparts from the financial or insurance sector, such as those of KBC, INGA or AGS. This is probably due to the fact that companies such as TTE have a greater impact on climate change due to higher CO2 emissions and therefore require more extensive reporting. As a result, comparing different sectors based on their sustainability reports remains a formidable challenge. A plausible future remedy could be the introduction of sector-specific standards to facilitate comparative analysis between companies. Indeed, EFRAG is in the process of issuing such sector-specific standards to facilitates such comparisons. In addition, throughout the analysis it became clear that the various standards included in the thematic environmental standards often overlap and that their boundaries appear to be fluid rather than rigid.

Concerning the social standards, the lack of compliance with ESRS S4 'Customers and end-users' and the incomplete compliance with ESRS S3 'Affected communities' are of particular concern. It is imperative that companies significantly address these areas by 2024. The forthcoming adoption of the Corporate Sustainability Due Diligence (CS3D) Directive could potentially act as a facilitator in this regard, as its primary intention is to ensure that companies are held accountable for identifying and mitigating any adverse impacts of their operations throughout their value chain.

As far as the ESRS G1 standard is concerned, the analysis showed that all ten companies in the selected sample successfully complied with this standard. Consequently, these companies are already adequately prepared for the CSRD with respect to this specific criterion. However, the tabular analysis for ESRS 2 'General Disclosures' indicates a need for companies to improve on this criterion. The existing different structure of each report introduces a degree of complexity in contrasting and comparing the different company reports.

One prominent feature of all reports is the integration of information derived from the EU Taxonomy. While this was not mandatory under the Non-Financial Reporting Directive (NFRD), it will be by 2024, suggesting that the companies examined have effectively anticipated and prepared for this development. In addition, the forthcoming CSRD will require independent third-party verification for all companies. Notably, all ten companies in the sample have pre-emptively complied with this requirement, demonstrating their readiness for the new directive.

Companies required to report under the CSRD are obliged to carry out a 'double materiality assessment' in order to identify the most material sustainability issues from the perspective of both the organisation and its stakeholders. This is illustrated in different ways in each of the ten reports through the use of a materiality matrix, various materiality scoring tables or a simple materiality analysis. The current level of preparedness on this issue across all companies is commendable. However, there may be a future need to establish a standardised framework or format for companies to disclose their assessment of 'double materiality'.

In conclusion, the ten selected companies display a significant degree of preparation for the publication of their 2024 annual reports under the CSRD in 2025. Nevertheless, it is important to note the potential areas for improvement, particularly within the social thematic standards (ESRS S3 and especially S4) and the structural changes required by the ESRS 2 standard. Integral elements of the CSRD and ESRS are 'double materiality', the inclusion of forward-looking information, insight into upstream and downstream value chains and the concept of sustainability rating. The latter is closely linked to the forthcoming Corporate Sustainability Due Diligence Directive (CS3D), which aims to promote sustainable and responsible corporate behaviour within global value chains. Therefore, once the CS3D is adopted by the EU, it will be of great interest to monitor the development of corporate sustainability reporting. All companies in the selected sample have previously reported under the Non-Financial Reporting Directive (NFRD), suggesting that the transition to the CSRD is not an entirely new endeavour and that some preparatory work has already been done. This raises the question of the CSRD readiness of smaller companies not required to report under the NFRD. Their timetable for transition is different, meaning that they have slightly more time to compile their corporate sustainability reports. In addition, the EU has proposed different and sector-specific standards for small and medium-sized enterprises (SMEs), to be presented in the second half of 2023. As the majority of European companies are classified as SMEs, and given their significant role in the European economy, they are an integral factor in realising the EU's goal of a net-zero economy.

5 Conclusion

The evolution of corporate sustainability reporting over the past few decades is emblematic of a broader shift in the corporate world towards more responsible and transparent business practices. What was once seen as a peripheral activity has now become central to the business of many organisations. This evolution reflects an increasingly demanding society that expects companies to address environmental, social and governance (ESG) issues as well as profitability.

Furthermore, the evolution of corporate sustainability reporting has been shaped by the maturation of reporting standards, led by bodies such as the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB) and the forthcoming EU CSRD. These evolving standards have both catalysed and reflected the growing complexity of sustainability reporting, as well as the widening range of stakeholders wanting information on a company's ESG performance. Moreover, sustainability reporting remains a dynamic process. As social and environmental concerns evolve, companies' responses and disclosures must also adapt. Therefore, companies should not view the adoption of the CSRD and similar legislative acts as the end of the road, but as an ongoing commitment to improve their sustainability performance and transparency.

Corporate sustainability reporting is intrinsically linked to the principle of double materiality, which calls for companies to evaluate both their impacts on the environment and society (outward materiality) and the reciprocal influence of these external factors on their performance and prospects (inward materiality). This principle is embodied in a holistic approach to sustainability reporting, which encapsulates a comprehensive portrayal of a corporation's actions and impacts. Standards established by bodies such as the GRI, SASB, and the impending European Union's CSRD embed the double materiality perspective.

While corporate sustainability reporting in the European Union brings certain benefits, it has also brought with it negative phenomena, notably 'cherry picking' and 'greenwashing'. It is postulated that the forthcoming Directive on Corporate Sustainability Due Diligence (CS3D) may encourage better identification of these issues. However, this potential outcome remains speculative. Therefore, future academic research and debate should continue to monitor this development, focusing on the effectiveness of the forthcoming reporting guidelines such as

the CSRD and the CS3D. In addition, the ability of companies to assimilate and comply with these changes warrants sustained investigation.

This research paper examines the preparedness of companies required to publish sustainability reports under the Non-Financial Reporting Directive (NFRD), particularly in the context of the forthcoming implementation of the CSRD. At first sight, the majority of the twelve standards appear to have been adequately complied with by various companies, as evidenced by the positive indications. However, certain standards, in particular 'ESRS S4: Customers and End-Users' and 'ESRS 2: General Disclosures', indicate potential areas for improvement by 2024. Of the companies assessed, only COLR has achieved compliance with ESRS S4 and INGA has achieved compliance with ESRS 2. Moreover, both INGA and KBC have the most significant non-conformities, each failing three standards. It can therefore be concluded that within the limited scope of the analysis, financial sector companies appear to be the least prepared for the forthcoming Corporate Sustainability Reporting Directive.

Furthermore, there are still significant differences in the level of detail provided in the reports of different companies. For example, TTE and SOLB provide exceptionally comprehensive descriptions of the five criteria of the environmental standard, surpassing financial or insurance sector counterparts such as KBC, INGA or AGS. This may be due to the higher climate impact of companies such as TTE due to their implicitly higher CO2 emissions which require more detailed reporting. As a result, sectoral comparisons of sustainability reports are a significant challenge. The introduction of sector-specific standards could potentially alleviate this problem by facilitating comparative analysis. EFRAG is currently developing such sector-specific standards. In addition, the study found significant overlap in environmental standards, suggesting a fluid rather than fixed boundary between different standards.

In terms of social standards, non-compliance with ESRS S4 'Customers and end-users' and partial compliance with ESRS S3 'Affected communities' is particularly alarming. It is crucial that companies make significant improvements in these areas by 2024. The forthcoming implementation of the Corporate Sustainability Due Diligence (CS3D) Directive could potentially help this process, as its main objective is to require companies to identify and mitigate adverse operational impacts throughout their value chain.

Nonetheless, there are certain limits inherent in the analysis. As explained in the section **4 Interpretations of the analysis of the reports**, it was not possible to examine all the criteria set by the EFRAG uniformly for each standard, due to their extensive and complex nature of these criteria. As a result, a focused approach was adopted, carefully identifying the relevant topics for each standard (see Appendix 7.3 to 7.5). It must be acknowledged that there is an inherent subjectivity in this analysis, pointing to the possibility of different assessments by other sustainability reporting academics. Furthermore, companies may selectively highlight positive aspects while neglecting negative ones – a phenomenon known as 'greenwashing'. Such biases can influence the interpretation of data, introducing an additional layer of subjectivity. Another limitation is the study's time frame. The chronology of the analysis could significantly influence the results, as sustainability initiatives often have long-term effects. As such, studies of limited duration may fail to capture their full impact.

Consequently, future academic research could assess the effectiveness of the CSRD or alternative reporting standards. In addition, given the growing concerns about greenwashing and cherry-picking, future research could also examine their prevalence, implications, and possible remedies.

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7 Appendix

7.1 Stock Exchange Abbreviations of the companies

Engie	ENGI
TotalEnergies	TTE
Siemens	SIE
ING Group	INGA
Colruyt Group	COLR
Volkswagen Group	VOW3
Solvay	SOLB
KBC Group	KBC
AB InBev	ABI
Ageas	AGS

7.2 Structure of the 12 ESRS standard

Source: Ernst & Young (2022). *European Sustainability Reporting Standards (ESRS)*. Retrieved from file:///C:/Users/Elvira/Downloads/ey-esrs-3.pdf

7.3 Topics from the ESRS E1-E5

[Draft] topical ESRS	Sustainability matters covered in [draft] topical ESRS		
	Topic	Sub-topic	Sub-sub-topics
[draft] ESRS E1	Climate change[6]	• Climate change adaptation • Climate change mitigation • Energy	
[draft] ESRS E2	Pollution	• Pollution of air • Pollution of water • Pollution of soil • Pollution of living organisms and food resources • Substances of concern • Sustances of very high concern	
[draft] ESRS E3	Water and marine resources	• Water withdrawals • Water consumption • Water use • Water discharges in water bodies and in the oceans • Habitat degradation and intensity of pressure on marine resources	
[draft] ESRS E4	Biodiversity and ecosystems	• Direct impact drivers of biodiversity loss	• Climate Change • Land-use change • Direct exploitation • Invasive alien species • Pollution • Others
		• Impacts on the state of species	Examples: • Species population size • Species global extinction risk
		• Impacts on the extent and condition of ecosystems	Examples: • Land degradation • Desertification • Soil sealing
		• Impacts and dependencies on ecosystem services	
[draft] ESRS E5	Circular economy	• Resources inflows, including resource use • Resource outflows related to products and services • Waste	

Source: EFRAG (2022). *ERSS 1 General requirements November 2022*. Retrieved from https://www.efrag.org/Assets/Download?assetUrl=%2Fsites%2Fwebpublishing%2FSiteAssets%2F06%2520Draft%2520ESRS%25201%2520General%2520requirements%2520November%25202022.pdf

7.4 Topics from the ESRS S1-S4

[Draft] topical ESRS	Sustainability matters covered in [draft] topical ESRS		
	Topic	**Sub-topic**	**Sub-sub-topics**
[draft] ESRS S1	Own workforce	• Working conditions	• Secure employment • Working time • 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
		• Equal treatment and opportunities for all	• 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 • Diversity
		• Other work-related rights	• Child labour • Forced labour • Adequate housing • Privacy
[draft] ESRS S2	Workers in the value chain	• Working conditions	• Secure employment • Working time • Adequate wages • Social dialogue • Freedom of association, including the existence of work councils • Collective bargaining • Work-life balance • Health and safety
		• Equal treatment and opportunities for all	• Gender equality and equal pay for work of equal value • Training and skills development • The employment and inclusion of persons with disabilities • Measures against violence and harassment in the workplace • Diversity
		• Other work-related rights	• Child labour • Forced labour

[Draft] topical ESRS	Sustainability matters covered in [draft] topical ESRS		
	Topic	Sub-topic	Sub-sub-topics
			• Adequate housing • Water and sanitation • Privacy
[draft] ESRS S3	Affected communities	• Communities' economic, social and cultural rights	• Adequate housing • Adequate food • Water and sanitation • Land-related impacts • Security-related impacts
		• Communities' civil and political rights	• Freedom of expression • Freedom of assembly • Impacts on human rights defenders
		• Particular rights of indigenous communities	• Free, prior and informed consent • Self-determination • Cultural rights
[draft] ESRS S4	Consumers and end-users	• Information-related impacts for consumers and/or end-users	• Privacy • Freedom of expression • Access to (quality) information
		• Personal safety of consumers and/or end-users	• Health and safety • Security of a person • Protection of children
		• Social inclusion of consumers and/or end-users	• Non-discrimination • Access to products and services • Responsible marketing practices

Source: EFRAG (2022). *ERSS 1 General requirements November 2022*. Retrieved from https://www.efrag.org/Assets/Download?assetUrl=%2Fsites%2Fwebpublishing%2FSiteAssets%2F06%2520Draft%2520ESRS%25201%2520General%2520requirements%2520November%25202022.pdf

7.5 Topics from the ESRS G1

[Draft] topical ESRS	Sustainability matters covered in [draft] topical ESRS		
	Topic	Sub-topic	Sub-sub-topics
[draft] ESRS G1	Business conduct	• Corporate culture • Protection of whistle-blowers • Animal welfare • Political engagement and lobbying activities • Management of relationships with suppliers including payment practices	
		• Corruption and bribery	• Prevention and detection including training • Incidents

Source: Same as above

7.6 Analysis of the reports

The following table provides an overview of ten companies and their compliance with the twelve different ESRS standards. In this presentation, a cross (X) indicates that a particular standard or criterion is not addressed in the company's sustainability report. Conversely, a check mark (√) indicates that the relevant standard is satisfactorily addressed in the sustainability report. The sign '/' indicates that this standard has not been analysed, as it can only be analysed when the first reports under the CSRD are published.

Companies	ING Group	Engie	TotalEnergies	Siemens	Colruyt Group	Volkswagen Group	Solvay	KBC Group	AB InBev	Ageas
ESRS 1 General requirements	/	/	/	/	/	/	/	/	/	/
ESRS 2 General disclosures	✓	×	×	×	×	×	×	×	×	×
ESRS E1 Climate change	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
ESRS E2 Pollution	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
ESRS E3 Water and marine resources	×	✓	✓	✓	✓	✓	✓	✓	✓	✓
ESRS E4 Biodiversity and ecosystems	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
ESRS E5 Resources and circular economy	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
ESRS S1 Own workforce	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
ESRS S2 Workers in the value chain	✓	✓	✓	✓	✓	✓	✓	×	✓	✓
ESRS S3 Affected communities	×	✓	✓	✓	×	✓	✓	✓	✓	✓
ESRS S4 Customers and end-users	×	×	×	×	✓	×	×	×	×	×
ESRS G1 Business conduct	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

1) ESRS 1 General requirements:

It's not possible to analyse the different reports according to this standard because ESRS 1 is an overarching standard that applies to all sustainability issues. It' difficult to decide which information exactly under ESRS 1 requires companies in scope to disclose certain sustainability information irrespective of the companies' judgment of their materiality, including information on governance, strategy, management of impacts risks and opportunities, and metrics and targets (all ESRS 2) related to climate change.

Under ESRS 1, sustainability information would be included in a clearly identified single section of the management report and referred to as 'sustainability statements'. Any other information that a company includes in its sustainability statements is presented separately and distinctly. If a company includes information that is based on other legislation or guidance, then it would need to clarify that this information refers to other requirements and provide a suitable reference. This is not yet the case in the 10 companies' reports and therefore not yet analysable.

What's more, I find it difficult to assess whether the sustainability information is relevant, accurate, comparable, verifiable, and understandable. Therefore, the ESRS1-standard can only be analysed when the first reports under the CSRD are published.

2) ESRS 2 General, strategy, governance, and materiality assessment disclosure requirements:

INGA: ✓

All the 4 reporting areas are included in the climate report: Governance, Strategy, Risk Management and Metrics and Targets. So, the demanded structure under ESRS 2 is met. In addition, the definition and outcome of the double materiality assessment is given.

ENGI: ✗

The 4 categories are addressed in the report, but the required structure is not present. They are called something else: Ambition, Impact, Governance and Indicators and Annexes. As a result, the 4 themes are scattered throughout the report and are not very well structured.

TTE: ✗

Again, all 4 categories are addressed in the report, but the required structure is not present. The different categories are named and structured differently than required by ESRS 2. There are 11 categories, that's not very well structured. Anew, the 4 reporting areas are scattered throughout the report.

SIE: ✗

The 4 categories are addressed in the report, but the required structure is not present. They are called something else: Siemens at glance, sustainability management, governance, environment, social sustainability indicators and annex. However, the structure is clear. Again, the 4 reporting areas are scattered throughout the report, especially the impact, risks and opportunities.

COLR: ✗

Again, the 4 reporting areas are covered in the report, but the required structure is not present. So for example is the impact, risk and opportunities area in the section corporate governance, more precisely in the section 'sustainable corporate governance'. Therefore, the structure how the sustainability information should be reported, is not respected.

VOW3: ✗

Again, all 4 categories are addressed in the report, but the required structure is not present. The different categories are named and structured differently than required by ESRS 2. Therefore, the structure how the sustainability information should be reported, is not respected.

SOLB: ✗

Here the structure is more or less respected, but the area 'metrics and targets' could not be found directly, this area is scattered throughout the report. So, that's not very clear. However, all 4 categories are addressed in the report.

KBC: ✗

Again, all 4 categories are addressed in the report, but the required structure is not present. The different categories are named and structured differently than required by ESRS 2. However, all 4

categories are addressed in the report. As a result, the 4 themes are scattered throughout the report and are not very well structured.

ABI: ✘

Here the structure is more or less respected, but the area 'impact, risk and opportunity management' could not be found directly, this topic is scattered throughout the report. So, that's not very clear. However, all 4 categories are addressed in the report.

AGS: ✘

Again, all 4 categories are addressed in the report, but the required structure is not present. The different categories are named and structured differently than required by ESRS 2. However, all 4 categories are addressed in the report. As a result, the 4 themes are scattered throughout the report and are not very well structured.

Topical standards: Environment

3) **ESRS E1 Climate Change:**

INGA: ✓

ING initiated its climate governance structure in 2018, when we established a Climate Change Committee (CCC) to provide Management Board-level oversight of strategic climate-related risk and opportunity management. The CCC was Chaired by the Group chief risk officer (CRO) and co-chaired by the board member responsible for Wholesale Banking. It was mandated to oversee and set priorities for implementing the recommendations of the TCFD, as well as other strategic climate-related topics that impact the group. We believe our new ESG governance approach supports a future-proof ING and drives long-term value creation; it makes action on climate change a strategic priority and an integral part of ESG.

Their approach: In practice, this means that we strive for net zero in our own operations, while in parallel steering our financing towards meeting net zero by 2050 and supporting the smooth transition to a low-carbon society. As biodiversity and human rights are closely linked to climate change, these are also in focus for the transition we aim to support. This also means that INGA must identify the risks that climate change, biodiversity, and human rights pose to our business. Sustainability issues impact our business, and they work to assess these risks and take action to mitigate them across our business relationships. (See the screenshot of climate approach in section ESRS E4).

INGA speaks also about the risks: it is essential to take measures to reduce our vulnerability from the harmful effects of climate change, known as climate adaptation. Examples of climate adaptation measures include protecting coastlines and dealing with sea-level encroachment, managing land and forests, dealing with, and planning for reduced water availability, developing resilient crop varieties, protecting energy and public infrastructure. In addition, climate change has a profound impact on many fundamental human rights including. Another risk that the ECB shared its assessment of the climate risk stress test on an aggregated basis in its 2022 Climate Stress Test Report, as well as in a bank-specific report. The key challenges of the stress test were data related. The required attributes, such as GHG

emissions and Energy Performance Certificates (EPC), were not available for all counterparties and proxies were used.

Concerning the energy in relation with the Climate Change: Over 80% of ING's total electricity consumption footprint can be traced to our larger retail markets, such as the Netherlands, Belgium, Poland, Turkey, and Germany, where our primary electricity sources are from green energy products with energy suppliers. The team supports a range of clients in achieving their sustainability goals: from those with a strong sustainability track record, an ambitious agenda, or that are addressing resource scarcity and seeking financing for sustainable deals in renewable energy, green buildings, waste management or water. We've financed billions of euros in energy projects, from wind farms, solar energy, and geothermal power production; to energy efficiency in buildings and production lines; to electric vehicles and biobased plastics; to wastewater treatment and circular economy solutions. This supports our approach to climate action.

Table 9 Breakdown of electricity consumption and other energy consumption

Breakdown of electricity consumption						
	2021	2020	2014	2021	2020	2014
Coverage (% of employees)	99	99	92	99	99	92
		MWH x 1000			kilotonne CO_2e	
Non-Renewable electricity	-	-	75	-	-	42
Renewable electricity	177	195	227	-	-	-
Total electricity	177	195	302	-	-	42

Breakdown of other energy consumption						
	2021	2020	2014	2021	2020	2014
Coverage (% of employees)	99	97	92	99	97	92
			GJ X 1000		kilotonne CO_2e	
Natural gas	162	165	358	9	11	23
Fuel oil	5	4	15	0.4	0.3	2
District heating	117	110	81	8	8	7
Total other energy[1]	284	279	454	18	19	31

On the materiality matric has the term 'Energy' a high impact and a medium Dependency. On the page 46 all the different metrics/examples of countries are given how INGA produce energy there. On page 57 it is explained how INGA is steering their portfolio related to energy topics.

Lastly, the sector transition plan is the following: We stepped up our sustainability efforts this year and we aim to continue innovating and improving our practices. This is why in 2020 we set the ambition of being in alignment with the goals set out in the Paris Climate Agreement by 2040. To achieve this, we have created a series of milestones we aim to meet along the way: Only recognize energy label A and above as 'green' from 2022. Integrate our energy transition approach into our credit risk policies in 2022. Identify an approach that seeks to shift all assets to energy label A label or above by 2025. Execute on our 2025 ambition to shift all assets to energy label A label or above by 2030. Identify a strategy that aligns with the goals set out in the Paris Climate Agreement by 2035. Have executed on this 2035 ambition by 2045.

If you are also looking at the other environmental topics, then you realize that they integrated the climate change very well into their strategy and are very concerned about it. Here the energy consumption of INGA:

ENGI: ✓

Already the chairperson, Jean-Pierre Clamadieu, stated: The outbreak of war in Ukraine triggered an unprecedented situation on the energy markets with the gradual isolation of Russia which, as recently

as 2021, was the leading energy exporter. Against this backdrop, securing supplies and stepping up the energy transition to boost its strategic independence have become top priorities for Europe. This energy transition is even more urgent as climate change is becoming increasingly visible, through extreme weather and climate phenomena which underline the pressing need to reduce our greenhouse gas emissions.

The report also explains the dual materiality approach and said for example, the challenge of low-carbon transformation impacts the Group's activities positively, since they contribute to the fight against climate change by substituting renewable capacities for capacities that consume fossil fuels. In addition, they identified the risks and opportunities:

ENGI set up a specific governance for climate issues (on page 21 you can see the structure).

The strategy is explained on page 32: ENGIE has an ambitious climate plan as part of its strategy to accelerate the transition to Net Zero Carbon. It should result in the reduction of its greenhouse gas emissions across all scopes, by following a trajectory in line with the Paris Agreement and by developing renewable capacities. the target year of 2045 is an ambitious deadline for a company with a strong gas DNA. While pure electricity companies are encouraged to set NZE targets from now to 2040, companies that still hold fossil assets rarely commit to targets before 2050. By targeting 2045, ENGIE is confirming its desire to act as quickly as possible for clean, safe, and affordable energy.

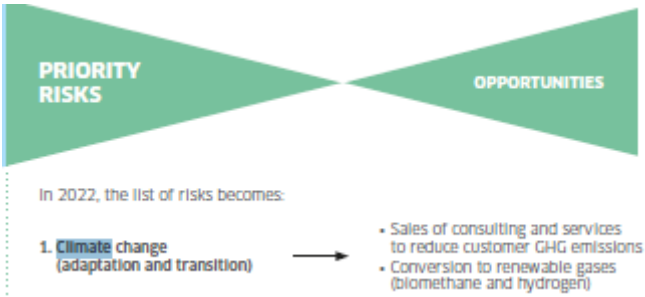
See also the section ESRS E4 with the Climate Change on point 2. On pages 66-71 a detailed climate strategy is given and on page 72 the risks and opportunities are presented. Lastly on page 76 the process is explained. Concrete examples are given on page 91.

Again, if you are also looking at the other environmental topics, then you realize that they integrated the climate change very well into their strategy and are very concerned about it.

TTE: ✓

In the section 'Sustainability ambitions and targets' it's written that TotalEnergies has structured its sustainable development approach for conducting its activities to contribute to the achievement of the United Nations Sustainable Development Goals (SDGs), to which TotalEnergies has committed its support since 2016. Concerning the climate and sustainable energy it can be stated that TotalEnergies' commitment to the sustainable development focuses on four areas and one area is the climate and sustainable energy: leading the transformation of the energy model to contribute to fight against climate change and meet the needs of populations. The Paris Agreement is also mentioned.

On page 120 the risk factors are listed and the 'Operational risks relating to the effects of climate change



and of extreme events' has a materiality assessment of 3. In detail, Climate change and extreme events (natural catastrophes, pandemics...) potentially have multiple effects that could harm TotalEnergies' operations. The increasing scarcity of water could be detrimental to operations, rising sea levels could

harm certain coastal activities, and the proliferation of extreme natural or weather events (such as floods, landslides, etc.) could damage onshore and offshore facilities and/or the associated logistical infrastructures. Moreover, climate change can expose TotalEnergies to an increase in its costs. For instance, more and more countries are likely to adopt carbon pricing mechanisms to accelerate the transition to a low-carbon economy, which could have an adverse impact on some of the Company's activities and lead to a loss of competitiveness and a cost increase.

The indicators related to climate change are presented on a table on page 173.

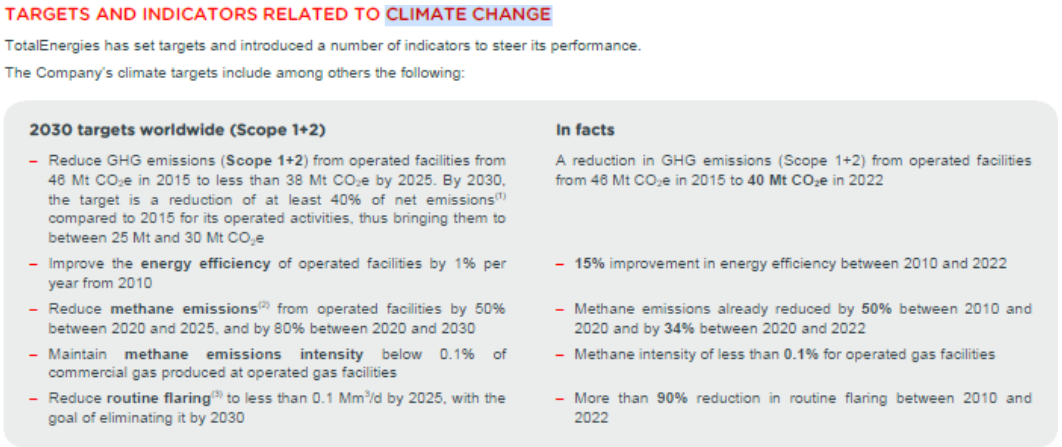
INGA is organizing trainings, so the continuing training program relating to the climate for directors has been approved in 2021. It includes various modules on the following themes: Energy, Climate Change and Environmental Risks; Energy and Climate; Climate Change and Financial Risks and Opportunities; Causes and issues of global warming. In 2022, as part of this training program, directors participated in the Climate Fresco (a scientific, collaborative and creative workshop designed to raise awareness of climate change and in particular its causes and consequences).

In the section 5.4 all climate change-related challenges are explained very in detail. This is the most detail ones of all the reports (page 279 onwards). Therefore, if you are also looking at the other environmental topics, then you realize that they integrated the climate change very well into their strategy and are very concerned about it.

SIE: ✓

At first glance, the report stated that The world is continuing to change in multiple dimensions. Megatrends like climate change, glocalization, digitalization, demographic change, and urbanization are challenging us. And they're also changing the needs of our customers and our markets. To meet these, we need to keep evolving constantly. Our focus on four strategic priorities will help us do that. Moreover, SIE supports the United Nations Framework Convention on Climate Change (UNFCCC).

Besides aiming to reduce emissions from Siemens' operations by 55% by 2025 and by 90% by 2030 compared to 2019, we also strive to lower all emissions associated with us – from our supply chain to the entire use phase of our products. Siemens is committed to a 20% reduction in emissions in its supply chain by 2030 compared to 2020, and aims to achieve a CO2-neutral supply chain by 2050. With its commitment to science- based targets, Siemens supports the goal of the Paris Climate Agreement to limit climate change to 1.5 degrees Celsius. The SDG 13 with his actions to combat and its impact is also explained.



TARGETS AND INDICATORS RELATED TO CLIMATE CHANGE

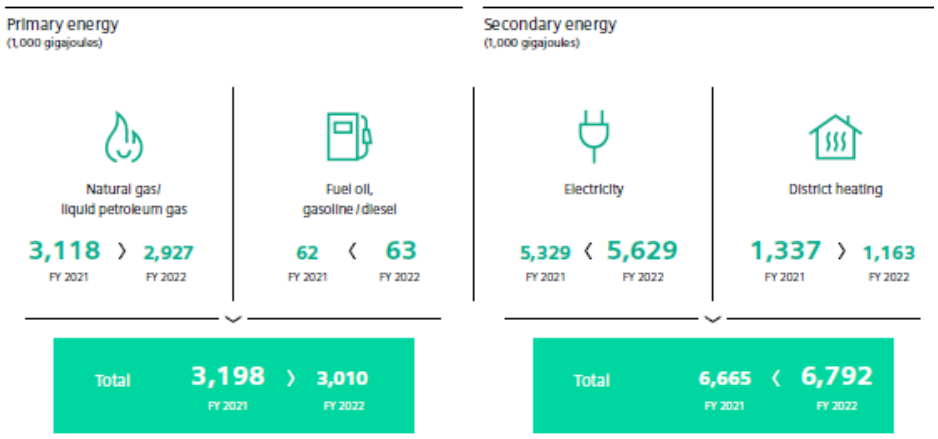
TotalEnergies has set targets and introduced a number of indicators to steer its performance.

The Company's climate targets include among others the following:

2030 targets worldwide (Scope 1+2)	In facts
– Reduce GHG emissions (**Scope 1+2**) from operated facilities from 46 Mt CO_2e in 2015 to less than 38 Mt CO_2e by 2025. By 2030, the target is a reduction of at least 40% of net emissions[1] compared to 2015 for its operated activities, thus bringing them to between 25 Mt and 30 Mt CO_2e	A reduction in GHG emissions (Scope 1+2) from operated facilities from 46 Mt CO_2e in 2015 to **40 Mt CO_2e** in 2022
– Improve the **energy efficiency** of operated facilities by 1% per year from 2010	– **15%** improvement in energy efficiency between 2010 and 2022
– Reduce **methane emissions**[2] from operated facilities by 50% between 2020 and 2025, and by 80% between 2020 and 2030	– Methane emissions already reduced by **50%** between 2010 and 2020 and by **34%** between 2020 and 2022
– Maintain **methane emissions intensity** below 0.1% of commercial gas produced at operated gas facilities	– Methane intensity of less than **0.1%** for operated gas facilities
– Reduce **routine flaring**[3] to less than 0.1 Mm^3/d by 2025, with the goal of eliminating it by 2030	– More than **90%** reduction in routine flaring between 2010 and 2022

SIE is always in dialog with politics and society. So, As a global company, we work with our customers to find innovative solutions to some of the most pressing issues facing the planet. For that reason, dialog with policymakers is intrinsic to our social responsibility and is of tremendous importance to our success as a company. We base the priorities of our political activities on our business strategies and innovation fields. Our advocacy activities focus on the following topics and policy areas, among others: cybersecurity, digitalization (including Internet of Things / IoT and artificial intelligence / AI), decarbonization and climate change action, energy, R&D, and trade policy, as well as connected and automated mobility for rail and road. We have joined forces with leading companies from around the world to establish the Charter of Trust, which aims to make the digital world safer and more secure.

Siemens' sustainability performance has received recognition in external ratings and rankings: Over 10 years at leadership level (A / A–) in Climate Change. To make our portfolio's contribution to limiting climate change transparent, we report how much greenhouse gas (called CO2 emissions in what follows) our products and solutions avoid compared to reference solutions and thus help our customers drive their decarbonization activities. On page 75 onwards there are energy sources, waste and recycling and recovery are presented:



Water is one of humanity's most important resources. For this reason, our company has been analyzing water scarcity, water pollution, and climate change as well as the development of flooding and precipitation patterns at our locations for several years. We consider these analyses in our business decisions – when, for example, we select the site for a location or implement precautionary measures.

The EU taxonomy is mentioned: In compliance with the EU Taxonomy Regulation and the supplementing Delegated Regulations, for the first time our Management Report includes the proportion of our taxonomy-eligible revenues, capital expenditures, and operating expenses for fiscal 2022 that relate to the environmental objectives of climate change mitigation and climate change adaptation as currently laid down in the EU taxonomy. Taxonomy eligibility presupposes that an economic activity is mentioned and further described in the Delegated Acts. Moreover, for the current reporting period only the first two environmental objectives (climate change mitigation and climate change adaptation) are relevant; these are the ones for which descriptions of relevant activities and technical screening criteria are already available in the Delegated Acts.

Climate change is also having an impact on water supply. With our water strategy, we want to minimize the negative local impact of water consumption and use. We also take into account, among other

things, factors such as water scarcity, water pollution, flooding, ambient fire risk, and the results of climate change. In 2021, we incorporated our water strategy into our standard guidelines, the EP Standard, after we had successfully implemented it worldwide by 2020 with the aid of Serve the Environment, our most recent environmental program. The necessary process of analysis begins with an assessment of the environmentally,relevant locations using the Aqueduct Water Risk , Atlas of the World Resources Institute (WRI). Siemens assesses the risks that originate from a location's activities at the local level and places them in relation to regional water risks. Locations with a high risk assessment must define targets to reduce it. In fiscal 2022, 93% of our locations implemented this water strategy. Indicators on page 110.

Climate action: We report our greenhouse gas emissions on the basis of the Greenhouse Gas (GHG) Protocol corporate standard published by the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD). Direct greenhouse gas emissions (Scope 1) arise from sources that are in the company's possession or under its control. Indirect greenhouse gas emissions (Scope 2) arise from the use of purchased electricity and district heating. Since fiscal 2016, we have also reported upstream Scope 3 emissions arising within our supply chain, from sources such as business travel, capital goods, fuels and energy-relevant activities, and shipments. Scope 3 emissions from our supply chain have been calculated using a cross-regional, macroeconomic input-output model based on our volume of purchased goods and services. We also report downstream Scope 3 emissions, including those arising from the use of our products, our investments, employee commuting, and work-from-home activities.

Through the whole report the energy of policy of SIE is explained too.

Again, if you are also looking at the other environmental topics, then you realize that they integrated the climate change very well into their strategy and are very concerned about it**.**

COLR: ✓

First, the EU taxonomy is mentioned. With the European Green Deal, the European Union has undertaken to reduce greenhouse gas emissions to net-zero by 2050, thereby becoming climate-neutral. Two of the six related objectives are the climate change mitigation and secondly the climate change adaptation. Therefore, for reporting year 2021/22, companies are called on to identify which of their economic activities could potentially be environmentally sustainable ('eligible'), considering the first two EU-defined environmental objectives: climate change mitigation and adaptation.

The eligible activities: COLR is mainly active in food and non-food retail and wholesale, as well as food service. However, these economic activities were not included in the Delegated Climate Act, meaning that our group's main activities are outside its scope. Nevertheless, we have analysed all our economic activities in line with the definitions established by the Delegated Climate Act. The following Colruyt Group economic activities are eligible under the EU Taxonomy (see page 181 for the schema).

On page 183 are the key performance indicators from the EU taxonomy: Revenue, CapEx and the Operating expenditure. Revenue: 0,21% of Colruyt Group's revenue is eligible. This revenue comes mainly from the sale of cycles in our Bike Republic cycle chain and also includes limited revenue from the sales of electricity for electric charging stations. Capital Expenditure (CapEx): Colruyt Group has eligible capital expenditure (CapEx) of 64,11%. This mainly relates to investments in buildings (both their acquisition and renovation), installation, maintenance and repair costs related to buildings,

transport and energy efficiency technologies. In addition, eligible CapEx also covers our investments in hydrogen and IT projects. With regard to the acquisition and ownership of buildings, the rights of use under IFRS 16 are also included. Operating expenditure (OpEx): Finally, 3,15% of operating expenditure (OpEx) is eligible. This mainly involves expenditure on maintenance and repairs in the context of building renovation and transport.

On page 176 the SDG 13 is explained. Faster than expected, we have also managed to meet our current reduction target: 40% reduction by 2030, versus base year 2008 and relative to revenue. Following changes in the calculation methods to become more in line with the Greenhouse Gas Protocol, we recalculated our emissions data back to the base year. The reasons for this included a significant shift of emissions from scopes 1 and 2 to scope 3 (see graphic in the section ESRS E2).

Also, for the different activities (see graphic in the section ESRS E2). However the Paris Agreement is not mentioned in the report.

Again, if you are also looking at the other environmental topics, then you realize that they integrated the climate change very well into their strategy and are very concerned about it**.**

VOW3: ✓

Climate change and its consequences are threats to our planet and can already be felt in many places today. According to the Intergovernmental Panel on Climate Change's calculations, the transport and mobility sector currently accounts for around 23% of global energy-related greenhouse gas emissions. As one of the world's largest automotive manufacturers and mobility providers, Volkswagen is aware of the responsibility this entails. We are committed to the Paris Climate Agreement, which aims to keep the increase in global temperature by 2050 to well below two degrees Celsius. Volkswagen wants to become a net carbon-neutral company by 2050. We have set an intermediate goal for ourselves along the way: by 2030, Volkswagen wants to reduce the carbon footprint of its passenger cars and light commercial vehicles by 30% per vehicle (compared with 2018). We want to achieve this goal purely through reduction measures and switching to renewable energies – i.e., without any offset measures. In addition to the Group's electric offensive, we are concentrating to a greater extent on integrating **renewably generated electricity** in the use phase and switching the entire power supply for our plants to renewable energy.

The Group identifies both risks resulting from climate change (physical risks) and risks and opportunities due to the shift toward a decarbonized economy (transitional risks and opportunities), which are addressed by the internal control system's master control catalogs and the risk management system's risk clusters (page 38 onwards). For example: Rising sea levels: The Group counters this risk through systematic analyses of the impact of climate change on its production sites in order to assess potential risks and derive recommendations for countermeasures. Another example is the Climate-related adaptation measures: Implementing measures to adapt to the impact of climate change may strengthen the resilience of production sites – for example, against extreme weather events but also against chronic effects such as the rise in sea levels – and thus prevent business interruptions. For this reason, in a first step the Group conducted an analysis of physical climate risks for 31 EU-taxonomy-relevant production locations, derived recommendations for implementing specific adaptation measures based on this and sent these to the individuals in charge locally for validation.

The EU taxonomy is also mentioned with the two objectives: Climate change mitigation and Climate change adaptation. Here an overview:

The tables for Capex and OpEx are on page 62 and page 63.

SOLB: ✓

Climate, environment, and respect for human dignity are now top priorities for governments, businesses and consumers. Our Solvay One Planet sustainability roadmap reflects this, helping us to raise the bar to tackle climate change and resource scarcity and foster a better life for all. Built around three pillars, the roadmap is an integral part of our Strategy, setting out ten targets to achieve before 2030 that will help us develop more sustainable solutions and achieve our ambition to reach carbon neutrality across all our businesses before 2050. See the goals on the screenshot in the part ESRS E2.

According SOLB a challenge for the customers is securing global water supply, despite human activity and climate change, by increasing access to clean and drinkable water.

The stakeholders have the following expectation: Acceleration of actions to reduce greenhouse gas emissions and address climate change; Confirmation of United Nations Sustainable Development Goals (SDGs) as reference for sustainability priorities at planetary scale; Introduction of metrics describing sustainable value creation, as per the World Economic Forum's International Business Council (IBC) work on "Toward Common Metrics and Consistent Reporting of Sustainable Value Creation". The response of SOLB for this: Confirmation of SDGs where Solvay can have most impact across the value chain: — SDGs 7, 13, 14 & 15 on Climate; — SDG 12 on Resources; — SDGs 3, 6, 8 & 17 on Better Life; 10 ambitious goals defined through Solvay; One Planet sustainability roadmap; Announced plans for carbon neutrality by 2050; Unveiled Scope 3 target of -24%.

On the CDP index Solvay is rated A- by the CDP in the 2022 Climate Change questionnaire (from F to A) and is among the top 8% assessed for supplier engagement on climate change.

The risks are identified on page 165 onwards. For example: Transition risk: Financial: inability to cope with the influence of climate change on investors' and lenders' decisions or Reputation: negative stakeholder attitudes caused by failing to address stakeholder climate change concerns effectively.

SALES REVENUE 2022

Economic activities	Sales revenue		Substantial contribution to climate change mitigation		Compliance with DNSH criteria	Compliance with minimum safeguards	Taxonomy-aligned sales revenue	
	€ million	%[1]	€ million	%[1]	Y/N	Y/N	€ million	%[1]
A. Taxonomy-eligible activities	**257,043**	**92.1**	**26,145**	**9.4**	**Y**	**Y**	**26,145**	**9.4**
Vehicle-related business								
3.3 Manufacture of low-carbon technologies for transport	254,502	91.1	26,128	9.4	Y	Y	26,128	9.4
of which taxonomy-aligned BEVs	–	–	–	–	Y	Y	19,589	7.0
Power Engineering								
3.2 Manufacture of equipment for the production and use of hydrogen	18	0.0	18	0.0	Y	Y	18	0.0

The main actions: Assessment of potential climate change impacts on our operations due to flooding, water scarcity, hurricanes, and other environmental events through the application of best-in-class models and collaboration with external experts.

Moreover, Solvay's materiality analysis remains substantially unchanged compared to 2021. The Russia-Ukraine war and the energy crisis in Europe confirmed the priorities defined during the preparative work for Solvay One Planet, in particular: An increased emphasis on climate change and biodiversity, with evidence of the link between climate resilience and energy security and independence.

The EU taxonomy is also mentioned. On page 261 and 262 there is a section about the climate change: Since 2015 the Group has adopted an internal carbon price and it has imputed that as an input cost into all investment decisions, irrespective of prevailing market prices. The internal cost was originally set at €25 per metric ton in 2015 and was doubled to €50 in 2019. In 2021 it was then decided to be raised to €100 per metric ton of CO2 with implementation in 2022. This approach ensures that all investments contribute positively to the resilience of the Group in the face of climate change risk and are also oriented towards achieving carbon neutrality. In summary, the Group's climate change considerations mentioned above did not have a material impact on the financial reporting judgments and estimates during the year. Further, the Group concludes that the climate change risk does not impact the going concern assessment for December 2022.

Again, if you are also looking at the other environmental topics, then you realize that they integrated the climate change very well into their strategy and are very concerned about it**.**

KBC: ✓

KBC received a A-rating according to the CDP climate rating (page 9). Climate change is one of the biggest global challenges. We also face other major environmental challenges relating to biodiversity, pollution, water and the circular economy that require urgent action. Environmental responsibility is therefore one of our four focus areas. We already offer a range of solutions to tackle these issues and plan to continue to do so.

KBC has their approach to sustainable finance. To date, the fight against climate change has been high on our agenda. In addition, biodiversity, water management, circularity and pollution are also gaining importance. Work also continues how we can contribute to achieving social and governance related objectives (see also section ESRS E3). The 'double materiality' approach guides their Sustainable Finance Programme: 1) Environmental and social materiality: We are committed to managing the direct and indirect impact of our company on the climate. We want to limit the negative impact of our activities on the environment and increase our positive impact. We do this by adopting environmental policies and climate-related targets for our loan, investment and insurance portfolios. 2) Financial materiality: We are committed to managing the impact of climate change on our company. We do so by closely monitoring the climate-related risks and opportunities, and by taking appropriate actions to manage them effectively.

Sustainable Finance Awards 2022 (Global Finance): ČSOB in the Czech Republic was recognised as: Outstanding Leader in ESG-Related Loans in Central and Eastern Europe for 2022; Financial Leader in Sustaining Communities in Central and Eastern Europe for 2022; Outstanding Leader in Sustainability Transparency in Central and Eastern Europe for 2022; The Best Bank for Sustainable Finance in the Czech Republic for 2022. This awards programme recognises global, regional and local leadership in

sustainable finance for initiatives designed to mitigate the negative impacts of climate change and help build a more sustainable future for humanity.

There are several RI funds: 1) Responsible funds invest in companies or countries that promote sustainability aspects and make efforts to limit climate change. 2) ECO-thematic funds invest in companies which provide solutions to a specific sustainability challenge such as climate change or water scarcity. Another initiative is that KBC signed up to the Equator Principles (EP) for project financing as far back as January 2004. This voluntary set of guidelines aims to support responsible decision-making related to environmental and social risks in project finance. This includes human rights risks, the rights of indigenous people, climate change and biodiversity.

The White Papers: Going forward, we will include the objectives within the scope of our Sustainable Finance Programme, so we can embed them in our activities in a structured manner. We will adopt an approach similar to our previous efforts on climate change mitigation and adaptation. The scope of our White Papers, for example, will be widened to include these issues. We are also following developments in the field of impact calculations and will continue to incorporate these into our approach in the course of 2023.

Projects related to the climate change topic are on page 61. Climate change and the other environmental objectives defined in the EU Taxonomy carry several risks but also many opportunities. We believe that these opportunities not only contribute to today's sustainable economy models, but also reduce the adverse direct and indirect impacts on our environment and society.

The risks: KBC approaches climate-related risks from a double materiality perspective. We concentrate on financial materiality (i.e. focusing on the impact of climate change on our business activities) and environmental and social materiality (considering our impact on the climate).

Again, if you are also looking at the other environmental topics, then you realize that they integrated the climate change very well into their strategy and are very concerned about it**.**

ABI: ✓

ABI was recognized with a double A score from CDP for our corporate transparency and performance on climate change and water security. They were also included in the 2022 Fortune Change the World List for our leadership in water stewardship. Moreover, working closely with GITEC, our Global Barley Research Center in Fort Collins, Colorado, uses cutting-edge breeding techniques as it aims to develop barley varieties that have better resistance to climate change.

A concrete project where they addressed the climate change was the project in Peru (page 27).

On page 37 the section 'Climate' explains the present situation and the strategy for the future of ABI. Climate change is one of the most pressing global challenges. Our business is closely tied to the natural environment: agricultural crops and water are our key ingredients, we require raw materials for our packaging, and we need energy and fuel to brew, transport and cool our beers. Our business is also closely connected with local communities and people across our global footprint. All of these have the potential to be impacted by climate change, and we are already experiencing both environmental and social climate-related impacts in our value chain and communities (see also the other section ESRS E2 for the emissions).

Goals	Metric	2022	2021	2020	2019	2018	2017 (Baseline)
	Total water use (in billion hl)	1.55[6]	1.52	1.41	1.56	1.59	1.71
	Water use by hectoliter of production (hl/hl)	2.64[6]	2.64	2.68	2.79	2.94	3.08
	Total GJ of energy (in millions)	55.45[6]	56.23	52.36	58.51	59.46	59.83
	Total GJ of energy purchased (in millions)	52.71[6]	53.82	50.51	56.57	57.71	*
	Energy usage per hectoliter of production (in Mj/hl)	94.43	97.37	99.50	104.74	109.95	111.42
	Energy purchased per hectoliter of production (in Mj/hl)	89.76[6]	93.19	95.98	101.28	106.69	*

A risk assessment tool: Water and climate change are inextricably linked. We feel their impacts through more frequent and intense extreme weather events such as floods, droughts, heatwaves and wildfires. Sustainable water management is central to building the resilience of societies and ecosystems and ensuring the continuity of our supply chain. We developed a water risk assessment tool that leverages external data sources and input from our local teams to review our operational risk globally. Using this tool, we have identified and continue to prioritize our sites that are located in high-stress areas. In 2022, a total of 44 of our facilities were located in high-stress areas; 36 of these are in scope for our 2025 Water Stewardship Goal based on a 2017 baseline analysis.

Concrete projects are also presented on page 46. The sustainable agriculture on page 48 is also an action related to the climate change (see page 49 for the goals of the smart agriculture).

Their strategy: Their 2025 Circular Packaging Goal is critical to support our efforts to help address the impacts of climate change. In 2022, packaging accounted for 42.5% of our Scope 3 GHG emissions. Our approach to reach our goals is based on four principles: 1. Reduce packaging and the need for virgin materials; 2. Increase the availability and use of recycled content; 3. Promote the recovery and reuse of packaging; 4. Rethink our packaging and distribution models.

Lastly, the TCFD is mentioned related to the climate change (page 96-97). The EU taxonomy is explained on page 101. On page 76 the energy use is given. Here the metrics:

AGS: ✓

More specifically, Ageas has made concrete commitments on ways to contribute to the Paris agreements by defining two climate-related targets in its 3-year strategy ‘Impact 2024’. Early June 2021, Ageas announced its new 3-year strategy Impact24 putting sustainability “at the heart of everything we do”. Those sustainability ambitions have been clustered around four impact areas: people, customers, investments and planet, with an explicitly ambition to contribute towards global efforts to mitigate climate change as a transversal commitment throughout all impact areas. Ageas will focus on those themes where it can make most impact and consequently:

We will offer transparent products and services that create economic and societal value, stimulating our customers in the transition towards a more sustainable and inclusive world.

▪ We will strengthen the long-term, responsible approach to how we invest, contributing to solutions around sustainable cities, local economies, and climate change.

▪ Across the Group, we will reduce our environmental impact, aiming to be ‘GHG-neutral’ in our own operations.

▪ And finally, we will work towards a diverse workforce, ensuring fair and equal treatment of our employees, while fostering a culture of continuous learning.

Building upon strong financial ambitions, this strategy also includes for the first time 3 non-financial and 9 sustainability targets, among which two climate-related ones:

▪ Neutral carbon emissions of our own operations (scope 1 & 2) by 2024

▪ Net zero carbon emissions of our investment portfolio by 2050 at the latest

In line with Ageas climate neutral ambition for own operations, as one of the targets of Impact24, Ageas has set a target to reduce its CO2 emissions for 2022 by 30% compared to 2019, the base year. As such, the focus is first on reducing measured GHG emissions of its own operations as much as possible, moving on to offsetting the remaining emissions. This reduction target is also one of the components of the management bonus for 2022, similar to 2021.

In 2020, AG joined the Climate Action 100+. This initiative unites investors, while encouraging the world's largest GHG emitters to take necessary action on climate change to help achieve the Paris Agreement's goals. In 2021, Ageas and AG became signatories of the Carbon Disclosure Project (CDP), an initiative which urges companies, cities and governments to measure and publish climate related data and to implement strategies to tackle the environmental issues linked to climate change. In 2022, AG participated for the first time in the CDP SBTi campaign, an initiative which urges companies to commit and to set SBTi targets.

On page 45 all the actions/strategies are explained to achieve net-zero greenhouse emissions. The EU taxonomy is mentioned on page 47 and their related objectives.

The main risks that Ageas are exposed to from climate change are credit risk, market risk, general insurance and life insurance risk, and modelling the effects of climate risk on our portfolios is an important focus area as understanding and managing climate impacts will be essential in forming strategic responses and maintaining our long-term resilience. Following the first inclusion of different climate change scenarios in our 2021 ORSA, this activity has continued to be refined. The scenarios, that cover medium to longer term time horizons, seek to better understand potential impacts of both Transition Risk and Physical Risk on our assets and liabilities.

4) <u>ESRS E2 Pollution:</u>

<u>INGA:</u> ✓

As they adjust to the new normal, they have set a new medium-term target for 2025 to reduce our CO2e emissions by 75% compared to the 2014 baseline. They have previously set a joint Scope 1 and Scope 2 target for 2030 of a 90% reduction by 2030, INGA plan to review this target and set a combined target for Scope 1, Scope 2 and Scope 3 for business travel by 2030. In addition, INGA wants to limit the impact from the car travel, they focus on electrifying their fleet of leased cars. Recently ING in Belgium and the Netherlands announced that from late 2022 only fully electric vehicles (EVs) will be available in our range of new lease cars. Together, Belgium and Netherlands represent 72% of their total number of lease cars. Globally, they have set an ambition to reach at least 90% EVs in our fleet by 2030. Also the EU taxonomy is mentioned.

Moreover, from 2020 to 2022, the targets for operational carbon emissions were divided between a scope 1 and 2 target of 80% reduction, and a scope 3 target for business travel of 25% reduction. As part of a detailed review of their Environmental Programme and historical data, INGA has identified that their progress against these targets was behind what was reported in our 2021 Annual Report. Reviewed data indicate that at year end 2021, we reached: In scope 1 and 2, a 77% reduction in CO2e to roughly 18,700 tonnes, instead of the 80% reduction previously reported. In scope 3, a 72% reduction to 6,900 tonnes, instead of the 79% previously reported. Collectively, this brought our combined operational emissions reduction across scope 1, 2 and scope 3 business travel to over 75% at the end of 2021.

Also, they have a climate dashboard of all the different sectors (page 55). The evolution of the decarbonisation is always shown. In the report the present emissions of each sector of INGA's portfolio is presented and afterwards the actions are explained to decarbonise the sector.

Table 11 Carbon emissions

Carbon emissions			
	2021	2020	2014
Actuals coverage (% of employees)	97	97	91
			kilotonne CO_2e
Total actual carbon[3]	25	28	96
Total extrapolated carbon	26	29	105
Total actual carbon scope 1[4]	10	11	25
Total actual carbon scope 2[5]	8	8	49
Total actual carbon scope 3[6]	7	9	23

As far as conservation is concerned: INGA, in this area, has begun to help its clients structure green bond frameworks that can finance projects that focus, for example, on combating desertification, soil pollution and deforestation. The metrics are on page 98 (environmental programme).

ENGI: ✓

The 'pollution' criterion is discussed in detail in the report. ENGI states in the report that the company contributes to air pollution by through emissions of NOx, SOx and particulate matter from coal and gas-fired power stations, the discharge of hot plants, discharging hot water from the power plants into watercourses, waste from the light or water, waste and noise or noise pollution from certain plants. ENGI also discloses the objectives monitored by the governing bodies (EESDC) and the operational objectives pursued by the Group's management. The figures for 2020-2022 are disclosed, as well as the target figures for 2023. See screenshot:

PLANET		2020	2021(1)	2022(1)	TARGET 2030
Objectives monitored by the governance bodies (EESDC)					
CO_2 Energy production	GHG emissions from energy production (scopes 1 and 3) in Mt CO_2 eq.	68	65	60	43
CO_2 Energy production and consumption	Carbon intensity of direct energy production (scope 1) and energy consumption (scope 2) in g CO_2 eq. per kWh	212	181	156	110 (< 149: SBTi well-below 2°C limit)
CO_2 Energy sales	GHG emissions from final gas sales (scope 3) in Mt CO_2 eq.	62	66	61	52
	Carbon intensity of energy sales produced (scopes 1 and 3) and purchased (scope 3) in g CO_2 eq. per kWh	270	252	221	153 (SBTi well-below 2°C obj.)
CO_2 Others	Other GHG emissions, including scope 3 from procurement, capital goods and the upstream of purchased fuels and electricity (scopes 3.1, 3.2, 3.3) in Mt CO_2 eq.	103	101	90	85 (SBTi well-below 2°C obj.)
Renewable capacities	Share of renewable capacities (@100% and excluding pumped storage) in electricity production (scopes 1 and 3)	31%	34%	38%	58%
Decarbonation of our customers	Emissions avoided at the customers' sites through Group's products and services in Mt CO_2 eq.	21	27	28	45
Decarbonization of our suppliers	Rate of top 250 SBT-certified or aligned preferred suppliers	15%	20%	23%	100%
Biodiversity	Rate of industrial sites with natural management of green spaces without the use of chemical plant protection products	0%	28%	34%	100%
Water	Fresh water consumption per energy produced in m^3/MWh	0,278	0,342	0,301	0,1
Operational objectives followed by the Group Executive Committee					
Renewable capacities	Renewable capacities (@100% and excluding pumped storage) of electricity production in GW	31	34	38	80
CO_2 Energy production	Carbon intensity of energy production (scopes 1 and 3) in g CO_2 eq per kWh	266	240	216	158
Decarbonization of our work practices	GHG emissions linked to our working practices in Mt CO_2 eq.	0,5	0,3	0,3	0 (after offsetting-maximum of 0,2 Mt CO_2 eq.)
Environment	Rate of activities with an environmental plan established in consultation with stakeholders	21%	37%	53%	100%
Pollution	NOx emissions reduction rate vs 2017	-47%	-47%	-64%	-75%
	SOx emissions reduction rate vs 2017	-25%	-34%	-95%	-98%
	Total particulate emissions reduction rate vs 2017	-14%	-23%	-54%	-60%
	Non-hazardous waste generation reduction rate vs 2017	+3%	+3%	-47%	-80%
	Hazardous waste generation reduction rate vs 2017	-90%	-92%	-94%	-95%
Methane emissions	Direct methane emissions on gas networks in Mt CO_2 eq.	1,52	1,62	1,26	-30% vs 2017 or 1,45 Mt CO_2 eq.

The table shows, for example, the development of the various emissions (CO2, NOX, SOX and waste emissions and also the decarbonization scenarios). There are also graphs showing the development of Scope 1 and Scope 3 emissions up to 2045. Firstly, the company's current impact on the different emissions is presented (current actions are briefly described), and then the report presents several plans on how ENGI intends to achieve this development. In addition, the emissions along the value

chain are reported (customer emissions, supplier emissions and decarbonisation). There is therefore a section in the report entitled "FOLLOWING AN AGGRESSIVE CLIMATE STRATEGY". It explains in detail how ENGI intends to become more climate-friendly in the coming years. Another category is "SUPPORTING CUSTOMERS IN strategy" or "SUPPORTING SUPPLIERS IN THEIR DECARBONISATION TRAJECTORY". On page 61 you will then find all the "Environmental Indicators", which are also included in the ESRS 2 standards. Finally, the specific "Climate Strategy Pusued" is explained. For example, ENGIE is committed to being "Net Zero Carbon" in all its areas (1, 2 and 3). Reduce ENGIE's direct and indirect greenhouse gas emissions by at least 90% compared to 2017. Increase carbon sinks to neutralize the Group's remaining emissions throughout the ENGIE value chain. There is also a category of RISKS AND OPPORTUNITIES arising from impacts and dependencies.

TTE: ✓

In the section "Prevention of serious industrial accidents" you can find some information about pollution. Namely, to prevent the occurrence of a major industrial accident, such as an explosion, fire, hazardous product spill or mass leakage that could cause death, bodily injury, large-scale pollution or contamination on or at an environmentally sensitive site, or significant property damage, TotalEnergies applies appropriate risk management strategies and measures applicable to the activities operated. All risks are stated. Substances of very high concern are mentioned: There is also a table summarising the following:

Losses of primary containment[(a)]	2022	2021	2020
Losses of primary containment (Tier 1)	11	29	30
Losses of primary containment (Tier 2)	37	48	54
Losses of primary containment (Tier 1 and Tier 2)	48	77	84

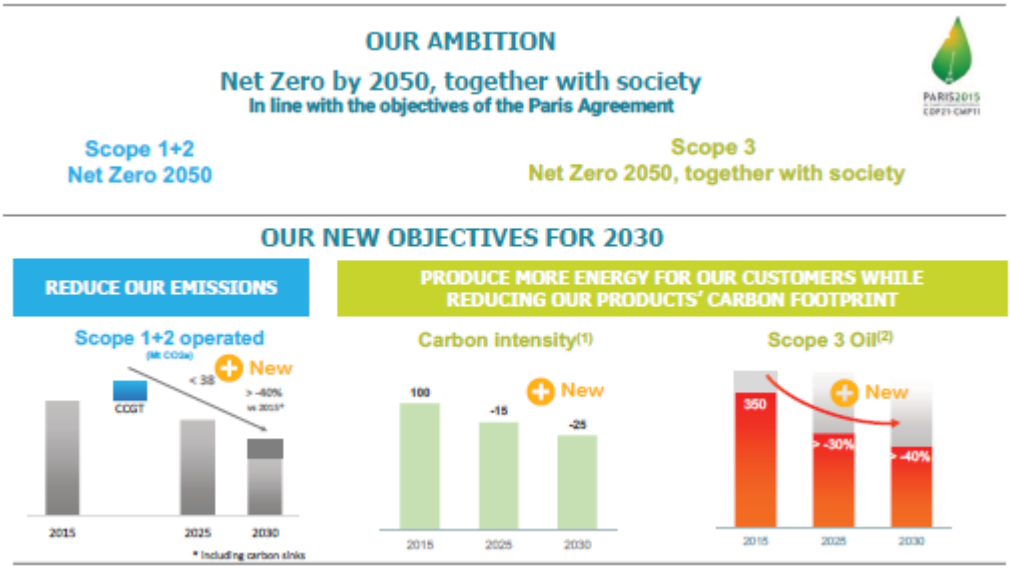
(a) Tier 1 and Tier 2: indicator of the number of losses of primary containment with more or less significant consequences (fires, explosions, injuries, etc.), as defined by API 754 (for downstream) and IOGP 456 (for upstream). Excluding acts of sabotage and theft.

To manage a major industrial accident efficiently, TotalEnergies has therefore implemented a global crisis management system, which is based on a based on a 24-hour standby system and a crisis management centre at the head office, which can manage two simultaneous crises. The framework requires subsidiaries to have plans and procedures for intervention in the event of leakage, fire or explosion, and to test them regularly. In addition, the report discusses the Taxonomy Regulation (EU) 2020/852 ("the Regulation"), which is a common classification system for the European Union aimed at identifying economic activities that are considered sustainable, taking into account six environmental objectives. These include pollution prevention and control. TTE has also identified its main environmental risks, namely: the risk of accidental pollution; environmental risks arising from the discharge of liquid, gas or solid substances or from the unsustainable use of natural resources or solid substances or from the unsustainable use of natural resources. There is also a chapter on the prevention of accidental pollution risks. This chapter describes the measures taken by TTE to prevent pollution. The risks are also presented openly, see picture (example with oil spill):

Oil spill preparedness	2022	2021	2020
Number of sites whose risk analysis identified at least one risk of major accidental pollution to surface water	113	119	119
Proportion of those sites with an operational oil spill contingency plan	100%	100%	100%
Proportion of those sites that have performed an oil spill response exercise or whose exercise was prevented following a decision by the authorities	92%	97%	88%

The various emissions of the TTE are also disclosed (page 320). About soil protection, the following is disclosed: TTE has developed a guideline for its subsidiaries to prevent and mitigate this pollution. The recommended approach is based on four pillars: 1) Prevent spills by following best industry practices, practices in engineering, operations and transportation, 2) performing maintenance at appropriate frequencies to minimise the risk of spills, and to minimise the risk of leakage, 3) comprehensive environmental monitoring to detect any soil and groundwater contamination and 4) address contamination from past activities by and reduction or elimination. Also, TTE promotes a policy of reducing greenhouse gas emissions based on the following principles in order of priority: Avoid emissions, reducing them by using the best available technologies and offsetting the residual emissions thus minimised. It is noted that they want to reduce the "SCOPE 1+2 EMISSIONS REDUCTION USING BEST AVAILABLE TECHNOLOGIES": There are graphics which are explaining this: from page 287 onwards. They want also to reduce the Scope 3 oil emissions (again graphics, which explain the evolution from now to the year 2030). The term "decarbonization" appears also 35 times in the report and from page 294 the present actions and the actions which will be done by TTE are explained. On page 320 all the emissions are disclosed and the discharged water quality. On page 620 all the different World Economic Forum Core ESG metrics are published.

Achieve by 2050 or earlier carbon neutrality (net zero emissions) for Total Energies' operated activities (Scope 1+2) with intermediate targets of: – reducing GHG emissions (Scope 1+2) from its operated facilities from 46 Mt CO2e in 2015 to less than 38 Mt CO2e by 2025, – reducing net emissions(1) of GHG (Scope 1+2) for its operated activities by at least 40% by 2030 compared to 2015, thus bringing net emissions to between 25 Mt CO2e and 30 Mt CO2e, – reducing methane emissions(2) from its operated facilities by 50% between 2020 and 2025, and by 80% between 2020 and 2030, – reducing routine flaring(3) to less than 0.1 Mm3/d by 2025, with the goal of eliminating it by 2030.



On page 623 all emissions are presented.

SIE: ✓

The report shows that SIE takes a holistic approach to air pollution by analysing emissions on-site at our offices and production facilities. SIE also looks at emissions of volatile organic compounds (VOCs), pollutants from combustion processes and, where present, ozone-depleting substances (ODS) at our environmentally relevant sites. These principles and procedures are now mandatory in their internal

environmental standard. Water is one of mankind's most important resources. For this reason, scarcity, water pollution and climate change, as well as the development of flooding and precipitation trends at their years. They take these analyses into account in our business decisions - when they choose a site or taking precautionary measures. Moreover, water is one of the most important resources of mankind. For this SIE has been addressing the issues of water scarcity, water pollution and climate change, as well as the development of flooding and precipitation patterns at their sites for the past years.

As far as SIE's water analysis is concerned, the report makes clear that we want to minimise the adverse local impacts of water consumption and use. SIE considers factors such as water scarcity, water pollution, flooding, local fire risks and the impacts of climate change. In 2021, they transposed the water strategy into the standard legal framework. There are again concrete figures given on the topic of "decarbonisation", see screenshot:

Certain rules are mentioned in the report, namely the Siemens CO2 Use Phase Impact Reporting Guideline contains basic requirements and guidelines for calculating and reporting emissions related to the use of Siemens products, systems, solutions and services and investments. It covers:

- Scope 3 downstream GHG emissions from the use of products sold (category 11) and investments (category 15) according to the GHG Protocol Corporate Value Chain (Scope 3) Standard (GHG Protocol Standard)

- Emissions avoided by the customer (according to Siemens' own methodology as a modification of the previous environmental portfolio methodology).

On page 135 onwards the TCFD is explained and the link to the decarbonization. On page 136 the risks and opportunities are mentioned.

In terms of metrics, by joining the Science Based Targets initiative, Siemens has committed to reducing emissions from its own operations (scopes 1 and 2) by 50% by 2030 and scope 3 emissions (upstream and downstream) by 15% compared to 2019 (upstream and downstream) by 15% compared to 2019. Several ongoing activities will contribute to this GHG reduction, including building emissions reductions, fleet electrification and our Carbon Reduction @ Suppliers approach. At Siemens, we bundle our binding climate protection targets and measures under "D" (Decarbonisation) in our DEGREE sustainability framework. For our KPI "Net Zero operations by 2030", we have set our reduction target for our business areas (Scopes 1 and 2) at - 0.5 percent. (Scopes 1 and 2) for Siemens excluding SHS to - 55% by 2025 compared to 2019. By 2030, we aim to reduce emissions by 90% instead of 50% compared to 2019. As set out in the DEGREE framework, we also aim to reduce emissions in the upstream supply chain by 20% by 2030 (compared to a 2020 baseline) and then to net zero by 2050.

Sustainability Key Performance Indicators (KPIs)		Fiscal Year September 30th	Unit	FY 2022	FY 2021	+/–
DEGREE FRAMEWORK – KPI OVERVIEW (FIGURES WITHOUT SIEMENS HEALTHINEERS)						
Decarbonisation						
Scope 1+2: Emission reduction to base year	Total (w/o SHS)	Fiscal Year	% to base year (2019)	**–46%**	–39%	16,8%
Supply Chain: Emission reduction to base year	Total (w/o SHS)	Fiscal Year	% to base year (2020)[31]	**2.5%**	–6.6%[32]	–138.1%

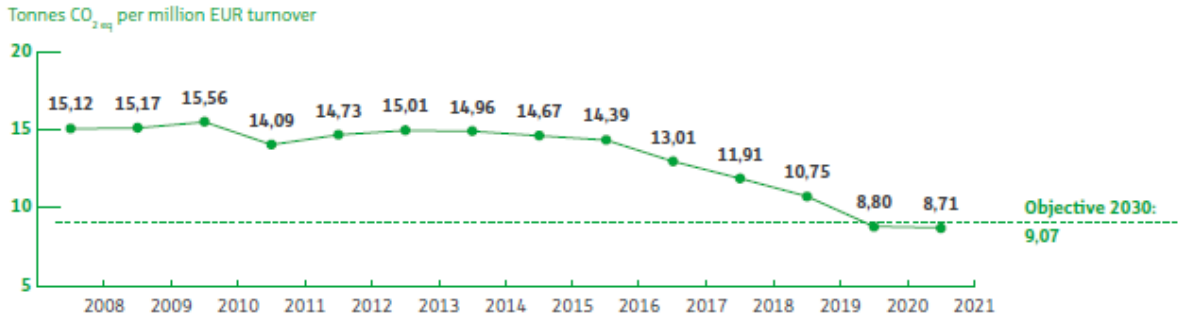
COLR: ✓

A first approach in COLR's report, where the term "pollution" is discussed, is the mitigation-oriented approach: the Group has taken out insurance policies for accidental environmental damage. For its service station operations, the Group fulfils the statutory inspection obligations. It also carries out additional inspections to detect pollution in good time. For any pollution that is detected pollution, a remediation plan is drawn up immediately. Natural disasters caused by climate change can also damage both supply chains and our own infrastructure. To limit the impact on climate change and pollution, we are focusing, among other things, on greening our vehicle fleet and avoiding and reducing our energy consumption at the same time, as well as on renewable energies.

COLR also talks about the EU Taxonomy and mentions 6 environmental goals and one is pollution prevention and control.

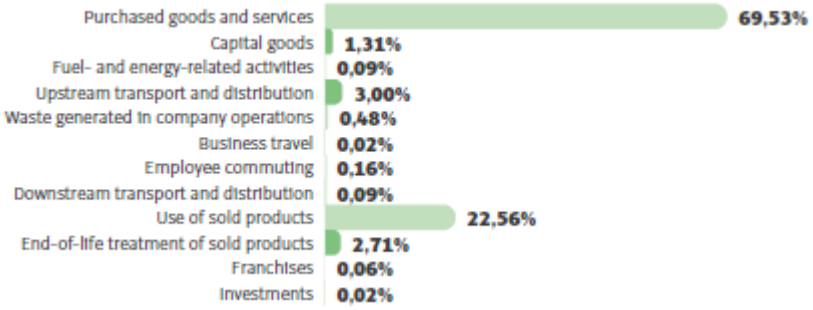
In addition, the Colruyt Group is a member of the Sustainability Initiative Fruit & Vegetables (SIFAV) and represents Belgian retailers on its steering committee. We are working with SIFAV and other supply chain partners in the fruit and vegetables sector to develop a sustainability strategy for 2025. Some SIFAV targets for 2025: Reduce the carbon footprint of three products by 25%, reduce food loss and waste by 25% for three products and reduce water consumption to best practice levels in three selected river basins in Peru, South River basins in Peru, South Africa and Spain.

In the report, there is a specific section called "SDG 13 Scope 1 and 2: Reduce and mitigate greenhouse gas emissions". The present Co2 emissions are presented in a graphic:



So, faster than expected, they have managed to meet their current reduction target: 40% reduction by 2030, versus base year 2008 and relative to revenue. Following changes in the calculation methods to become more in line with the Greenhouse Gas Protocol, they recalculated our emissions data back to the base year. The reasons for this included a significant shift of emissions from scopes 1 and 2 to scope 3 (well-to-tank emissions), more detailed data input and updated emission factors. In addition, they have also expanded their organizational perimeter in line with the principle of financial control (more info on this can be found in the indicators on page 193). Moreover, they are continuing our efforts to make their passenger fleet more environmentally friendly. 46% of the vehicles run on CNG, 16% have hybrid engines, 1.6% run on electricity and 0.3% run on hydrogen. They are also carrying out tests on trucks running on electricity and hydrogen. The speak also of climate-friendly cooling their stores (page

177). Also, they planted new forest to reduce the emissions (PAGE 178). Then on page 180 onwards they speak about the EU taxonomy. Here the Footprint of the different activities:



That are the Indicators for the SDG 13:

Indicators SDG 13		2019	2020	2021	Objective
Scope 1 and 2: Capturing greenhouse gas emissions through afforestation					
# Trees planted in DRC	Financial year	-	-	1.678.341	
Scope 3: Avoiding and reducing greenhouse gas emissions					
Employee mobility					
# Regional offices	Financial year	11	11	11	
% Employees who come to work by bicycle	Financial year	-	-	19,5	
% Employees who come to work by public transport	Financial year	-	-	5,8	
% Employees who carpool to work	Financial year	-	-	4,0	
Freight Mobility					
# Truck journeys saved by the use of barges in Belgium	Financial year	4.998	5.062	4.836	
% Load factor inbound deliveries for Colruyt	Financial year	76,7	76,1	76,3	
% Load factor outbound deliveries from Colruyt	Financial year	94,0	94,0	94,0	

The indicators for Liquid Ice Containers refer to the food retail sector in Belgium and Luxembourg (Bio-Planet, Colruyt and OKay).
The indicators for stores using natural refrigerants, heat recovery and not using fossil fuels refer to the food stores of Bio-Planet, Colruyt and OKay in Belgium and Luxembourg.
The indicators for low-energy stores refer to the stores of Bio-Planet, Colruyt (Belgium), Cru, OKay, Dreambaby and Dreamland.

VOW3: ✓

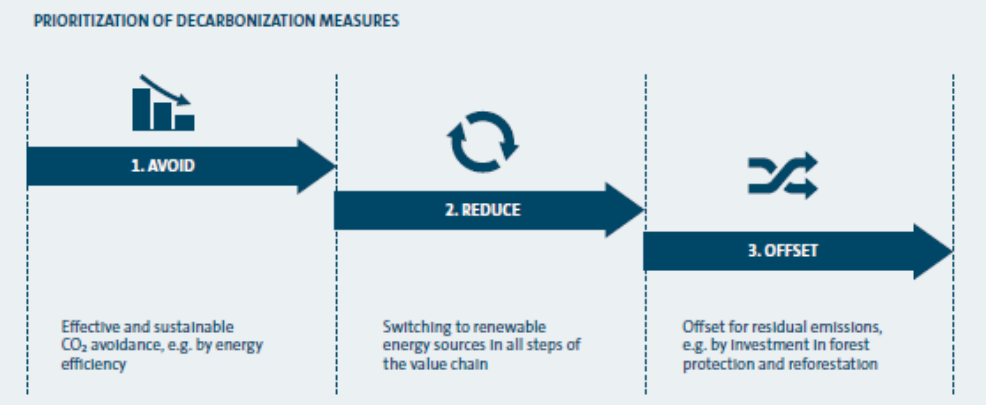
One first thing to see in the report is that in connection with the production strategy, we have defined the KPI of reducing environmental impacts in production (EEP) and underpinned it with targets for the Group and its brands. By 2025, the production-related environmental impacts at all locations where we produce passenger cars and light commercial vehicles are to be reduced by 45% per vehicle compared to 2010. In the reporting year, the five indicators of the UEP KPI were as follows: Energy demand per vehicle: -14.1% (2021: -3.4%), CO2 emissions per vehicle: -43.1% (2021: -33.5%), Water consumption per vehicle: -17.4% (2021: -11.6%) and Waste for disposal per vehicle: -68.5% (2021: -61.7%).

VOW3 also talks about the EU Taxonomy and mentions 6 environmental goals and one is pollution prevention and control.

This is what VOW3's decarbonisation actions look like for the future: For Volkswagen, climate-related topics have an important strategic and operational significance - e.g. with regard to regulatory requirements and the corresponding performance of our products, but also with regard to the ongoing transformation process of our Group. For example, the Group plans to invest around 89 billion euros in future topics such as hybridisation, electromobility and digitalisation by 2026. This corresponds to around 55 percent of the Group's investments and total research and development costs in the planning period. 52 billion euros alone are earmarked for investments in electromobility.

Regarding risks and opportunities, the report makes clear that the Group identifies both risks arising from climate change (physical risks) and risks and opportunities arising from the shift towards a decarbonised economy (transition risks and opportunities), which are addressed through the master control catalogues of the internal control system and the risk clusters of the risk management system. They are not only identified, but also assessed and addressed according to the procedures explained in the risk management chapter (Page 39: risks and opportunities).

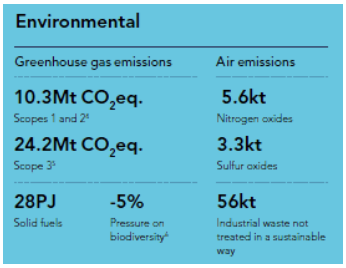
That is the prioritization:



There is also a paragraph on the decarbonisation along the supply chain. For example, the Group wants to reduce the CO2 emissions of its passenger cars and light commercial vehicles by 50.4% by 2030 – compared with the base year of 2018. The Group had previously been aiming for a reduction of 30%. The Science Based Targets initiative (SBTi) confirmed to the Volkswagen Group in the reporting year that the company is fulfilling the conditions for limiting global warming to 1.5 degrees Celsius with its objective for the production phase (Scope 1 and 2). Every year, they calculate the Group's carbon footprint using the Scope 1 to 3 inventory, in line with the requirements of the internationally accepted Greenhouse Gas Protocol (GHG Protocol). On this basis, they can determine the success of the measures we have put in place and identify other areas where we can act. The KPIs could be found on page 52 and onwards.

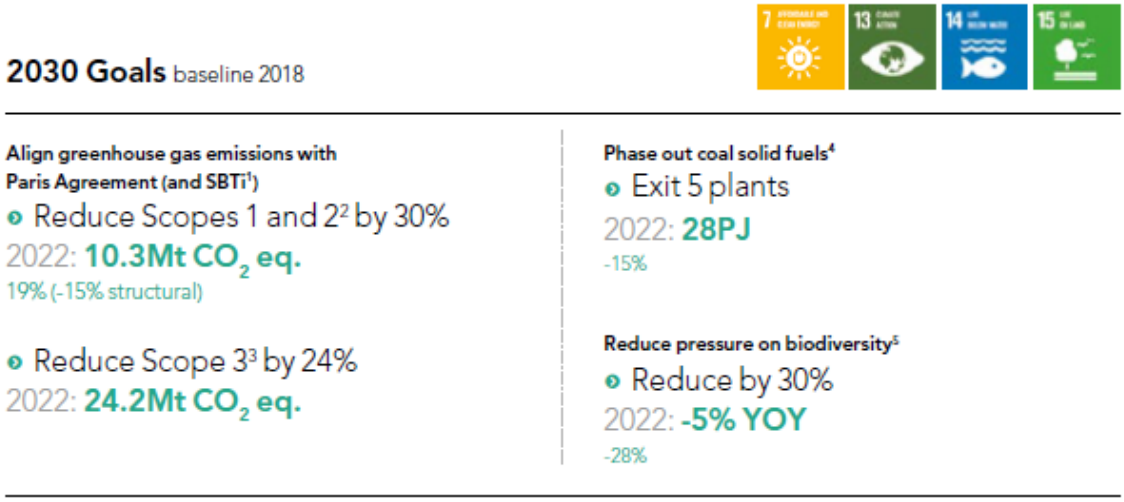
SOLB: ✓

Solvay is insured up to €200 million per claim and in the annual aggregate for unknown gradual pollution and sudden and accidental pollution. The insurance cover includes defence costs, remediation costs and third-party liability. The main actions in 2022 were the following: Carbon neutrality is targeted, with 59 energy transition projects and more than 60 waste projects. Moreover, they have announced an estimated 15-million-euro investment in new technical and process solutions at the site to remove limestone residue from the production from the production cycle. Our aim is to reduce the maximum currently specified in the Integrated Pollution Prevention and Control (IPPC) permit. (IPPC) permit by 20% by 2030 and by 40% by 2040 through targeted improvements at various stages of the production process as well as optimizing the granulometry and quality of the product and quality. Here is screenshot, where all the emissions could be identified of the year 2022:



In the risk management part several information could be found. For example, the **transition risk**, which are the following linked to the pollution: - Political and legal framework: Regulations and measures to limit CO2 emissions, such as increasing carbon taxes, banning internal combustion engines, the banning of internal combustion engines, the use of certain fuels and the tightening of environmental standards. Technology: Unsuccessful investment in new, lower-emission technologies. Secondly the physical risk could be identified: · Sites in water scarcity regions · Sites in flood zones.

In addition, In 2022, Solvay has set a 2030 target to reduce by 24% scope 3 greenhouse gas emissions from its top five categories both upstream and downstream in the value chain and representing 85% of the total scope 3. - Early 2023, the Science Based Targets Initiative (SBTi) has validated the Solvay 2030 targets with a slight adjustment to reduce scope 1 and 2 emissions by 31%. Another action is the establishment of a task force to develop renewable energy and other energy transition projects adapted to local markets and regulations. Increasing our internal carbon price from €50 to €100 per tonne of CO2 for greenhouse gas emissions from operations and using our Sustainable Portfolio Management (SPM) tool to assess all investment decisions worldwide. Here the goals:



KBC: ✓

In general, at the begin of the report the sustainability strategy of KBC is well explained. A first eye-opening figure is that 600 000 tons of CO2e Avoided greenhouse gas emissions through renewable energy projects Financing. It is described that the expanded focus will include the sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and the protection and restoration of biodiversity and ecosystems. It is no coincidence that this area coincides with the environmental objectives of the EU taxonomy. Technical criteria have been published for climate change mitigation and adaptation. It's also mentioned several times.

KBC even has a concrete project, namely the use of charcoal not only leads to deforestation and to air pollution. This project aims to improve access to more efficient cookstoves in Malawi. The main objective, therefore, is to reduce greenhouse gas emissions from the burning of non-renewable biomass. At the same time, the project contributes to a broader sustainable development of the households. The risks are also recognized, Climate risk is closely linked to other environmental risks, such as pollution and waste management. These can amplify the adverse effects of climate change. They can also have a compounding effect on climate change, but also affect the balance sheets of

financial institutions financial institutions in various other ways, namely through their clients and investments. Therefore, in our risk analyses, we are increasingly including these other environmental risks into our risk analyses.

Since 2015, they have been calculating the GHG emissions caused by their own business activities at Group level in accordance with the GHG Protocol Corporate Accounting and Reporting Standard. Every year, an external party verifies the data and the methodology for the calculations with reasonable assurance in accordance with ISO 14064-3.

Our calculations include: Scope 1: direct emissions from fuel combustion and refrigerant gases in our office buildings and from business and commuter travel by our own company car fleet; Scope 2: indirect emissions from purchased energy (electricity, heat, cooling and steam consumption); and Scope 3: indirect emissions from business and commuter travel, and emissions from sources over which we have direct operational control (such as paper and water consumption and waste generation).

There is a white paper in the report, which is explaining how KBC will achieve the targets in the future. Also there is a section “SUSTAINABILITY FACTS AND FIGURES”, where all the present figures are shown (for example: Summary of KBC Group’s total GHG emissions). The metrics are the following:

TARGETS

Direct environmental footprint

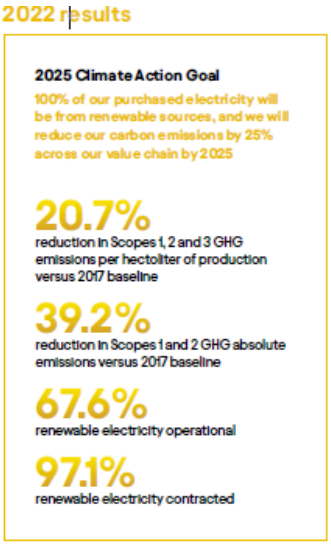
Indicator	Target	2022	2021	2020	2019
Total CO_2e emissions from own operations (direct footprint scope) in tonnes CO_2e	-80% for the period 2015-2030	-70%[1]	-71%	-56%	-42%
Renewable electricity consumption in %	100% by 2030	100%	100%	87%	83%
Carbon credits purchased (in % of remaining GHG emissions from own operations)	Net climate neutrality as of 2021	100%	100%	-	-

ABI: ✓

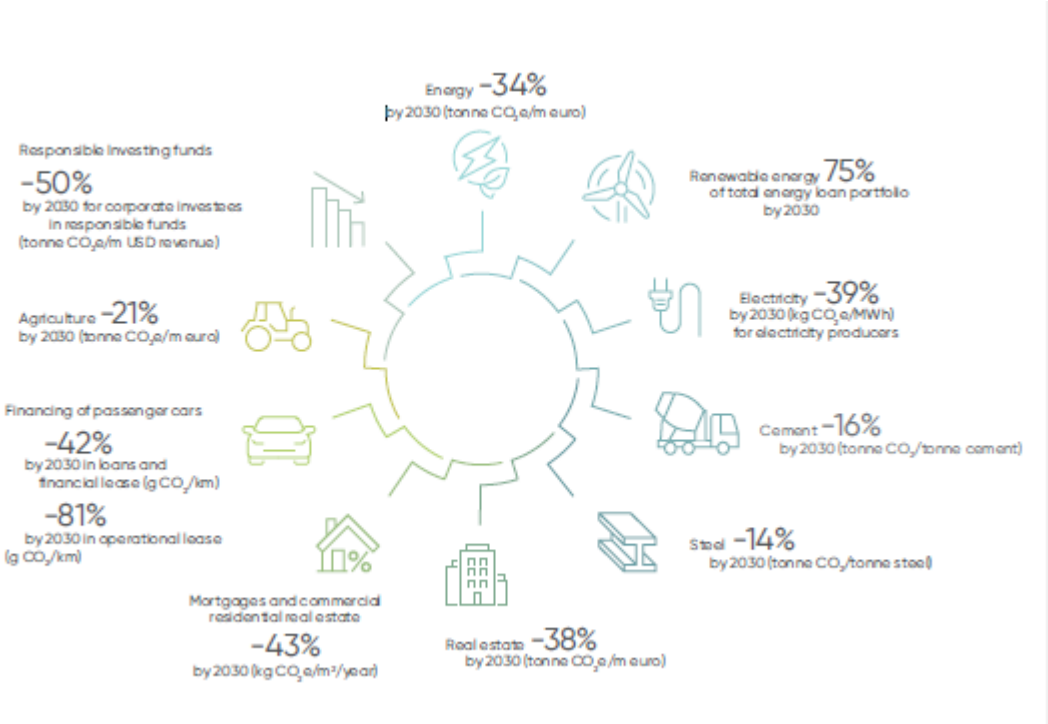
Also here in the ABI report, reference is made to the EU Taxonomy and its 6 objectives and one of them is pollution prevention and control.

One of ABI's concrete actions to combat pollution was that in Mexico they joined forces with more than 150 local anglers who went out into the seas to fish, not for food, but for plastic waste. Not only the tournament not only helped clean up the ocean, but it also supported the livelihoods of those whose catches have been decimated by overfishing and pollution. The initiative was awarded a Golden Cannes Lion in the SDG category. One action to mitigate carbon emissions is to invest in local recycling supply chains to recover returnable glass. Making the most of their share of returnable glass bottles is their

biggest opportunity to reduce emissions from packaging. Approximately 38% of their global volume is sold in returnable bottles which are almost six times less carbon intensive than single-use bottles.



Their absolute emissions in Scopes 1 and 2 decreased in 2022 by 39.2% versus a 2017 baseline, a reduction of 2.37 million metric tons CO2e. They have continued to drive decarbonization in their brewing operations through efforts like increasing efficiency, using new technologies and implementing new renewable electricity projects. As of 2022, 67.6% of their electricity needs are now coming from renewable sources, increasing from 41.2% renewable electricity operational in 2021. They also saw a reduction in emissions intensity across our value chain (Scopes 1, 2 and 3), going from 50.03 kgCO2e/hl in 2021 to 47.29 kgCO2e/hl in 2022. This year's results reflect a 20.7% reduction in CO2e/hl vs. the 2017 baseline. With the progress in 2022, they are on track to achieve our 2025 Climate Action Goal. Here are some key figures related to the climate:



They have also well described their 2025 Climate Action Plan and their TCDFD analysis on climate-related risks. ABI follows concrete climate science to drive decarbonization. Namely, the - Science-

Based Targets Initiative (SBTi). For setting and validating our climate targets and ambitions; - TCFD recommendations. For disclosing our climate-related risks and opportunities on climate; and the - GHG Protocol. To measure, manage and report greenhouse gas emissions across our entire value chain. They also break the Scope 3 GHG emissions by category (page 40). Another project where ABI tries to prevent soil and water pollution is in Brazil (page 46). On page 75 onwards the different metrics are presented, especially the page 82 shows the different scopes of emissions and water use. Page 93 shows all the action, which are undertaken by ABI to reduce the emissions. The metrics and targets are on page 99.

AGS: ✓

What stands out about AGS in the report is that AG Real Estate strives to improve its footprint on the ground, reduce its environmental footprint, promote biodiversity, and reduce pollution on its through the development of environmentally friendly concepts and the application of recycling. Example, In Paris, for example, one of the buildings uses recycled brick to reconstruct the façade. Another action is to support the transition to low-emission vehicles, Interparking will increase the number of charging stations for electric and hybrid vehicles in the car parks. In 2022, Interparking has increased the number of car parks equipped with charging stations to 2,500. Again, they speak about the EU taxonomy in the report and its related objective: pollution prevention and control (page 47).

5.5.2 Carbon neutrality in Ageas's own operations

In tonnes CO_2e	2022	2021
Carbon emissions of own operations	21,694	17,265

Within Impact24, Ageas aims for carbon neutrality of its own measured operations. It wants to lessen its impact on the environment by reducing its carbon emissions, using resources more efficiently, and offsetting the remaining emissions.

	2022	2021
Investments making a positive contribution to transition towards a more sustainable world	EUR 10.3 bn	EUR 9.9 bn

Moreover, the risks are presented (page 143): The climate-related perils that are most relevant to Ageas' insurance portfolio are Floods, storms, subsidence, forest fires, heat waves and, to a lesser extent and, to a lesser extent, air pollution. On page 40 onwards the sustainability strategy of their investment is explained: The most important contributors to Ageas's carbon footprint are in scope 1 car fleet (37%) and in scope 3 commuting (27%); due to the exceptional circumstances in 2020 and 2021 business travel dropped significantly and now picking up again representing 7% (compared to 14% in 2019). This follows the organizational structure of the group with strong ties in Europe and Asia, whereby in the latter region the activities are managed out of the regional office in Hong Kong and management follow up requires frequent visits. The category "IT" comes as the 3rd most important source at a weight of 12%.

The indicators:

3.8.4.1 Carbon footprint of own operations

Carbon footprint in tCO_2e		2022		2021(***)	
Scope		Net total (tCO_2e)	Relative share	Net total (tCO_2e)	Relative share
Scope 1	Direct energy – gas & heavy fuels	1,891	9%	2,171	13%
	Refrigerants	330	2%	181	1%
	Owned vehicles	8,089	37%	7,381	43%
	Total scope 1	**10,309**	**48%**	**9,730**	**56%**
Scope 2	Electricity – net(**)	760	4%	488	3%
	Total scope 2	**760**	**4%**	**488**	**3%**
Scope 3	Home – work commuting	5,941	27%	3,907	23%
	Business travel	1,497	7%	273	2%
	Purchased goods and services				
	Paper	245	1%	227	1%
	IT	2,711	12%	2,582	15%
	Waste	229	1%	57	0%
	Total scope 3	**10,624**	**48%**	**7,047**	**41%**
TOTAL tonnes CO_2e gross		21,694		17,265	
Carbon offsetting		*		17,265	
TOTAL tonnes CO_2e net		21,694		0	
Tonnes CO_2e per FTE		2.4		1.8	

So, as the first Belgian Asset Owner to join NZAOA, Ageas has made a strong commitment to reduce the carbon intensity of the investment portfolio of its European consolidated entities by 50% by 2030.

5) ESRS E3 Water and Marine Resources:

INGA: ✘

In the part strategy it's written that, the team deals with the origination, structuring and execution of structured finance transactions, with a focus on waste and water management. One example of INGA doing this is our role in a funding package for the construction of the UK's first new Reservoir which will secure water supplies in the Southeast region for the next next 80 years. The KPIs for this loan to improve sustainability included environmental and social factors such as water losses, supply interruptions, carbon reduction biodiversity and affordability.

Physical risk is recognised as being event-related (acute), caused by extreme weather conditions, such as hurricanes, droughts, floods, and fires, or longer-term (chronic), by progressive changes such as rising temperatures and sea levels, **water stress** and loss of biodiversity. Another risk that has been identified is that the use of fertilisers and pesticides may have a negative impact on the natural environment, and some forms of agriculture compete **with nature for water.**

However, in my opinion, this standard (ESRS E3 Water and Marine Resources) is not yet met by INGA. As no concrete actions are described, and the result of such actions, to protect water and marine resources, also with reference to reduction of water withdrawals, water consumption, water use, water discharges in water bodies and in the oceans, habitat degradation and the intensity of pressure on marine resources, are missing. In addition, to what extent the undertaking is contributing to the European Green Deal's ambitions for fresh air, clean water, a healthy soil and biodiversity as well as to ensuring the sustainability of the blue economy and fisheries sectors, to the EU water framework directive, to the EU marine strategy framework, to the EU maritime spatial planning directive, the SDGs 6 Clean water and sanitation and 14 Life below water, and respect of global environmental limits, are not described and developed.

As well there are not the plans and capacity of the undertaking to adapt its business model and operations in line with the transition to a sustainable economy as well as with the preservation and restoration of water and marine resources globally. Moreover, there is no understanding of the extent to which the company has strategies in place to identify, assess, manage and/or remediate the significant water and impacts, risks and opportunities of water and marine resources.

So, in conclusion, it can be stated that the description of the water and marine resources policies do not follow the principles defined in ESRS 1 Disclosure Principle 1 on policies adopted to manage material sustainability matters. There are enough other arguments, such as is not shown under paragraph 19 (a) required disclosure, because it must meet the following objectives for its own operations where significant water impacts, risks and opportunities have been identified: (a) Water withdrawals in thousands of m3; (b) Water consumption in thousands of m3; (c) Water discharges in thousands of m3.

ENGI: ✓

On page 12 there is the double materiality approach and on the matric there is a point, which calls "preservation of biodiversity, water and the environment". So, on this materiality matrix the results underline the coherence between stakeholder expectations and ENGIE's strategic orientations. On page 14 it's clearly demonstrated that the SDG6 is considered as an important topic and goal to achieve. The SDG is also on the list of the 8 SDGs for which ENGI's contribution is significant. One concrete action is that in Brazil, a program to conserve water sources in rural areas has been set up with local communities. The table which is presented in the section 'ESRS E2 Pollution' from ENGI states the freshwater consumption per energy produced.

ENGI is also involved in different networks and coalitions that assist it in improving its practices and energizing its value creation for the benefit of its stakeholders. This collective approach allows it – in line with its purpose – to reconcile economic performance with a positive impact on people and the planet. For the water aspect, it calls the "CEO WATER MANDATE".

In 2022 ENGI consumed 80 million m3 of water. In addition, ENGI advocates the following: Production of renewable hydrogen from electrolysis of water with renewable electricity, it is a promising technology that is being currently being industrialised. It does not emit greenhouse gases and allows for the storage of surplus electricity in the form of hydrogen form of hydrogen and possibly methane, all of which can be fed into existing feed into existing grids. ENGI also recognises its influence and dependence on nature, namely the discharge of hot water from the plants into water environments.

Concrete projects where ENGI is driving decarbonisation are the Parly 2 shopping centre, the town of Le Chesnay-Rocquencourt and the department of Yvelines decarbonisation of the region with the Géomy geothermal project. The new plant will produce hot water and heat, 75% of which will be produced from generated from renewable energies, for the equivalent of 9,000 households and will be operational from the 2025 heating season. In December 2021, the Île-de-France region and ENGIE Solutions officially commissioned the 16 MW deep geothermal energy plant at Vélizy-Villacoublay, which supplies 12,000 homes with heating and hot water, most of which is sourced from renewable energy. The project benefits from the multi-drain drilling technology known as Solar Impulse. The

network receives decarbonized energy at +60% renewable energy and prevents the emission of 22,801 tCO2 / year.

There is table, which shows all the environmental indicators on page 64. There is also a concrete project where they pay attention to the water consumption (page 71 project in Malaysia). ENGI also clearly describes their footprint, because the quality of the soil depends on the stability of the soils, which is dependent on ecosystem services (**water filtration**, biological diversity of the subsoil).

A new target is the following: The water challenge is a local issue closely tied to the availability of fresh water and the degree of water stress of the watershed. For ENGIE, the activities that consume the freshest water are thermal power plants, LNG terminals, heating / cooling networks and the creation by dissolution of salt caverns for gas storage. In 2022, ENGIE set a new target for2030: the reduction of the freshwater consumption rate in relation to the energy produced (m3 / MWh) for the consolidated entities of the Group with the following target: 0.100 m3 / MWh. This target thus represents a reduction of 70% in freshwater consumption per energy produced at the end of 2030 compared with 2019. So ENGI knows exactly his impact.

In addition, there is a specific 'Water network' within the company, which spread both the commitments and the water strategy within the group and sharing best practices.

TTE: ✓

A first number which I discovered in the report, is that TTE had a fresh water withdrawal from 107 Mm3. The goal is to achieve a reduction in freshwater abstraction at sites in water stress areas by 20% between 2021 and 2030 (new). A limit on the hydrocarbon content of water discharges to below 30 mg/l for offshore sites and a limit on hydrocarbon content of water. Discharges below 1 mg/l for onshore and coastal sites coastal sites until 2030 (new).

The present situation: Stabilization of withdrawal in water stress area and launch of major resource preservation projects (preservation target of 9 Mcm/y) 93% of the Company's oil sites met the target for the quality of offshore discharges in 2022. 73 % of the Company's oil sites met the new target for the quality of onshore discharges in 2022.

Another project is that in Oman, TotalEnergies has teamed up with Veolia to launch the construction of a photovoltaic project to power a seawater desalination plant and provide drinking water to more than 600,000 people. The 17 MW solar project is a first of its kind in the Middle East and is designed to produce more than 30 GWh/y of renewable electricity and avoid nearly 300 kt CO2 emissions. Moreover, TotalEnergies holds interests in two deep water projects, Anchor (37.14%) and Ballymore (40%). The development of Anchor, with a planned plateau production capacity of 80 kboe/d, is continuing, with production scheduled to begin in 2024. The investment decision for the Ballymore (40%) project was made in May 2022 and its commissioning is scheduled for 2025. Also, there is a construction of a large-scale seawater treatment unit to increase water injection capacities in the fields of southern Iraq and to reduce water withdrawals from rivers and aquifers as the country is facing drought. This water injection is required to ensure that pressure is maintained in several fields and as such will help optimizing production of natural resources in the Basra region. Here is a statistic:

A action from TTE end Saudi Aramco: In December 2022, TotalEnergies and Saudi Aramco announced an investment of $11 billion (of which $4 billion in equity, 37.5%-financed by TotalEnergies and 62.5% by Saudi Aramco) to develop Amiral, a petrochemicals complex in Saudi Arabia with an ethylene production capacity of 1.65 Mt/y. The project should integrate a steam cracker downstream of the SATORP refinery in Jubail, in which TotalEnergies holds a 37.5% interest alongside Saudi Aramco. Reducing the site's environmental footprint is a central aspect of the project, with the goal of not increasing GHG emissions by 2030 and building a wastewater treatment plant that will save up to 8 Mm3 of water per year.

The EU taxonomy is also mentioned with the goal: the sustainable use and protection of water and marine resources. There is also a key performance table within in the Taxonomy (page 307). On page 321 a detailed description of sustainable use of resources is given. Also on page 381 some numbers concerning the water consumption,etc. is given.

Oil spill preparedness	2022	2021	2020
Number of sites whose risk analysis identified at least one risk of major accidental pollution to surface water	113	119	119

Discharged water quality	2022	2021	2020
Hydrocarbon content of offshore continuous water discharges *(in mg/l)*	12.9	13.7	12.8
% of sites that meet the target for the quality of offshore discharges *(30 mg/l)*	93%	92%	100%[a]
Hydrocarbon content of onshore continuous water discharges *(in mg/l)*	1.8	2.6	1.9
% of sites that meet the target for the quality of onshore discharges of:			
– goal 2010-2020: 15 mg/l	100%	100%	100%
– goal 2030: 1 mg/l	73%	80%	–

Fully aware of these challenges, TotalEnergies implements the following water risk management actions: – monitor water withdrawals to identify priority sensitive sites and then carry out a risk assessment, – improve water resources management depending on identified needs, by adapting the priority sites' environmental management system.

SIE: ✓

The first sign in the report is that Siemens has other environmental initiatives that give it flexibly timed, focused tools for managing and improving its environmental impact. At present, their initiatives have set targets for water and biodiversity. In addition to the goals of the Eco Efficiency @ Siemens program, they are actively pursuing resource conservation in other areas as well: For example, it is also vital for Siemens to identify and mitigate water risks, to reduce emissions of volatile organic compounds (VOCs), and to foster biodiversity.

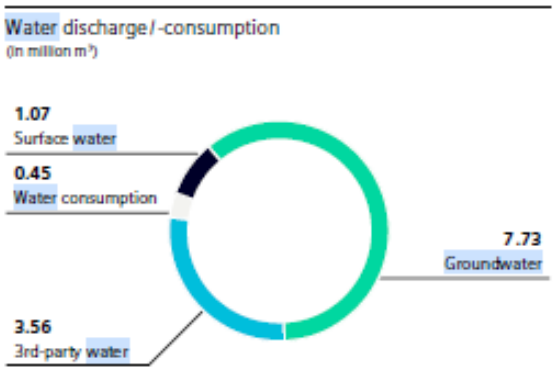
Water-related indicator *(Mcm)*	2022	2021	2020
Fresh water withdrawals excluding open loop cooling water	107	101	105
Fresh water consumption	80	75	75
Fresh water withdrawal in water stress area[1]	55	54	52

So, the is one of humanity's most important resources. For this reason, SIE has been analyzing water scarcity, water pollution, and climate change as well as the development of flooding and precipitation patterns at our locations for several years. We consider these analyses in our business decisions – when, for example, we select the site for a location or implement precautionary measures.
More precisely, The aim of our water strategy is to minimize the adverse local effects of our water consumption and use. Here we take account of such factors as water scarcity, water pollution, flooding, local fire risks, and the consequences of climate change. In 2021, we transferred our water strategy to

our standard regulatory framework, the Environmental Protection Standard, after it had been successfully implemented worldwide by 2020 via our last environmental program, Serve the Environment.

Our total water use decreased 14% from the previous year and is now 12.9 million m3. The largest share of our water use is for cooling processes. These processes leave the water's chemical quality largely unchanged, so that the water can be returned directly to the receiving water body or groundwater. Water consumption is a water substream with a major environmental impact since it withdraws water from the catchment area – in our case, mostly by evaporation. At 0.45 million m3, the share is relatively small. Of this amount, 0.07 million m3 is accounted for by water consumption in water stress areas.

On page 118 and 119 are the sustainability indicators, also for water… they speak also about the United Nations CEO Water Mandate. Like Engie they are member of this one. Siemens became a signatory to the United Nations CEO Water Mandate in 2008. We are continuing to support the Mandate in two ways: by managing water efficiently at our own facilities and by providing solutions that help our customers handle water and wastewater more efficiently. There is one project through this mandate: The WeTu social enterprise founded by Siemens Stiftung works on innovative solutions for supplying energy and drinking water to communities on Lake Victoria. Its WeWater unit operates 11 water dispensing stations at various locations that supply their surrounding rural communities with safe, filtered drinking water at economical prices.



COLR: ✓

First of all, again The EU Taxonomy is mentioned and their related objective (Sustainable use and protection of water and marine resources). Here are the indicators for the SDG 6 'Circular water management':

Indicators SDG 6		2019	2020	2021	Objective
Circular water management					
Total water consumption (in m³)	Calendar year	605.846	592.468 (1)	560.578	
% Rainwater and wastewater	Calendar year	27,2	29 (1)	33,4	50% by 2025
Recycled wastewater at Fine Food Meat (in m³)	Calendar year	96.926	109.199	101.943	
Drinking water produced in the PURA drinking water installation	Calendar year	972	4.242	7.732	

(1) When calculating the figures for 2021, it was found that there was an error in the calculation method for 2020.

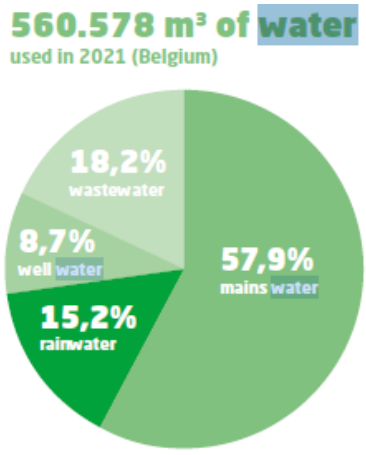
They have also a so called '12 programs for making a difference' and there is one section 'Water'. In addition, COLR pays attention along their supply chain, so they try to avoid or reduce negative impacts

by reducing their energy consumption, water use, transport of goods, etc. At the same time, we take a positive lead through innovation.

According to the materiality matrix has the topic 'Water management' a high importance for their stakeholders but the impact of COLR is not so high on the ecosystem in this topic. COLR also tries to consume the most sustainable drinking water itself. Because the Ghent start-up ROBINETTO installs professional tap installations that supply filtered, cooled, still and sparkling water and also relieve users of masses of plastic waste. In 2021, customers tapped in this way more than 1,3 million litres, at a savings of two million packaging items. In the course of 2022, Robinetto will be installing more than 500 water taps in the group's central buildings and in Colruyt, Bio-Planet and OKay stores. At their headquarters in Halle, they now treat the wastewater and rainwater from ten buildings themselves, including the offices and the distribution centre with. The treatment plant can produce 11 m³ of potable water per hour, reducing the tap water consumption of the connected sites by up to 90 %.

Another project is the strengthening existing partnerships. Several years ago, we joined forces with the non-profit organisation De Lochting, a sheltered workshop and organic farm in Roeselare, for their organic vegetables. In 2021, they set some clear targets, ranging from sustainable land use and growing policy to sustainable water and emission management.

This what they are doing concrete In concrete terms, this means that we use water even more sparingly on our sites. We do this in several ways: By optimising existing installations, by using the right type of water for the right purpose, for instance not using drinking water when this is not necessary, by treating and reusing wastewater, by collecting and using as much rainwater as possible, treated or not by buffering surplus rainwater or letting it soak into the groundwater. In figures: In 2021, 33,37% of their consumed water came from rainwater and treated wastewater. The wastewater and rainwater treatment are explained on page 160.



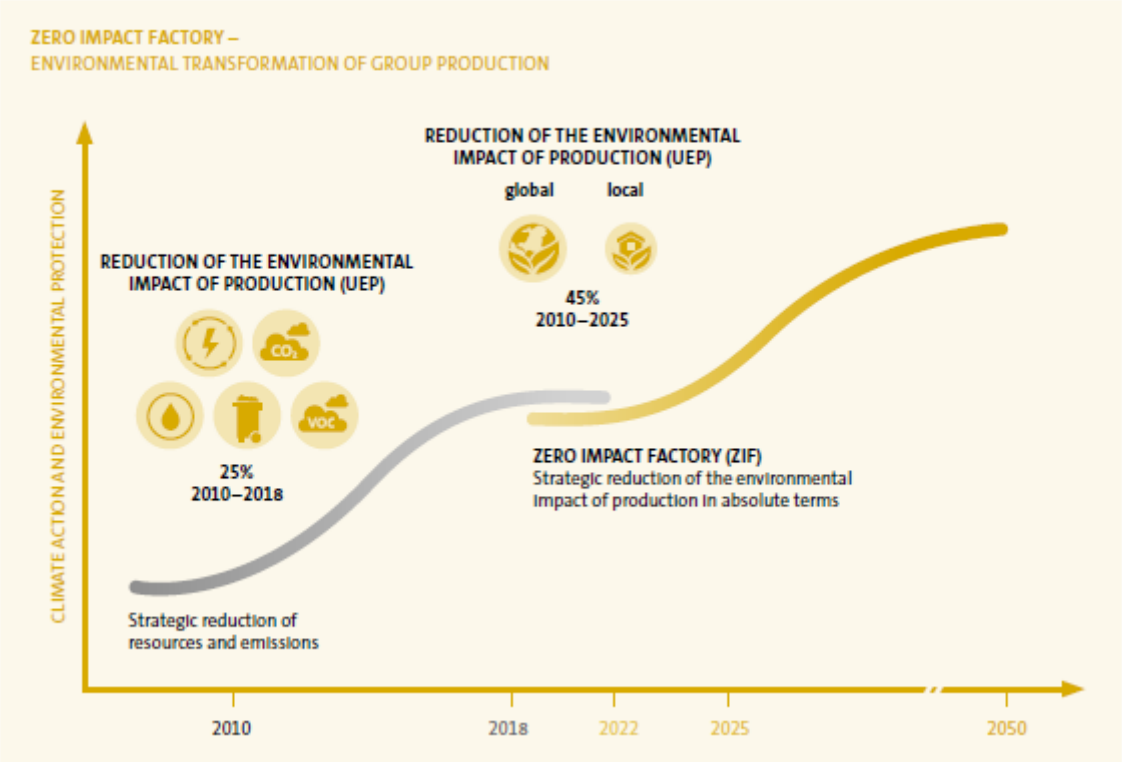
On page 161 more projects are presented how they reduce their water footprint of their product range, etc.

VOW3: ✓

A first number/letter which is presented in the report is, that Volkswagen continued to have a score of A– in the CDP climate rating and had an A rating in the Water Disclosure Project (WDP). Concerning the conserving of the resources: They maximize our energy and resource efficiency and establish closed

loops for materials and water. In addition, they to reduce harmful emissions in air, soil, and water. About the water consumption per vehicle, the following number is given: –17.4% (2021: –11.6%).

The strategy to the ‘zero impact factory’ is given on page 29:



22 quantitative environmental indicators (for example, CO2 emissions, solvent emissions, freshwater requirements, wastewater loads or different types of waste) are measured locally and converted into impact points. This makes the absolute environmental impacts comparable with one another and means they can implement reduction measures targeted precisely at the areas where greatest impact can be achieved. Moreover, in the current year, the sites are being asked to contribute the best measures for saving water to the competition. Here is the change shown between 2021 and 2022:

Volkswagen Group				Passenger cars and light commercial vehicles
Change in overall environmental impact of production (UEP)	in %	–37.4	–29.1	
Change in specific energy requirements	in %	–14.1	–3.4	
Change in specific CO_2 emissions	in %	–43.1	–33.5	
Change in specific VOC emissions	in %	–65.9	–62.0	
Change in specific water consumption	in %	–17.4	–11.6	
Change in specific waste for disposal	in %	–68.5	–61.7	Only production-specific volumes
Volkswagen AG				
Change in overall environmental impact of production (UEP)	in %	–2.3	8.4	
Change in specific energy requirements	in %	6.5	20.5	
Change in specific CO_2 emissions	in %	3.6	19.9	
Change in specific VOC emissions	in %	–14.5	–18.8	
Change in specific water consumption	in %	11.4	19.0	
Change in specific waste for disposal	in %	–37.0	–28.6	Only production-specific volumes

Also on page 32 are figures. VOW3 makes also reference to the EU taxonomy with their related objectives. VOW3 also identifies the risks: They evaluated their economic activities with respect to the

sustainable use and protection of water and marine resources looking at the following three criteria: Preserving water quality, avoiding water stress, and an environmental compatibility assessment (EIA or comparable process). Risks identified in an EIA are examined during the approval process and, if relevant, result in measures and regulatory requirements. We based the analysis primarily on ISO 14001 certificates, information from site approvals and other external data sources related to sites with a high-risk exposure.

That is the focus of VOW3 concerning the water management: We focus on the following areas of activity in sustainable water management: Reduction of freshwater consumption and efficiency in water use, particularly in water stress areas. Minimization of pollution and no worsening of the environmental and chemical status in the receiving waters (waters into which the treated wastewater is introduced). Increased soil and groundwater protection when using water-polluting substances.

Again, on page 73 the responsible use of water is described. The KPI is the following:

CIRCULAR ECONOMY KPIS

Précédent

KPI	Unit	2022	2021	Notes and comments
CO_2 avoided since 2017 through the Aluminum Closed Loop Project	In metric tons of CO_2	633,881	467,671	The calculation of the CO_2 savings from the Aluminum Closed Loop was updated compared with the prior year because the press shop offcuts were reassessed.
Proportion of freshwater needed at sites in risk zones	In million m^3/year	15.9	15.8	Passenger cars and light commercial vehicles

SOLB: ✓

Over the past 30 years, Solvay has invested €40 million in developing proprietary technology first patented in 2014. This investment, and the work of our talented engineers and researchers, has enabled us to develop a new method for producing soda ash, which introduces three revolutionary improvements: 50% less CO2 emissions**; a 20% reduction in water and** salt usage and a 30% reduction in limestone consumption; as well as significantly less limestone residues. In addition the EU taxonomy is mentioned.

SOLB uses the tool of the World Wide Fund of Nature Water Risk Filter. Improving waste recovery and water-use efficiency will reduce their impact on the environment and preserve scarce resources. It also helps them to create value; by improving the sustainability of their sites and processes, we improve the sustainability of their products, allowing us to better cater to the needs and expectations of our customers. Projects are explained on page 45:

In 2022, they experienced two droughts and two cases of severe freezing with an impact on water intake. To address water scarcity at their sites, we have launched various water management initiatives. These include putting in place a dashboard that monitors around 90% of the Group's daily freshwater intake. In 2022, they began significant work to improve the resilience of their sites in relation to water risks. They conducted a review of water risks, which assessed about half of our sites according to several criteria including water scarcity, quality of effluents and risks related to regulations, and led to longer-term initiatives. At our site in Paulinia, Brazil, for example, we are working to avoid future water shortages by holding regular roundtables with authorities and local stakeholders to better manage the water basin. Three projects have been approved so far that will reduce water intake by **5.6Mm³ per yea**r. Seven sites have designed roadmaps to improve their resilience, with the **potential to achieve 30**

million cubic meters in water intake reduction. Two more examples are given on page 45. It' written that projects to reduce freshwater intake underway at more than 20 sites across the world on track to reach our -25% target by 2030.

The opportunity for SOLB is that Solvay offers leading technologies to many of the markets where resource efficiency is a key driver. So, SOLB offers leading technologies to many of the markets where resource efficiency is a key driver. But also the risks are identified on page 206 related to water scarcity.

Another example is that their researchers have developed Udel® PSU to purify water through various treatment processes. This high-performance polymer can be used to manufacture reverse osmosis water treatment membranes, for instance, which are essential to removing contaminants and making fresh water out of seawater through desalination.

SOLB identifies 'Water and wastewater' as high materiality topics. Here is the volution from year 2018-2022:

	Water						
R	Total freshwater withdrawal	Mm³	330	315	314	330	330
	Freshwater withdrawal in water-stressed areas	Mm³	18.5	30.7	29.0	-	-

RESOURCES

Topics	Boundaries	Evidence of interest	Evidence of financial impact	Forward - looking adjustment	Materiality
Product design and life cycle management Management of value chain economic, environmental and social impacts of products and services	Operations Value chain SDG-12 SDG-13	High High materiality for the chemical industry	High Revenue, costs: yes Assets, liabilities: yes Cost of capital: no	Yes Probability, magnitude: yes Externalities: yes	Priority
Air quality Management of emissions of air pollutants from operations	Operations SDG-3 SDG-15	High High materiality for the chemical industry	High Revenue, costs: yes Assets, liabilities: yes Cost of capital: no	Yes Probability, magnitude: yes Externalities: yes	High
Water and wastewater Management of water withdrawals, discharge and consumption	Operations SDG-3 SDG-6 SDG-14 SDG-15	High High materiality for the chemical industry	High Revenue, costs: yes Assets, liabilities: yes Cost of capital: no	Yes Probability, magnitude: yes Externalities: yes	Priority

The indicators are on page 187. On the pages 225-227 is the detailed version of 'water and wasterwater' topic:

Water input from (Mm³)*		Water discharge to (Mm³)*	
Surface water (freshwater)	216	Surface water (freshwater)	237
Surface water (other water)	0	Surface water (other water)	4
Groundwater (freshwater)	73	Groundwater (freshwater)	0
Groundwater (other water)	0.13	Groundwater (other water)	0.63
Sea water	83	Sea water	84
Third party (freshwater)	46	Third party (freshwater)	39
Third party (other water)	12	Third party (other water)	55
Other sources	23	All losses	36
TOTAL	453	TOTAL	456

(*) Excluding the H_2O_2 HPPO plants from Zandvliet (Belgium) and Jubail (Saudi-Arabia), where the secondary cooling circuit is integrated in a primary cooling loop managed by the external partner.

KBC: ✓

As part of this process KBC regularly examines the way they manage Environmental, Social and Governance (ESG) domains within our impact area. KBC will increasingly address issues of biodiversity, **water, circularity, waste and pollution**, given the evolving concerns over our environment.

The problem of the water economy is well-known and it 'classified in the area "Environmental responsibility". As part of its overall sustainability strategy, KBC has set up a separate Sustainable Finance Programme. Initially, the programme was set up to focus on KBC's approach to climate mitigation and adaptation. Since then, however, we have extended the scope to other environmental themes such as biodiversity, **water** and circularity. In the sustainable finance category, it's mentioned that **water management** is gaining importance.

There are three types of RI funds, each with their own specific characteristics and criteria. So, one fund 'ECO-thematic funds', which is dedicated to invest in companies which provide solutions to a specific sustainability challenge such as climate change or **water scarcity.** Here is the target of the funds:

TARGET

RESPONSIBLE INVESTING FUNDS

Indicator	2019 bench-mark	Base-line 2021	2022[1]	2025 target	2030 target
RI funds in % of total AUD (direct client money)	-	33%	37%	45%	55%
RI funds in % of total annual fund production (gross sales)	-	55%	48%[2]	-	65%
Carbon-intensity (Scope 1 + 2) of corporate investees in Responsible funds (t CO_2e/ million USD revenue)	196	-	66 (-67%)	-	98 (-50% versus 2019 bench-mark)[3]

A project which tries to save water is the 'ČSOB Start! t Social grant programme' (page 53).

Reference to the EU taxonomy: In 2022 we gradually broadened our focus to cover other environmental objectives, although climate change remains our main focus. Our widened focus includes the sustainable use and **protection of water and marine resources**, the transition to a circular economy, pollution prevention and control, as well as the protection and restoration of biodiversity and ecosystems. It is no coincidence that this scope aligns with the environmental objectives outlined in the EU Taxonomy. Technical criteria have already been published for climate change mitigation and adaptation, whereas such criteria for the other objectives are expected to be published in the near future.

Water consumption falls under the category 'Scope 3' in the report: Scope 3: indirect emissions from business and commuter travel, and emissions from sources over which we have direct operational control (such as paper and water consumption and waste generation). In addition, the White Paper will be extended: From 2023, the scope of some of the White Papers will be expanded to include the other environmental themes; biodiversity, water, circularity and pollution. On page 102 the general water consumption is shown, the more detailed one is on page 105:

Water consumption

	Note	2022		2021 recalculated		2021	
		m^3	tonnes CO_2e	m^3	tonnes CO_2e	m^3	tonnes CO_2e
Scope 3							
Drinking water consumption and water treatment		254 825	107	263 834	111	240 758	101
Total Scope 3		254 825	107	263 834	111	240 758	101

Source emission factors: DEFRA GHG reporting: 2022 conversion factors.

Also, on page 107 the different emissions of water are presented.

On page 134 the main challenges are listed, and the term “Water” is also presented there. Lastly on page 137 all the milestones are explained to achieve the sustainable targets in the future.

ABI: ✓

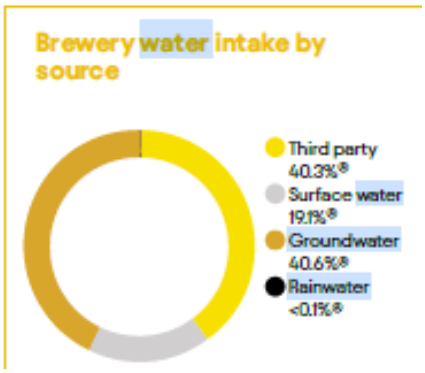
A first statement, which I discovered in the report is that ABI was recognized with a double A score from CDP for their corporate transparency and performance on climate change and **water security**. Also, they were included in the 2022 Fortune Change the World List for their leadership **in water stewardship.** Moreover, ABI has a 14.3% improvement in water efficiency since 2017.

A first action that they did is a participatory approach to local water security in India. Their team in India is working to improve water accessibility and security in the communities around our breweries through long-term local watershed initiatives. To date, the initiative has supported more than 1.6 million hectoliters of water recharged into the groundwater. Along with activities around improving water availability and accessibility, the projects included training and awareness sessions on water-demand management. We believe such stakeholder participatory processes instill community ownership of the new structures. Farmers impacted by the project have seen an average increase of approximately 18,885 INR (~230 USD) in annual income. We note an approximate increase of 43% in the average annual income postintervention.

In the section ‘Water Stewardship’, it’s written that water is a critical resource for the health and well-being of communities around the world. Water resource challenges are magnified by climate pressures, inadequate infrastructure, and governance issues. The growing scarcity of freshwater resources is not just an important issue for our company. It is also important to the economic, social, and environmental well-being of our communities. They have achieved a water use efficiency ratio of 2.64 hectoliter/hectoliter across our sites globally, bringing us closer towards our ambition of 2.5 hectoliter/hectoliter by 2025. They also continue to prioritize water use efficiency across the high-stress sites identified as part of their 2025 goal. We set the ambition to achieve 2.0 hectoliter/hectoliter in these high-stress sites by 2025. In 2022, we achieved a water use efficiency ratio of 2.4 hectoliter/hectoliter in these sites, which is an improvement of over 16.1% compared to our 2017 baseline of 2.8 hectoliter/hectoliter. The 2022 results are the following: In 2025 Water Stewardship goal is that 100% of their communities in high-stress areas will have measurably improved water availability and quality by 2025. 2.64 hl/hl shall be the water use efficiency ratio and 100% of the 36 sites in scope for our goal have conducted outreach, analyzed local water challenges and identified potential solutions. Also, 100% of these sites have started implementing solutions. Lastly, 6of these sites have already begun seeing measurable impact.

The strategy: Within our operations by aiming to drive water use efficiency, responsible discharge and effluent re-use;Beyond our brewery by investing in shared water security and watershed health

through partnerships; In local communities by promoting and supporting water access and disaster relief efforts; Across our value chain by promoting water security through our brands, key brewing materials and engaging major suppliers; and as a company by contributing to the broader water landscape through innovation, policy engagement and thought leadership. Water security is local and complex, and there is no single solution. Each of our sites will have its own specific set of local water issues to address and help reach our 2025 Water Stewardship Goal. To help us identify these specific local watershed challenges and the appropriate solutions to address them across our high-stress sites, we have developed and implemented a seven-step watershed management process. (There are also examples on page 44)



Example on page 45 in Africa, page 46 in Brazil and page 47 in Mexico. All the engagements were ABI is included could be found on page 73.

The 2022 ESG index is on page 75 for the Water Stewardship topic. All the 2025 sustainability goals and other key metrics are on page 82:

Goals	Metric	2022	2021	2020	2019	2018	2017 (Baseline)
	Total water use (in billion hl)	1.55®	1.52	1.41	1.56	1.59	1.71
	Water use by hectoliter of production (hl/hl)	2.64®	2.64	2.68	2.79	2.94	3.08

On page 87 there is SASB table related to the water management. On page 91 there is the SDG 6 table explained in detail (target, examples of actions, etc.). To finish, it's also worth mention that there is the link with the EU taxonomy and their objectives.

AGS: ✓

5. MEASURING WATER CONSUMPTION - OWN OPERATIONS

Water consumption in cubic meters	2022
Water usage	85,742
TOTAL water consumption	85,742

In 2022, Ageas has decided to start monitoring water consumption indicators, including water consumption and water discharge. Considering data availability, only water usage is disclosed externally at this stage. As a company in the financial sector, water consumption related to own

operations refers to day-to-day activities, hence, general human consumption from tap water at offices. Only in two of their operating companies (AG Insurance and AG Real Estate) water recovery installations are in place.

The targets are the following: In September 2022, Ageas reached another milestone in its climate journey to become carbon neutral as a Group, obtaining for the first time a CO2 neutral certificate for the full scope of the measured CO2 emissions in 2021, including Scope 1, 2 and categories of Scope 3 in own operations. This was achieved via various offsetting projects, certified with the highest standards, such as the Gold Standard or Verified Carbon Standard.

That are the projects/actions taken: Ageas Corporate Center, along with other entities in the group, joined a reforestation project in India, primarily located in Odisha region. Ageas UK supported several projects, including a carbon finance initiative on renewable energy projects across the world, as well **as a project distributing water filter in Kenya**. Another project is from Ageas Portugal Group: In 2022, together they created a series of educational videos related to environmental issues, health, and wellbeing. As well as creating awareness on the impact of climate change on health, the videos also **shared tips on how to save water**, ways to improve the thermal comfort of homes without major expenses and ideas on adapting to more sustainable mobility solutions.

The overall benefit of these projects goes beyond the avoidance of GHG emissions and aim to also benefit, amongst others: The distribution of water filters enables communities access to safe drinking water, as well as reduces the need to boil water to make it safe to drink, an activity which requires the burning of unsustainable fuels.

They have also KPI's: Energy, water, and carbon footprint KPI's are monitored in real time confirming that what gets measured, gets done: e.g., a 30% reduction in water consumption in the office portfolio between 2018 and 2022**.** Two are related to the water, namely the Visual diagnostic tools for telemonitoring energy and water consumption and energy audits; and 7% of the current investment portfolio already has a water leak detection system in place.

To finish, it's also worth mention that there is the link with the EU taxonomy and their objectives (sustainable use and protection of water and marine resources).

6) ESRS E4 Biodiversity and Ecosystems:

INGA: ✓

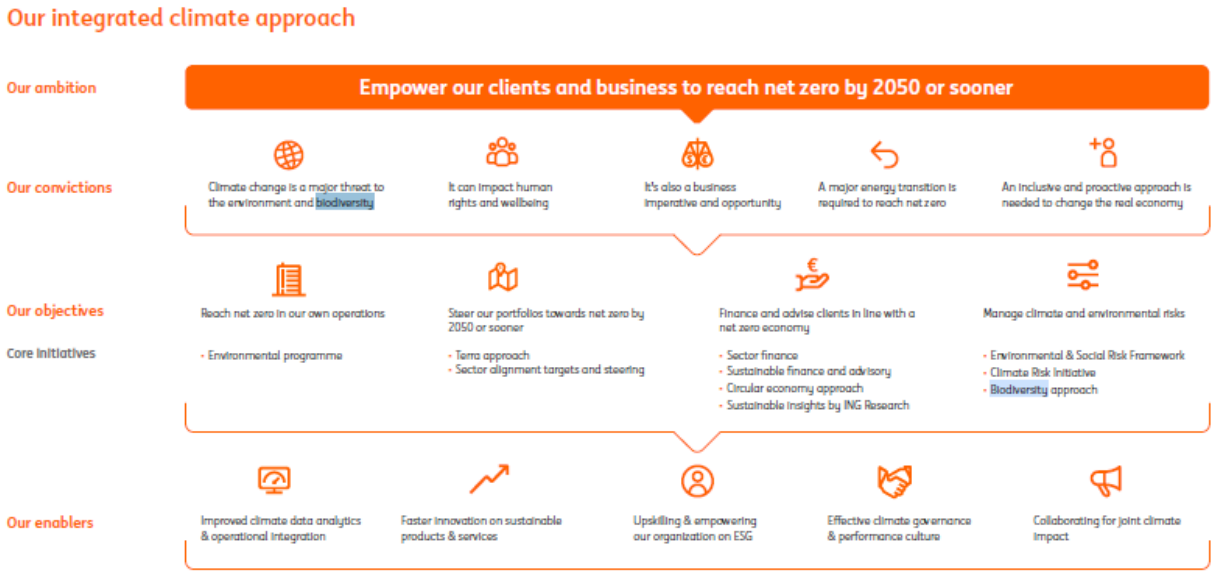
Strategy: INGA targeted the integration of biodiversity into our sustainable finance frameworks and strengthened biodiversity considerations into risk assessments. Moreover, INGA will continue to explore further ways in which to link biodiversity, human rights, and circular economy into our approach to climate action.

In the 'Governance' section INGA wants more content to learning channels by topic, such as introductory videos on climate risk, created in cooperation with the Dutch Banking Association (NVB). To ensure the effectiveness of this training, we have selected best-in-class vendors to partner with us, have expert colleagues collaborating across ING, and have a clear evaluation programme aligned to

business and societal impact. Additional training opportunities on sustainability-related topics will also be available such as human rights, **biodiversity** and financial health.

Their approach: As biodiversity and human rights are closely linked to climate change, these are also in focus for the transition we aim to support. This also means that they must identify the risks that climate change, biodiversity, and human rights pose to our business. Sustainability issues impact our business, and INGA works to assess these risks and take action to mitigate them across our business relationships.

Here is the climate approach (page 20):



On the strategy part the term 'Biodiversity' is explained. So, the gap between current funding and what is needed on average per year to protect the most important biodiversity and its services, is known as the global biodiversity funding gap, and currently stands at $711 billion. At ING we believe we have a role to play in protecting biodiversity, and that as a bank we can best do this by shifting financial flows toward nature-positive outcomes. By doing so we also contribute to the goals of the United Nation's (UN) Global Biodiversity Framework. One way we help reduce negative impact on biodiversity is by supporting clients to reduce their pressures on nature through the five direct drivers of biodiversity loss as identified by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES). These are, in descending order of global impact: 1. changes in land and sea use; 2. direct exploitation of natural resources; 3. climate change; 4. pollution and 5. invasive alien species.

With our sustainable finance offerings we already focus our attention on some of these drivers. For instance, as the agricultural sector is one of the largest users of land in the world, it has significant potential to contribute to addressing the challenges of biodiversity loss. Our clients realise this and increasingly commit to practices and initiatives that support the preservation of biodiversity.

Example: These commitments gradually find their way into sustainable financing frameworks whereby our clients are rewarded for their biodiversity efforts. This development is visible in various industries and across the supply chain, but mostly concentrates around land use change, use and exploitation of natural resources and climate change. Examples include an increasing level of agricultural commodities supply chain traceability (land use change), flower strip planting alongside agricultural lands to stimulate crop diversity and biodiversity monitoring (use and exploitation of natural resources), and reduction of the ecological footprint. Finally, connecting sustainable finance directly to biodiversity

protection and restoration is not common in the financial market. We are proud and excited to do pioneering work in this area and are looking forward to many new opportunities to work with our clients to protect and restore biodiversity.

The risk and impact: 2021 we improved our understanding of how the drivers of biodiversity loss relate to our lending portfolio through a biodiversity hotspot analysis (see Risk management section). The interaction between business and nature forms the core of this analysis and is central to the work of the Taskforce on Nature-related Financial Disclosures (TNFD), established in response to the growing realisation that nature needs to be an important consideration in corporate decision-making. ING supports the TNFD framework and intends to use it as guidance in our future reporting. We are actively working with peers and expert organisations to contribute to the development of the framework. Moreover, ING's biodiversity hotspot analysis reveals those sectors where our lending portfolio is most **dependent on, and could most impact, biodiversity.** We based our analysis on the tool ENCORE, **(Exploring Natural Capital Opportunities Risks and Exposure**). The outcome of this analysis led us to focus on the sectors food and agriculture, construction, mining, and energy because these have an increased impact and dependence on biodiversity. **The dependence is largely because companies operating in these sectors rely on ecosystems for water while the ecosystems protect them from floods and storms**. On the impact side, the main issues in these sectors are the amount of land used, the way it was used, and the levels of water used in production.

The biodiversity hotspot analysis showed biodiversity loss is also material to the sector. While agriculture can have a negative impact on nature, it depends on its biodiversity, in the case of crop pollination, for soil health and stability, and to ensure water retention. The use of fertilisers and pesticides can negatively affect surrounding natural environments, and some forms of agriculture compete with nature for water. Nitrogen deposits, which can disturb ecosystems and cause biodiversity loss, are a growing problem in the agriculture sector, especially in the Netherlands and Belgium. For this reason, and because of its relevance to our clients, we follow the public debate with great interest.

ENGI: ✓

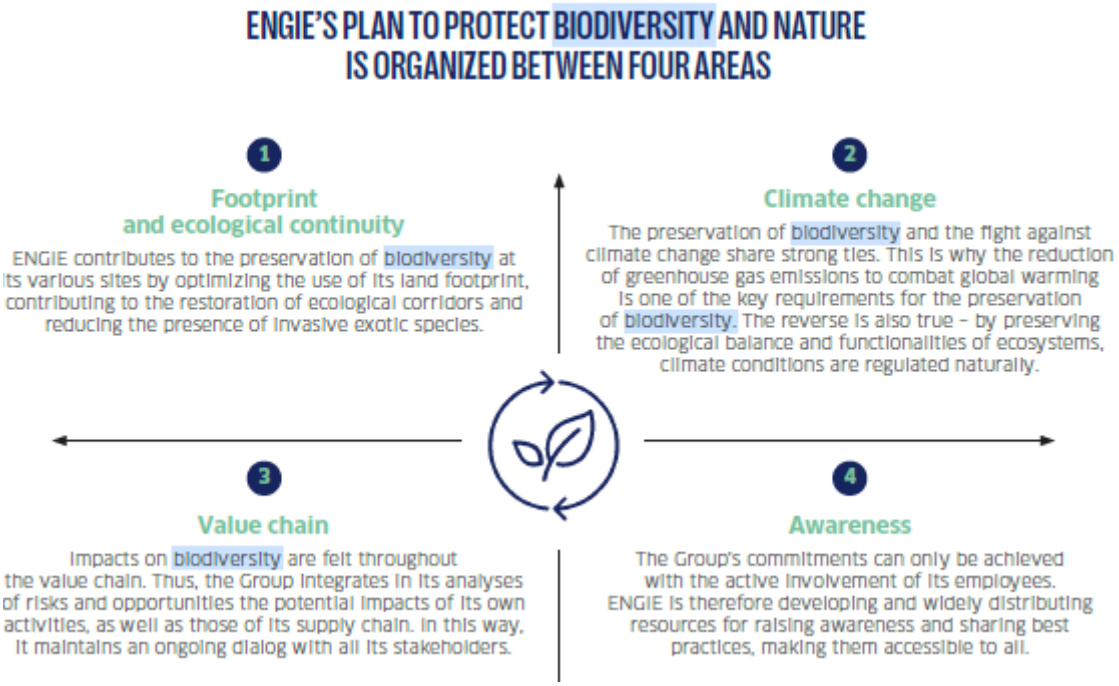
On the materiality matrix, the term 'preservation of biodiversity, water and the environment' is on levers of value creation. Here can be the evolution seen of biodiversity:

PLANET		2020	2021[1]	2022[1]	TARGET 2030
Objectives monitored by the governance bodies (EESDC)					
Biodiversity	Rate of industrial sites with natural management of green spaces without the use of chemical plant protection products	0%	28%	34%	100%

In addition, ENGI is in several environmental commitments related to biodiversity (page 19). ENGIE has a vigilance plan designed to identify and prevent human rights abuses, infringements of fundamental freedoms, dangers to human health and safety and environmental damage: In the pillar 'Environment and societal', it' written: Risks **related to biodiversity and ecosystem rehabilitation.**

ENGIE has been committed to the French National Strategy for Biodiversity since 2011 and to the act4nature initiative from its launch in 2018. It has renewed and expanded this commitment with a new 2020-2030 roadmap based on the shared commitments, taking into account the pressures defined by the Intergovernmental Science and Policy Platform on Biodiversity and Ecosystem Services (IPBES) and the challenges specific to the Group's activities. For more than 10 years, the Group's biodiversity

approach has been supported by the French Committee of the IUCN and France Nature Environnement. The Group recently joined the pilot phase for the development of Science Based Targets for Nature (SBTN).



The impact of ENGI: Like any human activity, the businesses of the ENGIE group constantly interact with biodiversity and nature. This interaction takes two directions: The activities have an impact on biodiversity, mainly habitat disturbance caused by the land footprint of the Group's industrial sites, the soil sealing and the disruption of ecological continuity (page 37 all other impacts are also explained).

A partnership with TED related to biodiversity (page 51).

The Group also set out a new road map for 2020-2030 based on the major pressures on biodiversity identified by the IPBES (Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services), the United Nations SDGs (Sustainable Development Goals), common act4nature commitments and issues specific to its activities. The biodiversity notebook starts on page 90 onwards.

The footprint to limit its impact on biodiversity is explained on page 91. On page 93 is example from Brazil. On page 94 there are approaches and tools to measure the biodiversity footprint. ENGI has also a BIODIVERSITY Network within the group.

TTE: ✓

TTE has several commitments: Implement a net zero deforestation policy in new projects on new sites approved from 2022 onwards and Implement the biodiversity ambition in the 4 areas presented in point 5.5.4 of chapter 5.

Some facts: 7 biodiversity action plans deployed or in preparation in 2022 for projects located in protected areas(1) or aligned with IFC standard – 43 biodiversity assessments carried out on sites important for the environment(2) in 2022 – World Environment Day was celebrated in 2022 on the theme of biodiversity, thereby raising awareness among the Company's employees – 18 citations in

scientific publications of biodiversity data sets produced by the Company and shared in the database of the Global Biodiversity Information Facility (GBIF) database.

In 2016, the Company pledged to contribute to the achievement of the UN Sustainable Development Goals (SDGs), including those relating to biodiversity. In 2018, TotalEnergies signed up to the act4nature initiative promoted by the French Association of Enterprises for the Environment, now act4nature international. In 2020, TotalEnergies set a new biodiversity ambition on the occasion of preparing for the United Nations' global biodiversity plan, which aims to protect global biodiversity and updates its public commitments concerning biodiversity. This ambition has been factored into the One MAESTRO reference framework. The core principles of this ambition are – the Company has made a commitment not to conduct any exploration activities in oil fields under sea ice in the Arctic, – the Company recognizes the universal value of UNESCO's world natural heritage sites, by not conducting oil and gas exploration or production activity in these areas, – for each new project located in an IUCN (International Union for Conservation of Nature) protected areas category I or II or a Ramsar site, the Company undertakes to implement measures to generate a net positive impact on biodiversity.

The EU taxonomy is also again mentioned and the related objective 'the protection and restoration of biodiversity and ecosystems.'

TTE has identified several risks: risks: Risk of accidental pollution, environmental risks that would arise in the event of a liquid, gas or solid discharge or unsustainable use of natural resources, risk of damage to biodiversity and ecosystems during projects and operations, especially those located in sensitive natural environments, environmental risks associated with the production of final waste.

Finally, In 2020, TotalEnergies set itself a new global biodiversity ambition to coincide with the preparation of the United Nations' global biodiversity plan, and updated its public commitments in this field. This ambition is based on four core principles: (1) voluntary exclusion zones, (2) biodiversity management in projects, (3) biodiversity management at existing and abandoned sites and (4) promoting biodiversity. This ambition has been incorporated into the Company's One MAESTRO framework (all this are explained on page 322 and 322).

SIE: ✓

The policy: Our environmental policies require our locations to avoid activities with an adverse impact on local biodiversity, to perform water risk analyses, and to take steps to protect water bodies. That is especially the case in particularly vulnerable areas. The policies furthermore include mandatory rules for handling and reducing CO2 emissions and waste, with special attention to landfill waste.

In addition to our long-term Eco Efficiency @ Siemens environmental program and the DEGREE framework, Siemens has other environmental initiatives that give it flexibly timed, focused tools for managing and improving its environmental impact. At present, our initiatives have set targets for water and biodiversity. In this connection, Siemens is an advocate of the global Green Deal initiatives, such as the European Green Deal, which has adopted the objective of transitioning to a circular economy, restoring biodiversity, reducing the release of pollutants into the environment, and achieving climate neutrality by 2050. We are constantly at work to expand and improve our employees' knowledge and awareness of environmental protection. For instance, we have developed an internal white paper and the two- part Circular Design learning program that explains the requirements Siemens must currently

meet for our products' sustainability and links those requirements with our Robust Eco Design approach. This program has been available online to all Siemens employees1 since fiscal 2022.

In the section 'Conserving resources', a detailed explanation is given (page 74): The target: While many types of waste can be recycled or reprocessed in a functioning circular economy, the production of landfill waste has a particularly negative impact on the environment. Landfill waste takes up space, generates greenhouse gas emissions, influences local biodiversity, and causes health problems for people and ecosystems. That's why we want our landfill waste, which has already been reduced through numerous reduction initiatives, to be reduced by 50% by 2025 compared to fiscal 2021 and progress towards zero landfill by 2030. We also want to continuously increase the percentage of material recycling by 2030. In addition to the goals of the Eco Efficiency @ Siemens program, they are actively pursuing resource conservation in other areas as well: For example, it is also vital for Siemens to identify and mitigate water risks, to reduce emissions of volatile organic compounds (VOCs), and to foster biodiversity.

Initiatives for greater biodiversity: The aim of Siemens' environmental management system is to foster the preservation of a diverse natural environment. Biodiversity and conservation are defined in our environmental policies as environmental aspects at the company level that must be assessed locally. The aim here is to ensure that the business activities in our factories and offices do not reduce species diversity beyond an unavoidable minimum. To further develop our approach to biodiversity, we have entered a strategic partnership with a consulting firm specializing in biodiversity – experts who will help us scientifically assess our biodiversity footprint and expand our commitment to sustainability.

The detailed sustainability metrics (from the topic environment) could be found on page 113 onwards.

COLR: ✓

Firstly, it can be seen that the EU taxonomy is mentioned in the report and their related objectives, especially the 'protection and restoration of biodiversity and ecosystems'. On page 15 COLR puts the topic 'Biodiversity' in the 12 programmes to make a difference. We make a difference with 12 programmes where we are keen to make tangible progress through innovation and collaboration across the entire value chain. The word 'programme' makes clear that this work is never finished and that we are constantly refining our strategy and objectives. We are working towards these clear objectives through more than 150 concrete projects.

On the materiality matrix it can be seen that the point 11 'Biodiversity' has a medium impact on the ecosystem but a relative high importance for their stakeholder.

A concrete project is 'Beyond Chocolate': The goal for 2030 is different: to guarantee cocoa farmers a living income. Here again, we are already making progress thanks to our cocoa supply chain project in the Ivory Coast. Starting in June 2020, we have been supporting 102 farmer families in two Ivorian villages for three years. They supply the cocoa for our Boni 72% pure chocolate bar. It has been in our stores since October 2021. The cocoa farmers are paid a living income reference price for this. They also receive support to boost biodiversity and resilience to climate change. The intention is to later scale up this supply chain project to cover the whole Boni chocolate bar range, as part of Beyond Chocolate. In this way, we want to contribute to the goal of zero deforestation and a living income for cocoa farmers. Also they promoted a new forest in the Democratic Republic of Congo in order to avoid the further emission of greenhouse gases.

The risks are also well identified regarding the SDG2,6,7,12 and 13.

VOW3: ✓

VOW3 is talking about 'Conserving the Ecosystems': They reduce harmful emissions in air, soil and water. They mitigate the impact of their business operations on biodiversity and ecosystem performance and support projects to conserve these.

See the graphic 'Zero impact Factory' in the point before: They use the site checklist to continuously review the implementation status of 143 predefined environmental criteria that cannot be easily quantified. Examples of this include specific projects for retaining biodiversity, creating conditions for environmentally friendly employee mobility or measures for promoting the circular economy.

Now the commitment to biodiversity: The manufacture and operation of our vehicles impacts biodiversity through emissions, land use and transportation – from raw material extraction through the use phase to recycling. Volkswagen is aware of its responsibility and has been involved in protecting and retaining biological diversity through conservation projects since 2007. As a founding member of the Biodiversity in Good Company e. V. initiative, we acknowledge the three goals of the international Convention on Biological Diversity (CBD). Moreover, we have defined corresponding action areas to make our contribution to achieving these goals within the framework of our business activities. This is documented every two years in our progress report on the initiative. Furthermore, we support CBD's Action Agenda for Nature and People initiative by publishing our commitment on the CBD page of the German Business for Biodiversity platform set up by the German Federal Ministry for the Environment.

Lastly, in addition to supporting conservation projects around the world, we have set ourselves the target of increasing biodiversity at our production sites as well. Local measures include creating wildflower meadows, planting trees and shrubs and installing nesting aids for bats, birds and insects. To increase biodiversity at the production sites, we have developed an internal assessment tool. The tool assesses both direct measures to increase biodiversity at the site and also indirect measures, such as integrating biodiversity into the strategy or communication. The comparison of measures with the tool also gives brands a basis for making decisions on the implementation of projects. Another step is introducing a biodiversity KPI at site and brand level to allow us to track the development of biodiversity at our production sites. Examples of the conservation projects we support around the world can be found on our website.

The EU taxonomy is also mentioned in the report and their related objectives, especially the 'protection and restoration of biodiversity and ecosystems'.

SOLB: ✓

Since 2020, Solvay has been a pioneer in biodiversity, combining a global and local approach with the aim of reducing pressure and damage, and progressively restoring biodiversity around our sites. A 28% reduction in our global pressure on biodiversity in 2022 brings Solvay close to achieving their 2030 target.

As part of their Solvay One Planet sustainability ambition, they have committed to reducing by 2030 our pressure on biodiversity by 30% compared to 2018, and after just four years we are now close to

achieving this target. Our efforts to decrease our impact on biodiversity focus on four drivers, which represent more than 90% of our impact: greenhouse gas emissions (50%); marine ecotoxicity (17%); freshwater eutrophication (15%); and soil acidification (12%).They calculate the Group's pressure on biodiversity across the value chain, from cradle-to-gate, for our entire portfolio of products. This is a global approach, based on a Life Cycle Impact Assessment (LCIA) methodology known as the ReCiPe method. This method translates emissions and resource extraction into an environmental impact score.

All of Solvay's sites have been assessed on their sensitivity toward biodiversity using two international reference tools: the International Union for Conservation of Nature (IUCN) Integrated Biodiversity Assessment Tool (IBAT) and the World Wide Fund for Nature (WWF) Water Risk Filter. These tools identify protected species and areas around a specific location, as well as "Key Biodiversity Areas," which play a significant role in biodiversity conservation and sensitive ecosystems. Of our 185 sites, 48 are within five kilometers of one of these areas.

Actions: Based on this evaluation, we have prioritized 30 manufacturing sites, for which we are developing and implementing biodiversity roadmaps. All our roadmaps aim to develop a vision for better integrating the site into its local environment and communities; identify and implement projects on the sites and in the surrounding area to protect biodiversity and support regeneration; develop "nature-based solutions" that will bring economic, environmental and social benefits.

In addition, the COP15 on Biodiversity, which was chaired by China and organized in Montreal, Canada, ended with the adoption of the Global Biodiversity Framework, an ambitious program of targets and recommendations relating to biodiversity conservation and restoration. The private sector was invited to participate in negotiations and Solvay played an active part in the discussion. The resulting "Make it mandatory" pledge, which Solvay signed, requires businesses to measure and report their impact and dependency on nature.

See page 91 for the figures for the term 'Biodiversity'. On page 213 the term 'local biodiversity' is explained: Local biodiversity: Assessing our 185 operational sites for biodiversity risks using the IBAT and WWF tools revealed that: 112 of the 185 sites (59%) were within 5km of a protected area; 48 of the 185 sites (25%) were within 5km of a Key Biodiversity Area; and more than 15,000 vulnerable, endangered and critically endangered species are potentially present within 50km of our sites.

KBC: ✓

In their leadership statement it's noted that KBC will increasingly address issues of biodiversity, water, circularity, waste, and pollution, given the evolving concerns over our environment. Moreover, they pay attention to the environmental responsibility, namely KBC also faces other major environmental challenges relating to biodiversity, pollution, water, and the circular economy that require urgent action. Environmental responsibility is therefore one of our four focus areas. We already offer a range of solutions to tackle these issues and plan to continue to do so.

KBC has set up a separate Sustainable Finance Programme. Initially, the programme was set up to focus on KBC's approach to climate mitigation and adaptation. Since then, however, we have extended the scope to other environmental themes such as biodiversity, water, and circularity. The high impact area of KBC is the following: There is a clear link between KBC's business solutions for our 'environmental responsibility' focus area and several of the SDGs: SDG 13 (climate action), SDG 7 (affordable and clean energy) and SDG 12 (responsible consumption and production (See page 40: sustainable finance).

In addition, in 2021, KBC introduced the 'Sustainability hot skill' and developed a training on sustainability, given the great importance of the topic. The training raises awareness about the significance of transitioning to a more sustainable and greener economy, and key elements embedded in KBC's strategy to achieve this goal. So, they plan to extend the training programmes with other sustainability topics, such as **biodiversity** and circularity over the years ahead.

The EU taxonomy is mentioned but also other international bodies, such as the Taskforce on Naturerelated Financial Disclosures (TNFD) and the Partnership for Biodiversity Accounting Financials (PBAF) further address some of the other environmental objectives.

KBC's sustainability policies: Major milestones in KBC Group's energy and biodiversity policies since 2016. Also, in 2016 the EXCLUSION OF NEW DIRECT FINANCING OF COAL-RELATED ACTIVITIES FIRST RESTRICTIONS ON ACTIVITIES WITH A POTENTIALLY NEGATIVE IMPACT ON BIODIVERSITY. Then in 2020 FURTHER EXCLUSIONS AND RESTRICTIONS FOR CLIENTS WITH COAL-BASED ENERGY GENERATION CAPACITY INTRODUCTION OF A COMPREHENSIVE BIODIVERSITY POLICY. In 2021 NO MORE FINANCING OF EXPLORATION OF NEW OIL AND GAS FIELDS. Lastly, in 2022 FURTHER REFINEMENT OF OUR COAL POLICY IN ORDER TO SUPPORT THE ENERGY TRANSITION. In 2022, KBC conducted the regular two-yearly update of our sustainability policies. We particularly updated our sustainability policies in the areas of energy and biodiversity. The changes are effective from the beginning of 2023 (page 42: Energy policies).

Biodiversity policy (page 43): As to our biodiversity policy, KBC now excludes the financing or insuring of farms that have more than 200 000 ruminants. In doing so, we aim to reduce large-scale operations resulting in methane emissions and inappropriate land use. Also, we strictly do not finance or insure activities located in protected areas or having a potentially negative impact on these areas. We use a broad definition to classify 'protected areas'. This definition is partly based on the International Union for Conservation of Nature (IUCN) Green List of 'protected areas' categories I and II. Our own policies go much further, however, as we widened the scope of the definition of protected areas. Doing so enables us to contribute to the protection of more tracts of land across Europe.

A concrete project (page 60): Avoided deforestation: Protecting 200 000 hectares in Envira, Brazil Tropical rainforests are home to many species and store large amounts of carbon. The Envira Amazonia Project **will preserve rich biodiversity** and a wide range of ecosystem services. Moreover, it will provide direct benefits to local communities, and mitigate the release of about 12.6 million metric tonnes of carbon dioxide emissions over the first 10 years of the project. Other projects on page 61.

Lastly, as already mentioned in the other parts: There is the white paper approach: The Internal Sustainability Board (ISB) closely monitors and approves actions and targets determined in the White Papers. From 2023, the scope of some of the White Papers will be expanded to include the other environmental themes, **biodiversity**, water, circularity, and pollution.

In the risk department, the climate risk is recognized. In the report it's stated that risk is heavily interlinked with other environmental risks, such as biodiversity loss, water stress, pollution and waste management. On page 93, there is table which calls 'Advice provided by experts on sustainability-related matters in 2022' and there you can find the term 'Biodiversity'.

ABI: ✓

ABI stated that their beer is 'natural'. With products made from simple ingredients and fermentation processes, they are a company based in nature. ABI continue to invest in nature based solutions to help address challenges such as water stress, climate change and **biodiversity loss**.

As an example of how we are pursuing innovation, we created the 100+ Accelerator program in 2018 to source, validate and scale sustainable technology, products and services. The program gives startups an opportunity to pilot their innovation to help solve challenges in global corporate value chains and scale their solutions faster. So, the 100+ Accelerator launched Cohort 4 with 46 startups tackling six challenges: Circular Economy, Smart Agriculture, Water Stewardship, Climate Action, Inclusive Growth and Biodiversity.

A concrete project: ABI believe that nature-based solutions help address challenges such as water insecurity, climate change and biodiversity loss. In Peru, our amunas project has shown that an ancient, nature-based solution can provide an answer to a modern problem (page 27).

ABI also aim to draw on our experiences in implementing local solutions to engage in global forums such as the Taskforce for Nature related Financial Disclosures (TNFD) to further refine and scale our approach, while working to advance the private sector's approach to nature and biodiversity. Through their Water Stewardship approach, ABI will continue to work to scale our existing on-the ground efforts to see co-benefits and measurable impact across water, agriculture, nature, biodiversity and climate.

They recognize the problems with the climate change: They explore how agriculture can help reduce GHG emissions, protect watersheds and improve biodiversity. Beyond the environmental aspect, we know the impacts of climate change in agriculture are closely linked with the social and economic challenges farmers face across the globe, affecting the more than 23,900 farmers with whom ABI works (page 48: sustainable agriculture). Therefore, ABI is working in our agricultural supply chains to address these integrated issues, using a collaborative systems approach to help improve soil health and farmer productivity, protect and restore water resources and biodiversity and mitigate the impacts of climate change for more resilient communities. ABI continues to establish our soil health framework, launched in 2020 in partnership with The Nature Conservancy (TNC), to provide a path for our agronomists and researchers to design and measure the impact of soil health, water an biodiversity initiatives in the field.

Partnerships: In 2022, we deepened our longstanding partnership with TNC to map priority areas for biodiversity action. Together, we overlaid global environmental data sets with our direct sourcing regions to assess biodiversity pressures. This practical approach uses our supply chain transparency to help us determine opportunities.

Lastly on page 80 is the explanation of the term 'Biodiversity' (how they manage it, etc.). And the EU taxonomy is also mentioned with the objective to protect and restore the biodiversity and the ecosystem.

AGS: ✓

The EU taxonomy is mentioned and their related objective of the protection and restoration of biodiversity. In addition, AGS is improving on-site footprint, AG Real Estate strives to reduce its environmental footprint, promoting biodiversity and preventing pollution in its construction sites by

developing eco-friendly designs and applying recycling. For example, in Paris in one of the buildings recycled brick will be used to reconstruct the façade, and in another project, a partnership with a specialised company for the reconditioning and reuse of false floor slabs in the office operations has been initiated. More generally, AG Real Estate France is integrating the 'RE 2020' environmental regulation in terms of energy consumption in new development operations. As cities are increasingly impacted, the search for ways to reduce urban heat and loss of biodiversity is now systematically integrated into all projects e.g., by installing green roofs and walls, beehives, etc.

A further partnership helps Ageas to leverage the strengths of Digital platforms and ecosystems. In pursuing growth, Ageas is exploring ways to participate in ecosystems and the platform economy embracing the opportunities that emerge from increased digitization. Ageas chose to partner with eBaoTech Corporation (eBaoTech), a global digital solution provider for the insurance industry, leveraging its InsureMO® platform. Active in 14 countries across Europe and Asia, Ageas is distinguished by its expertise in partnerships. Ageas has developed long-term agreements with market-leading local partners, financial institutions and distributors allowing it to stay close to the customer. Ageas will continue to strengthen those partnerships and is gradually exploring to move in ecosystems that provide mutual benefit, now and for the future.

Moreover, the Impact24 skills plan focuses on the leadership and behavioural skills needed to become a 'Great place to Grow'; on the commercial and digital expertise to Grow the Core; **expertise in ecosystems** and platforms to develop new Growth opportunities; and on proficiency in sustainability. This is translated into tailored programmes delivered by the Ageas Academy programmes.

The risk is also identified related to climate change which also changes the biodiversity: The Taxonomy was updated in 2020 to explicitly include Sustainability Risk, that itself includes environmental risk and climate change, as part of an update to Ageas's Risk Policy, one of the overarching policies within our suite of risk policies. Other risk polices that have been updated to incorporate ESG considerations include the Product Approval Policy, the Outsourcing Policy and the Procurement Policy and a Responsible Investment Framework has been created (page 138 and page 143).

7) ESRS E5 Resources and Circular Economy:

INGA: ✓

See screenshot in the other section 'ESRS E4' to see the integrated climate approach. In the objectives it's written that INGA finance and advise clients in line with a net zero economy and as a sub-point there is I written "circular economy approach".

In the future: The team is involved in the origination, structuring and execution of structured finance transactions, with the focus on circular economy, bio-chemicals, waste and water or any other project supporting sustainable development.

There is a section on page 25, which calls 'Circular economy'. In fighting climate change, there is a huge focus on the transition to renewable energy and activities related to energy efficiency. However, these measures can address just 55% of emissions, according to the Ellen MacArthur Foundation, a circular

economy charitable organisation. The remaining 45% can only be tackled by reducing the production of cars, clothes, food, and other products we use every day. To address this, we see the circular economy as an important means to reach global climate goals, while at the same time preventing pollution and harmful impacts on biodiversity. Advancing the circular economy is a fundamental step towards achieving the Paris Climate Agreement goals as well as the UN Sustainable Development Goals. The European Commission (EC) recognises that the transition to a circular economy is one of the main building blocks of the European Green Deal and has set up the EU New Circular Economy Action Plan (CEAP), which aims to reduce the EU's consumption footprint and double the EU's circular material use rate in the coming decade. This means making products more durable, reusable and reparable, making more use of recycled materials and increasing recycling capacity. As transitioning to a more circular economy is becoming a priority for many of our clients, it is also part of our integrated climate approach. We support our clients by financing circular business models and activities and by focusing on those value chains that use the most resources and where the potential for circularity is high, such as plastics, packaging, construction, textile, batteries and vehicles and electronic equipment.

INGA has made several progresses to fund the circular activities of their clients: Sustainability-linked products such as sustainability-linked loans or bonds. Or Green loans and green bonds whereby proceeds from the loan or bond are fully dedicated to the financing or refinancing of circular projects or assets. Lastly, financing new circular business models. We see a rise in new circular business models, such as sharing, or product-as-a-service, as well as the emergence of new technologies. About circular economy and new technologies, ING focuses largely on the chemical recycling of plastics.

Moreover, The EC is currently working on an extension to the EU Taxonomy, in line with the CEAP, with more detailed technical screening data. This data will make it clear which economic activities contribute to a transition to circular economy and, equally important, the associated thresholds in labelling an activity 'circular'.

Sector transition plans: Material sustainability topics for the cement sector include not only decarbonisation, but also biodiversity and the circular economy. Our biodiversity strategies target a net-positive impact on biodiversity, through reducing net water usage for example, eliminating water pollution, implementing biodiversity management, improving biodiversity scores on managed land, and implementing plans for rehabilitation on large land-use sites. Actions around a circular economy include recycling concrete and building materials during demolitions. Leveraging on our sector expertise, we are working to implement additional KPIs in these new areas, strengthening our clients' engagement with sustainability.

An example of their strategy: For instance, building a hydroelectric dam to regulate floods in lowlands might be an effective climate adaptation measure, but it may also restrict access to land and forest resources for people who live upstream, increasing their vulnerability to the impacts of climate change. Climate mitigation actions could also have an adverse effect on human rights. Reducing carbon emissions involves closing down coal mines and coal-fired power plants, which in turn could result in millions of people losing their jobs. In such cases, we believe it is the joint responsibility of governments and businesses to ensure that employees are re-trained to meet the demands of the job market and remain employable.

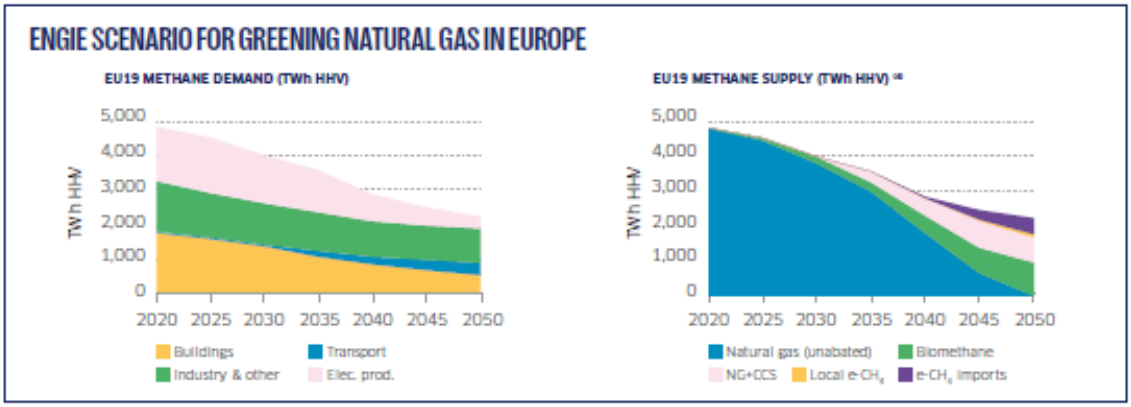
How INGA is steering their portfolio: The Sector's specialist Renewables and Power, and Utilities teams work alongside ING's Energy sector-led, multi-disciplinary New Energy Technologies Centres of Expertise, which bring focus and resources to areas of new opportunity, such as hydrogen, energy storage, and carbon capture and storage. This category is linked with the other categories.

ENGI: ✓

At first glance it can be seen that the term 'circular economy' is only listed very low on the materiality matrix. So, it's not the among the strategic priorities or a levers of value creation.

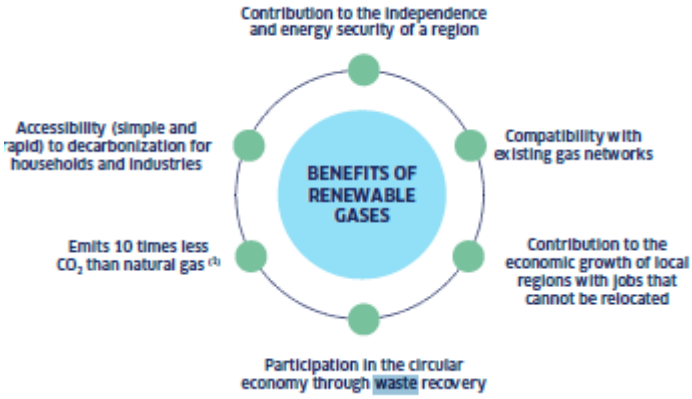
However, on page 48 the facilitate and support of the regions'-carbon transition is presented: The regions are particularly active in decarbonization. They are working to recycle their local energy resources in a circular economy approach. This strategy allows them to develop networks, create jobs and expand local companies. An example is: As the leading producer of wind and solar electricity in France, ENGIE is also betting on the strong growth potential of biomethane – related to the local production of biomass – and green hydrogen, both of which can be produced and stored near the location where they are consumed. These new energies require dedicated networks that play a significant role in the local economy bringing a high volume of local job creation, growth investments and contributing to the development of VSE-SMEs. • At Meudon: In October 2022, ENGIE Solutions and the city of Meudon launched GéoMeudon, the company that will provide heat to the city network using deep geothermal energy. The city will benefit from 83% renewable heating and prevent the emission of 17,700 tCO2 / year. Other examples are on the page 48.

The vision of ENGI's vision for the energy transition in Europe is the following: Different gases will contribute to the energy system of tomorrow. Biomethane, the first contributor, is part of a circular economy, decentralized solutions and creates local jobs. It can be injected into all existing networks without adaptation. Renewable hydrogen produced by electrolysis from renewable energy sources will be key to decarbonizing high-temperature industrial processes and heavy transport. Finally, synthetic methane will complete the possible solutions. More details on the role of renewable gases can be found in the "renewable gases" notebook.



For ENGI renewable gases are the key players in the high-growth market: Finally, renewable gases have a positive impact on the communities: they encourage the creation of jobs that cannot be relocated and contribute to the development of the circular economy through the treatment of waste (agricultural, urban, etc.) and the recovery of residual organic matter in the form of energy, biogenic CO2 and biofertilizers.

For the SDG 12 the ENGI's contribution is that they want to optimize the use of its resources and waste and the promotion of sustainable practices in its value chain are part of ENGIE's purpose: 55% reduction in the production of hazardous waste in the Group vs 2019. They identify also the risk related to waste.



Page 98. Their footprint is on page 89, especially 'waste' is recognized as an impact. On page 97 the process is explained how they want to reduce the waste.

TTE: ✓

First of all, the EU taxonomy is mentioned with the objective to the transition to a circular economy. TTE is promoting a net zero company by 2050, together with society. By 2050, TotalEnergies would produce:

– about 50% of its energy in the form of low-carbon electricity with the corresponding storage capacity, totaling about 500 TWh/y, on the premise that it develops about 400 GW of renewable capacity.

– about 25% of its energy, equivalent to 50 Mt/y of decarbonized fuels in the forms of biogas, hydrogen or synthetic liquid fuels from the circular reaction: H2 + CO2 k e-fuels.

– about 1 Mb/d of oil and gas (about a quarter of the total in 2030, consistent with the decline envisaged in the IEA's Net Zero Scenario), primarily liquefied natural gas (roughly 0.7 Mb/d, or 25-30 Mt/y) with very low-cost oil accounting for the rest. Most of that oil would be used in the petrochemicals industry to produce about 10 Mt/y of polymers, of which two thirds would come from the circular economy.

Moreover, TTE wants to reduce the scope 3 emissions: • Guide our customers towards lower-carbon energies • Promote a circular economy approach in the use of biomass and plastics • Develop a carbon storage offer for our customers with capacity exceeding 10 Mt/y by 2030 • Forge partnerships with our top 1 000 suppliers to reduce emissions from our purchasing.

A concrete project to promote the circular economy: In Japan, TotalEnergies partnered with ENEOS Corporation in April 2022 to launch a feasibility study for a SAF production unit at an ENEOS refinery, initially at the Negishi site. Following an in-depth review of the production units and loading and unloading facilities at several sites, ENEOS and TotalEnergies finally decided on the Wakayama refinery rather than Negishi, which improves the competitiveness of the project. The contemplated unit, with a production capacity of 300 kt/y of SAF**, would process waste or residues from the circular economy** (mainly cooking oils and animal fats). The two partners have planned to create a joint venture dedicated to SAFs.

In addition, by 2050 in the air and maritime transport, TotalEnergies aims to develop its offering of sustainable fuels from biomass, from the circular economy as well as hydrogen-based fuels (synthetic fuels), despite technological and scalability uncertainties. A profitable growth in renewables and electricity: – Circular economy: • Signature of an agreement with Honeywell to promote the

development of advanced plastic recycling in Europe • Commercial agreement with New Hope Energy to produce polymers from recycled plastics in the United States.

On page 324 and page 325 the details to promote the circular resource management is explained: In March 2022, TotalEnergies joined the Platform for Accelerating the Circular Economy (PACE). This initiative, launched by the World Economic Forum and currently hosted by the World Resources Institute (WRI), aims to accelerate the transition to a more circular economy, in particular by developing tools to facilitate this acceleration. In 2022, the Company actively participated in the Circular Economy Indicators Coalition initiative, which aims to develop a set of common circularity indicators for industry. The Company pledges to double the circularity of its businesses within the next 10 years. It contributes to the circular economy at different points in the value chain: through purchasing, sales and production, as well as through the management of its own waste. They want to promote biofuels and sustainable aviation fuels, biogas and recycled plastics and bioplastics. The waste prevention and management is also explained on page 325:

The Company's waste balance[a]	2022	2021	2020
Non-hazardous waste *(in kt)*	322	335	303
Reused non-hazardous waste[b] *(in kt)*	204	206	190
Hazardous waste *(in kt)*	176	165	198
Reused hazardous waste[b] *(in kt)*	98	98	107

Waste treatment processes[a]	2022	2021	2020
Reuse[b]	61%	61%	59%
Landfill	12%	16%	12%
Other (incineration without reuse, biotreatment without reuse etc.)	27%	23%	29%

SIE: ✓

In their strategy it's written that digitalization, automation, and sustainability are growth engines for their business. In terms of sustainability, our portfolio makes an especially strong contribution toward decarbonization, resource efficiency, and circular economy. Software and hardware solutions will increasingly reinforce each other in the future, accelerating sustainable value growth. Moreover, they speak about the 'DEGREE' programme. The 'R' stands for resource efficiency: They want to accelerate recycling and a circular economy. Using software and simulations, our technology offers sustainable approaches for the design phase of products and solutions, for both our customers and ourselves. They have developed a new standard for the design of environmentally friendly products that incorporates clear product design criteria and is intended to cover 100% of relevant product families. In addition, we promote decoupling consumption of natural resources from economic growth by increasing our purchases of secondary materials. Also, by 2025, we are aiming to reduce our landfill waste by 50% from the 2021 baseline year. The Eu taxonomy is also again mentioned with their objectives.

They explain the SDG 12 'Ensure sustainable consumption and production patterns': Siemens is committed to using resources responsibly and recognizes that the circular economy offers highly beneficial opportunities for business, the environment, and society. So by the end of this decade, we want to evolve even further toward the circular economy, for example by increasing the percentages of metals and plastics we procure as secondary materials. We also aim to reduce our amount of landfill waste. Siemens has worldwide strategic initiatives for the design phase and end-of-life cycle for its products and operations, and is committed to robust, ecologically friendly design. We apply disruptive technologies and innovative business models to make an active contribution to the circular economy.

The European Green Deal is also mentioned in the report: In this connection, Siemens is an advocate of the global Green Deal initiatives, such as the European Green Deal, which has adopted the objective

of transitioning to **a circular economy,** restoring biodiversity, reducing the release of pollutants into the environment, and achieving climate neutrality by 2050. As part of the New Circular Economy Action Plan, in March 2022 the European Commission proposed an Ecodesign Regulation for sustainable products. It aims to address the most harmful impacts on the environment and to transition away from a linear approach to a circular way of doing business.

On page 74 it's explained how SIE will conserve the resources. The three main actions are the progress toward DEGREE ambition to reduce the volume of landfill waste, improvement of energy efficiency as part of our Eco Efficiency @ Siemens target and new water categories introduced: While many types of waste can be recycled or reprocessed in a functioning circular economy, the production of landfill waste has a particularly negative impact on the environment. Landfill waste takes up space, generates greenhouse gas emissions, influences local biodiversity, and causes health problems for people and ecosystems. That's why we want our landfill waste, which has already been reduced through numerous reduction initiatives, to be reduced by 50% by 2025 compared to fiscal 2021 and progress towards zero landfill by 2030. We also want to continuously increase the percentage of material recycling by 2030.

Concerning the secondary materials: We want to increase the procurement of recycled materials – so-called secondary materials, metals and resins – and implement a circular economy. In fiscal 2022, we purchased 34% of the metals – primarily iron, copper, and aluminum used in the manufacture of our products – from recycled sources. This percentage is the weighted average of the secondary material proportions of the three metals on the basis of average regional or global values from literature values and supplier information. Last year this share was 38%. The decline in the proportion of secondary metals is primarily due to a shift in the ratio of the volumes of the various purchased metals. Moreover, in fiscal 2022 we again sourced less than 1% of the resins used to make our products from recycled sources. We continue to work with the recycling chains for technical plastics currently being established, and on further developing product specifications as well as material standards in this context.

As already mentioned in the other sections SIE is also in the United Nations CEO Water Mandate, which also trying to conserve resources.

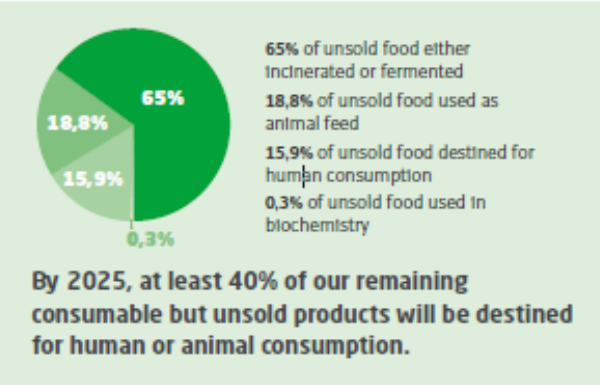
COLR: ✓

A first example how COLR is implementing the principle of circular economy by working more ergonomically: new model with a higher loading board and a shallower but wider basket into which a folding crate fit. This means that store employees need to bend less deeply, significantly reducing the physical strain of working at the checkout. The new cart will be rolled out in all stores in mid-2022. We are offering the old versions to schools, associations and the self-employed for 25 euros, to do our bit **for the circular economy.**

Resource-saving use of raw material: COLR is continuously working to reduce residual waste and avoid food loss. We do this by making our range of products, packaging and services more circular and upgrading our residual streams, working to the principles of the circular economy and recycling and reusing the available raw materials again and again. In doing so, we use the R-ladder as a guide: refuse, rethink, reduce, reuse, recircle, recycle and recover. By 2025, we want all household packaging for our private-label products to be reusable, recyclable, compostable or biodegradable.

COLR wants to work together to fight food loss. In 2021, we sold 96,98% of our fresh produce. The sales in fresh produce decreased, while waste in fresh produce remained virtually unchanged. As a result, the percentage of sold fresh produce decreased and we did not reach our target of selling at least

97,4% of our fresh produce as of 2021. In 2022 we will do our utmost to achieve this ambition. In 2021, we saw a slight decrease in the total tonnage of food losses by 121 tonnes (-0,37%) to 32.951 tonnes. The proportion of surplus food going to human consumption rose to 15,9% in 2021. By contrast, the proportion without any useful application (incineration) fell to 7%. In collaboration with the Brussels city farm Eclo, we conducted a successful test to grow mushrooms on bread residues from Bio- Planet. The mushrooms were temporarily available for sale at Cru as of October 2021.



The EU taxonomy is also again mentioned with their related objectives: Transition to a circular economy.

In relation to SDG 6, COLR makes the following points: Water is irreplaceable, whether for people or nature. This makes it one of the most precious resources and it is crucial to use it sparingly. In concrete terms, this means that we use water even more sparingly on our sites. We do this in several ways: • by optimizing existing installations • by using the right type of water for the right purpose, for instance not using drinking water when this is not necessary • by treating and reusing wastewater • by collecting and using as much rainwater as possible, treated or not • by buffering surplus rainwater or letting it soak into the groundwater. To keep as much water as possible in the natural water cycle and out of the sewer system: that's our goal. At our sites, we strive for a minimal impact on surface water and groundwater. We opt for permeable paving and provide above- and below-ground systems such as wadis, infiltration ditches and pits to allow rainwater to soak into the ground. Only if the subsoil is unsuitable for letting it soak away, do we buffer the water on our own sites during downpours before discharging it later.

Along their supply chain COLR is trying to use waste/recycling. We are constantly working on innovative solutions for packaging, food waste, reuse of materials etc. Waste management could also be found on the materiality matrix on page 20.

Partnerships: Colruyt Group has committed to continuing to fight food waste in collaboration with 'Too Good to Go'. Colruyt Group has been taking a very conscious approach to food waste for years and aims to raise its customers' awareness in this respect as well. This collaboration is another important step in this direction. In the years ahead, the group will also continue to invest in the sustainable conversion of existing stores into low-energy stores. See also ESRS E3 for the Robinetto project and ESRS E4 for the farmer project (page 155 in the report).

The SDG 12 is explained on page 170 in detail and SDG 13 on page 176.

Working together for less waste: The total tonnage of waste dropped by 3.708 tonnes (-4,42%) to 80.217 tonnes. As of 2021, we will have our tonnage of waste per million euros of sales decrease annually. Residual waste (waste not reused and thus incinerated) is already down for the seventh year

in a row, to 12.878 tonnes (- 1,5%). We continued to meet our goal of recycling at least 85% of our waste in 2021.

Indicators SDG12:

Indicators SDG 12		2019	2020	2021	Objective
Resource-saving use of raw materials					
% Recycling rate	Calendar year	83,98	85,27	85,06	At least 85% by 2021
% Fresh producuce actually sold	Calendar year	97,21	97,33	96,98	At least 97,4% by 2021
% Food lost to incineration and fermentation	Calendar year	69,0	66,8	65,0	Maximum 60% by 2023
Working together to fight food loss					
Indicator					
% Unsold food for human consumption	Calendar year	-	-	15,9	
% Unsold food used as animal feed	Calendar year	-	-	18,8	
% Unsold food used in the biochemical industry	Calendar year	-	-	0,3	
% Unsold food incinerated or fermented	Calendar year	-	-	65	
Circularity in packaging					
Volume of packaging material where a transition has occurred (sustainable materials now used) (in kg)	Calendar year	12.060,00	-	15.023,07	
Volume of packaging material where a transition has occurred from non-recyclable to recyclable packaging (in kg)	Calendar year	-	-	82.860,54	
Volume of packaging material removed from the market (in kg)	Calendar year	36.475,50	88.804,23	20.668,96	
% RPET in private-label beverages	Calendar year	-	22	33	At least 50% by 2025

VOW3: ✓

On page 3 the new strategy is explained and on the middle are 6 ESG topics and one of this is the topic 'Circular Economy'. In the highlights of 2022 for the topic 'Circular Economy' it's presented that 633,88 metric tons of CO_2 saved through the Aluminum Closed Loop process since 2017. Moreover, reconditioning a gearbox reduces CO_2 emissions by 54% and reduces the primary energy requirement by 52% compared with the new part. On page 11 onwards it's explained how VOW3 will achieve their objectives and on page 31 and 32 there are the environmental KPI's presented.

On page 68 onwards the chapter 'Circular Economy' starts: The finite nature of natural resources and the social and environmental consequences of mining raw materials make uncoupling economic growth from resource consumption and the development of a circular economy key sustainability topics. One important driver of the circular economy is the ongoing decarbonization of the Volkswagen Group: The growing use of secondary materials and the establishment of closed material loops is helping to significantly reduce our CO2 emissions.

Recognizing the importance of this topic, Volkswagen has anchored circular economy as a focus topic in Group Initiative 6 of the NEW AUTO Group Strategy. Cross-divisional and cross-brand working structures have been developed at Group level for managing the topics to be developed. These build on the work of committees such as the Group Steering Committee for the Environment and Energy, the Group Steering Committee for Sustainability, the Group Steering Committee for Product Recycling and the Group Working Committee for Environment Product.

Examples: Fundamentally, we pursue four lines of action at Group level in the area of circular economy: Firstly, we are already stepping up efforts to use recyclable and reusable materials in our vehicle projects – for example, from production waste. In addition, we want to further improve the supply of circular materials, i.e., secondary materials and renewable raw materials – for example, by buying back end-of-life vehicles – and thus bring valuable materials back into the loop. Another approach is to preserve recyclable materials through reuse and repurposing – for example, in the recycling of high-voltage vehicle batteries in Salzgitter. The topic of circular economy is also a core element of the

"goTOzero" Group environmental mission statement, on which we orient the strategic design of this action area. With this Group mission statement, the Volkswagen Group is setting itself the target of, among other things, further improving its resource efficiency and promoting reuse and recycling approaches in the areas of materials, energy and water. Other topics that contribute to the topic of circular economy are embedded in the "goTOzero – Zero Impact Factory" program

With a circular way of doing business in mind, we aim to minimize our consumption of resources, to live up to extended producer responsibility and to reduce energy consumption. The vehicles already have a long service life: The average age of an end-of-life vehicle is 14 to 20 years according to national authorities in Europe. For the first steps regarding circular economy, we have concentrated on the aspects of batteries, steel, aluminum and plastics. The results obtained from this are used to further develop the overall circular economy strategy and for devising new business models. In geopolitically difficult times, the topic of circular economy is also about strengthening the Group's resilience and minimizing dependencies.

The focus is on: Avoiding waste creation by optimizing production and auxiliary processes and increasing material utilization levels (material efficiency); Reducing the quantity of waste produced by processing waste at sites; Prioritizing the reuse of waste and reducing the quantity of waste that needs to be disposed of; In addition to waste, another focus is on the resource of water. We focus on the following areas of activity in sustainable water management: Reduction of freshwater consumption and efficiency in water use, particularly in water stress areas; Minimization of pollution and no worsening of the environmental and chemical status in the receiving waters (waters into which the treated wastewater is introduced) and Increased soil and groundwater protection when using water-polluting substances. Here the KPIs:

CIRCULAR ECONOMY KPIS

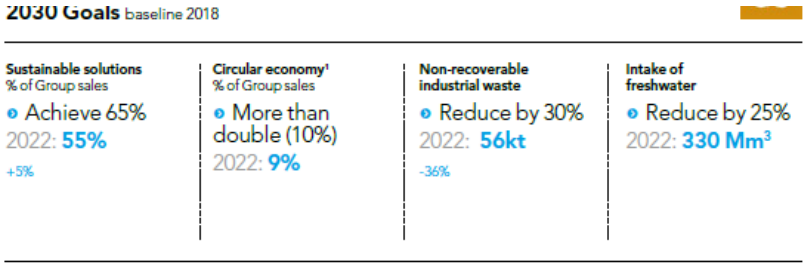
Précédent

KPI	Unit	2022	2021	Notes and comments
CO_2 avoided since 2017 through the Aluminum Closed Loop Project	In metric tons of CO_2	633,881	467,671	The calculation of the CO_2 savings from the Aluminum Closed Loop was updated compared with the prior year because the press shop offcuts were reassessed.
Proportion of freshwater needed at sites in risk zones	In million m^3/year	15.9	15.8	Passenger cars and light commercial vehicles

At VOW3 the circular economy has the highest importance and is the most developed of all reports.

SOLB: ✓

A first action what they are doing is that they create a circular economy in batteries: Our solutions enable us to recover 95% of highpurity metals, which can be used in new cathodes. We are currently in the demonstration plant engineering phase of this project. Integrating EV batteries into the circular economy will ensure access to critical raw materials and decrease recycling costs. It will also lower the CO2 footprint of the battery-making process, as the carbon footprint associated with battery metal recycling is far lower than that of primary metal extraction or mining.



Their approach to circular economy is the following: In 2022, our circular sales reached 9% of Group sales, progressing faster than average growth. Consumer markets lead the way, following accelerated trends for nature-based portfolios and biodegradable solutions, and going beyond existing solutions such as biosolvents, natural vanillin and bio-based polymers like Bio Kalix and Bio Amodel. Our new growth platform on Renewable Materials and Biotechnology was launched in 2022. It will help us meet the growing demand for circular and sustainable solutions by increasing the share of renewable carbon in Solvay's product offering and developing new business opportunities enabled by biotechnology or biodegradable solutions. More than 200 researchers work on these topics at Solvay in Brazil, the US, Europe and India, focusing on accelerating the integration of sustainable renewable feedstocks into our products, using biotechnologies to transform these raw materials into products and developing new approaches to manage their end of life.

- ⇨ Our technologies are essential for enabling the circular economy in many fields, but reinventing progress in this area requires collaboration with partners. We aim to do this through our role in the Ellen MacArthur Foundation, through the growth platform, and through multiple partnerships, such as those we have with Mitsubishi Chemicals Advanced Materials relating to polysulfone (PSU), with Carbios for PVDC and other bio projects, and with Veolia for batteries.

A product that hey developed: We have developed a number of high-performance products with a reduced carbon footprint as part of our efforts to transition our specialty polymers portfolio to the circular economy. Our ReCycle MB Specialty Polymers are used for applications ranging from automotive and household appliances to electronics and use the mass balance method to ensure responsible sourcing.

Moreover, they have several partnerships. On page 62 the resource efficiency is explained (the challenges and the opportunities are presented). On page 91 you can find this:

Resources	2022	2021	Progress vs 2018	Comment	2030 target
Sustainable solutions % of Group sales	55%	50% [3]	+5%	Acceleration driven by growth in Materials and Solutions	Achieve 65%
Circular economy % of Group sales	9%	8% [3]	n.a	Progress rapidly approaching 2030 target	More than double (10%)
Non-recoverable industrial waste (Kt)	56	58	-36%	Exceeded 2030 target	Reduce by 30%
Freshwater intake (Mm^3)	330	315 [3]	-	change in methodology	Reduce by 25%

Lastly, the EU taxonomy is described on page 2018 and on page 222 the term 'circular economy' is defined and the management approach to this topic is given.

As already mentioned in the other section ESRS E3 on page 44 there is the waste and water management.

KBC: ✓

KBC recognizes that climate change is one of the biggest global challenges. We also face other major environmental challenges relating to biodiversity, pollution, water, and the circular economy that require urgent action. Environmental responsibility is therefore one of our four focus areas.

An example where KBC is supporting the circular economy is that in Flanders, for example, we joined a network that helps startups in the circular economy and with sustainable business models. Through this, Start it @KBC helped multiple circular businesses see the light of day. Moreover, Start it @ČSOB

organised a 'Green Challenge' for sustainable start-ups. Among the winners were a start-up for the recycling of soft and dirty plastics, a database of sustainable technologies in the construction industry and solutions for regenerative agriculture.

See page 42 for the energy policies: The aim of this adjustment is to support as widely as possible the energy transition of existing as well as new clients, irrespective of their existing activities. This type of financing is, however, subject to strict conditions, such as the strict ringfencing of this financing from the company's other activities. In doing so, we want to make sure we do not support coal-fired electricity or heat generation activities in any shape or form, whether directly or indirectly. Finally, also in 2022, KBC expressly excluded the financing of coal-to-gas, coal-to-liquid, and coalbed methane projects.

Furthermore, KBC's dependence on natural resources is limited compared to industrial companies. Nevertheless, we aim to reduce our direct footprint in line with our targets. In 2022, 100% of our electricity source was based on renewables. In 2020, we set more stringent ambitions to reduce the GHG emissions resulting from our own operations. We also strengthened our ambitions regarding the use of electricity from renewable resources by 2030. The table on this page shows the progress we have made in comparison to those targets. Note that a gradual return to the workplace and resumption of business travel after two 'Covid years' resulted in a rise in our GHG emissions compared to 2020 and 2021. Nevertheless, we will continue to pursue our strategy of reducing our GHG emissions in line with our targets.

Here are the climate and other environmental objectives for KBC:

Table 6.2: Climate- and other environmental objectives-related opportunities for KBC

White Paper sector	Opportunity	Selection of products and services
Energy	Energy transition to alternative and affordable energy sources Green hydrogen production Increased electricity storage capacity	• Expert advice for corporate and retail banking clients through our own network, through partnerships or through our mobile channels • Energy services • Financing cleaner energy supply • Stimulating clean and efficient energy consumption • Financing sustainable buildings • Financing and insuring low-emission cars and bicycles • Sustainability-linked loans • Issuance of green bonds
Real Estate	Retrofitting buildings and energy-efficiency advisory services Integration of renewable energy such as energy-efficient heat pumps and photovoltaics	
Transport	Transition to electric vehicles and bicycles Green hydrogen for long-haul transport Use of recycled plastic and batteries for the remanufacturing of vehicles	
Agriculture, food and beverages	Bioenergy and chemical production from agri-food waste resources Capturing and storing carbon in soil and plants through carbon farming Smart and precision farming	
Building and construction	Bio-based and carbon-negative building materials Modular constructions Electrification of machinery	
Metals	Recycling of steel and aluminium in old scraps Extraction of rare earth metals and lithium from electric batteries	
Chemicals	Increase in plastic recycling rate by implementing mechanical and chemical recycling techniques	

See also page 43 for the application of KBC's sustainability framework.

Additionally, we transitioned our own energy consumption to more sustainable sources, using different initiatives, such as investments in solar panels and insulation. We reduced the waste we produced as well as the amount of paper consumed. Here the waste generation:

Waste generation

Note	2022		2021 recalculated		2021	
	tonnes	tonnes CO_2e	tonnes	tonnes CO_2e	tonnes	tonnes CO_2e
Scope 3						
Recycled waste generation	1 607	34	1 812	39	1 628	35
Incinerated waste generation	577	12	534	11	534	11
Landfilled waste generation	1 820	850	1 916	895	1 679	784
Total Scope 3	4 004	896	4 263	945	3 841	830

ABI: ✓

First of all, the EU taxonomy is included in the report and the related objectives, too. Objective: The transition to a circular economy.

A project that illustrates the 'Circular Economy' well is the biogas project: In our South America Zone, we are increasingly installing anaerobic digesters in wastewater plants to recover biogas that can be used as energy in our boilers. This enables us to offset the purchase of natural gas, saving up to 15% of our energy purchases. To date, we have 35 breweries in the region with wastewater plants. We installed 13 biogas collection systems prior to 2022 and installed 11 more in 2022.

The breakdown of scope3 could be found on page 40. 2.1% of the scope3 emissions are for brewing operations and their target on this is that ABI wants to Achieve near-zero to landfill production waste in brewing operations. 2.6% of scope3 are the end of product life and their target on this is that ABI wants to reduce waste through use of recycled content and lightweighting initiatives in packaging.

Another concrete project is the first-of-its-kind green biological treatment system in South Africa: South African Breweries (SAB) is pushing green innovation and converting brewery waste streams into value-added products and outcomes through sustainable technologies and collaboration at the Ibhayi brewery on the Eastern Cape. The project treats the local brewery effluent and uses the water and nutrients to irrigate a sustainable spinach crop for the local community.

Concerning the reuse of water, the following could be said: Following a successful pilot through the 100+ Accelerator in the US in 2019, Anheuser-Busch has partnered with Cambrian®, a commercial provider of distributed wastewater treatment and resource recovery solutions and started implementation of a new water reuse technology at its Houston brewery in 2022. Through Cambrian's innovative series of reactors and filtration technologies, Anheuser-Busch seeks to clean and reuse previously discarded water in industrial processes which do not contact beer, with the aim to reduce reliance on the municipal water supply. We estimate that these improvements in the Houston brewery will result in a reduction of more than 2.7 million hectoliters per year as of 2023.

There is section called 'Circular packaging': As the world faces increasing resource scarcity, taking a circular approach to packaging and improving the materials we use have the potential to deliver long-term financial benefits, provide our business with long-term packaging supply security and help eliminate waste. Furthermore, there is also a section called 'Entrepreneurship': We work with entrepreneurs across our value chain from seed to sip and beyond, including farmers, waste collectors and recyclers, suppliers and retailers. Through meaningful engagement with these entrepreneurs and other key partners, we catalyze resources and opportunities to develop localized solutions. These entrepreneurs are often the backbone of their communities, and their success is tied to supporting their families and growing the local economy.

See the ESG-topics 'Circular Packaging' and 'Waste management' on page 76, where all the details are provided. Some facts: 71% of our beverage production facilities are reaching more than 99% recycling rates. 31% of our total beverage facilities are recycling between 99.99% and 100% of generated waste, considered zero waste generation.

The different categories of the environmental topics are sometimes overlapping.

AGS: ✓

First, the EU taxonomy is included in the report and the related objectives, too. Objective: The transition to a circular economy.

As a company in the financial sector, waste generated and disposed related to own operations refers to day-to-day activities, hence, general household waste at offices:

Disposed waste in metric tonnes	2022	2021	2019
Total waste generated	653	340	1,153
Total waste used / recycled / sold	302	176	606
Total waste disposed	351	164	547
- waste landfilled	0	0	-
- waste incinerated with energy recovery	351	164	-
- waste incinerated without energy recovery	0	0	-
- waste otherwise disposed	0	0	-
TOTAL waste disposed - incinerated with energy recovery	351	164	547

Within Impact24, Ageas aims for carbon neutrality of its own measured operations. It wants to lessen its impact on the environment by reducing its carbon emissions**, using resources more efficiently**, and offsetting the remaining emissions.

Several examples of implementation of the circular economy are the following: 1) Monitor buildings occupancy and further optimise workspace and resources usage. Various initiatives have been taken in 2022 such as the move from five older to two new state-of-art buildings in Portugal with BREEAM certificate. In Belgium the new AG Campus has been inaugurated, an example of a modern construction among others making use of recycled materials; in the UK, older equipment has been structurally replaced by more energy-efficient material, such as air conditioning systems, boilers and pumps. 2) IT initiatives like the extension of the lifetime of devices, recycling of old materials, regular clean-up of IT storage and use of IT tools through an internal awareness campaign and 3) Implementation of a group wide environmental policy with the explicit commitment to develop a long-term process of continuous improvement to enhance environmental protection and as such to minimise the negative environmental footprint whilst maximising environmental opportunities. Several initiatives have been launched such as the implementation of a waste policy at AG. Ageas Group Portugal rolled out an education initiative focused on how to avoid food waste, and in Ageas UK, zero waste was sent to landfill thanks to the mobilisation of all employees.

Topical standards: Social

8) **ESRS S1 Own Workforce:**

INGA: ✓

As an employer, we impact the lives of over 57,000 employees worldwide. We potentially impact employees' right to health and a safe working environment, as well as the right of their families – including children – to leisure, play, family environment and education. Healthy employees contribute to healthy families and communities.

INGA did assessments: To understand the impact we have on our employees, in 2018 we carried out a salience assessment which resulted in the identification of two salient issues: • Workplace discrimination; • Work-related stress.

Monitoring our salient human rights issues is an ongoing effort. In an ever-changing world, we need to be prepared to act on sudden changes, such as the Covid-19 pandemic, and their potential impact on our employees. The following rights are also made explicit in the Code of Conduct: fair remuneration and working hours, no forced labour, child labour, discrimination or harassment, and freedom of association, occupational health and safety and whistleblowing.

INGA identifies discrimination: ING stands against all forms of discrimination and our policies and initiatives aim to prevent discrimination within our company. We recognise that discrimination can affect a person's physical and mental health, sense of belonging, sense of agency and sense of personal value. It can even cause an employee to feel unsafe at work. Discrimination can also lead to loss of income and development opportunities. It can have a negative effect on wellbeing and socio-economic opportunities. How INGA addresses the potential impacts of discrimination:

1.Policies:

• Global Code of Conduct, with a mandatory e-learning for all employees. In 2021 we added the issue of transgressive behaviour;

• Orange Code: our Values and Behaviours;

• Diversity Manifesto: applicable to all employees worldwide, addressing what diversity means to ING, why it is important, and what employees can do to promote diversity and inclusive behaviour;

• Human Rights statement for employees.

2. Initiatives to promote a diverse and inclusive workplace:

• A Diversity and Inclusion approach;

• Appointing dedicated diversity and inclusion ambassadors in the countries and business units;

• Trainings and e-learnings on diversity and inclusion topics;

• The 70% principle;

• Global diversity and inclusion day / week;

• Improving the leadership appointment process;

• Diversity employee networks.

3. Channels for employees to raise concerns:

1. Whistleblower channel;

2. Confidential Advisor (in the Netherlands and Belgium);

3. Employment Relations Consultants (in the Netherlands);

4. Line Manager;

5. Trade Unions;

6. Employee Communities.

The 70% principle gives managers a goal for building mixed teams around appropriate dimensions of diversity (with a focus on gender, nationality and age group). It strives for a 30% difference in team make-up, meaning that no group or level comprises more than 70% of the same gender, nationality or age group. In 2019, we continued to work with the countries and business lines to refine and implement their plans to work towards the 70% principle. We also initiated a deep-dive across ING into diversity dimensions and set up dashboards to help different areas of the business monitor their progress. While ING understands that getting the right mix of people is a challenge, we are committed to making progress in achieving diversity at the top. To this end, we plan to accelerate the development of internal candidates for top roles and attract more diverse candidates from the external market. ING currently employs people from over 130 different nationalities around the world.

About people with disabilities: Enable employee network started an Employee Resource Group (ERG) working on improving the accessibility of global mandatory trainings and testing these in collaboration with the D&I Learning group as a means to promote inclusive learning for employees with disabilities. Furthermore, ING is member of the Business Disability Forum (BDF). In collaboration with BDF members and partners ING is taking part in the setting the benchmark for disability inclusion and accessibility maturity of businesses. ING is active in the BDF Global Taskforce developing a framework for global strategies, global policies and approaches towards disability inclusion of, and accessibility for, employees and customers. With the work from the members of the Global Taskforce, BDF provides guidelines for its members to improve disability inclusion and accessibility in Global Businesses, moving from a local approach to an overall business strategy.

ING is one of 418 firms recognized in the 2022 Bloomberg Gender Equality Index as a company committed to a more equal and inclusive workplace. The Index offers public companies the opportunity to disclose information on how they promote gender equality across five separate areas: female leadership and talent pipeline, equal pay and gender pay parity, inclusive culture, sexual harassment policies, and pro-women brand. Moreover, We also took steps to adopt policies important to the LGBTQI+ community in our business units. In the Philippines for example, we adopted an AIDS and HIV Prevention Policy, which aims to ensure the implementation of programmes on non-discrimination, awareness, and health support for HIV/AIDS prevention.

1. Measures to promote a healthy work space: • Ensuring every local ING entity tracks sick leave; • Promoting flexible working to help employees better manage their work / life balance – this has been reinforced with our Hybrid Mode; • Ensuring company counsellors are available in many of our locations; • Providing reintegration support for colleagues returning to work after extended absence; • Promoting a healthy work culture, and monitoring performance through employee surveys.

Lastly, ING’s approach with respect to human trafficking, slavery, forced labour and child labour.

There is also a works council: ING’s works councils are elected by employees and represent the interests of both the employee and employer. They contribute ideas on economic and social issues and in doing so contribute to the proper functioning of the company and alignment with ING’s purpose and strategy. The Employee Council (the name given to the collective works councils in the Netherlands) consists of five works councils and the Central Works Council (CWC).

In conclusion, it can be said that this standard is very fulfilled in detail form INGA.

ENGI: ✓

ENGIE's strategy to offer a balanced, resilient and affordable energy mix. This plan aims, in particular, to: guarantee quality social dialog at all levels, offer social protection to all employees worldwide, guarantee their employability though training and retraining and through providing support during restructuring.

At ENGIE, employee dialog includes consultation practices to allow employee representatives to influence decisions at each stage of the Group's reorganization. This innovative process is implemented over the entire territory with the unions and regional public authorities. In accordance with its commitments, in 2022 ENGIE signed an agreement with three world union federations and four of the Group's union organizations. In this way, it reaffirmed its commitment to respect international standards on labor and human rights. Moreover, In 2020, the Group rolled out the world social protection program "ENGIE Care." Designed with the international union federations, it protects employees against the hazards of life. "ENGIE Care" will be expanded in 2023 (14-week maternity leave, minimum four-week paternity leave, payment of a minimum benefit of 12 months of salary in the event of total disability). There also partnerships and this allows people with disabilities to get employed (page 109).

Trainings: The Group's reorganization involves abandoning certain sectors as well as the appearance of new industries; this implies a profound change in its business lines and the appearance of personnel shortages in some activities. This is why ENGIE is pursuing a strategy to transfer expertise along three vectors: early management of skills; stronger internal mobility; and professional training goals for all employees. Different training programs are developed by ENGIE University to meet this need. In 2022 ENGI had 96,400 employees.

To maintain its employee engagement: In this challenging environment, various measures have been taken, including: the payment of a special bonus of €1,500 to all employees worldwide, • the launch of "Link 2022," a new global employee shareholding plan, in September 2022. In addition, Health and safety in the workplace, the safety and resiliency of the facilities, ethics and compliance, as well as diversity and inclusion in the workplace have been identified as fundamental challenges. This means that they should be permanent and structural in the Group's activities.

Also, by increasing its clean energy production, ENGIE improves living conditions. Its employees all benefit from social protection. Here are some figures about the working conditions:

PEOPLE		2020	2021[1]	2022[1]	TARGET 2030
Objectives monitored by the governance bodies (EESDC)					
Health & Safety	Lost time injury frequency rate for employees and subcontractors on closed sites with controlled access	2,7	2,5	2,0	≤ 2,3
	Fatality rate	-	0,045	0,014	0 each year
Diversity	Share of women in Group management	24,1%	28,9%	29,9%	[40-60%]
Equity	Gender pay gap	-	-	1,73%	< 2%
Learning	Rate of apprentices in the workforce in France	6,7%	7,2%	7,7%	> 10%
Training	Rate of employees trained each year	70%	82%	84%	100%
Responsible purchasing	Responsible purchasing index (excluding energy): CSR assessment and inclusive purchasing	25	40	38	100
Fraud and corruption prevention	Rate of training of staff most exposed to the risk of corruption	21%	49%	55%	> 95%
Operational objectives followed by the Group Executive Committee					
Stakeholder dialogue	Rate of activities with a societal plan for stakeholder consultation	10%	37%	46%	100%
Access to energy	Number of beneficiaries with access to sustainable energy in millions[2]	6 M	7 M	9,5 M	30 M

Here a comparison of the year 2022 and the target on 2030:

2022 RESULTS

People
- **29.9%** women in Group management
- **1.73%:** gender pay gap
- **2.0:** frequency rate of occupational accidents for employees and subcontractors on sites with controlled access

TARGETS

to 2030
- Percentage of women in Group management **[40%-60%]**
- Pay gap: **<2%**
- Frequency rate of occupational accidents for employees and subcontractors on sites with controlled access **≤ 2.3**

Finally, The Group's commitments can only be achieved with the active involvement of its employees. ENGIE is therefore developing and widely distributing resources for raising awareness and sharing best practices, making them accessible to all. Therefore, Ensure common social protection for all ENGIE employees with collective social guarantees through a global agreement with the internal labor federations. Offer training and permanent ongoing professional training to all ENGIE employees. Responsibly manage the restructuring operations with regard to the employees.

Following the global labor agreement on fundamental rights signed in January 2022 with three international union federations, a basis of common shared rights and social protection was established for all Group employees. An annual world forum was also established to report on its progress. It was within this framework that Chief Executive Officer Catherine MacGregor met the stakeholders of this labor agreement on September 8, 2022. It was an occasion to assess the progress made by the Group on its key labor commitments – the rate of employees trained, diversity and salary equity – and to report on the different programs or plans, such as "ENGIE Care", "ENGIE One Safety", the vigilance plan and ethics whistleblowing. At the same time, ENGIE invests in apprenticeships as a path to excellence. In 2020, it formed its Energy Transition Academy to train 400 young work-study apprentices in the new energy business lines by 2024. Today, there are close to 140. Other initiatives exist in Brazil, the Middle East and Romania, where the Group financed two classes that allowed 50 young people to enroll in the "Energy For My Job" program. The 2030 objectives are 100% of employees trained annually and 10% of apprentices in France.

See the 'ENGIE ONE SAFTEY' plan on page 43. Here the social indicators:

SOCIAL INDICATORS	2020	2021(1)	2022(1)
Number of employees ■■	172,703	101,504	96,454
Managerial staff in the workforce (%) ■■	26.2	30.2	30.4
Employees on permanent contracts (%) ■■	90.4	91.5	91.5
No. of permanent contract and fixed-term hires ■	29,481	15522	16974
Voluntary turnover (%)	5.4	5.2	6.5
Internal lost-time occupational accident frequency rate for employees ■■	3.0	2.8	2.3
Lost time injury frequency rate for employees and subcontractors on sites with controlled access ■■	2.7	2.5	2.0
Accident seriousness rate (employees) ■	0.11	0.1	0.06
Number of fatal accidents (employees) ■	3	2	0
Number of fatal accidents (subcontractors)	3	11	4
Women in the workforce (%) ■■	21.5	25.1	26.1
Women in management positions (%) ■■	24.1	28.9	29.9
Gender pay gap (%)	-	-	1.73
Trained workforce (%) ■■	70.1	82	83.8
Hours of training (no.) ■	2,963,242	2,254,023	2,126,584
Percentage of apprentices in France (%) ■	6.7	7.2	7.7
Overall employment rate of employees with disabilities in France (%)	3.7	3.4	3.4
Employee engagement (%) ■	83	83	86
Employee shareholding (% of share capital held)	3.2	3.2	3.9

TTE: ✓

A quick overview of the employees of TTE:

People well-being: being a reference as an employer and responsible operator. TotalEnergies intends to promote a work environment that combines performance and conviviality, and to ensure compliance with human rights in the workplace, both within the Company and with its partners, as well as the safety and health of people. Accordingly, TotalEnergies is committed to respecting internationally recognized human rights wherever it operates, especially the Universal Declaration of Human Rights, the Fundamental Conventions of the International Labour Organization (ILO), the U.N. Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the Voluntary Principles on Security and Human Rights (VPSHR).

In 2002, TotalEnergies joined the United Nations Global Compact. Since 2010, the Company has been supported by a Human Rights Steering Committee. The human rights road map is presented and reviewed regularly at Executive Committee meetings. In 2013, the Executive Committee examined and validated the Company's first human rights road map, and in 2016, its first human rights briefing paper, which has since been updated. In 2021, TotalEnergies created a Sustainability & Climate division to which the Human Rights department is attached.

On page 145 the risks of impacts on human rights for TTE are identified.

Training programs dedicated to human rights have been set up for senior executives, site directors and employees most exposed to these issues. Awareness-raising sessions are organized regularly for employees, for example as part of ethical assessments of Subsidiaries. The Human Rights department is developing a training plan for Company employees to encourage understanding of issues relating to human rights and thereby better manage the associated risks. This training plan is rolled out as a priority among employees who are most exposed to risks linked to human rights. Events such as the annual Business Ethics Day are used to raise awareness among employees of TotalEnergies SE and its Subsidiaries. A Guide to Human Rights is also made available to employees and stakeholders. Its goal is to raise TotalEnergies employees' awareness on issues relating to human rights in its industry (at work, with local communities and in relation to security) and it provides guidance as to the appropriate behavior to adopt in their activities and relationships with stakeholders. It includes case studies, specifically on Uganda. This guide serves as a reminder of the Company's commitments in relation to human rights. It offers proposed answers to common questions and concerns about human rights, notably child labor, forced labor, discriminatory practices and collective negotiations.

TotalEnergies has several whistle-blowing mechanisms that are open to employees, Suppliers and third parties. To support employees on a day-to-day basis, the Company encourages a climate of dialogue

and trust enabling individuals to express their opinions and concerns. Employees can turn to their line manager, an HR or other manager, their Compliance Officer or their Ethics Officer.

Several assessments were done: In 2022, five ethics and human rights assessments were conducted. They involved five Subsidiaries, totaling approximately 2,600 employees in Argentina, Mexico, Qatar and India. These assessments confirmed that the Code of Conduct has been taken on board by employees. The follow-up of the action plan put in place further to the assessments in 2020 and 2021 in the Subsidiaries in Kenya and France (Pau) was also carried out in 2022. It is planned to follow up the action plan concerning the Subsidiary in Poland in 2023.

Human rights in the workplace of TotalEnergies' employees as well as of the employees of its suppliers and other business partners: – forced labor and child labor, – discrimination, – just and favorable conditions of work and safety. Human rights and local communities: – access to land, – the right to health and an adequate standard of living. – respect for human rights in security-related activities: – the risk of misuse of force (See page 344-348).

Lastly, throughout its activities, diversity is integral to TotalEnergies' identity and key to its success. The Company has long been committed to promoting equal opportunity and diversity, and strives to promote an inclusive corporate culture and an environment that allows every employee to express and develop his or her potential. The diversity of its employees and management is crucial to the Company's competitiveness, appeal, acceptability and capacity for innovation. TotalEnergies aims to develop its employees' skills and careers by implementing an inclusive Human Resources policy, while excluding any discrimination related to national, ethnic or social origins, gender, sexual orientation or gender identity, marital or parental status, disability, state of health, age or affiliation with a political, labor or religious organization, or membership in a minority group. On page 338 are measures to promote hiring people with disabilities.

Works Council: At the European level, as part of the transformation of the Corporation into a European company (SE), an agreement was reached on April 15, 2020, to create the SE Works Council (known as the TotalEnergies European Works Council) to replace the former European Works Council, while maintaining continuity in its operations and missions. The TotalEnergies European Works Council serves as a forum for providing information and regular exchanging views about the Company's strategy, its workplace, economic and financial situation, as well as o matters relating to sustainable development, environmental and social responsibility and safety.

SIE: ✓

Regarding the human rights of Siemens Partners: In fiscal 2022 we expanded our procedures for fulfilling our duty of care for human rights by adding a "customer deep-dive due diligence" function. This gives us a way to review established Siemens business partners annually for possible environmental, social, human-rights, or reputational risks. If irregularities are discovered, we can then take up focused discussions with the partner concerned. This process will have a pilot run in fiscal 2023.

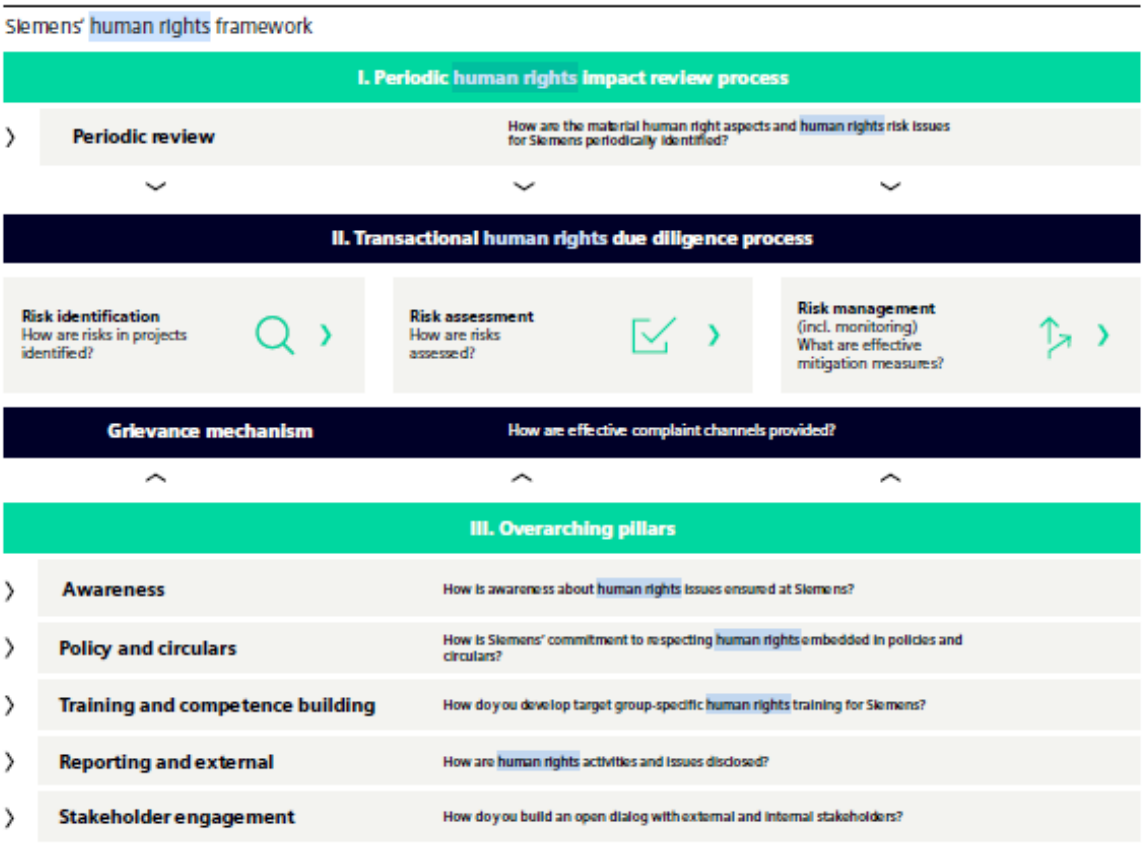
On page 48 it starts with the human rights: The three main objectives are the respect for human rights remains in focus at all times, commitment to compliance with international standards and inclusion of all key partners. Our DEGREE framework consists of different components to address the multifaceted issue of human rights in the areas of G (Governance), E (Ethics), and E (Equity). In the following, the human rights-related topics in the DEGREE framework are outlined.

These standards include the United Nations Guiding Principles on Business and Human Rights and the Guidelines for Multinational Enterprises published by the Organization for Economic Cooperation and

Development (OECD). They highlight the importance of a due diligence process that is able to proactively identify, assess, and prevent any human rights violations. Their pledge to safeguard human rights is anchored in the Siemens Business Conduct Guidelines (BCGs).

Our actions in support of respect for human rights and our commitment to implementing the UN Guiding Principles on Business and Human Rights are monitored by the Siemens Managing Board and the Siemens Sustainability Board (SSB). These bodies discuss both progress and challenges and identify improvement measures. Furthermore, the Chief Compliance Officer reports to the Supervisory Board and Managing Board at a regular and also on an ad hoc basis on topics relating to human rights.

Here is the Siemens' human rights framework:



Our brochures "Sustainability in the Supply Chain" and "Siemens Group Code of Conduct for Suppliers and Third Party Intermediaries and Business Partners" support and sensitize our suppliers to the importance of embedding these values, as well as the sustainability requirements they entail, more deeply in their own supply chains. Siemens also offers web-based training on sustainability and human rights in the supply chain for all its suppliers. Besides regular dialog with peer groups and think tanks, we also interact continually with external human rights advisors on the subject of training, sensitization, and due diligence. In addition, we communicate continually with investors, shareholders, rating agencies, and NGOs.

Agreed-upon improvement measures[1]	2022	2021
Legal Compliance/prohibition of corruption and bribery	**915**	1,152
Respect for the basic human rights of employees	**564**	773
Prohibition of child labor	**80**	149
Health and safety of employees	**879**	705
Environmental Protection	**546**	680
Supply Chain	**125**	145
Total	**3,109**	3,604

We actively promote diversity, equity, and inclusion by creating a working environment that is open and appreciative for all. Our commitment to human rights is anchored in our Siemens Business Conduct Guidelines (BCGs). We do not tolerate discrimination of any kind. The guidelines clearly state: “We respect the personal dignity, privacy, and rights of each individual.” They also make it clear that Siemens is committed to maintaining a workplace that is open to everybody regardless of ethnic origin, culture, religion, age, disability, skin color, gender, sexual identity and orientation, or world view. We aim to increase the percentage of top management positions held by women globally to 30% by September 30, 2025.2 As of September 30, 2022, 27.7% of top management positions were held by women (+0.2%-points compared to previous year).

Work-life balance: There is an increasing desire for more flexibility and more individual solutions depending on phase of life when it comes to organizing working hours and work location. For this reason, we offer our people flexible working models, which are structured according to the local requirements in their various countries, and in ways compatible with the employees’ roles. Examples include mobile working, part-time hours, sabbaticals, time-outs, parental leave, and partial early retirement.

The principles of fair pay, right to collective bargaining, and freedom of association are embedded in the Siemens BCGs and in the International Framework Agreement COMPLIANCE AND ETHICS. Fair pay is an integral aspect of appreciative and respectful relations with employees. In line with national laws and regulations, Siemens is guided by the principle of “equal pay for equal work”. In Germany, for example, the pay system according to the collective bargaining agreements is determined in the course of collective bargaining negotiations. 78% of employees in Germany are covered by collective agreements. Therefore, SIE wants to guarantee fair pay (coverage of basic needs) that at least conforms to the national statutory minimum wage. Subject to national regulations, Siemens adheres to the principle of “equal pay for equal work” – for instance, equity in wages for women and men with the same job profile or same role.

Finally, Siemens strives to ensure equity for people with disabilities, their inclusion in society and the workplace, and their self-determined participation and right to be treated with respect. What counts for us is the person – disabilities should have no relevance at all. For that reason, we also aim for a barrier-free work environment. But at Siemens, inclusion means more than just accessibility: It is a holistic way of thinking and acting that eliminates both visible and invisible barriers and encourages a culture of conscious, equitable participation and understanding as a way of supporting and enabling people with disabilities.

Lastly, Siemens does not tolerate discrimination, sexual harassment, or any other form of personal attack on individuals or groups. In addition, the principles of equal opportunity and equal treatment apply without restriction. The ‘people’ metrics could be found on page 146.

COLR: ✓

It’s written that promoting sustainable job creation and decent work where every employee can make a positive contribution, we want to form a long-term relationship with every one of our employees. To this end, we create an optimal work context in which everyone can make the most of their skills.

Through numerous tools and levers (training, personal development plans, teamwork, new learning solutions, consultation moments, etc.), we encourage our employees to invest in the long-term development of their careers. We also pay close attention to a healthy work-life balance.

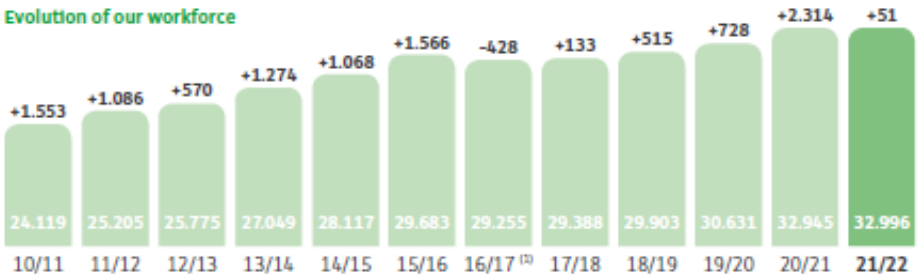
• Fifth most attractive employer: in 2022, we were ranked the fifth most attractive Belgian employer in the leading Randstad Employer Brand Research. This is our highest position ever.

• Colruyt Group India is certified as a Great Place to Work by the Great Place to Work® Institute.

• Beginning in 2022, we have enshrined the possibility for office workers to telework several days a week.

• Many Colruyt and OKay store employees are already able to specify their available hours via a system of 'self-rostering', thus exercising greater control over their schedules.

• Our well-being survey shows that 82% of our employees are satisfied with their jobs.



Indicators for SDG8:

Indicators SDG 8		2019	2020	2021
Learning and developing together				
Investment in education and training (in million EUR)	Financial year	38,8	32,1	**39,1**
% payroll invested in education and training	Financial year	3,04	2,41	**2,82**
# individual participants in personal growth training courses	Financial year	1.759	1.562	**1.548**
# Different personal growth training courses	Financial year	58	73	**55**
# Employees in a dual learning programme	Financial year	206	185	**211**
# Trainees	Financial year	585	395	**710**
# Traineeship programmes	Financial year	8	10	**14**
# Colruyt Group Academy centres	Financial year	11	10	**10**
# Participants in Colruyt Group Academy workshops for consumers	Financial year	52.602	5.361	**23.501**
# Different courses for consumers	Financial year	190	192	**152**
Investment amount (in EUR) Collibri Foundation	Calendar year	808.593	798.860	**907.846**
# Training projects Collibri Foundation	Calendar year	14	14	**18**
# Young people directly involved in Collibri Foundation training projects	Calendar year	6715	9.350	**10.480**
Average number of training hours per employee	Financial year	-	-	**27**
Total number of training hours during the year (in millions)	Financial year	-	-	**1,02**

We believe in the power of diversity. Colruyt Group stands for an inclusive corporate culture based on the added value of diversity. We have a clear-cut non-discrimination policy. • In our training offerings, we focus on multicultural teams and intercultural communication. • In 2021, we conducted several awareness-raising campaigns around transgressive workplace behaviour. • Our selection process is open to all, regardless of age, cultural background, disability, ethnicity, gender, marital status, political beliefs, religion, or sexual orientation. The best candidate is selected in an objective and professional manner. Their group counted 89 nationalities in 2021.

Concerning the remuneration: 20,42 million euros of profit sharing or 5,4% of company profits were distributed to 26.679 employees in Belgium. 1.606 employees subscribed to 184.228 shares in 2021.

Lifelong learning and development are embedded in Colruyt Group's DNA. We structurally invest in learning and development opportunities, encouraging self-development at both a professional and personal level. COLR invested 39,1 million euros in employee education and training in 2021. See details on page 168.

Moreover, their code of conduct endorses universal principles of international human rights treaties. These must be respected, inter alia with regard to the minimum age for employees, the right to fair wages, exclusion of child and forced labour, guaranteed safe and healthy working conditions, and a ban on discrimination.

COLR wants to honour visible individual performance and growth potential. That is why we focus on various remuneration elements (both financial and nonfinancial). • Remuneration is more than just salary. At Colruyt Group, opportunities for growth and development, a sustainable context, and a work-life balance, in addition to salary, are an essential part of the total remuneration package.

VOW3: ✓

The Declaration by the Volkswagen Group on Social Rights, Industrial Relations and Business and Human Rights (Social Charter). Here, we commit to paying all employees the legally required national minimum wage that is to be guaranteed, to protecting the right to privacy, personal safety and freedom of opinion, to the rights of indigenous peoples and to preventing cruel, inhuman or degrading treatment. The Social Charter is geared to the conventions of the International Labour Organization (ILO).

The employee satisfaction index, which is calculated from 22 questions, is the principal indicator of the Opinion Survey. It is calculated from the total of all the related answers in the survey and, in 2022, stood at 82.4 out of a possible total of 100 index points in the Volkswagen Group (2021: 82.3 index points) and at 76.2 index points in Volkswagen AG (2021: 76.2 index points). The result of the employee satisfaction index influences the level of the annual bonus as part of the variable remuneration for the Board of Management. Internal Employer Attractiveness: The indicator is derived by asking respondents as part of the Opinion Survey, which is conducted for the majority of our Group workforce, whether they perceive their respective company as an attractive employer. The Volkswagen Group's target for 2025 is 89.1 out of a possible total of 100 index points. 86.6 index points were achieved in the reporting year, i.e., the intermediate target for 2022 of 88.7 index points was missed. 86.8 points were achieved in the previous year. For Volkswagen AG, the value for 2022 was 87.1 index points (2021: 87.7 points).

Diversity Index: As part of our Group-wide diversity management, in this strategic indicator we report on the trends in the proportion of women in management and the internationalization of top management, in each case as a percentage of the active workforce[1] globally. In particular, this indicator underpins the objective of the human resources strategy, which is aimed at contributing to an exemplary leadership and corporate culture.

Number of Training Hours per Employee: Due to the transformation in the automotive industry, we are facing the biggest process of change in expertise and cultural change in the history of the Group. As a result, individual opportunities for change for employees are becoming an enhancing important success factor. Volkswagen is increasing access to training by leveraging economies of scale in connection with digitalization and through the Degreed platform. The goal is to increase the average number of training hours per employee in the Volkswagen Group – based on the active workforce[1] – by 35% to 30.0 hours per year by 2030. The baseline value is 22.3 hours and represents the average for the years 2015 to 2019. The years 2015–2019 were chosen as the baseline due to the outbreak of the Covid-19 pandemic, which temporarily curtailed training activities in 2020 and 2021. The target for the reporting year was 22.0 hours. An average of 19.9 hours per employee meant it was not achieved.

The KPIs of the people could be found on pages 86-88.

Diversity was defined as a focus topic for sustainability as part of the NEW AUTO Group strategy and Group initiative 6, which was derived from it. We have enshrined the topic of diversity and equal opportunities in the HR Compliance Group policy. The particular importance of this action area is further underpinned in the Volkswagen Group by the fact that the diversity index as a strategic KPI has acquired direct remuneration relevance at Group Board of Management level. We have also set out the aim of diverse workforces in key documents. The declaration “We live diversity” as one of the seven Group Essentials is thus a firm part of the Volkswagen Group’s cultural DNA. Our understanding of diversity extends beyond gender equality, sexual orientation and internationality. For example, we also focus on the inclusion and integration of employees with disabilities. Index is on page 93.

The proportion of women in management positions – comprising line management, senior management and top management (including members of the Group Board of Management) – was 17.2% in 2022, which is significantly above the previous year’s level. We aim to raise this figure to 20.2% by 2025. The Volkswagen Group actively participates in the Target Gender Equality program, which was set up by the UN Global Compact and targets increased gender equality. The program is based on the UN Women’s Empowerment Principles. These provide all companies with guidance on how they can promote the empowerment of women and gender equality in the workplace, in business and in society. The program is also accompanied by workshops each focusing on different issues, such as the gender pay gap, cross-sector peer-to-peer learning processes and multi-stakeholder dialogs.

They at Volkswagen strongly reject discrimination. This is because we stand for respect, for equal opportunities, for working together and for equal treatment of people, irrespective of their ethnicity, race, gender, disability, ideology, religion, nationality, sexual orientation, social background or political beliefs, provided the latter are based on democratic principles and tolerance towards those who hold different views. The Volkswagen Group Code of Conduct provides guidance throughout the Group and we sanction any breaches of the rules set out in it. Under the code, every employee and manager is responsible for ensuring that colleagues work together in partnership and for taking action if rules are breached. We also keep central statistics on this: In 2022, 14 Volkswagen Group employees were dismissed due to breaches in the area of discrimination, harassment or stalking.

Work-life balance: Volkswagen has recognized its employees’ need to be able to respond flexibly and at short notice in various life situations. We are therefore constantly working on improving our employees’ work/life balance through flexible working time models. For example, we want not only to take into account the specific needs of parents, single parents or carers for relatives but to facilitate more flexibility for all employees. The rules and programs here vary from country to country and are determined by the legal framework, cultural circumstances, and the results of collective negotiations.

We provide our workforce with information on the supply chain and human rights via a number of channels. This includes articles in internal media and newsletters and internal dialog and Q&A events. This is because it is important to us that our employees obtain information directly at first hand. We communicate our positioning to the public and external stakeholders through interviews with top managers, in media reports and through our digital channels.

Health care is managed at Group level by the Head of Group Occupational Health and Safety, who is also Volkswagen AG’s senior physician. They report directly to the Board Member for Human Resources, reporting to the latter on the topics of health and occupational safety. The Group Steering Committee for Health and the Group Steering Committee for Occupational Safety make decisions on strategic direction and coordinate topics of fundamental importance across brands.

Lastly, the works councils are also mentioned (page 76).

SOLB: ✓

Solvay's Human Rights in Business Policy, published on our website, sets out Solvay's commitment to respecting human rights and acting with due diligence to avoid any infringement of human rights or any adverse impact on or abuses of such rights. The policy emphasizes Solvay's commitments to our stakeholders, namely our employees and business partners, the communities and environment in which we operate and children.

Solvay has a Global Human Rights Committee (GHRC), which oversees implementation of the policy, ensures compliance and monitors the Group's performance. Members of the Global Human Rights Committee include the heads of the following Solvay business service activities: General Counsel; Compliance; Human Resources; Procurement; Communication; Internal Audit and Risk Management; and Sustainable Development. Two parallel processes are used to assess human rights risks at Solvay sites. These focus on Solvay employees, based on internal data, or on our business partners, namely suppliers and contractors identified according to the risk associated with the country they operate in. Six human rights dimensions are considered: child labor; forced labor; trafficking in persons; human development; freedom of association; and collective bargaining. The assessment is used by Solvay's internal auditors to identify priorities for their work on the subject.

Employee engagement is the level of commitment, passion and loyalty an employee has toward their work, team and company. Solvay believes that engagement increases performance through higher productivity and employee retention and that engagement is fostered by fair labor practices and well-being at work. A constructive relationship with employees and their representatives, built on trust, is considered the basis of fair labor practices at Solvay. This relationship reflects the Group's commitment to respect employees' fundamental human rights and guarantee their social rights. Well-being at work is a holistic concept which relates to all aspects of the quality of working life that ensure workers are safe, physically and mentally healthy, satisfied, engaged and efficient. It addresses recognition and support, work-life balance, employee growth and development, and good communication and collaboration, based on International Labor Organization and World Health Organization definitions.

Solvay has implemented a comprehensive approach to reducing risks in the workplace. Our approach includes: Risk assessments and risk-based medical surveillance, using both qualitative and quantitative methodologies, with a focus on chemicals; pandemic preparedness and mitigation plans; human biomonitoring, when warranted; improving and adapting working conditions; deployment of a well-being at work program; promoting general physical and mental health; and setting more conservative in-house exposure limits for critical substances

The employee health and safety (on page 227 onwards): Occupational safety is about preventing work-related injuries. Accidents are mostly linked to falls at the same level, human energy, such as pushing, pulling or striking an object, and exposure while opening a line or system. Industrial hygiene management encompasses the assessment, monitoring and management of workers' potential exposures to ergonomic, chemical and physical hazards. Occupational health includes all the preventive actions undertaken in order to protect and promote physical and psychological health at work, both collectively and for each individual Solvay employee.

In addition, SOLB has been in permanent dialogue with our European Works Council (EWC) for more than 20 years. In 2022, the EWC met physically on three occasions and the EWC Secretariat met eleven

times, either virtually or physically, with senior Group management, to help steer Solvay's evolution. The main topics discussed were reorganizations, actions taken by the Group to face the consequences of the Ukraine war, the support given to employees to cope with high inflation, the evolution of working conditions with the extension of mobile working, the Group Sustainable Development strategy and Solvay's financial results.

HOURS WORKED

	Units	2022	2021	2020
Work hours - Employees	1,000 hours	42,362	42,967	45,359
Work hours - Contractors	1,000 hours	20,493	18,622	16,577
Work hours - Employees and contractors	1,000 hours	62,855	61,589	61,936

There are also table on a statistic of accidents. In 2022, communication material on health promotion was deployed to all our sites. Topics included healthy nutrition, physical activity, sleep and recovery, alcohol abuse and tobacco cessation. At 89% of our sites, health and well-being topics were covered during our Health and Safety Days events. In addition, survey results show that 90% of our sites report active promotion and support for the health and well-being activities (see table on page 231).

In 2022, we continued our series of short quarterly surveys, known as One Pulse surveys. Available in 14 languages, the One Pulse surveys enable us to listen to the feedback and opinions of Solvay employees around the world. This not only promotes a feedback culture, where everyone can safely share their opinions and have open conversations with their team and leaders, but also helps to improve employee experience at work.

On page 234 there is a survey about how the employees feel at work.

Diversity: Accelerate gender parity at all mid and senior levels. Make our workplace more appropriate for people with disabilities. Develop Resource Groups to encourage employees to bring their "whole self" to work.

Equity: Assess if there are undesired pay gaps and close them. Ensure fair recruitment: all mid and senior level job openings to have a shortlist comprising 50% of under-represented groups, including women. Ensure equitable access to career opportunities and development: set up mentor/mentee programs starting with under-represented groups.

Inclusion: Build an inclusive employee experience: set up an Inclusion Index and improve our score. Assessment and development program for Solvay leaders to grow and nurture an inclusive mindset. Build a culture in which individuals feel empowered to speak out or speak up when they experience or witness non-inclusive behaviors.

GENDER DIVERSITY BY EMPLOYEE CATEGORY

	Units	2022	2021	2020
Women in senior management	%	17	16	15
Women in middle management	%	27	26	26
Women in junior management	%	35	35	34
Women in non-managerial positions	%	19	19	20
Total women in Solvay	%	24	23	24

The table of the average training hours could be found on page 238.

KBC: ✓

KBC group employs a total workforce of 42 000 staff who are the organisation's main driving force and biggest asset. Team Blue unites all our employees to work together for our common goals. KBC group employs a total workforce of 42 000 staff who are the organisation's main driving force and biggest asset. Team Blue unites all our employees to work together for our common goals. We are proud of the dedication and engagement demonstrated by our employees in supporting KBC's vision and strategy. Our priority is to keep our employees satisfied. For this reason, we engage in an open social dialogue with our employees and employee representatives, and we conduct regular employee engagement surveys. We make sure that our people – regardless of gender, religion, age or disability – are treated equally in every circumstance. It is our responsibility to make sure that each and every employee feels recognised, empowered and motivated whilst having equal opportunities (page 22).

KBC states that their employees are crucial in carrying out our sustainability philosophy. In this regard, we focus on creating a team spirit for 'Team Blue' on the topic of sustainability. We do so through training sessions specifically developed for our employees.

KBC sums up their business culture in the acronym 'PEARL+': Performance: we strive for excellent results and do what we promise. Empowerment: we allow the creativity and talent of the individual employee to blossom. Accountability: we meet our personal responsibilities. Responsiveness: we anticipate and respond proactively to questions and suggestions. Local Embeddedness: we view the diversity of our teams and clients in our core markets as a strength.

KBC created a digital platform called StiPPLE, which stands for Skills to improve Performance Progression Learning and Employability. StiPPLE helps our employees develop, in terms of both output and skills, in their current function and assists their progress towards future functions, roles and skills. Employees receive insights into their career opportunities at KBC and can very easily apply for open positions. KBC's Performance and Progression Management supports its employees with a continuous review method instead of annual appraisals. All managers and team members are actively involved in this process. To ensure that each employee progresses along with their team and in line with our group strategy, we set dynamic individual and team goals. We support our employees with these endeavours through regular progression dialogues, continuous feedback, and coaching sessions.

Leadership programmes: KBC's Performance and Progression Management supports its employees with a continuous review method instead of annual appraisals. All managers and team members are actively involved in this process. To ensure that each employee progresses along with their team and in line with our group strategy, we set dynamic individual and team goals. We support our employees with these endeavours through regular progression dialogues, continuous feedback and coaching sessions.

We carefully listen to our employees and value their opinions. In doing so, we regularly conduct employee engagement surveys. We also invest in good social dialogue with employee representatives (page 25). We closely watch our employees' opinions and consult them on a regular basis. KBC conducts a six-monthly employee engagement survey in each of our core countries. Moreover, We are keen to build a constructive dialogue with our employees and with our formal employee representation groups. We fully support the freedom of association and the right to collective bargaining. Just as we are fully committed to the ILO (International Labour Organisation) Declaration on Fundamental Principles and Rights at Work.

In addition, KBS values their employees' health and well-being. We aim to create and maintain a working environment where people feel safe, are free to speak up and able to grow. We are keen for

our employees to enjoy the right work–life balance and put in place all relevant measures to ensure this balance is achieved. We believe this benefits both the employees and KBC.

Although the general guidelines of our Diversity policy apply to all types of diversity and inclusion of every employee, we particularly focus on 'gender'. Each core country focuses on a diversity action plan including local ambitions and specific initiatives. At group level, we monitor the gender balance in our top talent management programme and the inflow into managerial positions. To support gender diversity in the higher echelons of our organisation – where women at KBC currently remain underrepresented – we have set a goal of having one female and one male candidate for every new senior management nomination (see page 27). There is also an equal pay policy at KBC.

Lastly, they also focus on the inclusion of our colleagues with a disability. We have added a diversity and inclusion statement in our Belgian job ads to take a clear stance on our values and to inform potential applicants. In 2023, we are set to develop our programme to embed access of people with a disability into our organisation. We also plan to launch specific support training for our Belgian managers and employees with a disability.

ABI: ✓

Ethics and transparency: We are committed to promoting the highest standards of ethical behavior and transparency. This guides everything that we do as an organization and serves as our foundation in creating a future with more cheers. We have created governance bodies and programs on anti-corruption, digital ethics, and human rights.

Respecting human rights is fundamental to creating healthy, thriving communities: ABI seeks to foster business practices that support and respect human rights and align with the UN Global Compact principles. Our approach to human rights is based on the United Nations Guiding Principles on Business and Human Rights (UNGPs) and is outlined in our Global Human Rights Policy. To cascade the principles of our Human Rights Policy throughout our value chain, we have developed a Global Responsible Sourcing Policy and Responsible Sourcing Principles for Farms. We have further embedded respect for human rights and relevant principles across our policy landscape, including the following policies:

• Responsible Marketing and Communications Code;

• Diversity and Inclusion Policy;

• Global Anti-Harassment and Anti-Discrimination Policy;

• Global Health and Safety Policy; and

• Global Whistleblower Policy.

We share our policies with colleagues through internal communications channels and online trainings, and we communicate the relevant policies to our business partners during the contracting process by including them in contract clauses. Our approach to human rights is centered around due diligence: identifying actual and potential impacts and putting in place measures to address, prevent and remedy issues that may arise. An example is: As an example of how local teams work to identify and address relevant human rights topics, workshops are convened by local Legal Compliance teams and bring together representatives from different functions including Procurement, Sales, Supply, Logistics, People and Marketing to map the value chain in the country and identify where there could be potential human rights impacts on people. Impacts are prioritized based on their salience, and local targeted action plans are developed for each issue. In 2022, our teams held workshops in Ghana, Tanzania, Mozambique, Peru and El Salvador.

88% is the score for DEI index in annual engagement survey (one percentage point increase versus previous year). 28% is the representation of women among our top five leadership levels (two percentage point increase versus previous year).

Our employee resource groups (ERGs) around the world continue to grow and expand to welcome new colleagues into inclusive, safe spaces. In Brazil, ERGs created toolkits around key moments throughout the year with tips and resources on how to develop more inclusive environments for diverse colleagues. These toolkits were cascaded to managers to share with their teams and focused on mental health, LGBTQ+, gender and racial equity.

Select demographic metrics

	2022	2021	2020	2019	2018	2017
Number of nationalities represented in our overall workforce	132	125	121	123	122	122
Number of nationalities represented in our global headquarters	61	64	54	55	54	48
Percent of women in our overall workforce	22%	21%	19%	19%	18%	18%
Percent of women in our salaried workforce	35%	34%	32%	31%	30%	30%
Percent of women among our top five leadership levels	28%	26%	24%	22%	20%	19%
Percent of women among our top three leadership levels	14%	14%	14%	12%	11%	10%
Percent change in D&I index in annual employee engagement survey	1pp	1pp	2pp	0pp	1pp	NA

The health and safety of our colleagues and partners is a core value of our company. We are committed to training our colleagues to make the right choices for safety, for themselves and for others. Creating a future with more cheers starts within our own operations. That is why the health and safety of our colleagues, contractors and service providers is a core company value. We are training our colleagues to make the right choices for safety, for themselves and for others. Whether brewing or delivering our products, operating machinery or driving in any vehicle, safety is paramount. We work vigorously to achieve high standards of health and safety in our offices and breweries and throughout our value chain by engaging teams to build an interdependent safety culture through trainings, workshops and coaching sessions. Safety metrics are cascaded and monitored through our supply and logistics safety management systems.

Through our due diligence processes, we have identified key areas of focus in our value chain that include living income, child labor and our sponsorship of global sporting events. In 2022, we used internal risk management tools to review these salient risks as well as our plans to address them to continue improving our approach. An example of the due diligence is: In partnership with local research organization Kilimo Trust and the Sustainable Food Lab in 2022, we continued a baseline study on barley farmer net household incomes in Uganda to analyze how our programs contribute to farmer livelihoods. The findings of the study have helped us understand how we could adapt local interventions to help further improve farmer incomes across our direct sourcing programs.

Our menu of inclusive benefits promotes our shared goal of creating belonging and enhancing well-being. Our Global Parental Leave Standard offers 16 weeks of parental leave to the primary caregiver, which includes all gender identities and all entry points to parenthood, and two weeks to the secondary caregiver. Inspired by the progress we made on our return-to-work programs in Europe, we have expanded similar programs for our colleagues in other local markets, such as Argentina and Canada, to help returning parents stay connected and offer more flexibility when transitioning back to work.

All the SDG metrics start on page 89 onwards.

Trainings: Implement skills training programs for smallholder farmers, informal recycling collectors and small retailers in our value chain, with a specific focus on engaging and empowering women; Provide training and tools to suppliers to measure and track decarbonization across their supply chains through the Eclipse platform.

AGS: ✓

Firstly, it's written that Ageas does not invest in companies that severely violate international norms and standards related to corruption, the environment, human rights, and labour rights including child labour, forced labour and discrimination.

Ageas fully subscribes to the UN Universal Declaration of Human Rights and the International Labour Organisation's Core Conventions. with applicable legal requirements and internal policies on the subject, and to respect internationally recognised human rights and avoid complicity in human rights abuses, as stated in the UN Guiding Principles on Business and Human Rights. Since 2020, Ageas is signatory of the UN Global Compact (UN GC) framework, supporting the Ten Principles on human rights, labour, environment, and anticorruption as well as communicating upon progress made to implement these principles. with applicable legal requirements and internal policies on the subject, and to respect internationally recognised human rights and avoid complicity in human rights abuses, as stated in the UN Guiding Principles on Business and Human Rights. Since 2020, Ageas is signatory of the UN Global Compact (UN GC) framework, supporting the Ten Principles on human rights, labour, environment, and anticorruption as well as communicating upon progress made to implement these principles.

Within Ageas's policy framework, such guidance refers to Codes of Conduct reflecting Ageas commitments as well as specific Human Rights & Labour guiding principles, Diversity and Inclusion policy, and mechanisms for gauging staff sentiment (e.g. employee engagement surveys). As the Incident Reporting policy indicates, Ageas Internal Alert System is available to all employees as well as trainees, temporary (agency) staff and people hired to work on specific projects at Ageas. In accordance with the Belgian Whistleblowing law, an update on the Internal Alert System is scheduled for February 2023.

In the section '5.2 Our employees' all the relevant information is disclosed (SDGs 3,4,5,10):

Impact24 targets: Glass ceiling index; ratio% women in senior management / total % of women in company –70%; balanced (M/F) succession pipeline top 800 – 50/50; Gender diversity index – equal participation of women at decision level -top quartile; Employee NPS – top quartile;Impact24 skills plan – 100% achieved.

Mental health: Ageas Portugal launched in the course of 2022 a new area, "Health, Security and Well-being" where the first focus was the Mental Health, including both face-to-face and remote format "Let's talk about your Mental Health" gatherings, free of charge consultations of psychology or a social worker, and launch of the Nutrium Care Programme (consultations, anthropometric measurements, webinars) as nutrition was also defined as a pillar for the Mental Health Program. All information provided to employees has been made available and can be easily accessed on a newly developed intranet on the "People Hub" platform (internal intranet).

Diversity and inclusion: Both our Glass Ceiling index and the Gender Diversity index show considerate improvement and good progress towards our ambitions for 2024. Ageas has a clear commitment to diversity and inclusion, expressed through its Diversity and Inclusion Policy, and the ambitious Impact24 targets. Ageas as a Group ensures that all employees feel welcome, respected and are given

the opportunity to realise their potential within the organisation. The Group Diversity and Inclusion plan, launched in 2020, aims to develop an inclusive workplace for everyone no matter their gender, age, sex, disability status, ethnicity, nationality, sexual orientation, religion etc.

5.2.2 Diversity & Inclusion

	2022	2021
Balanced succession pipeline top 300 (top 800 minus top 300, male / female)	63/37	65/35
Glass Ceiling Index (GCI)	57	50
Gender Diversity Index (GDI)	0.75	0.68

The head office in Belgium and the Asia Regional Office in Hong Kong employs a high number of different nationalities, creating an environment where diverse culture and backgrounds allow people to learn from each other and together build a multicultural, diversified, and strong team. At Corporate Centre, a new initiative, "Diversity week" celebrated the mix of different nationalities providing a platform for colleagues to share the characteristics of their culture and how they personally experience the advantages of diversity in their daily working.

Moreover, Ageas's employees participated well to the engagement survey, on average the participation rate was at 88 %. The E-NPS remaining at high level with a score of 56, close to top quartile. Annually, Ageas conducts a group-wide employee engagement survey. In 2022 engagement levels were once again high, and the outcome shows the increasing trust and confidence employees have in the company. "I am prepared to go the extra mile" and "I enjoy working with my team" received the most support. 90% of employees agreeing or strongly agreeing. "I have trust and confidence in my manager" continues to improve year on year from an approval rate of 84% in 2021 to 86% approval rate in 2022.

9) ESRS S2 Workers in the Value Chain:

INGA: ✓

INGA recognizes that ING and its business relationships have the potential to impact human rights through their operations **and value chains across sectors** and geographies. We could cause, contribute to, or be directly linked to potential or actual negative human rights impacts. Our ambition in our human rights journey is to understand these impacts and to take appropriate action to avoid or mitigate severe harm and enable remediation if severe harms occur.

ING's Statement on Human Rights provides an overview of how we embed human rights in our business conduct. It outlines our responsibility to respect the internationally recognised human rights of all people affected by our activities and business relationships, including our employees, customers, and workers and communities affected by our business partners **and their value chains.** It refers to our underlying policies and expectations and provides guidance on human rights to our business.

Since 2018, INGA mapped human rights risks in the gold, palm oil and cocoa Value Chains. Anne-Sophie Castelnau, ING's global head of sustainability, stated that ING's human rights journey has over 20 years of history and there is much more to come in our road ahead. We look forward to continuing our proactive application of the UNGPs through our governance and policies, exercising our leverage through client dialogue and bringing value-chains together."

On a global level, suppliers must go through ING's supplier qualification process Know Your Supplier (KYS), which helps us determine the levels of social, environmental, and financial risk associated with a supplier. Within this process, our due diligence approach varies based on the value of the contract

with the supplier. Suppliers that successfully complete this process and attain 'Qualified' status have the potential to become an ING supplier. As part of KYS, suppliers are screened for Environmental and Social Risk (ESR) and sustainability risks and performance. Suppliers who require further due diligence must agree to sustainability, environmental and social risk policies that incorporate the UN Global Compact's ten principles. By doing so, they acknowledge and agree that they will and do comply with the stated principles on human rights, forced labour, child labour, fair labour standards, environmental protection and anti-corruption standards. We have also developed a Supplier Sustainability Code of Conduct. As of 2022 this must be included in new procurement contracts in the Netherlands. The Code includes our expectation that the supplier and their subcontractors respect the human rights of their own employees, as well as those in their supply chain, as indicated in Principles 1 and 2 of the UN Global Compact. The following rights are also made explicit in the Code of Conduct: fair remuneration and working hours, no forced labour, child labour, discrimination or harassment, and freedom of association, occupational health and safety and whistleblowing. Suppliers falling in the enhanced due diligence category are required to agree to ING's sustainability risk policies and confirm that they operate in line with the principles of the UN Global Compact. These principles encompass human rights, forced and child labour, fair labour conditions, environmental protection, and anti-corruption.

Perhaps this could go a bit more in detail in the future.

ENGI: ✓

Strengthen the vigilance: The Procurement segment contributes to a reduction of the risks within the supply chain through rigorous management of its suppliers. These suppliers must, therefore, apply ENGIE's ethics and CSR requirements, i.e. respect the right to work and human rights, offer equitable and decent compensation, and provide a safe working environment. The Group decided to reinforce its Due Diligence policy on its solar supply chain in order to identify suppliers that may be involved in human rights violations. In China, an action plan was deployed in the Group's supply chains with new contract clauses aimed at fighting the forced labor of the Uyghurs. A search was also launched to find alternatives in all areas where ENGIE is exposed. In addition, the traceability of supplies, already implemented in the United States to comply with the requirements of the Uyghur Forced Labor Prevention Act (UFLPA), will soon be applied to at-risk purchasing categories worldwide in order to select responsible suppliers.

ENGI's plan is to • establish stringent standards in terms of labor law, human rights and sustainability throughout the supply chain, promote inclusive procurement and engage with suppliers in their own transition.

So ENGI is conducting rigorous supplier selection: To succeed in ENGIE's just transition project, Purchasing contributes to risk reduction in the supply chain through rigorous supplier management as part of the Group's vigilance plan. They must apply ENGIE's ethics and CSR requirements: respect the right to work and human rights, offer equitable and decent compensation, and provide a safe working environment. They must also participate in sector initiatives (for example: SolarPower Europe) and undertake training to understand ethics and CSR imperatives. Evaluations are conducted to monitor priority suppliers via the EcoVadis platform. Suppliers that receive less than 45 points must set up a corrective action plan monitored by EcoVadis.

Seven principles for relations with suppliers: 1) Respect the laws, regulations, external standards, Group commitments and internal procedures; 2) Act towards suppliers with equity, transparency and impartiality;3) Respect and ensure compliance with mutual commitments; 4) Protect personal data and the confidentiality of all information exchanged; 5) Communicate and respect the Group's

commitments in ethics and personal data protection, sustainable development and social responsibility; 6) Prohibit any conflict of interest that could alter objectivity and independent judgment; and 7) Raise an alert in the event of situations against these rules.

On page 23 all the risks, related policy and the 2022 monitoring of the suppliers of ENGI is provided. Catherine MacGregor, Chief Executive Officer, stated that “The success of the energy transition is not only a technological adventure, its societal and human dimensions are also crucial and we must be attentive to all our stakeholders: employees, local communities, customers, suppliers. This is the objective of our just transition plan.”

Perhaps this could go a bit more in detail in the future.

TTE: ✓

Since 2016, the Company has had audits of human rights and working conditions at its Suppliers carried out by an independent external service provider. A targeted audit plan is defined each year and includes at-risk Suppliers. In 2022, 200 Suppliers were audited, covering 69,000 workers. In 2022, TotalEnergies updated the audit framework in order to add environmental issues to it and had nine tests carried out, with a view to rolling out this approach from the 2023 audit plan onwards.

Work to improve the transparency of the Company's supply chain, including traceability audits on the supply chain, was initiated in 2021, and continued in 2022 with studies on human and environmental rights in the supply of minerals, ore, and raw materials. About photovoltaic panels, TotalEnergies has joined a pool of American developers who jointly order and share traceability audits. At the end of 2022, six Suppliers with which the Company works had been audited via these traceability audits.

In 2022, the Company set itself the objective of assessing its 1,300 priority Suppliers in terms of human rights and environment by the end of 2025 and then every three years, on their performance in terms of sustainable development (including human rights, working conditions and environment) through assessments covering these aspects.

TotalEnergies has set up a number of channels of communication to raise employees’ awareness of risks and concerns relating to its supply chain. Training modules explaining the Company’s ethical commitments and the Fundamental Principles of Purchasing have been developed for and made available to buyers of the Company. In addition to training buyers, numerous awareness-raising initiatives are regularly carried out in order to strengthen the responsible purchasing culture within the Company. In July 2022, TotalEnergies launched its first training program on responsible purchasing for its buyers. More than 455 of them have already completed this online training course, i.e. 32% of buyers at the end of 2022. In addition, all new employees of TotalEnergies Global Procurement receive training which includes a section on sustainable procurement, presenting the Fundamental Principles of Purchasing and training on anticorruption. Awareness webinars on specific topics also took place in 2022, for example on human rights (300 buyers). A quarterly newsletter on responsible purchasing for the Company's Purchasing population (approximately 1,400 people) was also launched and several forums were organized to regularly communicate the progress of the Sustainable Procurement program to all of the Company's buyers.

The Company regularly conducts awareness-raising actions with its Suppliers on the responsible procurement approach, particularly on respect for human rights, the protection of workers' health and safety and the preservation of the environment. In June 2022, TotalEnergies set up a platform dedicated to monitoring Suppliers' performance in terms of sustainable development. More than 500 of the 1,300 priority Suppliers invited had already joined this platform at the end of 2022. In December 2018, the

Company committed to pursuing its efforts with regard to decent work and respect for human rights in its supply chain by signing six commitments contained in the United Nations Global Compact. TotalEnergies is also a member of the IPIECA Supply Chain Working Group.

Whistleblowing mechanisms: An email address (mediation.fournisseurs@totalenergies.com) is available on the TotalEnergies website to enable the Company's suppliers to contact the dedicated internal mediator. The mediator's mission is to facilitate relations between the Company and its French and international suppliers. The general purchasing terms and conditions also mention the possibility of recourse to mediation.

Finally, in 2022, 200 suppliers were audited and an audit plan for 2023 targeting 300 suppliers was launched. In total, 430 high-risk suppliers in terms of human rights have been audited since 2016. These audits covered 160,000 workers of suppliers worldwide in 77 countries. 181 suppliers required the implementation of action and monitoring plans, of which 53 have been fully completed (validated by a follow-up audit) – positively impacting the working conditions of more than 14,000 of their employees. 128 suppliers are being monitored. A 2023 audit plan, targeting 300 suppliers, was defined in 2022, with the target to achieve 1,300 suppliers audited by the end of 2025.

SIE: ✓

It has been clearly shown that strong governance goes hand in hand with better, more sustainable business. Besides embedding these principles in our own management systems, we extend them to our suppliers, who are required to follow a comprehensive Code of Conduct. They set out the fundamental principles and rules that apply to our actions within our company and in relation to our customers, external partners, and the public. The BCGs are binding on all employees worldwide. In addition, the Siemens Group Code of Conduct, which is mainly focused on rules of conduct in relation to human rights, applies to the company's suppliers, third-party intermediaries, and business partners.

As a global company, we are well aware of our responsibility to society. We are unreservedly committed to safeguarding and respecting human rights in every stage of the value chain. We understand this to be a key element of acting with integrity and responsible corporate governance. Our holistic approach to respecting human rights is not limited to our own business locations: We also consider our supply chain and the business activities of our customers. Our goal and aspiration is to identify any human rights violations occurring anywhere in our value chain as early as possible and to mitigate identified risks responsibly.

Maintaining sustainable supply chains is one of our guiding principles. Siemens suppliers commit to uphold the Siemens Group Code of Conduct for Suppliers and Third-Party Intermediaries and Business Partners, which affirms the fundamental human rights of our suppliers' employees.

This Code encompasses, but is not limited to, the following points:

→ Fair working conditions (pay, working hours, vacation),

→ Right to freedom of association,

→ Responsibility for health and safety standards,

→ Prohibition of discrimination,

→ Prohibition of forced labor and child labor,

→ Provision of anonymous grievance mechanisms.

Siemens takes a risk-based approach to identifying potential risks in its supply chain. This includes Corporate Responsibility Self-Assessments (CRSAs) by suppliers, internal quality audits with sustainability questions, and external sustainability audits. Whenever deviations are identified from the principles of the Code of Conduct for Siemens Suppliers, and therefore also violations of the human rights principles defined in this document, we work with the supplier to clarify how lasting corrective action can be taken within a reasonable time frame.

Moreover, Siemens provides training for suppliers, interactive training formats for employees, and targeted skill-building activities for global and regional salespeople, as well as specific functions such as Compliance and Environment, Health, and Safety (EHS). Our brochures “Sustainability in the Supply Chain” and “Siemens Group Code of Conduct for Suppliers and Third Party Intermediaries and Business Partners” Among other things, suppliers declare their willingness to respect the fundamental rights of employees, establish high standards for health, safety, and environmental protection, and pursue a zero-tolerance-strategy in relation to corruption and bribery. The Code of Conduct also contains a section on preventing purchases of conflict minerals, meaning minerals produced in certain countries that yield profits for armed groups in particular.

See page 53-58 for more details on supply chain practices.

COLR: ✓

It’s written in the SDG 8 section that COLR also attaches great importance to the right working conditions, within both their company and their supply chain. Moreover, it’s written on page 169 that they continue to strive for 100% good working conditions.

As a retailer, we take responsibility for proper working conditions at our producers. For example, we ask suppliers of private-label products to sign the amfori BSCI Code of conduct, committing them to respect universal human rights. Compliance with the code of conduct is monitored via certificates, social initiatives and/or social audits. If it appears that the trading partner needs support, we look together at how we can make improvements. What if there is no will to create good working conditions? Then we stop the cooperation.

Supplier commitments: We use the amfori BSCI Code of conduct as a benchmark for all suppliers of our private-label products. Our code of conduct endorses universal principles of international human rights treaties. These must be respected, inter alia with regard to the minimum age for employees, the right to fair wages, exclusion of child and forced labour, guaranteed safe and healthy working conditions, and a ban on discrimination.

Auditing working conditions: Working conditions at 81% of our producers were audited in 2021. Among other reasons, this lower percentage was due to Covid restrictions and a renewed process at amfori BSCI. 96% of producers in high-risk countries received a positive audit. In the remaining 4%, an improvement process was initiated.

We also make a positive and sustainable difference in production regions through sector initiatives and international supply chain projects. Transparency and cooperation with all supply chain players play a key role here. Looking at international supply chain projects, we always work closely with the local producers and all other supply chain players to bring the most sustainable product to market. In 2021, we were active in 8 international supply chain projects that resulted in 46 private-label products. We also systematically combine these supply chain projects with training projects for local young people under the banner of our Collibri Foundation.

Working conditions in the supply chain				
# Producers monitored in at-risk countries	Calendar year	430	487	485
% Producers in at-risk countries receiving at least one audit	Calendar year	100	97	81
% Producers in at-risk countries with an acceptable social audit result	Calendar year	90	95	96
# Producers moving up from poor to acceptable results compared with previous year	Calendar year	31	19	5
# Producers with whom cooperation was terminated due to a violation of the Code of Conduct	Calendar year	9	3	5

From year 2019-2021

Supply chain projects				
# Active supply chain projects	Calendar year	7	7	8
# Products from supply chain projects in our stores	Calendar year	40	40	46
# Farmers involved in supply chain projects (indirectly via cooperatives)	Calendar year	33.140	43.864	49.864
# Farmers involved in supply chain products (directly in the chain)	Calendar year	-	2.174	2.320

VOW3: ✓

The Volkswagen Group pursues the vision of enabling sustainable mobility for generations to come. This includes living up to our legal, social and environmental responsibility not just in our own Group but also in our supply chains. In 2022, the Volkswagen Group once again anchored the focus topic of "Supply chains and human rights" in the key Group initiatives.

The officer prepares the Group Board of Management's declaration of principles prescribed by the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG). In addition, the officer for human rights-related issues has responsibility for the external and internal reporting obligations, the dialog with stakeholders, and stakeholder management. The officer for human rights-related issues is the first point of contact for all human rights-related concerns on the part of authorities, policymakers and society.

The Volkswagen Group respects international guidelines and conventions, including in particular:

•The UN Universal Declaration of Human Rights, which is codified in the International Covenant on Civil and Political Rights and in the International Covenant on Economic, Social and Cultural Rights

•The Core Labor Standards of the International Labour Organization (ILO)

•The UN Guiding Principles on Business and Human Rights

•The OECD Guidelines for Multinational Enterprises

•The principles of the UN Global Compact

These "salient business & human rights issues" refer to: labor rights; freedom of association and the right to collective bargaining; no forced labor; no child labor; good working conditions; no involvement in any unlawful activities; guarantee of people's safety; tolerance towards different ideological and religious opinions and respectful expression of them; no discrimination and diversity and protection of disadvantaged, especially indigenous groups

We provide our workforce with information on the supply chain and human rights via a number of channels. This includes articles in internal media and newsletters and internal dialog and Q&A events. This is because it is important to us that our employees obtain information directly at first hand. We communicate our positioning to the public and external stakeholders through interviews with top managers, in media reports and through our digital channels.

Volkswagen completely rejects all forms of forced labor in the Group's businesses all over the world. We have no indications that forced labor is being used in the supply chain or in any of our production sites.

Moreover, due to the complexity of its products, the Volkswagen Group's supply chain is highly complex, globally distributed and subject to constant change. It comprises more than 59,000 supplier sites[1] around the world in more than 90 countries. Our activities may have negative effects on our environment and on people in our supply chain. At the same time, our size and position in the market also mean there are opportunities to achieve environmental and social improvements in our suppliers' countries. Our aim is to design supply chains responsibly. The Group Procurement Sustainability department conducts the operational management of sustainability topics in our supply chains. In order to identify current developments and long-term challenges in the individual countries, we also encourage dialog between our brands and regions through the Sustainability Procurement Network, in which more than 70 experts from five continents work together.

See graphic on page 107.

The supply chain grievance mechanism is used to process information on human-rights and environmental risks and on breaches of human-rights or environmental obligations by the Volkswagen Group's direct or indirect suppliers. The mechanism is accessible via the channels of the Volkswagen Group's whistleblower system and is open to all potentially affected stakeholders – e.g., employees of suppliers, civil society players or representatives of communities in the immediate vicinity of our production locations. The processing of cases is uniformly described in a binding manual and is managed by the Group. Cases are processed together with the brands and regions of the Volkswagen Group.

Lastly, more than 2,900 suppliers were trained accordingly in the reporting period. This includes 245 suppliers who use the Drive Sustainability initiative's online training and e-learning options.[4] Voluntary, in-depth human rights training for suppliers has been available since 2020 and was run again in 2022. In addition to the trainings, we make an e-learning module on sustainability available to current suppliers in nine languages.

KPIs are on page 112 and 113.

SOLB: ✓

Our Code of Business Integrity includes a wide range of topics, among which those listed above. It applies to all employees and majority-owned joint venture partners. Our Supplier Code of Business Integrity applies to suppliers.

We introduced training courses which all employees are required to take and to pass. We require that all employees sign an annual acknowledgement that they have read the Code and that they have nothing to report. We have created several training courses and increased awareness through a communication campaign to address specific behavioral risks. These include:

· anti-bribery and anti-corruption;

· anti-competitive activity;

· confidential and proprietary information;

· conflict of interest;

· reporting non-compliance with human rights in business policy;

· use of a gifts and entertainment tracking system;

· use of third-party reporting hotlines and a Group-wide “Speak Up” program to report non-compliance.

Before entering into a business relationship, our suppliers are required to sign our Supplier Code of Business Integrity and commit to its principles. In addition, we are increasing our oversight on third parties and suppliers in the field of human rights, anti-bribery and corruption and environmental breaches through proactive screening. Human rights has now been integrated in our Ethics Helpline as a matter type and is also open to the employees of our suppliers.

Two parallel processes are used to assess human rights risks at Solvay sites. These focus on Solvay employees, based on internal data, or on our business partners, namely suppliers and contractors identified according to the risk associated with the country they operate in. Six human rights dimensions are considered: child labor; forced labor; trafficking in persons; human development; freedom of association; and collective bargaining. The assessment is used by Solvay’s internal auditors to identify priorities for their work on the subject.

Our supply chain organization accounts for about 2,000 people. Most of them are located in the GBUs, where they are in charge of planning, customer care, logistics operations and improvement projects. In addition to this, a small Supply Chain Excellence team is located in Solvay’s Excellence Center. We have programs in place to foster continuous improvement in the value chain performance of our GBUs, while also contributing positively to cost and cash management, as well as fulfillment at the service of customers. Our procurement organization consists of about 600 people, located in Corporate Procurement, the GBUs and the Purchasing Service Line support teams. Their mission is to source products and services leveraging scale and expertise, and to secure sustainable value creation and supply security to directly support Solvay’s G.R.O.W. and One Planet agenda.

Solvay is concerned that the trade in tantalum, tin, tungsten and gold, and the metals known as 3TGs that are refined from such minerals and mined in certain conflict-affected and high-risk regions, such as the Democratic Republic of the Congo and neighboring countries, may be contributing to human rights abuses. We are continuously working to improve our overview on 3TGs included in products, components and materials supplied to Solvay. We continue to work to verify the integrity of our sourcing, and to support the actions of governments, our customers and suppliers toward achieving this aim globally. If our suppliers fail to meet our expectations in this regard, we will take these factors into consideration when making future business and sourcing decisions.

Lastly, one of our main priorities for 2022 was to assess our core suppliers. During the year, a total of 2,250 Solvay suppliers were assessed through EcoVadis. These assessments currently cover 376 (92%) of our 410 core suppliers. One of our objectives of the year was to assess our core suppliers as priority. In terms of how many of our suppliers are covered by an Ecovadis assessment, Solvay ranks as the fourth best performer among Together for Sustainability members.

The IndustriALL Global Union Framework Agreement: The four-year agreement includes serious commitments on due diligence along the supply chain. The agreement establishes a new working group of workers and management to investigate suppliers’ respect for core labor rights and seek remediation where problems are found. Solvay commits to suspend contracts with suppliers that fail to remedy human rights and environmental abuses following warnings.

KBC: ✘

CSR questionnaire as an integral part of our supplier assessments. Supporting suppliers willing to make the adjustments needed to comply with the Code of Conduct for Suppliers. Webinars on ESG-related topics. Vendor meetings on all levels of the hierarchy. Proofs of Concept during which we mutually learn about potential value creation. Transparent, simultaneous communications and approaches in competitive sourcing cases.

Suppliers

	Note	Unit	2022	2021	2020
Operating costs	1	m euros	1 237	1 058	1 015

[1] PF data, see note 3.8 of the 2022 KBC Group Annual Report. Includes: general administrative expenses such as repair and maintenance expenses, advertising costs, rent, professional fees, utilities and other such expenses.

	Note	Unit	2022	2021	2020
Number of suppliers that signed the Code of Conduct for suppliers	1	number	3 042	3 200	2 553

[1] 2020 data are corrected compared to the previous Sustainability Report.

We have drawn up a procedure for the different phases in purchasing activities to verify compliance with the KBC Sustainability Code of Conduct for Suppliers. If any infringements come to light that cannot be fundamentally resolved within an appropriate period, KBC will terminate the business relationship. KBC will support suppliers who are willing to make the adjustments needed to bring them into compliance.

So there is no information on working conditions (impacts related to e.g. living wage, health and safety, social security, working hours, water and sanitation); (b) access to equal opportunities (impacts related to e.g. discrimination, including on the rights of workers with disabilities or on women workers, as well as impacts related to issues of equality in pay and work-life balance, precarious work); (c) other human rights (impacts related to e.g. trade union rights, freedom of association and collective bargaining, child labour, forced labour, privacy, adequate housing).

In conclusion, it can be said that KBC fulfils not completely the criteria 'Workers in the value chain'. There are several elements missing like: the health and safety, diversity the gender equality and existing of works councils.

ABI: ✓

We work vigorously to achieve high standards of health and safety in our offices and breweries and throughout our value chain by engaging teams to build an interdependent safety culture through trainings, workshops and coaching sessions. Safety metrics are cascaded and monitored through our supply and logistics safety management systems. Our approach to safety focuses on mitigation. Key focus areas include: Mitigating risk; Executing violence prevention programs; Running high-risk processes safely; Training colleagues to better assess risk; Empowering individuals and teams to make safer decisions; and Using safety data to drive continuous improvement.

We seek to foster business practices that support and respect human rights and align with the UN Global Compact principles. Our approach to human rights is based on the United Nations Guiding Principles on Business and Human Rights (UNGPs) and is outlined in our Global Human Rights Policy. To cascade the principles of our Human Rights Policy throughout our value chain, we have developed a Global Responsible Sourcing Policy and Responsible Sourcing Principles for Farms. We have further embedded respect for human rights and relevant principles across our policy landscape, including the following policies: • Responsible Marketing and Communications Code; • Diversity and Inclusion Policy; • Global Anti-Harassment and Anti-Discrimination Policy; • Global Health and Safety Policy; and • Global Whistleblower Policy. We share our policies with colleagues through internal communications

channels and online trainings, and we communicate the relevant policies to our business partners during the contracting process by including them in contract clauses.

Responsibility for human rights is shared across relevant functions as well as global and local teams. Our cross-functional Global Human Rights Steering Committee enables greater collaboration by providing strategic direction and enhancing the level of visibility of our progress on human rights throughout the business and value chain.

Through our due diligence processes, we have identified key areas of focus in our value chain that include living income, child labor and our sponsorship of global sporting events. In 2022, we used internal risk management tools to review these salient risks as well as our plans to address them to continue improving our approach. Here are a few examples of how we address these areas of focus:

In partnership with local research organization Kilimo Trust and the Sustainable Food Lab in 2022, we continued a baseline study on barley farmer net household incomes in Uganda to analyze how our programs contribute to farmer livelihoods. The findings of the study have helped us understand how we could adapt local interventions to help further improve farmer incomes across our direct sourcing programs.

Lastly, ABI plans to continue to share their progress and take measures to increase DEI within our company and across our value chain.

AGS: ✓

Ageas is mindful that workplace discrimination and harassment, as well as labour rights may be at risk in its supply chain. Consequently, specific references to Human Rights are included in both Ageas's Procurement policy and Outsourcing policy. Third-party relationships are expected to fully comply with applicable laws and regulations and to adhere to internationally recognised Human Rights and broader ESG standards. Further information can be found below in sub-section 'Setting sustainability expectations to suppliers'.

Entering supplier and service provider relationships is subject to satisfactory responses to human rights and ESG related questions within the due diligence process. Clauses are included in certain contracts that require third parties to alert Ageas to any breach of laws, regulations and internationally accepted standards in short notice. Audit rights exist in certain contracts to ensure Ageas can undertake independent assurance activities. Given the importance of this topic, Ageas will continue to provide an annual update on efforts to respect human rights and further accelerate initiatives to deliver positive social impact both internally and externally, levering resources and expertise across the Group.

Another channel through which incidents can be detected, is the Complaints Handling process. A Complaints Handling policy is in place, that sets out the implementation rules to deal with complaints formulated by customers and policyholders, shareholders, suppliers and other external parties. It stems from Ageas's commitment to ensure that all its stakeholders are treated fairly. This is translated into the company's duty to inform policyholders and other stakeholders about the arrangements in place for lodging complaints, as well as the process for handling them.

The whole Ageas Policy Framework includes principles and rules that contribute to prevent corruption, specifically the acceptance and due diligence requirements towards third parties, suppliers, vendors.

Lastly, Ageas not only focuses on a more environment friendly management of its operations but aims to manage the organisation in a socially responsible way, expecting the same from its suppliers also. In 2022 the Group procurement policy was updated integrating ESG criteria formally into its supplier

assessment process. All entities across the Group have implemented detailed questionnaires is to be completed for all key suppliers and/or imposed specific requirements when requesting for an offer, e.g. in the case of the purchase of IT equipment or when selecting the supplier for catering in the new buildings in Portugal. The selected supplier is for instance known for its integrative approach towards disabled persons in their teams.

10) ESRS S3 Affected Communities:

INGA: ✘

Customers:

Discriminatory practices could harm our customers by limiting access to payment and savings accounts, credit and mortgages, by worsening debt situations, making offers less attractive, or worsening the conditions for our products and services because of human or algorithmic bias. These could all reduce our customers' financial health, affecting their ability to provide for their basic needs such as food, housing, and medical care. Half of our Retail countries identified that discrimination on the basis of nationality, race, ethnic origin, sexual orientation or gender identity is either an actual or a potential risk. Four of our Retail countries stated that there were isolated incidents of (alleged) discrimination which they were made aware of via complaints mechanisms; these were addressed. However, we recognise that customers who may be at risk of discrimination on the basis of these characteristics may not be aware of if, or when, they are treated differently, and therefore may not submit a complaint. This could make it more difficult for the bank to track such differences in treatment.

Lack of accessibility due to homelessness or expired ID: Banks, including ING, have to meet increasing (regulatory) obligations to screen customers carefully, and our KYC policy reflects this. In some of our Retail countries, accepting new customers who do not have a registered or fixed home address, or a valid ID, could breach this policy. The policy is in line with the law in this respect, but from a customer's standpoint, continually being unbanked or underbanked may increase their vulnerability and human right risks, as they may struggle to provide for their basic needs without access to basic financial services like a bank account or debit card.
Lack of accessibility when (only) digital services are offered due to age, disability, or lack of digital literacy: People with a disability, certain older people, and people with limited to no digital skills may experience our digital channels as difficult to access, meaning that they do not have equal access to banking services. This may lead to customers feeling the need to leave ING for a bank with a local branch, or to ask for support from third parties, such as family members, friends or caretakers. Further, we recognise that closing branch offices and ATMs may also result in restricted access to our services and products.

There are still other causes: page 18 and 20.

Conclusion: there is one affected community mentioned, but that' not enough. Because about these topics, nothing is mentioned: Adequate housing; Adequate food; Water and sanitation; Land-related impacts; Security-related impacts. In addition, the communities' civil and political rights: Freedom of expression and freedom of assembly are not mentioned. Lastly no information on: Particular rights of indigenous communities: Free, prior and informed consent, Self-determination or Cultural rights. Furthermore, no actions taken, no result of such actions, to prevent, mitigate or remediate actual or potential negative impacts; neither the nature, type and extent of the undertaking's material risks and opportunities related to its impacts and dependencies on affected communities, and how the

undertaking manages them, are presented. So, for me, it's not directly clear and there has to be a potential amelioration.

ENGI: ✓

On the materiality matrix on page 12 it can be seen that the term 'impact and development of communities and stakeholder' is considered as a major issue.

On page 23 it's explained that there are risks related to the human rights of local communities. In addition, there are risks related to the impact of activities on local communities and their social consequences.

The just transition plan designed by ENGIE includes ambitious goals for each of the Group's stakeholders. It aims to:

• ensure that customers, and in particular low-income customers, have access to affordable and sustainable energy thanks to innovative offers;

• sustainably develop and preserve the communities through the projects with positive benefits that contribute to their resilience;

• protect and support employees on a social level;

• develop an inclusive purchasing policy that benefits the most virtuous suppliers.

Promote ENGIE's positive socio-economic impacts in the communities with direct and indirect employment, the contribution to GDP and taxes. Develop long-term projects in the communities with the deployment of ENGIE's TED (Sustainable Energy Transition) label guaranteeing the preservation of nature, the involvement of the players and the contribution to the fight against climate change.

There is a section which calls dialog with stakeholders:

All the affected communities and the actions taken are presented.

Example how ENGIE affect local communities: ENGIE's local roots are a real asset in uniting the various economic players and institutions in the development of renewable hydrogen in the local communities. In France, ENGIE is actively responding to calls to bid on regional projects launched by the French environmental agency ADEME with solutions intended to accelerate the development of hydrogen uses. Hydrogen holds the promise of a new technological, energy and industrial sector, both locally and globally, with the additional benefit of new jobs. A vital division for contributing to the decarbonization of the energy mix. So, it can be said that "Most of the investments made by the Group in the communities focus on activities that support the acceleration of the energy transition."

However, it must be said that no information on particular rights of indigenous communities: Free, prior and informed consent, self-determination and cultural rights are mentioned.

TTE: ✓

How the effect the communities: Their collective challenge – which became evident in 2022 – is to reconcile the energy transition with the need for energy security and concerns over its cost. When the supply of oil or natural gas is restricted while demand continues to rise, the resulting price increases and supply insecurity have an immediate and acute impact on communities. To meet the challenge of the energy transition and still ensure that reliable energy is available in the short term at the lowest possible cost, we need to invest in two energy systems simultaneously: we must ensure the current system continues to operate responsibly, and at the same time speed efforts to build a new system centered on low-carbon energies.

In their sustainability ambitions and targets it's explained that they are creating value for society: generate shared prosperity across regions. TotalEnergies is a creator and a driver of positive change for the communities in its host regions.

Sustainable value creation alongside regions and communities: TotalEnergies' success in building and expanding partnerships worldwide can also be attributed to its strategy of generating value at the local level as part of its growth model. That commitment – carried out systematically and professionally – is a major competitive asset. Whether they target continued growth in LNG or renewable electricity generation, the partnerships with governments and local communities serve a critical function. The Company maintains a comprehensive, integrated policy, rooted in dialogue with communities and public and private stakeholders, for supporting local growth and in-country value. It forges synergies among the various sources of value generation for host countries (employment, subcontracting, infrastructure, support for local industry, socioeconomic development projects, education, energy access, etc.) by capitalizing on the Company's industrial expertise. TotalEnergies intends to maintain this approach over the long term to ensure that its presence in these regions and the major projects it develops create shared prosperity.

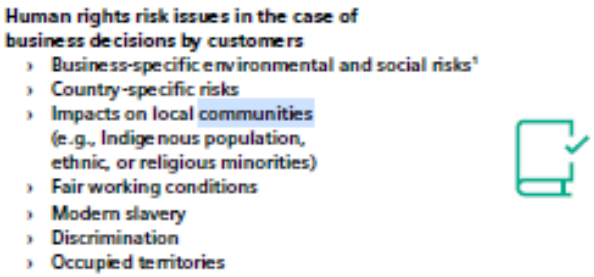
Moreover, In TotalEnergies' view, dialogue with its internal and external stakeholders is essential for the Company to conduct its business responsibly and integrate the long-term challenges of sustainable development in its strategy and policies. This dialogue contributes to the identification of the main risks and impacts of the Company's activities, and more broadly to a better understanding of changing trends and the main societal expectations of each of the major categories of stakeholders. It is also a prerequisite to ensuring that the Company is firmly integrated in its host regions, as well as an effective tool for identifying ways to generate value at the local level. TotalEnergies believes that transparency is an essential principle of action in building a trust-based relationship with its stakeholders and ensuring that the Company is on a path of continuous improvement. Each group of stakeholders (employees, employee representatives, customers, investors, shareholders and the financial sector, government officials, suppliers, academics, NGOs and civil society, and the media) has a single point of contact at the corporate level, responsible for responding to their requests, keeping them informed and maintaining an ongoing dialogue in formats appropriate to each concern. Those stakeholder liaisons also provide advice and support to Company subsidiaries when needed. The One MAESTRO framework provides that subsidiaries should conduct a stakeholder mapping and engage in a structured, ongoing process of dialogue with stakeholders to keep them informed, hear and address their concerns and expectations, report on mitigation actions or compensation, measure their satisfaction and identify ways the subsidiaries can improve their community outreach. This commitment to local dialogue puts special emphasis on residents and communities located near Company facilities.

See human rights for Total Energies personnel and third parties (page 145). The Code of Conduct, which can be accessed on TotalEnergies' website, is aimed at all employees and external stakeholders (host countries, local communities, customers, suppliers, industrial and commercial partners and shareholders). (Page 147).

Based on the United Nations Guiding Principles on Business & Human Rights, the One MAESTRO framework requires TotalEnergies' operational entities to deploy procedures to manage stakeholder grievances related to the Subsidiary's activities (excluding business claims). This provides residents and local communities with a preferential channel to voice their concerns and grievances. Handling these grievances locally makes it possible to offer a response to anyone who feels that they have been negatively affected by the Activities and to improve internal processes in order to reduce impacts that may be caused by the activities.

An example is on page 157: Tilenga and EACOP projects, Uganda and Tanzania.

On the pages 266-268 there is an overview of all affected communities (very well explained).



SIE: ✓

Special programme: Smart infrastructure is sustainable infrastructure. Siemens Smart Infrastructure combines the real and digital worlds across energy systems, buildings, and industries. This is how we seek to improve the way people live and work while also ensuring greater efficiency and sustainability. We work closely with customers and partners to create an ecosystem that addresses people's needs intuitively and also helps customers achieve their goals. It helps our customers be successful, moves communities forward, and supports sustainable development to preserve our planet for the next generation.

All the affected communities are mentioned: The key topics in our report are structured based on ESG issues (ESG = Environment, Social, Governance). Moreover, the ongoing dialog with external and internal stakeholders plays a key role in the materiality process. These stakeholders particularly include investors, customers, suppliers, our people, communities, policymakers, media, non-governmental organizations, business associations, and academic institutions.

Only by collaborating closely with stakeholder groups can we make serious progress on complex and intertwined sustainability challenges such as environmental concerns. We maintain a constant dialog for that purpose with investors, customers, suppliers, our people, communities, policymakers, media, nongovernmental organizations, business organizations, and academia. Our management and the relevant specific units with governance functions are in charge of this task. For example, overall responsibility for dialog with policymakers lies with the Siemens Managing Board. Within the various business units, the unit's CEO is responsible for coordinated dialog. The Managing Board has tasked the Government Affairs Department with performing the necessary coordination duties and has given it the powers it needs for the purpose. This engagement with our stakeholder groups creates value on all sides of the equation through exchanges of knowledge and information, as well as through creative partnerships. It helps us improve business conditions and reduce both external and internal risks.

What SIE wants to give to the communities: Based on our core business and our competencies, we have defined three strategic focus areas for our corporate citizenship activities: access to technology, access to education, and sustaining communities. With the aid of our core competencies in digitalization, automation, and electrification, as well as scientific research, we strive to give as many people as possible the chance to use the latest technologies. Knowledge is a resource on which our future depends. Therefore, improving educational prospects and allowing broad access to education are critically important challenges for all societies everywhere in the world. Our goals are to establish stable living conditions, protect values, unleash creativity, improve intercultural understanding, and contribute to progress.

So, in summary: Our goal in each society is to help improve general living and healthcare conditions (access to technology), enhance educational and training opportunities for the labor market (access to education), and strengthen social cohesion and cultural identification (sustaining communities).

An example of what SIE is giving to the community: In the “GraDItitude” campaign, Digital Industries provided donations for a STEM education project in Mexico especially oriented to girls, and for an initiative in Ghana to provide Internet access for rural communities. At the same time, this effort is focusing on connecting schools and furnishing high-quality digital teaching content.

Access to modern, reliable infrastructure, for example by securing the energy supply, delivering clean water, or also providing basic medical care, is a fundamental prerequisite, especially in developing countries, for improving the quality of life of many people and securing prospects for their future. Additionally, by outfitting research laboratories with control and automation equipment, for instance in Hungary, Turkey, and Latvia, Siemens helps improve educational opportunities and thus prospects for making a living. Moreover, protecting the environment and conserving natural resources are two goals that are also of the utmost importance for sustaining communities. For instance, Siemens UK conducted a systematic campaign to train almost 50,000 grade school students, especially from more socially disadvantaged communities, in what can be done to improve sustainability.

A last example of supplying communities with clean drinking water is on page 151.

Lastly, SIE anchors integrity and compliance throughout our company and advance the Siemens Integrity Initiative with external stakeholders. By these means and through our activities with other players, we support fair competition and ensure our company’s long-term success. Siemens is committed to incorporating the requirements of the UN Global Compact, the Human Rights Declaration, and all other relevant regulations into our supply chain and to promoting their principles through our work with external organizations and institutions.

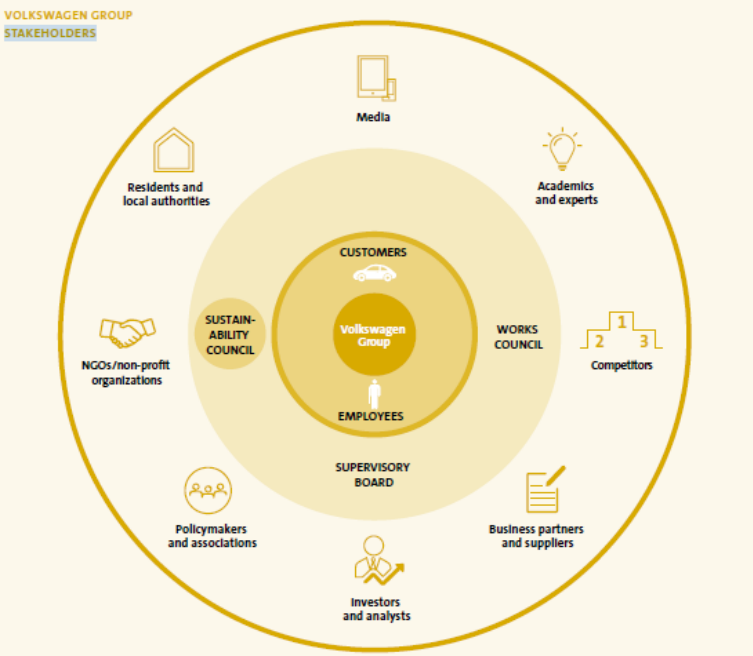
COLR: ✘

From IT to communication to technology: Colruyt Group has significant in-house expertise that we put at the service of employees, partners, and customers. To carry out our activities and organize them as efficiently as possible, we can rely on a wide range of support services.

The shareholders are identified: In order to continue to realise sustainable added value together, it is important to keep a finger on the pulse and to understand our shareholders’ expectations and interests. What do they see as sustainability priorities? What keeps them awake at night and what doesn’t? On the basis of international frameworks (e.g. GRI, SASB, SDGs) and our own sustainability strategy we selected 21 topics that we are already working on today and where we, as a company, can make a difference. We then selected a number of stakeholder groups that are important to our company: customers, employees, business partners, government players, civil society, press and media, financial analysts and shareholders.

In March 2022, 355 stakeholders participated in our online survey on materiality. Based on a questionnaire they were able to assess and rate the 21 selected topics. How well is Colruyt Group tackling these themes today? And how important should they be for Colruyt Group to ensure a sustainable future? Open questions also allowed participants to make suggestions and share their opinions. Also, at the end of March 2022, we organised a stakeholder consultation with some twenty guests: business partners, sector federations, NGOs, and social and environmental organisations.

During this consultation, we dialogued with them on our current and future sustainability policy. There is the materiality matrix on page 20 (what is important for stakeholders).



In conclusion I have to say that's not enough from COLR for meeting this standard ESRS S3. Because no information is mentioned on these topics: Communities' economic, social and cultural rights, adequate housing, adequate food, water and sanitation, land-related impacts and security-related impacts. Moreover, no information on the communities' civil and political rights: Freedom of expression, freedom of assembly and impacts on human rights defenders. Furthermore, no actions taken, and the result of such actions, to prevent, mitigate or remediate actual or potential negative impacts, are provided. In addition, the nature, type and extent of the undertaking's material risks and opportunities related to its impacts and dependencies on affected communities, and how the undertaking manages them are not explained and no the financial effects on the undertaking over the short-, medium- and long-term time horizons of material risks and opportunities arising from the undertaking's impacts and dependencies on affected communities are mentioned.

VOW3: ✓

Here are the different communities presented:

Continuous communication between internal and external stakeholder groups is important to us. For this reason, the Group's supervisory and advisory bodies – i.e., the Supervisory Board, the Works Council and the Sustainability Council – act as a special interface between internal and external stakeholders.

As an international business, our business activities impact the lives of a large number of different people. Appropriately aligned stakeholder management is essential so as to determine the sustainability strategy's material areas for action and become aware of stakeholders' expectations of us at an early stage. It also involves continuously informing and regularly communicating with all business areas. This communication not only helps us to identify our stakeholders' requirements, it also plays a key role in achieving corporate goals and complying with reporting standards and legal requirement.

We are continuing to systematically roll out this target. The main focus of our philanthropic activities is on supporting future, environmental, educational and community projects at many of our sites across the world. We select specific projects and develop them on our own or in partnership with local partner organizations and NGOs. The following applies here: The projects are in line with the Group Essentials and address a specific issue of local relevance or a global challenge. They are an expression of diversity within the Group and the social environment in which the projects are carried out. They are the result of close dialog with the local stakeholders involved in implementation. Projects are managed locally under the responsibility of the competent units.

The whistleblower system is intended to avert damage to the Group, the workforce and other stakeholders with binding principles and regulated procedures. Employees, business partners and their employees, customers and other third parties can report information on potential breaches of the rules at any time – including anonymously if they so choose. The whistleblower system offers six different reporting channels for this.

The officer also prepares the Group Board of Management's declaration of principles prescribed by the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG). In addition, the officer for human rights-related issues has responsibility for the external and internal reporting obligations, the dialog with stakeholders, and stakeholder management. The officer for human rights-related issues is the first point of contact for all human rights-related concerns on the part of authorities, policymakers and society.

The core element of our supplier management is the "Volkswagen requirements for sustainability in relations with business partners" – the Code of Conduct for Business Partners. It sets out our expectations of our business partners' conduct with respect to key human-rights, environmental, social and compliance standards. The requirements are based, among other things, on the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the relevant International Labour Organization (ILO) conventions. The Code of Conduct is, however, not just based on international standards, but also objectives, rules and policies of the Volkswagen Group.

In the reporting year, the Volkswagen Group and its brands joined additional important initiatives. For example, Volkswagen AG has been a member of the Initiative for Responsible Mining Assurance (IRMA) since February 2022. IRMA is a multi-stakeholder alliance that advocates for high standards in mining. The IRMA standards encompass the protection of human rights and the rights of local communities, the exclusion of corruption, health protection measures, occupational safety, and environmental protection. In the reporting year, the Volkswagen Group also became a member of the Leather Working Group. Porsche joined the Responsible Mica Initiative in 2022.

A concrete project in the Democratic Republic of the Congo: Volkswagen has the data received audited and verified by partner companies through second-party supply chain mapping audits. In the Cobalt for Development project in the Democratic Republic of the Congo, we work together with partners for improved working and living conditions for small-scale cobalt miners and their communities. The pilot project aims to strengthen compliance with laws and improve health and safety conditions and social well-being for people locally. Additional information is available on the project website.

Lastly, for the battery raw material lithium, the Volkswagen Group, together with other partners, has created the Responsible Lithium Partnership initiative, which works towards responsible use of resources and sustainable lithium production in Salar de Atacama in Chile. This is to be achieved through a multi-stakeholder platform comprising all the relevant players in the Salar watershed – from

civil society groups**, including indigenous communities**, through government institutions to local mining companies.

SOLB: ✓

Solvay develops an ambitious roadmap focused on climate, resources and better life to improve its carbon footprint, develop sustainable solutions and improve the well-being of its employees and **local communities.**

Citizen Day is an annual Solvay event aimed at creating bonds between employees and with local communities by rallying around a subject that impacts us all. The fourth edition of our Citizen Day focused on DEI, with almost 9,000 employees across 105 sites globally taking action to create a more inclusive company and society. Citizen Day activities took place at global, site, team and individual levels, and in both virtual and in-person formats, with many involving partners and non-governmental organizations (NGOs) We also encouraged employees to get involved with the local community and speak up against non inclusive behaviors. All these activities gave our employees the opportunity to learn, exchange, discover and dare to share their opinions, contributing to an inclusive, diverse and equitable workplace. To ensure our Citizen Day actions have a lasting impact on the communities Solvay serves, the Group committed to converting employee participation in Citizen Day activities into financial contributions to local charities and DEI organizations in 14 countries. This contribution amounted to €50,000.

Their comprehensive social benefits program provides employees with the support they need to perform at their best and ensures that we have a positive impact on our local communities. It groups together all our key social initiatives, focusing on three different areas: physical; mental and social; and financial. In 2022, we introduced several new initiatives.

Our social initiatives are aimed at providing our employees with the support they need to perform at their best and face life's challenges, including hardship. In addition, they ensure that our impact on our local communities is a positive one, enabling us to develop strong and mutually beneficial relationships.

Concrete project: We continue to support Solvay employees and local communities in need through the Solvay Solidarity Fund. Since 2020, the Fund has donated more than €9 million to individual and collective causes. In 2022, we supported more than 50 projects in 14 countries, funding post-pandemic research, helping employees and charity partners navigate uncertainty, and aiding reconstruction efforts after flooding in 2021. A major focus was on supporting those affected by the war in Ukraine, donating around €1.5 million to various initiatives organized at global and site levels. In recognition of our efforts, Solvay was named one of the winners of the 2022 European Chemistry Industry Council (Cefic) European Responsible Care Awards in the category of Humanitarian Aid.

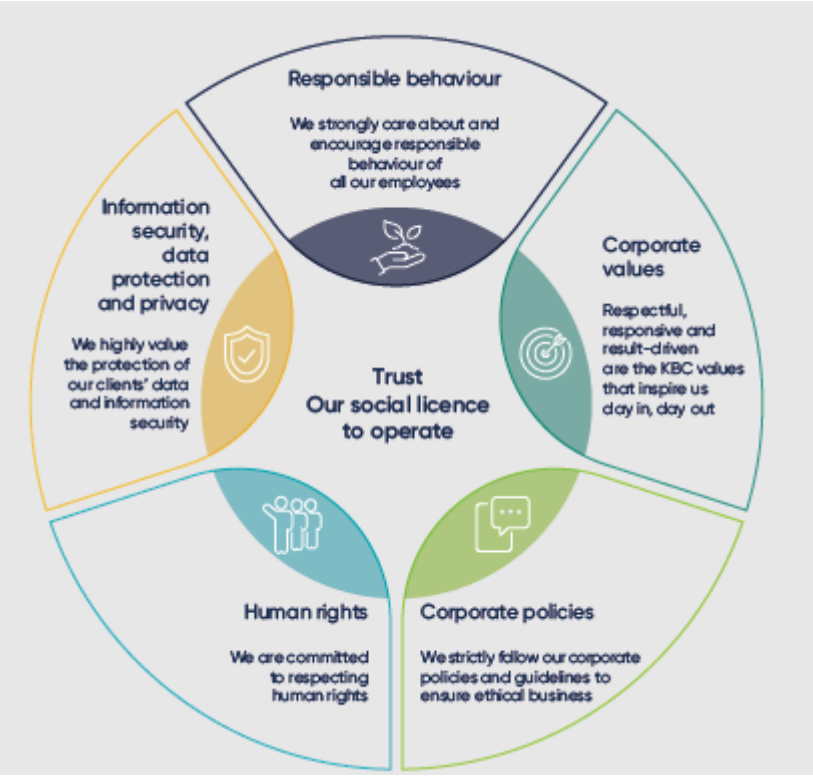
Partnership: The partnership will expand the total reach of the SGI program to slightly more than 11,000 farmers, including 1,800 women, helping equip guar farmers, and especially women, with the tools and knowledge about good agricultural practices that will increase yield production and crop productivity, improve financial stability, and promote better living and working conditions. In addition, we will be able to double the number of women trained in hygienic household practices and the building of kitchen gardens to almost 900, facilitating better nutrition, hygiene and food security in their communities.

See table on page 85 related to the local communities.

Human rights: Solvay's Human Rights in Business Policy, published on our website, sets out Solvay's commitment to respecting human rights and acting with due diligence to avoid any infringement of human rights or any adverse impact on or abuses of such rights. The policy emphasizes Solvay's commitments to our stakeholders, namely our employees and business partners, the communities and environment in which we operate and children.

KBC: ✓

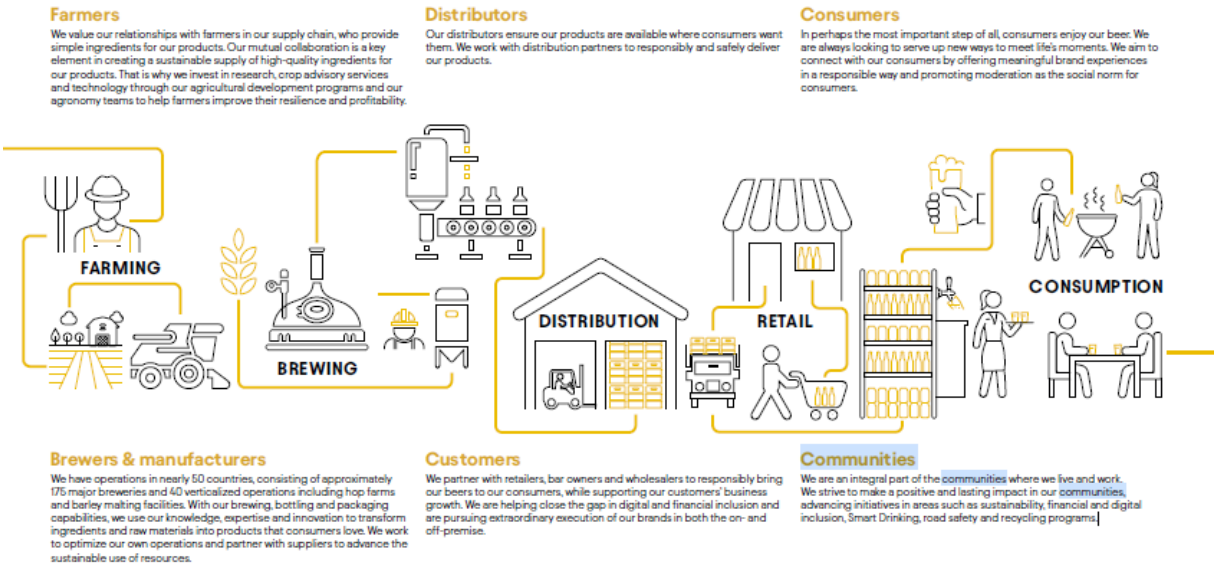
We define our stakeholders as an individual or group whose interest is affected or could be affected by KBC Group's activities. We have identified our main stakeholder groups through thorough analyses and in cooperation with internal and external sustainability experts. These include our clients, employees, investors and core shareholders, suppliers, public authorities, non-governmental organisations and the wider community. We engage with our stakeholders on a continuous basis to understand their views on the environmental and social challenges we face as a society. We do this both at group level and at local level in each of our five core countries. At the same time, we also share our insights on relevant topics and challenges with our stakeholders. One example being the way in which we regularly engage with experts from the world of academia throughout the year. Our so-called external advisory boards advise us on various aspects of our sustainability strategy and challenge us on a wide range of topics.



We firmly believe that only acting in a responsible and ethical manner enables us to grow and maintain our stakeholders' trust and to uphold our reputation. This is the foundation of our continuing existence and our 'social licence to operate'. In all our activities we comply with all regulations and corporate policies that ensure ethical business, ethical behaviour, openness, transparency, discretion and privacy. We particularly focus on respecting human rights throughout our operations. We strictly refrain from any potential direct and indirect impacts on human rights. Finally, in our rapidly evolving digital world, we strongly value the protection of our clients' data and information security. We therefore have a robust information risk management in place. Respecting the privacy of all stakeholders is an integral part of our profession as a bank-insurer. For this reason, we process personal data in a lawful and transparent manner. Our privacy policies ensure we manage data in a smart yet responsible way.

Responsible artificial intelligence: In Belgium, we worked up a framework on 'Trusted AI' in greater detail. The purpose of this framework is to effectively manage the risks related to AI models that have been developed inhouse. More specifically, this relates to the risk of bias and/ or infringements of the security and privacy of our clients and stakeholders.

In fact, since 2006 KBC has pledged to adhere to the principles of the UN Global Compact, the largest corporate responsibility initiative globally. We inform our stakeholders regularly on our progress since we have integrated these principles into our operations. Our annual Communication on Progress (CoP) is available on the UN Global Compact website. We strictly refrain from any human rights violations by: Formalising our KBC Group Human Rights Policy, which we update regularly; having set up specific policies and human rights due diligence processes; ircumventing any probable controversial activities with zerotolerance policies and improving the implementation of the UN Global Compact Principles across our daily operations. Promoting and safeguarding ethical and responsible behaviour in all our operations and under all circumstances and ensuring transparency towards all our stakeholders.



We value the ongoing conversation with our clients and other stakeholders as an important avenue for us to learn about their concerns. This also allows us to address their concerns and improve our products and services accordingly. This process involves the following steps: We advise our clients to first contact their bank branch, relationship manager or insurance agent. This is the person who knows the client best and is best placed to help find a tailored solution. We also have formal channels in place to report complaints. Our clients can contact complaints management in each core country. Information about these channels is available on the commercial websites of the various entities in our core countries.

See the table on page 112, where all the stakeholders are listed and presented.

ABI: ✓

We are an integral part of the communities where we live and work. We strive to make a positive and lasting impact in our communities, advancing initiatives in areas such as sustainability, financial and digital inclusion, Smart Drinking, road safety and recycling programs.

We are a global brewer but remain deeply rooted in local communities: We strive to source, brew and sell our beers locally. This decentralized structure means that taxes are paid where profits are made.

They use local products from the communities: Many of our beers are made with locally sourced ingredients by local people at breweries that are the pride of their communities, making us a truly

global-local business. For example, in 2021, our Bavaria team in Colombia proudly shared a milestone brewing innovation: Nativa, the first cassava starch-based beer in Bavaria's portfolio. Using local crops allows our brands to create refreshing, high-quality beers while supporting local smallholder farmers in rural Colombia. The Nativa project has positively impacted 178 cassava farmers on Colombia's Caribbean Coast. This model helps provide farmers with a more reliable market for their crops, using local production processes and helping to improve livelihoods in the communities involved.

Diverse and inclusive value chains can unlock innovation and deliver socioeconomic impact in local communities. Through digital, financial and social inclusion, we support and empower small and medium- sized enterprises, from the farmers who grow our crops to the retailers who sell our products.

Moreover, ABI is helping local communities by promoting and supporting water access and disaster

An Equitable Future is one where we work to ensure equity for all: one that includes opportunities for everyone. We are advancing initiatives for a future that is Inclusive, Empowered and Equitable across our zones and throughout our value chain, positively impacting our people, suppliers, customers, consumers and communities. Furthermore, an Inclusive Future is one where everyone belongs: one where we can all be our true, authentic selves at home, at work and in our communities.

See page 71 for the table for all the stakeholder engagement. Moreover, from page 75-81 there are all ESG topics are provided and there the term 'communities' can be found several times.

AGS: ✓

Adequate housing: Buildings are more than just bricks. They serve many purposes for people, as a home, an office, a warehouse, and more. Improving the wellbeing of people living and working in the communities AG Real Estate actively supports solidarity actions and socio-cultural activities, integrating social elements into its projects. For instance, prior to the redevelopment of the CCN, a project that will have an impact on the Espace Nord of Brussels, revitalising public spaces in consultation with numerous parties (social, cultural, communal) will be beneficial for all.

Another example is the recent investment in healthcare infrastructure and operations through the acquisition of Anima: Founded in 2007, Anima is currently the 5th largest care home operator in Belgium. The company runs a total of 24 nursing homes across the country and employs more than 1,600 people. From a financial point of view, this acquisition provides the group with stability linked to the control of the operations as the quality of the management team is a key success factor in this sector. Most of Anima's care homes can already be assimilated to next generation care homes, created in such a way that the residents live in smaller (more familial) communities with an 'own living' area, but within a larger facility offering. Furthermore, to stimulate vibrant and inclusive urban areas, AG Real Estate develops mixed-use projects that promote multifunctional neighbourhoods where people live, shop, work, and play.

Ageas operates at all times as a responsible taxpayer with adequate processes and controls in place to enable all tax liabilities are accurately calculated and all taxes due are paid in a timely fashion. As such, Ageas respects all international and national tax legislation in all countries in which it operates. Ageas does not engage in artificial structures that have no commercial substance and are intended solely for tax avoidance. With this engagement Ageas takes up its responsibility towards the local communities as an employer and a local stakeholder with the aim to fundamentally support the local economies and its citizens. All corporate and local taxes for the consolidated entities are reported in a transparent way.

A unique business model: Out of its group-wide purpose and values, a clear set of strategic choices and unique business model, Ageas aims to create value for all its stakeholders: customers, employees,

partners, investors and society. Impact24 is designed to deliver a top performance for all stakeholders. Accountability is ensured through clear KPIs and targets, allowing Ageas and its stakeholders to track the Group's progress in a disciplined way. Next to the financial and operating targets, the new non-financial and sustainability targets strengthen Ageas's commitment to create both economic and societal value.

Another channel through which incidents can be detected, is the Complaints Handling process. A Complaints Handling policy is in place, that sets out the implementation rules to deal with complaints formulated by customers and policyholders, shareholders, suppliers and other external parties. It stems from Ageas's commitment to ensure that all its stakeholders are treated fairly. This is translated into the company's duty to inform policyholders and other stakeholders about the arrangements in place for lodging complaints, as well as the process for handling them. We strongly value the dialogue with our shareholders and integrate their feedback in the agenda and discussions of the Remuneration Committee. The Remuneration Policy was submitted for approval to the General Meeting of Shareholders of May 2020.

We will work together with governments, regulators and other key stakeholders to promote widespread action across society on environmental, social and governance issues.

Actions in 2022: • Active promotion of societal related initiatives such as Road Safety, financial literacy • Chair at University of Antwerp on Sustainable Insurance • Collaboration with several universities on e.g. ethics, insurance • Support to the EVPA event • Multiple memberships to actively promote ESG aspects in insurance and in the world e.g. World Economic Forum, commitment to PRI.

11) <u>ESRS S4 Customers and End-Users:</u>

<u>INGA:</u> ✘

All countries have customer complaints policies in place. ING's customers can file a complaint via a variety of channels. There is a distribution of ING Retail Banking Customers across country groups on page 12.

We are aware that the products and services we offer our customers can have a significant effect on their financial health. If we fail to provide suitable banking products and services we may cause our customers serious financial distress, impacting (in extreme cases) their ability to meet their basic needs. Financial distress may occur as a result of:

• Inadequate communication or the use of an inappropriate language level when

communicating with our customers;

• Offering non-suitable products;

• Not offering suitable products;

• Offering unfavourable rates.

Policies addressing discrimination and access to finance, financial distress, and privacy abuses: All countries have a wide range of policies in place that are directly or indirectly aimed at protecting (retail) customers. Although this chapter is about customers, several policies mentioned in the table below

relate to managing employee behaviour. This is relevant, given that employee conduct is an important factor in what a bank can do to help protect our customers.

Table 1 Policies in place that directly or indirectly deal with discrimination and access to finance, financial distress and/or privacy

	Discrimination and lack of access to finance for basic needs	Financial distress that threatens customers' ability to meet their basic needs	Privacy abuses resulting from the integrity of customer data being compromised
Code of Conduct	▪	▪	▪
Integrity, Anti-Bribery, Fraud and Corruption	▪	▪	▪
Data Protection and Privacy			▪
Investor Protection		▪	
Anti-discrimination	▪		
Communication with customer	▪	▪	▪
Know Your Customer (KYC)	▪	▪	
Product Governance		▪	
General Customer Complaints Handling or Customer Best Interest	▪	▪	▪

Here the criteria are only partly fulfilled because there is no information on the freedom of expression and access to (quality) information. Moreover, there are no words over personal safety of consumers and/or end-users: Health and safety, security of a person or protection of children. Lastly, there are neither information on social inclusion of consumers and/or end-users: Non-discrimination, access to products and services and responsible marketing practices.

ENGI: ✘

Provide affordable energy for ENGIE's customers with financial aid in 2022 in view of the energy crisis, and offer them tools for energy efficiency with offerings such as Mon Pilotage Elec (My Electricity Management), Mon pilotage Gaz (My Gas Management), and Mon programme pour agir (My Program to Act). Fight energy poverty with the contribution to the housing solidarity fund (Fonds de Solidarité pour le Logement, FSL), the energy checks and a special, short-term fund for industrial and tertiary customers. Promote the energy accessibility of ENGIE's B2B customers with renewable long-term energy contracts (PPA) and energy performance contracts.

ENGI stated that customers are individual, professionals, companies and regional authorities. DIALOG PROCEDURES: Marketing / satisfaction studies / Net promoter score, consumer panels, responses to calls for tender, co-construction and access space.

Again, the criteria are only partly fulfilled because there is no information on information-related impacts for consumers and/or end-user: on privacy, on the freedom of expression and access to (quality) information. Moreover, there are no words over personal safety of consumers and/or end-users: Health and safety, security of a person or protection of children. Lastly, there are neither information on social inclusion of consumers and/or end-users: Non-discrimination, access to products and services and responsible marketing practices.

TTE: ✘

Limiting risks for the health and safety of consumers: TotalEnergies has also defined the minimum requirements to be observed in order to market its petroleum or chemical products worldwide with the goal of reducing potential risks to consumer health and the environment. These include the identification and assessment of the risks inherent to these products and their use, as well as providing information to consumers. The material safety datasheets that accompany the petroleum and chemical products marketed by TotalEnergies (available in at least one of the languages used in the relevant country), as well as product labels, are two key sources of information. The implementation of these requirements is monitored by teams of regulatory experts, toxicologists and ecotoxicologists within the Refining & Chemicals and Marketing & Services segments of the Company. The task of these teams is to ensure the preparation of safety documentation for the marketed petroleum and chemical products so that they correspond to the applications for which they are intended and to the applicable regulations.

On page 266 the 'Customer' and the main topics of common interest and identified expectations are the following: Consumer health & safety, carbon intensity of products used, energy efficiency services, low carbon goods and services, access to energy, energy price, digitization of services and competition law.

Again, the criteria are only partly fulfilled because there is no information on information-related impacts for consumers and/or end-user: on privacy, on the freedom of expression and access to (quality) information. Moreover, there are no words over personal safety of consumers and/or end-users: Security of a person or protection of children. Lastly, there are neither information on social inclusion of consumers and/or end-users: Non-discrimination, access to products and services and responsible marketing practices.

SIE: ✘

Pages 22-24 are focused on customers: Putting customers first has a long tradition at Siemens.1 When it comes to technology, sustainability, and innovation, our customers are always at the heart of what we think and do: everything begins with them. That's why we've made "customer benefit" a strategic priority. We listen so we can understand our customers' needs as early as possible – best of all, even before our customers themselves become aware of them. To meet our customers' needs and the constantly changing demands of the markets, Siemens draws on a global sales force that takes its guidance from our regional companies. Key success factors are a strong customer focus, the digital transformation, and efficient processes, as well as collaboration with external partners. And our customers have recognized that they need solutions that are sustainable, able to adapt to change flexibly and fast, and combinable with a diverse range of products, processes, and infrastructures.

We measure customer satisfaction annually at Siemens. The tense global situation (for instance with supply bottlenecks for materials and goods) is also reflected in this year's Net Promoter Score, which was lower compared to the previous year. This reflects the sharply changing customer needs and expectations in the face of new global challenges. We intend to do justice to our customers' desire for even closer, partnership-based collaboration to meet these challenges efficiently. We are focusing on areas where we can make a difference: creating sustainable, long-term value for our customers, for the environment, and society – and for the people who work for Siemens.

Our pledge to safeguard human rights is anchored in our Siemens Business Conduct Guidelines (BCGs). They set out the fundamental principles and rules that apply to our actions within our company and in relation to our customers.

Human rights risk issues in the case of business decisions by customers: Business-specific environmental and social risks, country-specific risks, impacts on local communities (e.g., Indigenous population, ethnic, or religious minorities), fair working conditions, modern slavery, discrimination and occupied territories.

Again, the criteria are only partly fulfilled because there is no information on information-related impacts for consumers and/or end-user: on privacy, on the freedom of expression and access to (quality) information. Moreover, there are no words over personal safety of consumers and/or end-users: Security of a person or protection of children. Lastly, there are neither information on social inclusion of consumers and/or end-users' access to products and services and responsible marketing practices.

COLR: ✓

They are doing something for the health of the consumers: JIMS operates 27 fitness clubs in larger cities in Belgium and Luxembourg and is also active online. As the second largest fitness chain in the country, its mission is to encourage consumers to adopt a fit, healthier lifestyle. Customers can go there for conditioning or strength exercises and group classes at attractive prices. Online, JIMS offers live group classes and digital coaching by enthusiastic, well-trained staff. Club members can also call on personal coaches. JIMS has been an integral part of Colruyt Group since the end of April 2021. So, COLR is protecting the health and safety of consumers and staff.

Furthermore, at Colruyt Group Academy, consumers can attend various face-to-face or online workshops on health. Inspiring consumers via Colruyt Group Academy. Due to the corona restrictions, Colruyt Group Academy was again only able to hold face-to-face workshops to a limited extent in 2021. However, online workshops continued to take place, reaching a total of 23.501 participants.

Colruyt Group leads the way in many areas of sustainability. We continuously improve the sustainability of our assortment and provide our customers with maximum information via the Eco-score and the Nutri-Score, for example. In this way, we aim to inspire them to make more conscious and sustainable choices. We also want to strengthen our special relationship with customers and maintain our dialogue, even in an increasingly digital world.

By creating simplicity in retail, we want to make our customers' lives easier. To this end, we want to offer them the right products and services and assist them in all phases of their lives with often innovative but always relevant and simple solutions. Mainly in food and non-food but also in other, related categories such as energy, mobility and health.

Therefore, COLR knows exactly their customers and is fulfilling most of the criteria, in my opinion.

VOW3: ✘

Here I must admit that I can find no topic, which I should find in these criteria.

Again, the criteria are not at all fulfilled because there is no information on information-related impacts for consumers and/or end-user: on privacy, on the freedom of expression and access to (quality) information. Moreover, there are no words over personal safety of consumers and/or end-users: Health and safety, security of a person or protection of children. Lastly, there are neither information on social

inclusion of consumers and/or end-users: Non-discrimination, access to products and services and responsible marketing practices.

There are any undertaking affects the consumers and end-users of its products and/or services (referred to in this [draft] Standard as “consumers and end-users”), in terms of material positive and negative actual or potential impacts; (b) any actions taken, and the result of such actions, to prevent, mitigate or remediate actual or potential adverse impacts; (c) no the nature, type and extent of the undertaking’s material risks and opportunities related to its impacts and dependencies on consumers and end-users, and how the undertaking manages them; and (d) no the effects of risks and opportunities, related to the undertaking’s impacts and dependencies on consumers and end-users, on the undertaking’s development, performance and position over the short-, medium- and long-term and, therefore, on its ability to create enterprise value, are presented.

SOLB: ✘

Growing consumer demand for sustainable sourcing, natural ingredients, and biodegradable and safer end products is driving consumer markets. In response, we are transforming our portfolio, making it more circular by using bio-based or renewable raw materials, producing products using renewable energy and working on their end of life to make them biodegradable by design. In doing so, we aim to improve consumer quality of life while reducing the impact on climate and resources.

Here, the criteria are not at all fulfilled because there is no information on information-related impacts for consumers and/or end-user: on privacy, on the freedom of expression and access to (quality) information. Moreover, there are no words over personal safety of consumers and/or end-users: Health and safety, security of a person or protection of children. Lastly, there are neither information on social inclusion of consumers and/or end-users: Non-discrimination, access to products and services and responsible marketing practices.

There are any undertaking affects the consumers and end-users of its products and/or services (referred to in this [draft] Standard as “consumers and end-users”), in terms of material positive and negative actual or potential impacts; (b) any actions taken, and the result of such actions, to prevent, mitigate or remediate actual or potential adverse impacts; (c) no the nature, type and extent of the undertaking’s material risks and opportunities related to its impacts and dependencies on consumers and end-users, and how the undertaking manages them; and (d) no the effects of risks and opportunities, related to the undertaking’s impacts and dependencies on consumers and end-users, on the undertaking’s development, performance and position over the short-, medium- and long-term and, therefore, on its ability to create enterprise value, are presented.

KBC: ✘

On the client’s perspective: Protecting the data of our clients and employees by implementing strict data privacy rules, by proactively helping clients in handling fraud issues (page 37). In all our activities we comply with all regulations and corporate policies that ensure ethical business, ethical behaviour, openness, transparency, discretion, and privacy. We particularly focus on respecting human rights throughout our operations. We strictly refrain from any potential direct and indirect impacts on human rights.

Again, the criteria are only partly fulfilled because there is no information on information-related impacts for consumers and/or end-user: on the freedom of expression and access to (quality) information. Moreover, there are no words over personal safety of consumers and/or end-users:

Security of a person or protection of children. Lastly, there are neither information on social inclusion of consumers and/or end-users': Non-discrimination and responsible marketing practices.

However, the access to products and services is well-described: The ageing population: The further digitalisation of our offering introduces new and innovative products and services aimed at boosting the financial well-being of our clients. At the same time, the ageing population is growing rapidly. Ageing in a digital world brings challenges with it. We run various educational activities in our core countries. KBC employees volunteer to coach non-digital clients – especially those aged 65 and above – at the branches. Clients with a disability: KBC is committed to providing easier access to our products and services for all. We are especially working to consistently improve access for those with a disability or long-term health condition. We have strategies and action plans in place in almost all of our core countries to provide a full range of services specifically aimed at these clients.

ABI: ✘

Responsible marketing practices: Through social norms marketing, we engage with consumers to improve behavior by helping to shape social norms. We are on track to deliver our one billion USDgoal by 2025, with investment of more than700 million USD since 2016. So, there is a social inclusion of the consumers. Examples of this marketing are on page 33.

Our consumer is the boss. Beer brings people together to celebrate life, and we serve our consumers by striving to offer the highest-quality products and meaningful brand experiences, always in a responsible way.

See the stakeholder engagement on page 71. On page 79 it's stated that there is anti-discrimination policy for the consumers.

So, several topics were covered but not all topics. Again, the criteria are only partly fulfilled because there is no information on information-related impacts for consumers and/or end-user: on the freedom of expression and access to (quality) information. Moreover, there are no words over personal safety of consumers and/or end-users: Security of a person or protection of children.

AGS: ✘

Access to products and services: Communicating in a transparent and understandable way with customers remains a top priority for Ageas. Through Impact24, Ageas wants all products to be recognized by customers as easy to understand. For this KPI also, alignment was sought with the core business teams on the definition of transparency: Communicate in simple and clear language with easy-to-understand policies; provide tools to help make informed decisions; offer clear value for the customer and serve their interests.

As transparency to customers can be defined as always communicating in an honest and open way (from designing and marketing products and services to underwriting and claims handling processes), the initial focus is on (pre) sales communication. Information has to be clear and straightforward with customers in terms of the prices of products and services and advertising material must not be misleading.

The Ageas's Compliance Teams developed a white paper on how to interact with vulnerable customers inviting all businesses of the Group to adhere to some key principles along the value chain. Transparent communication is critical in this approach which starts with a product design based on the understanding and needs of customers. In Ageas UK, transparency is strongly embedded in the purpose

of the company: “understand people + simplify insurance”. This purpose can only be fulfilled if propositions are clear, transparent and relevant, ensuring that all communication to customers is simple and easy to understand. Within this strategy sits a strong customer ambition statement translated into a care program throughout the entire company and going beyond the UK regulation on Treating Customers Fairly.

The section first elaborates on how Ageas brings ethics and integrity to life every day, internally by being explicit about responsible business conduct from its employees, how to deal with sensitive data of employees and customers, what it expects from its suppliers, and as a responsible taxpayer in society. Furthermore, Ageas has another role to play in society, beyond its business activities. This is described in the second part of this section, taking a deep dive on Ageas’s philanthropic activities.

Another channel through which incidents can be detected, is the Complaints Handling process. A Complaints Handling policy is in place, that sets out the implementation rules to deal with complaints2 formulated by customers and policyholders, shareholders, suppliers and other external parties. It stems from Ageas’s commitment to ensure that all its stakeholders are treated fairly.

The criterion of social inclusion is fulfilled but the other criteria are not met, as personal safety of consumers and information-related impacts for consumers and/or end-users.

Topical standards: Governance

12) ESRS G1 Business Conduct:

INGA: ✓

While customer centricity guides our business conduct, in our decisions we aim to balance the interests of all stakeholders, while operating within international norms and best practice. The norms and best practice standards that guide our business operations and engagements with clients, customers and suppliers are, amongst others:

• The United Nations (UN) Guiding Principles on Business and Human Rights;

• The Ten Principles of the UN Global Compact;

• The Organisation for Economic Co-operation and Development (OECD) Guidelines

for Multinational Enterprises (Human Rights chapter);

• The International Finance Corporation (IFC) Performance Standards.

ING’s Statement on Human Rights provides an overview of how we embed human rights in our business conduct. It outlines our responsibility to respect the internationally recognised human rights of all people affected by our activities and business relationships, including our employees, customers, and workers and communities affected by our business partners and their value chains. It refers to our underlying policies and expectations and provides guidance on human rights to our business.

An ongoing dialogue with stakeholders can help to drive internal change at ING, including by enhancing our environmental and social risk management policy and improving awareness of the wider impact of our business conduct. Equally, ING can drive change by sharing subject-matter expertise with external working groups and think tanks such as the RMI Center for Climate-Aligned Finance.

Responsible Business Conduct Agreement: following the Dutch Banking Sector Agreement, a new commitment on responsible business was formed among Dutch banks. Global Sustainability is leading the initiative for ING and the ESR team is aligned for any policy implications or client interactions. • Thun Group: was initially established in 2011 to support the integration of the UN Guiding Principles (UNGP) on Business and Human Rights into banking activities. The group consists of bank representatives who informally share best practices among participant members to deepen the understanding and application of the UNGP across the range of different banking activities. ING participated in this year's virtual annual meeting. Amongst other topics, the latest developments on human rights due-diligence obligations and the human rights impacts of climate transition plans were discussed.

The awarding of variable remuneration, where applicable, is based on group, business line and individual performance criteria unless local legislation prescribes otherwise. The criteria used to measure performance is aligned with the business strategy, objectives, corporate culture, values and long-term interests of ING. In all ING countries, we adhere to the applicable variable remuneration caps.

The Orange Code and the global Code of Conduct are the foundation of ING's risk culture. The global Code of Conduct defines the most essential conduct principles expected from ING employees in their daily activities, to create additional risk awareness and better meet expectations stated in external rules and guidelines. ING employees are required to take an annual e-learning and attest to their adherence to the global Code of Conduct. In 2021, the global Code of Conduct was embedded into our employees' performance management cycle with the aim ensuring continuous attention to the Global Code of Conduct, and dialogue on how to apply it in our daily work practice. The Orange Code is the sum of two parts, the ING values and ING behaviours, with integrity being the overarching principle. The ING values (being honest, prudent and responsible) are non-negotiable promises we make to the world, principles we seek to stick to, no matter what. The ING behaviours (take it on and make it happen, help others to be successful, and always be a step ahead) represent our way to differentiate ourselves. The Orange Code is embedded in commitments we make to each other and the standards by which we measure each other's performance.

Data privacy, protection and ethics: Customers trust us with confidential information and their personal data. It's important that we maintain that trust and keep their data safe from loss or misuse. In an environment that's increasingly open and connected, we must be ever more vigilant. ING is bound by global and local data protection laws, which can differ from country to country. We are transparent about what we do with the personal data of customers, employees, suppliers and business partners. We encourage employees to speak up when they are confronted with unethical or illegal behaviour and provide a variety of reporting channels, including via their manager, local compliance officer or an ING whistleblower reporting officer. ING also has external and anonymous whistleblower channels. We take great care to protect the identity of whistleblowers and the confidentiality of their reports to protect them against potential retaliation. We believe that trust, integrity and ethical behaviour are at the core of any reliable business. They go hand in hand with satisfied customers.

ING Group aims to have an adequate and balanced composition of its Executive Board, with a diverse selection of persons with knowledge, skills and executive experience, preferably gained in the banking sector, experience in corporate governance of large stock-listed companies and experience in the political and social environment in which such companies operate. In addition, there should be a balance of experience and affinity with the nature and culture of the business of ING. Factors such as nationality, gender, age and education are also taken into account for the composition of the Executive Board.

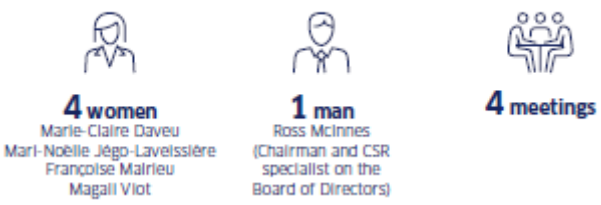
Management of relationships: As an organisation we need to be customer focused – after all, customers are who we're here for, our reason for being. And if we want customers to choose us for more of their banking needs, to become primary customers, we need to nurture relationships with them so that they choose ING before any other. At every step of their ING journey, customers should feel an emotional connection with us: that's how we win customers' hearts and their business. Banking is a relationship just like any other, and the best relationships are those in which people feel valued, confident, empowered and in control. In response to customers' changing expectations in today's always-on digital society, we've updated our customer experience principles. We want to provide customers with an experience that is personal, easy, relevant and instant. We believe every person, everywhere, has the right to be treated with dignity and have their interests considered equally. ING and our clients have the potential to impact human rights through our operations and business relationships. Our impact is on different levels: how we do business, and with who we do business, not only as an employer but also through our supply chains.

Bribery and corruption: Corruption fuels instability and conflict and curbs economic growth. It undermines business confidence and corporate integrity, hinders fair business competition and harms international trade. Bribery and corruption risks are part of our non-financial risk framework and are included in the client and third-party due diligence and monitoring measures in our financial crime risk management framework. We have continued to structurally strengthen our response to bribery and corruption risks in key areas as part of our multi-year enhancement programme and FCMP, and in support of our zero-tolerance approach for bribery and corruption.

ENGI: ✓

Our independence is defined by regulatory texts, the French Code of Ethics for Statutory Auditors (Code de déontologie de la profession de commissaire aux comptes) and the requirements of Article L. 822-11-3 of the French Commercial Code (Code de commerce). In addition, we implemented a quality control system (International Standard on Quality Control 1) which includes documented policies and procedures aimed at ensuring compliance with ethical requirements, French professional guidance, and applicable legal and regulatory requirements.

ENGIE is governed by a team of 15 directors with a variety of expertise. In line with ENGIE's purpose and in connection with the expectations of its stakeholders, their mission is to define the strategic directions of the Group and ensure their implementation. The Board's objective is to have members that correspond to ENGIE's activities, strategic directions and challenges. This is what allows the Board to make decisions consistent with the need to accelerate the transition to a carbon-neutral, eco-friendly economy. ENGIE also ensures that the individual competencies of its directors are wide-ranging and complementary. The diagram opposite compiled in February 2023 (with the exception of length of service calculated on April 25, 2023) presents the three key skills of each director among the 12 types of expertise selected (See page 53 with all the directors).



The ethics, environment and sustainable development committee ensures the Group has the right level of commitment with regard to ethics, compliance, and corporate, social and environmental responsibility. Reviews human resources policies and ensures that a corruption prevention and

detection system is in place. Ensures that the Group takes into account CSR issues and long-term perspectives. Main work in 2022: New CSR objectives for 2030 and their deployment, and changes in certain Indicators, CO2 Medium-Term Plan (MTP), monitoring of the “climate change” priority risks and “HR risks related to the challenges of transformation”, updating of the CSR policies, draft integrated report and NFPS, review of each fatal accident, annual reports on health and safety, professional and salary equality and Ethics and compliance activities.

The Group believes that acculturation, skills development and the commitment of its employees are a powerful lever to support the transformation of its business. Thus, ENGIE decided to create the Sustainability Academy in 2021. Through in-house courses, the academy aims to explain the Group’s strategy in terms of environmental, social and governance issues, to give it meaning and to explore its implementation. E-modules, podcasts, climate and biodiversity fresks, workshops, challenges around sustainability, or learning expeditions –, a number of modules have been rolled out. In addition, the Group offers all its employees different training programs (Sustainable Business for All, Energy Revolution Toward Decarbonization), some of which dedicated to certain activities (Sustainability with my Clients in the business development and sales division).

In accordance with its commitment to fight climate change and accelerate the transition to a carbon-neutral economy, ENGIE is committed to ensuring that its lobbying activities and sector associations are aligned with the objectives of the Paris Agreement and the company’s climate strategy. In 2021, ENGIE carried out a review of its membership of professional and industrial associations and conducted a detailed evaluation of the alignment of these associations with the objectives of the Paris Agreement. The evaluation document is available on the Group’s website. The evaluation will be updated in the first half of 2023.

Relationship with the suppliers: ENGIE maintains relationships of trust with all its stakeholders. The conditions for dialog that have been put in place provide a lasting structure for discussions and enable the Group to enrich its strategic thinking in order to accelerate the transition to a carbon neutral economy. Moreover, ENGIE excludes any form of corruption and deploys forums for dialog to improve the transparency of its communication.

Group whistleblowing and alert system: This system is open to all (any Group employee – any external person). Confidential and anonymous (reports are received by an external service provider and transmitted to the Ethics, Compliance and Privacy Department for handling). Strictly voluntary. Any breach of the Group’s ethical principles, any violation of laws and regulations or any incident. A phone line and one email address for the entire Group.

TTE: ✓

To that end, TotalEnergies leverages the principles of action at the core of its responsible business model and its Code of Conduct, which applies to all of the Company's operations around the world:

– Safety is a TotalEnergies value. Safety, operating excellence and sustainable development go hand in hand,

– Respect for each other is another TotalEnergies value and respect for human rights is a cornerstone of its Code of Conduct,

– Zero Tolerance is the rule in the fight against corruption and fraud.

– Transparency is the rule in engaging with society, no matter what the subject.

In TotalEnergies' view, dialogue with its internal and external stakeholders is essential for the Company to conduct its business responsibly and integrate the long-term challenges of sustainable development in its strategy and policies. This dialogue contributes to the identification of the main risks and impacts of the Company's activities, and more broadly to a better understanding of changing trends and the main societal expectations of each of the major categories of stakeholders. It is also a prerequisite to ensuring that the Company is firmly integrated in its host regions, as well as an effective tool for identifying ways to generate value at the local level.

Moreover, TotalEnergies' control environment is based primarily on its Code of Conduct, which spells out the Company's five values, including Respect for Each Other, which is reflected in the areas of integrity (fraud and corruption), respect for human rights, as well as the environment and health. The principles of the Code of Conduct are set forth in a number of guides, such as the Business Integrity Guide and the Human Rights Guide. These documents are distributed to employees and are available on the intranet. They also set out the rules of individual behavior expected of all employees in the countries where TotalEnergies is present. Similarly, a Financial Code of Ethics sets forth the obligations applicable to the Chairman and Chief Executive Officer, the Chief Financial Officer, the Vice President of the Corporate Accounting Division and the financial and accounting officers of the principal activities of TotalEnergies.

Relationship with suppliers: The Company pays particular attention to working with responsible suppliers who respect both human rights and the environment throughout its value chain. The Company expects its suppliers to adhere to the Fundamental principles of purchasing which derive from its Code of Conduct. To that end, the Company has chosen to have the management of its supplier relations coordinated by a dedicated cross-functional entity, TotalEnergies Global Procurement, which is specifically tasked with providing Purchasing services and assisting the Company's entities and sites. Agreements signed with third party suppliers are managed under TotalEnergies' dedicated procurement system (structure, rules and tools). This system includes a supplier evaluation and qualification process, the monitoring of contracts and their performance (refer to point 5.10 of Chapter 5) and the monitoring of the financial robustness of the main suppliers. Finally, the audits provided for in the agreements with the suppliers complete the system.

Lastly, TTE focuses on societal commitments in order to promote sustainable development and the circular economy, prevent food waste and food poverty or promote animal welfare and responsible, fair and sustainable food.

SIE: ✓

At Siemens, we're certain that above and beyond complying with the law, acting in accordance with ethical principles is an integral part of doing business responsibly. The way we do business is as important as our business success. Our values and ethical principles are embedded in our Business Conduct Guidelines, which are binding throughout the company and on which we provide regular training to all our people. Our company is marked by a culture of trust. We were co-founders of the "Charter of Trust" initiative to protect data and promote cybersecurity in a trustworthy digital world. In addition, it has been clearly shown that strong governance goes hand in hand with better, more sustainable business. Besides embedding these principles in our own management systems, we extend them to our suppliers, who are required to follow a comprehensive Code of Conduct. On top of that, we have made sustainability criteria an integral part of our long-term variable compensation programs for both the Managing Board and our senior management.

Ethics: Foster a culture of trust, adhere to ethical standards, and handle data with care. SIEs key ambitions:→ Striving to train 100% of our people on Siemens' Business Conduct Guidelines every three years. Additional topics: → Zero-tolerance approach to breaches of applicable laws and our own internal guidelines, → A global, risk-based compliance system,→ Aiming for a leading role in cybersecurity.

Governance: Apply state-of-the-art systems for effective and responsible business conduct. SIEs key ambitions: → ESG-secured supply chain based on supplier commitment to the Supplier Code of Conduct. → Long-term incentives based on ESG criteria. Additional topics: → Focus on human rights within supply chain: climate protection, occupational safety, and responsible sourcing of minerals → comprehensive environmental and social due diligence in customer business (ESG radar).

Furthermore, at Siemens, we take a zero-tolerance approach to corruption and other breaches of applicable laws and of our Business Conduct Guidelines (BCGs). We operate on the premise that only clean business is Siemens business. If violations do occur, we respond consistently and vigorously following defined procedures, everywhere in the world and on all organizational levels. Beyond our company's borders and in collaboration with other international and national organizations we are committed to fighting corruption and promoting fair competition in our markets. This is also reflected in our Collective Action activities. Part of that engagement is our commitment to the United Nations Global Compact (UNGC) and our involvement in the World Economic Forum and its Partnering Against Corruption Initiative (PACI). In addition, we actively support the United Nations Convention against Corruption and the Anti-Bribery Convention of the Organization for Economic Cooperation and Development (OECD). For years, we have been supporting the implementation of these Conventions as part of Business 20 (B20).

102,000 employees were trained on the contents of our Business Conduct Guidelines in fiscal 2022.

We actively promote diversity, equity, and inclusion by creating a working environment that is open and appreciative for all. Our commitment to human rights is anchored in our Siemens Business Conduct Guidelines (BCGs). We do not tolerate discrimination of any kind. The guidelines clearly state: "We respect the personal dignity, privacy, and rights of each individual." They also make it clear that Siemens is committed to maintaining a workplace that is open to everybody regardless of ethnic origin, culture, religion, age, disability, skin color, gender, sexual identity and orientation, or world view.

Animal welfare: This approach is part of our location planning, includes concepts for nurturing both plants and animals, and has already generated a large number of projects – ranging from the planting of flowering meadows and the installation of nesting places for animals and birds to the creation of a 45 km2 nature reserve (complete with a learning trail) in the Atlantic rainforest at our location in Anhangüera, Brazil.

COLR: ✓

At Colruyt Group, we want to make a positive difference with everything we do. At every stage of life and at all important moments in our customers' lives, we want to be there for them in a suitable way. For this reason, we aim for maximum complementarity between our different brands. One by one, they differentiate themselves with simple solutions for specific requirements. Each in their own, authentic way, our brands express the 'simplicity in retail' that we represent as Colruyt Group. In this way, each brand helps achieve our common mission. Each business format also embodies the same group values. Together, they form the foundation on which we continue to build as a group and a point of reference in this rapidly changing world. For ourselves, for our partners and for our customers. So, the all know what they can expect of us, and that creates trust in turn. Value-driven. Our values form a common

frame of reference that determines how we behave and cooperate with one another. They ensure that we act coherently and consistently, in everything we do.

The values: We have Respect for every individual. That is the basis for our interaction. Every person is equal, despite the great differences in appearance, culture, background, skills, knowledge, interests, etc. Our Togetherness, the realisation that we all rely on one another to be able to work well, is the basic attitude that enables us to work together as a team. We love to serve others. Our Readiness to serve is therefore the basic attitude required to be able to deliver quality day after day. In this, we aim for Simplicity by reducing things to essentials. That helps us work efficiently and essentially. To be able to produce good work, we need several other things. Starting with our Faith in people's positive intentions. That is essential if we are to trust. Our Hope then invites us to invest the necessary time and resources, to be clear in our expectations and eventually to let go and be open to the results that follow. It is essential here that we allow ourselves the Space to pause, take a step back and consider what we are doing. As soon as our head is too 'full', that consciousness vanishes and we fall behind. Finally, we demonstrate inner Courage in showing enterprise. With a positive attitude and a fresh, creative view, constantly working hard and mastering our craft, step by step. That is where our Strength lies, through which we experience satisfaction and fulfilment in our job.

Colruyt has always led the way in using energy and raw materials efficiently. Today, the supermarket chain continues to play a major role in many of the group's sustainability initiatives, relating to the environment, society, health and animal welfare. From our strategic position in the chain, we want to exert leverage by pointing to the importance of measuring, collecting and analysing the impact of each actor in the chain on the environment and on animal welfare.

More specifically and mitigation-based approach: in the field of corruption and bribery, Colruyt Group may run the risk of becoming involved in unwanted influence, conflicts of interest, non-objective pricing and subjective awarding of contracts. We monitor this risk within our Enterprise Risk Management. More information can be found in the section Risks of corruption and bribery on page 141.

Mitigation-based approach: the group strives for transparent, long-term relationships with all its suppliers. Moreover, no single supplier has a dominant position that could jeopardise the supply process. Finally, certain commodities are monitored on a daily basis and we seek to spread the risk by approaching a wide number of suppliers. In addition, the group has implemented the requisite continuity programmes and contingency measures.

The variable remuneration comprises payment for services for the group during financial year 2020/21. All Management Committee members included in the overview above are salaried persons. Social Security contributions are paid by Colruyt Group on their gross salaries.

See all sustainable corporate governance on pages 123-128.

VOW3: ✓

Code of Conduct: The Code of Conduct (CoC) lays the foundations for compliance in the Volkswagen Group. It acts as the key element for reinforcing awareness of responsible conduct and decision-making within the workforce, providing help, and finding the right contact persons in cases of doubt. The CoC is a component of the Group's employment contracts and is mandatory for all the Group's employees. The CoC is also part of employee appraisals as a measurement criterion for "setting an example of integrity and compliance."

ESG (Environmental, Social, Governance) refers to the basic principles of doing business sustainably. The Group's stakeholders (e.g., investors, employees, customers and non-profit organizations) have high expectations of the Company's ESG performance, including in areas such as decarbonization and integrity, and also of its conduct as an employer and as part of society. The Group's ESG performance therefore directly affects its market capitalization, cost of capital and investing activities. We aim for a top position relative to our competitors in sustainability ratings. We are committed to the Paris Climate Agreement and align our own activities with the 1.5 °C goal. We aim to achieve net carbon neutrality by 2050. By 2030, we have also set ourselves the target of reducing CO2 emissions from passenger cars and light commercial vehicles over the total life cycle by 30% compared with 2018. As part of this effort, we are looking for ways to increase the proportion of recyclable materials in our SSP-based vehicles. We also wish to become the benchmark for ethical corporate conduct. Volkswagen sees itself as an equal opportunities employer. The intention is therefore for at least a fifth of Company management positions to be held by women by 2025, and for at least a quarter to be held by international managers.

The minimum safeguards consist of the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, the Fundamental Conventions of the International Labour Organization (ILO) and the International Bill of Human Rights.With regard to the responsible sourcing of raw materials, the Volkswagen Group implements the five steps of the OECD Due Diligence Guidance for Responsible Business Conduct and the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Relationships with our business partners are based on the Code of Conduct for Business Partners. We review compliance with the binding requirements defined in the Code, using sustainability ratings for relevant suppliers. We address existing sustainability risks and violations of sustainability principles by systematically defining and implementing measures to correct the violations; this also includes the upstream supply chain. We implemented a Human Rights Focus System in 2022 to comply with international frameworks and requirements and specifically the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz –LkSG).

The Social Charter is geared to the conventions of the International Labour Organization (ILO). The scope of the charter extends to Volkswagen AG and the Volkswagen Group's controlled companies. The principles of the Social Charter were also integrated as a component of the sustainability requirements in the supply chain and in the Volkswagen Code of Conduct for Business Partners. At Group level, occupational health and safety form part of the Code of Conduct, on which the Group's employees are trained regularly. At Volkswagen AG, compulsory web-based training on occupational health and safety was rolled out for managers in the reporting year. The Safety First strategy requires all Volkswagen Group production sites to comply with the standards of ISO 45001 occupational health and safety management systems.

The Volkswagen Group created an advisory committee in the form of the Diversity Panel in 2021. The panel includes experts from civil society, business and academia but also high-ranking managers from various areas of the Group. The aim is to raise awareness of discriminatory content and conduct and enhance in-house skills to systematically counteract everyday discrimination and racism. The panel met twice in the reporting year and issued concrete recommendations for action regarding organization, processes and activities in the Group.

Whistleblower system: The whistleblower system is the central point of contact for reporting cases of rule-breaking by Group employees, direct and indirect suppliers, and selected other business partners.

These include, for example, economic crimes, corruption, tax offenses and breaches of the CoC. A detailed description of the whistleblower system follows on p. 101.

Anti-corruption: The Volkswagen Group has a zero-tolerance policy toward active or passive corruption. This is anchored in both the Code of Conduct for Employees and in the Code of Conduct for Business Partners. Further Group policies set out how to deal with conflicts of interest, donations and sponsorship or benefits in the form of gifts or invitations. In addition, there are operating guidelines addressing approval procedures, record-keeping and appropriate behavior. Reported breaches of the code are pursued and investigated by managers and HR, and in serious cases also by our investigation offices. If personal misconduct is found, the HR department in question takes the appropriate disciplinary action.

SOLB: ✓

Solvay's Code of Business Integrity and the policies and procedures adopted to enhance good governance apply to all employees wherever they are located. In addition:

· third parties are expected to act within the framework of the Code of Business Integrity;

· all core suppliers must confirm that they adhere to the principles set out in the Solvay Supplier Code of Business Integrity;

· majority-owned joint ventures are held to the Solvay Code of Business Integrity, or to a separate code adopted based on similar principles.

· The Code of Business Integrity is available on Solvay's website.

Solvay's Code of Business Integrity expressly states that the Group prohibits bribery in any form. Solvay and our employees do not use gifts or entertainment to gain competitive advantage. Facilitation payments are not permitted by Solvay and disguising gifts or entertainment as charitable donations is also a violation of the Code of Business Integrity. The Code is supported by more detailed policies. At the end of 2020, Solvay split our Gifts, Entertainment and Anti-Bribery Policy into two separate policies: an Anti-Bribery and Anti-Corruption Policy and a Policy on Gifts, Entertainment, Charitable Donations, and Sponsorship.

Solvay's Human Rights in Business Policy, published on our website, sets out Solvay's commitment to respecting human rights and acting with due diligence to avoid any infringement of human rights or any adverse impact on or abuses of such rights. The policy emphasizes Solvay's commitments to our stakeholders, namely our employees and business partners, the communities and environment in which we operate and children. A safety culture approach, which ensures people's safety, health and well-being. It relies on a safety leadership style, where managers act as mentors and demonstrate genuine care for all.

Employees have various internal channels through which they are encouraged to report suspected violations or concerns. These include management, Human Resources, the General Counsel Function, Ethics and Compliance, Internal Audit and employees' representatives. A Group-wide Speak Up program is in place and overseen by the Audit Committee of the Board of Directors. An external, third-party helpline, active 24 hours a day, 365 days a year, allows employees to ask questions, raise concerns or file reports. The helpline is open to internal and external parties, available in nineteen languages covering most of Solvay locations.

We have identified nine action plans to foster diversity, equity and inclusion by 2025:

Diversity: Accelerate gender parity at all mid and senior levels. Make our workplace more appropriate for people with disabilities. Develop Resource Groups to encourage employees to bring their "whole self" to work.

Equity: Assess if there are undesired pay gaps and close them. Ensure fair recruitment: all mid and senior level job openings to have a shortlist comprising 50% of under-represented groups, including women. Ensure equitable access to career opportunities and development: set up mentor/mentee programs starting with under-represented groups.

Inclusion: Build an inclusive employee experience: set up an Inclusion Index and improve our score. Assessment and development program for Solvay leaders to grow and nurture an inclusive mindset. Build a culture in which individuals feel empowered to speak out or speak up when they experience or witness non-inclusive behaviors.

As stated in the COP15 Global Biodiversity Framework, preserving the world's ecosystems is essential for human, animal and plant health and, with 50% of the global economy estimated to be reliant on nature, it's vital for the economy too. Solvay's policy, outlined in the Solvay Animal Care and Use Procedure, is to apply the "3R principles" (Replacement, Reduction and Refinement) in each case and to comply with all applicable regulations. All of our studies comply with international standards, such as Organization for Economic Cooperation and Development (OECD) guidelines. Regulatory studies are almost exclusively performed by laboratories accredited by the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC).

Relationship with supplier: Solvay applies supplier segmentation in order to identify key suppliers, which we refer to as Core Suppliers. Core Suppliers encompass three categories:· Strategic Alliances: strategic suppliers at Group level that contribute to Solvay's growth, market differentiation and innovation. · Strategic Partners: suppliers that deliver strategic materials or services to Solvay that can have a possible business impact. · Bottlenecks: suppliers that represent a high potential risk to Solvay or the business. This approach enables Solvay to focus on managing performance, mitigating supply risk and improving relationships, while also forming the basis for collaboration and stimulating innovation. Actions to be performed, such as carrying out a supplier evaluation survey, or requesting a mandatory third-party sustainability assessment, are defined according to the type of supplier. Key Account Managers are appointed for some of our Core Suppliers, allowing us to generate additional value and mitigate risk through strategic relationships. We have identified 410 suppliers as Core Suppliers.

KBC: ✓

Respect is one of the values associated with our PEARL+ culture and is the driver for diversity and inclusion at KBC. This means we treat all our people equally in all circumstances. The KBC Group Code of Conduct for Employees sets out the key behaviours we expect from all employees. It guides our staff on the path to being respectful and treating everyone equally. Although the general guidelines of our Diversity policy apply to all types of diversity and inclusion of every employee, we particularly focus on 'gender'. Each core country focuses on a diversity action plan including local ambitions and specific initiatives. At group level, we monitor the gender balance in our top talent management programme and the inflow into managerial positions. To support gender diversity in the higher echelons of our organisation – where women at KBC currently remain underrepresented – we have set a goal of having one female and one male candidate for every new senior management nomination.

We have a global whistleblowing policy and procedures in place as referenced in our KBC Code of Conduct for Employees. We encourage employees to 'speak up' and report actual or potential misconduct (on the intranet or using the dedicated reporting@kbc.be mailbox). To mitigate the potential risk of misconduct, our employees are also encouraged to report products or processes that appear unethical, unfair or contradictory to our values (ethics.and.fraud@kbc.be).

Money laundering is a problem which financial institutions are tackling across the globe. We have a regulatory obligation to report suspicious behaviour linked with money laundering which imposes large fines for non-compliance. To fulfil our role as a trustworthy bank-insurer, we set up a general framework entitled 'Anti-Money Laundering policy' to counteract money laundering and the funding of terrorism. We monitor compliance using an AI platform that was developed in-house.

In fact, since 2006 KBC has pledged to adhere to the principles of the UN Global Compact, the largest corporate responsibility initiative globally. We inform our stakeholders regularly on our progress since we have integrated these principles into our operations. Our annual Communication on Progress (CoP) is available on the UN Global Compact website.

Protecting our clients' data and our ICT systems remains extremely important to KBC. Maintaining our stakeholders' trust is at the core of our social licence to operate. We therefore aim to avoid any breaches that can lead to legal, reputational and financial harm, ultimately causing the loss of trust among our clients. In 2022, we once again defined information security, including cybercrime-related fraud, a top risk within the group. As such, the Risk and Compliance Committee and Board of Directors very closely monitor this risk. Same as in previous years, in 2022 we continued to focus on cybersecurity training sessions for all our employees across the group. We also provide training to and organise awareness initiatives for our clients. To increase awareness on IT security risks among our employees, we perform group-wide phishing simulation tests. We report to the managers on the outcome of the phishing test results of their teams. For the colleagues who repeatedly fail these tests, we provide additional training to improve their skills in this area. Moreover, we encourage our employees to attend international 'Cybersecurity Month' campaign sessions each year.

Moreover, we are set to launch a new reporting tool in observance of the requirements of new Belgian legislation on the protection of whistleblowers. This tool allows employees to report all forms of misconduct, including discrimination and retaliation against employees.

Lastly, KBC's suppliers are required to comply with the principles outlined in our Sustainability Code of Conduct for Suppliers. We assess all our procurement and outsourcing actions against the environmental and social criteria incorporated in the code of conduct. We also embedded product-related requirements in our internal process for screening suppliers.

ABI: ✓

Together with our global policies, our Code of Business Conduct (COBC) contains ethical principles that address key risk areas, including anti-bribery and corruption, digital ethics, human rights and antidiscrimination. The COBC and supporting policies are designed to guide and support our colleagues and business partners to adhere to the highest standards of business integrity and ethics. Our global Compliance Channel gives colleagues direct access to the Ethics & Compliance team to ask questions, access our confidential compliance helpline, seek guidance, access internal policies or request approvals related to certain compliance matters.

To further strengthen our commitment to ethical decision-making and real-time risk assessment, we use our award-winning compliance data analytics platform, BrewRIGHT. Through this platform, we

aggregate, standardize and demonstrate trends and patterns to help identify, detect and prevent fraud and corruption related to our operations. BrewRIGHT continues to pave the way we use technology and analytics to drive reputation, insights and intelligence within our legal and compliance teams.

Our culture is our collective behavior. It is what our people do and say every day, and our strong set of company principles defines how we bring our values and beliefs to life. We strive to bring together diverse perspectives and share best practices to create better solutions. We embrace ownership to build long-term value. More than ever, we are working with our customers and keeping our consumers at the heart of all we do. paramount. We work vigorously to achieve high standards of health and safety in our offices and breweries and throughout our value chain by engaging teams to build an interdependent safety culture through trainings, workshops and coaching sessions. Safety metrics are cascaded and monitored through our supply and logistics safety management systems. Our approach to safety focuses on mitigation. empowerment. After an assessment of our safety culture through internal and external benchmarking, we updated our management system to further strive for sustainable implementation of a positive safety culture. We developed a safety leadership workshop to support this transformational change. In 2022, we piloted the workshop in six breweries and distribution centers and plan to roll it out globally.

Relationship especially with our suppliers, are essential to our operations. Mutual collaboration is a key element to creating a resilient supply chain that delivers value and contributes toward our 2025 Sustainability Goals. We value our relationships with farmers in our supply chain, who provide simple ingredients for our products. Our mutual collaboration is a key element in creating a sustainable supply of high-quality ingredients for our products. That is why we invest in research, crop advisory services and technology through our agricultural development programs and our agronomy teams to help farmers improve their resilience and profitability.

Lastly, supported development of a Payment for Environmental Services program that helps to incentivize the adoption of conservation practices such as soil conservation, permanent preservation and forest maintenance through our ongoing engagement in the Bacias Jaguariuna water fund in Brazil.

AGS: ✓

At Ageas, these principles are translated into a consistent set of policies and codes of conduct: the Ageas Policy Framework. This framework is an essential element of the global group governance; it is based on the regulatory environment in which Ageas operates while reflecting an analysis of the risks to which the group is exposed from an integrity, governance, social and environmental perspective. The Ageas Policy Framework is carefully managed and followed-up, according to well-defined processes, including their (re-)approval by the Board of Directors. Its applicability extends to all entities of the group along a consistent and relevant set of rules. It touches upon all aspects of Ageas's business, of which the most significant ones in relation to ethics and integrity are corruption, conflict of interest, fit and proper, insider dealing, sanctions, anti-money laundering and countering terrorist financing, treating customers fairly, complaints handling.

Ageas has a policy in place that is specifically dealing with Anti-Bribery and Corruption; it describes the frame of mind in which Ageas intends to operate and to do business and sets out the principles and rules to abide by to avoid committing or seeming to commit an act of active or passive corruption. The leading principle is the zero-tolerance towards corruption. Other compliance policies provide for a series of processes that jointly form a beam of protective, detective and monitoring requirements to preclude corruption and more generally criminal activities, in the field of conflicts of interest, personal financial transactions and insider dealing, anti-money laundering, application of sanctions, and the fit

and proper framework. The whole Ageas Policy Framework includes principles and rules that contribute to prevent corruption, specifically the acceptance and due diligence requirements towards third parties, suppliers, vendors. Two major ones are the Procurement and the Outsourcing policies.

Personal) data is a vital asset for Ageas and is treated it that way. With increasing digitalisation leading to a larger digital footprint and greater complexity, its importance and attractiveness is growing together with the need to protect it. Combined with information, data can give insights about customers, products and services. It can also help innovate and reach strategic goals. However, when not correctly managed it can be exposed to information security risks and/or risks non-compliance with

Lobbying - memberships (in EUR mio)	2022	2021
Lobbying activities	1.6	0.8
Memberships	3.8	5.3

regulatory and legal requirements.

5.8.5 Safe, secure and compliant insurance

Organiser

Code of conduct	2022	
% of staff subject to a Code of Conduct, or Integrity Policy, or any Formal statement of ethical principles imposed by the undertaking	100%	100%
% of staff having to formally acknowledge their abidance to the Code of Conduct/Integrity Policy/Statement of ethical principles.	100%	

Participation rates to training sessions and questionnaires	2022	
Inception meetings	100%	100%
Awareness initiatives	87%	90%
Yearly Compliance questionnaire (control on personal transactions, gifts and hospitalities, external mandates or functions)	100%	95%
Yearly Legal questionnaire (memberships and collection on information on potential conflicts of interest)	82%	90%

Whistleblowing and breaches	2022	2021
Number of whistleblowing cases, all relating to code of conduct breaches	4	
Internal fraud – number of suspected cases	37	
Number of effective cases of internal fraud	11	1

Training initiatives are essential to supporting the compliance culture and maintaining awareness towards ethics and conduct in the whole group. A wide programme of training is organized in every entity of the group. Besides the technical and business-specific training, the Compliance function deploys a wide and continuous compliance training programme for employees and management. Training initiatives can take various formats: eLearning, interactive modules, webinars, presentations, workshops, deep-dive sessions. They are all mandatory and participation is followed up as part of the reporting towards the managing bodies. The objective is to reach 100% of the target audience.

Ageas fully subscribes to the UN Universal Declaration of Human Rights and the International Labour Organisation's Core Conventions. Underpinned in Ageas's culture of integrity, Ageas is committed to complying with applicable legal requirements and internal policies on the subject, and to respect internationally recognised human rights and avoid complicity in human rights abuses, as stated in the UN Guiding Principles on Business and Human Rights. Since 2020, Ageas is signatory of the UN Global Compact (UN GC) framework, supporting the Ten Principles on human rights, labour, environment and anticorruption as well as communicating upon progress made to implement these principles.

Lobbying: Ageas's positioning towards lobbying is also reflecting its concern to prevent corruption: it was outlined in a guidance note in 2021, approved by the Board of Directors. Ageas is recorded in the EU Transparency Register with the purpose to benefit from some of the practical advantages linked to it, i.e. receiving email notifications on the activities of Parliament's Committees; and being notified about consultations and roadmaps in specific areas.

Relationship with suppliers: As a procurer of goods and services, Ageas has business relationships with many suppliers from which products or services are purchased. Procurement activities refer mostly to

IT equipment and software as well as outsourcing activities. Ageas is mindful that workplace discrimination and harassment, as well as labour rights may be at risk in its supply chain. Consequently, specific references to Human Rights are included in both Ageas's Procurement policy and Outsourcing policy. Third-party relationships are expected to fully comply with applicable laws and regulations and to adhere to internationally recognised Human Rights and broader ESG standards. Further information can be found below in sub-section 'Setting sustainability expectations to suppliers'.

Abstract:

The evolution of corporate sustainability reporting over the last few decades marks a wider shift in the corporate sphere towards a more ethical and transparent approach to business. The historical perception of sustainability as a marginal activity has evolved into a fundamental cornerstone within many corporate operations. This paper examines the level of preparedness of companies required to publish sustainability reports under the current Non-Financial Reporting Directive (NFRD), with a focus on the forthcoming implementation of the Corporate Sustainability Reporting Directive (CSRD). Companies already subject to the NFRD will be bound by the new guidelines from the 2024 financial year, with the first reports published in 2025. The reports prepared under the current NFRD will be subject to extensive comparative analysis against the proposed CSRD regulations, using a pre-determined set of assessment criteria. These selected criteria reflect the draft 12 European Sustainability Reporting Standards (ESRS) proposed by the European Financial Reporting Advisory Group (EFRAG). The ten companies surveyed showed a significant level of readiness to publish their 2024 annual reports under the CSRD in 2025. Nevertheless, the study highlights the importance of identifying and addressing areas for improvement.

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