CSRD Green reporting requirements for corporates

September 25th, 2024

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Capgemini @ invent

Who we are!





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Our ESG Commitment supports the vision of clients and contributes to the solutions of climate-relevant issues

We are a best-in-class sustainability consultancy

From **Net Zero strategies** to **CSRD and EU Taxonomy implementation**, our portfolio of services makes us a market leader and has already received several awards



We have a **strong ESG commitment** that supports our customers' visions and we have also **set ourselves ambitious goals**, such as:

ESG

- Become a "Net Zero" company by 2040
- Helping our customers save 10Mt CO₂e by 2030
- Monitoring CO₂ emissions with cloud solutions

ESG

- Investing in talent development at Capgemini
- Supporting digital inclusion in our communities
- Incorporating Capgemini's ethical principles into partnerships and internal programs

ESG

- Promotion of diverse governance
- Promote corporate integrity for shared value creation
- Disclosure of material ESG information







We are a leading sustainability consultancy

Analysts rank us as leaders within the field of sustainability consulting services, e.g., according to the Consulting Services PEAK Matrix 2023



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We pursue a research-driven consulting approach and are recognized for our Research Institute

Selection of our Sustainability Publications

THE INTEGRATION OF

EMISSIONS CRITERIA IN PROCUREMENT PROCESSES

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Click me!



World-leading publications on sustainability, data and technology

For the sixth time in a row, our Capgemini Research Institute has been recognized as the world's leading research institute Source Global Research

As the demand for data-driven Sustainability activities rises, Capgemini's capabilities are ideal for the realization of such projects

Capgemini Core Capabilities





We empower our clients in their Sustainability journey with Data & Technology – enabling Sustainability transparency, facts-based decision & strategy making and next-level Sustainability solutions



Our references

Chains Data- & Technology-based Sustainability Performance Mgmt.

Transparent & Sustainable Value

Data-based ESG Strategy & Transformation 日日



ESG Regulations

Data- & Technology-based Circular Economy

ClimateTech

German energy company

Organizational anchoring of sustainability in structural and process organization

German energy company

Elaboration and completion of the Scope 1 - 3 emissions balance sheet and net zero transformation roadmap



German energy company Procurement concept for a PPA (Power Purchasing Agreement) portfolio and design of a target operating model

German energy company

Fine-tuning of the climate strategy and development of emission reduction measures, roadmap and governance

... additional support of various customers across all industries

Are you working on implementing the CSRD?





Code: 12345678

Our objectives for the next 30 minutes



How can the new mindset of sustainability management and reporting be implemented in everyday business life?

Get to know the CSRD and its' challenges

We explain the background and aim of the CSRD, to which companies it applies to as well as what needs to be covered when your organization is affected.

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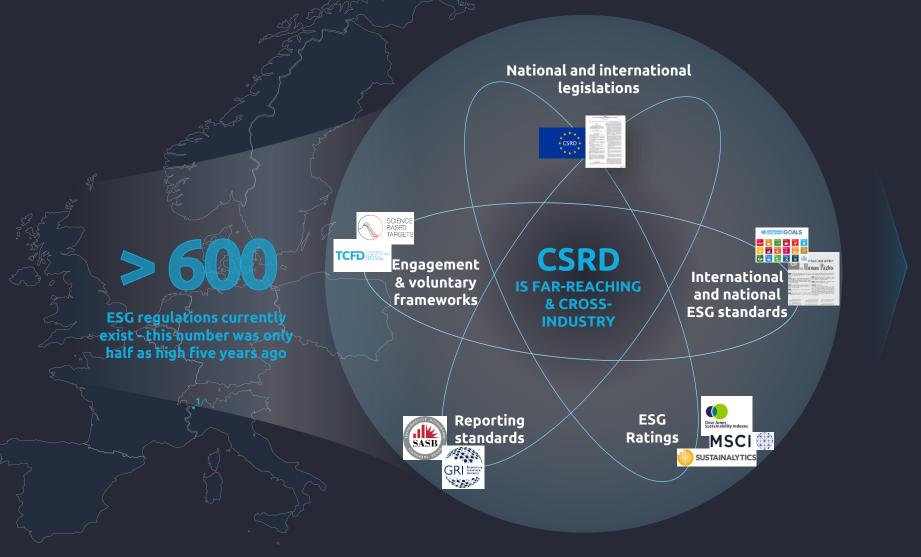
Understand the double materiality assessment (DMA) and its' opportunities

The DMA is the baseline for CSRD reporting but it can be also much more then that, let's explore how a DMA is conducted and what to be aware of while doing so.

Develop a feeling for the complex data requirements focusing on procurement

The DMA set's the scene, but the implementation of the vast data requirements put many organizations through multiple challenges, each different based on the sustainability topic.

The CSRD joined an increasingly global and complex corpus of ESG regulation



The impact of the CSRD must be carefully analyzed to report ESG issues efficiently and in compliance.



CORPORATE SUSTAINABILITY REPORTING DIRECTIVE

gress

BECOMES MANDATORY FOR MANY ENERGY PROVIDERS FROM 2024/25 ON

CSRD is being introduced in stages, with first application beginning of 2025

Approximately 50,000 companies within the scope of CSRD (currently 11,700)¹

So far, NFRD applies to around 500 companies in Germany, CSRD will apply to around 15,000 companies²

From 1 January 2024 for large companies already subject to the NFRD that meet two of three criteria

- Balance sheet > EUR 20 million
- Net sales > EUR 40 million
- Number of employees > 500
- Of public interest
 - Listed companies
 - Credit institutions
 - Insurance undertakings

With reports due in 2025.

From 1 January 2026 for listed SMEs and other companies that meet two of the following three criteria:

- Balance sheet > EUR 450.000
- Net sales > EUR 900.000
- Number of employees > 10

With reports due in 2027. SMEs can opt-out until 2028, with reports due in 2029.

2027

CSRD phased timeline

2025

From 1 January 2025 for (within or outside the EU) that meet two of the

2026

corporations and companies following three criteria:

Balance sheet > EUR 25 million Net sales > EUR 50 million Number of employees > 250

With reports due in 2026.

From 1 January 2028 for non-European companies that meet the following criteria:

2029

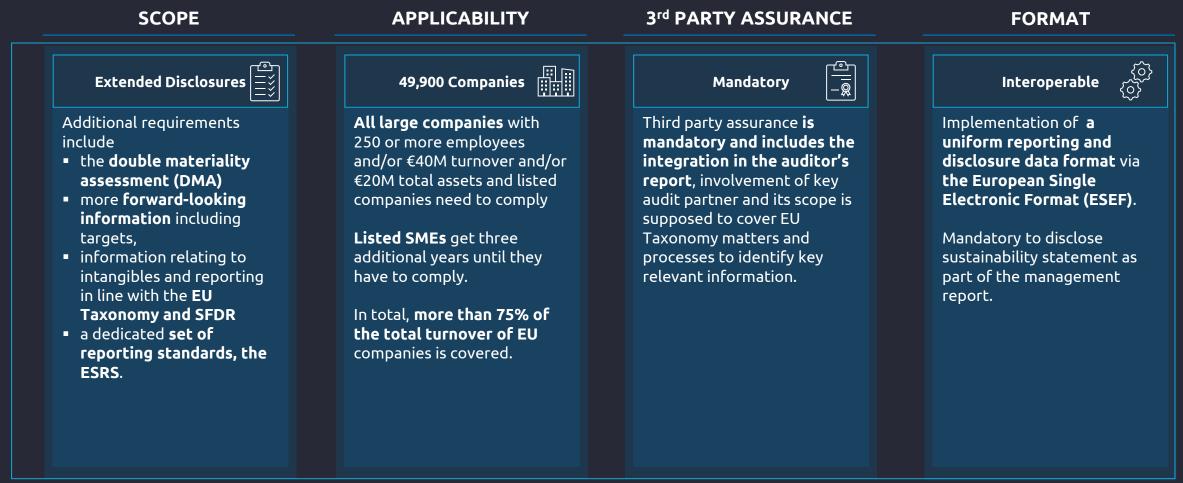
- Sales in the EU > EUR 150 million and
- a large EU subsidiary, or with a listed small or medium-sized EU subsidiary, or
- with EU branch office sales in the EU > EUR 40 million

With reports due in 2029.

The CSRD contains key aspects and differences to the previous sustainability reporting within the NFRD

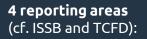


The CSRD changes sustainability reporting fundamentally and initially equates financial and non-financial reporting.



1) The GRI are a voluntary framework. It is applicable for all companies. Mandatory under GRI means that the requirement needs to be fulfilled in order to be allowed to state that the company is complying with the GRI. 2) The ESRS as reporting standards are part of the CSRD.

The disclosure requirements of the CSRD are set by the European *Sustainability Reporting Standards (ESRS)*



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

Individual topics do **not** have to be reported in **full** in the beginning

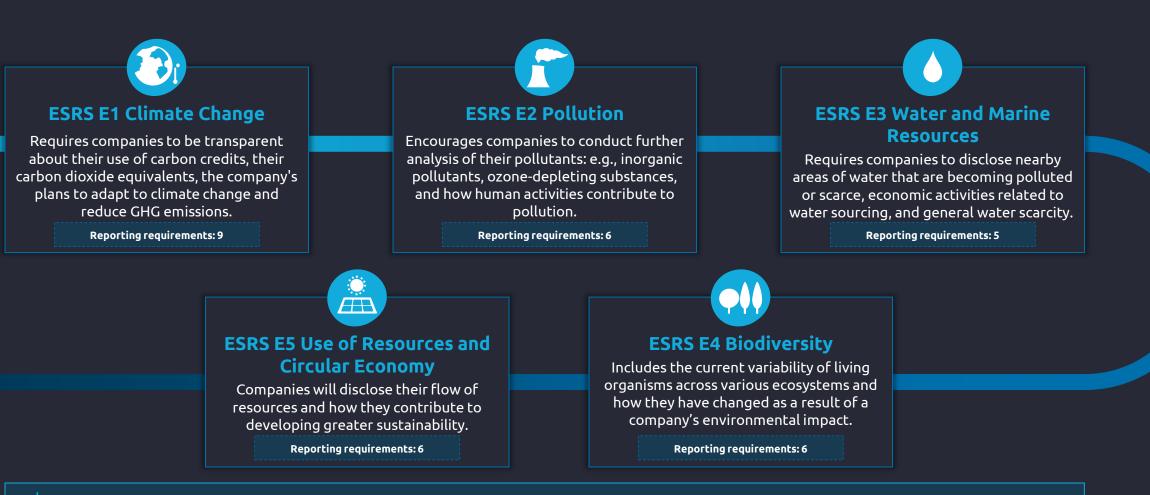
A total of **1,040 data points**



The cross-section and topic-specific standards already include a **significant expansion** when compared to the previous **scope** of the reporting, **sector-specific additions increase** the reporting **scope** even further.

Source: EFRAG

The five environmental standards have different disclosure requirements from climate change to circularity



All of those environmental and all other the other topic-specific ESRS requirement base on the business model and have different relevance for different industries - including energy companies.

Overview of ESRS data points – ESRS 2, E1, E4 and S1 as the most of comprehensive ESRS standards

Category	Standard	Торіс	Data points						
				Mandatory ("shall'	')	Voluntary ("may")			
			Narrative	Semi-narrative	Numerical	Narrative	Semi-narrative	Numerical	
Cross- section standard	ESRS 1	General requirements	-			-			
	ESRS 2	General disclosures	89	14	24	11	1	-	
		Sum			127			12	
Environment	ESRS E1	Climate change	51	25	111	4	1	10	
	ESRS E2	Pollution	18	2	24	12	4	4	
	ESRS E3	Water and marine resources	17	2	8	5	7	6	
	ESRS E4	Biodiversity and ecosystems	36	14	4	49	9	7	
	ESRS E5	Resource use and circular economy	24	3	15	19			
		Sum			354			129	
Social	ESRS S1	Own workforce	61	22	44	27	13	15	
	ESRS S2	Workers in the value chain	40	7		13	5		
	ESRS S3	Affected communities	40	5		14	4		
	ESRS S4	Consumers and end-users	39	5	-	14	4	1	
		Sum			263			105	
Governance	ESRS G1	Business conduct	25	6	8	3	2	5	
		Sum			39			10	
Total					783 (75%)			257 (25%)	

EFRACICS List of ESRS datapoints COEFERAGE EFRACICS Barree EFRACICS COEFERAGE EFRACICS COEFERAGE EFRACICS COEFERAGE COEFERAGE

Through the CSRD companies face major challenges, we are addressing these with praxis proven solutions



Mitigations

Audit-proof methodology integrated within excel-based tool as well as process documentation, that also serve as a basis for reporting content.

Development of a **clear governance model** based on a target reporting picture, can help **divide the financial resources among the departments** that will also carry the work within the daily business.

Comprehensive gap analysis for **all material ESRS requirements** help to understand the amount of resources required depending on the current status-quo of the data and process available.

Internal steer-cos, external support or collaborative sector dialogs are formats that help to gather multiple views to support a common understanding of the complex and broad regulatory requirements

Especially the availability of data, the implementation of required processes and the related governance pose challenges for companies which are required to report under the CSRD and respectively required to apply the ESRS.

Key challenges

Double Materiality

Lack of a stringent process and concrete guidance to determine material issues and subjective assessment leads to reports that are incomplete, misleading and not audit-ready.

Cost implications

Implementation may involve **additional financial resources**, especially for companies that have not yet established comprehensive sustainability strategies and systems.

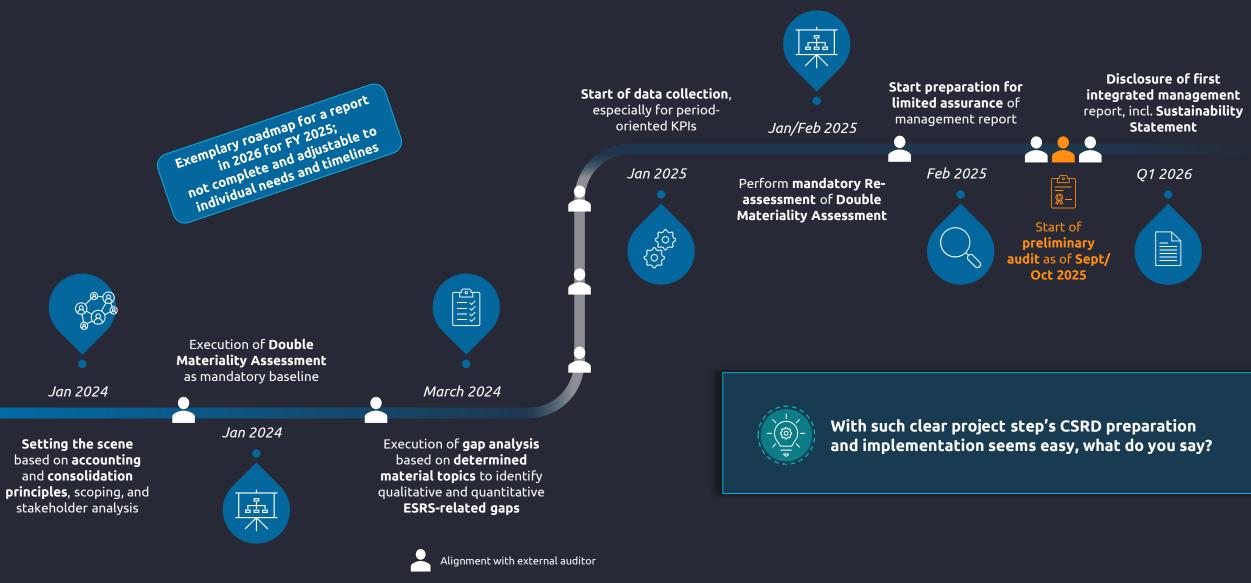
Data collection & Reporting

Collecting, reviewing and conceptualizing large volumes of complex and diverse sustainability data **requires** capacity, time, and technology **infrastructure.**

Capacity & Knowledge gaps

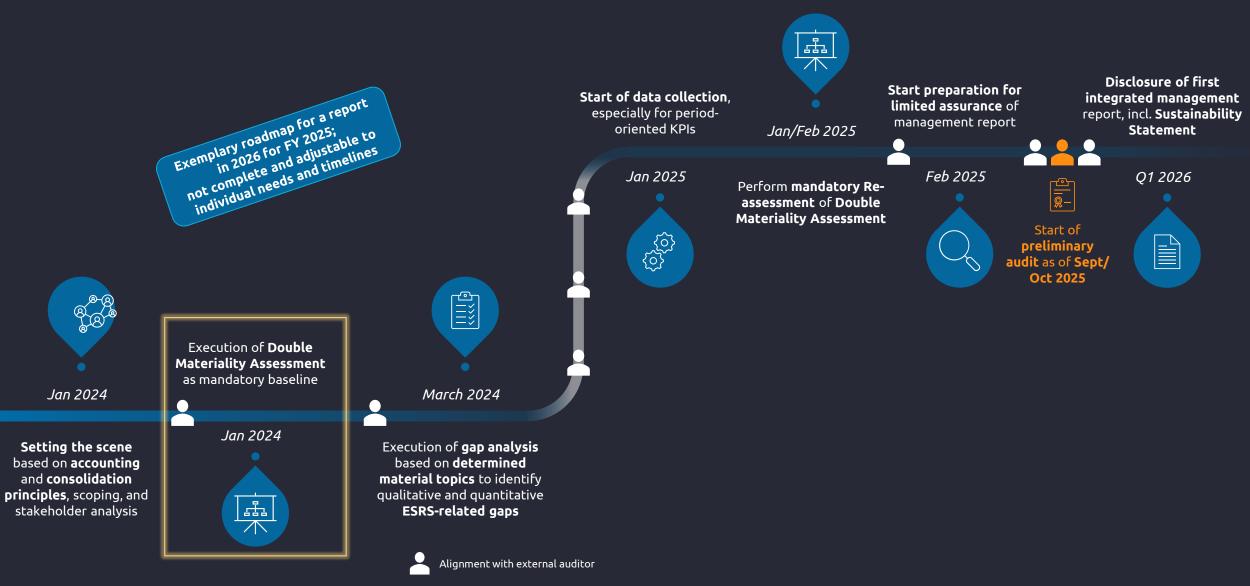
Many firms **do not have** sufficient **internal resources**, skills or knowledge to fully understand and implement the requirements of the standards, which requires targeted training and support.

Our proven project approach during the preparation and implementation stage of a CSRD project tackles said challenges



The DMA is a key aspect of the CSRD preparation that needs special attention due to the comprehensive requirements





The concept of double materiality combines financial and impact materiality in one assessment



EU CSRD

The concept of Double Materiality

Double Materiality is the union of Financial Materiality (Outside-in view) and Impact Materiality (Inside-out view). A sustainability topic is material if it either meets Financial Materiality or Impact Materiality or both.

Financial Materiality 🖗 Impact Materiality



Complements Impact Materiality by PRB requirements on Impact Assessment



Complements **Impact Materiality** by own impact reporting requirements for multistakeholder audience



Complements **Financial Materiality** by own framework for creditor protection

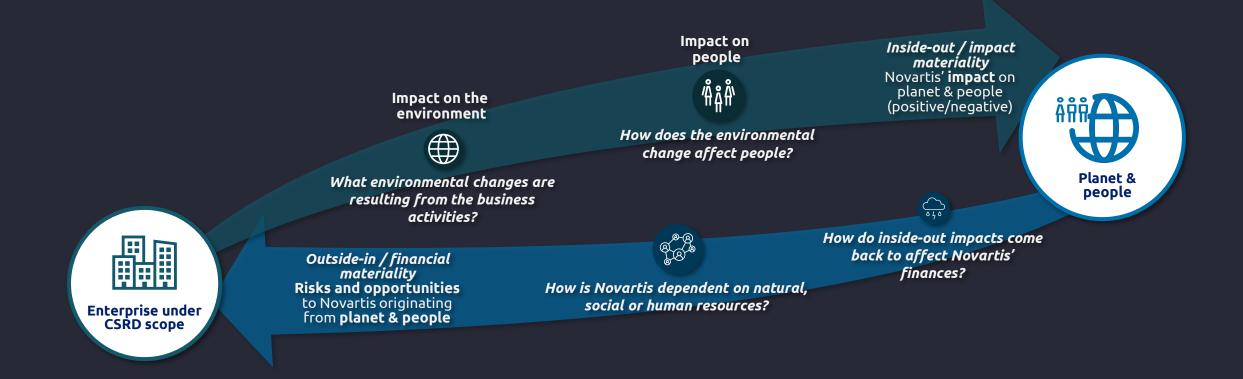


Analogous definition in Financial Materiality; Impact Materiality out of scope

INTERNATIONAL SUSTAINABILITY STANDARDS BOARD

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The aim of the DMA is to build sustainability management and reporting on a two-folded view



The DMA serves as **topic filter to identify the material topics** a company must report on externally and is the basis for strategic sustainability management.

Project examples

Work in progress

Building on a pre-defined list of sustainability topics impacts, risks and opportunities must be identified and assessed

For each of the ESRS Standards, an

IRO needs to be

identified



Negative Impact

Material impact: the biggest CO2 emissions stem from power purchasing.

Positive impact

Energy generation through waste incineration: Thermal waste treatment avoids the accumulation of waster while simultaneously generates energy.

Risk



ESRS E1

ESRS ET

ESRS ES

Wind turbines, solar panels etc. have a very complex supply chain based on critical raw materials with limited availability and high local regulatory dynamics.

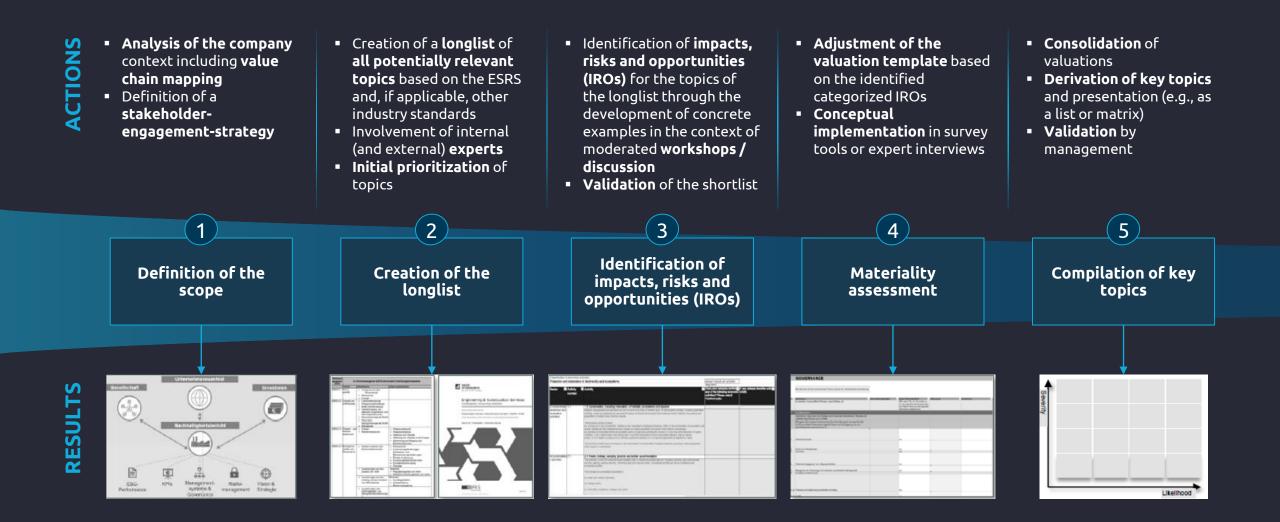
Opportunity

Potential increase in availability and / or decrease in financing costs for companies with public and science based 1.5C climate targets goals. Opportunity for further dynamic financing development (including green bonds).

37 cross-sector and company-specific topics						
Topics	Sub-topics					
Environment	Sub-topics					
ESRS E1 climate change	 Climate change adaptation Climate change mitigation Energy production and consumption: energy efficiency, share of renewable energy in energy mix 					
Social						
ESRS S1 own workforce	 Working conditions Equal treatment and opportunities for all Other work-related rights 					
Governance						
ESRS G1 business conduct	 Corporate culture Management of relationships with suppliers Avoiding corruption and bribery 					

Specified list within ESRS 1 (AR 16), which must be fully integrated into the longlist (mandatory!)

The DMA execution follow a sequential structure and is comparable with a topic filter (long to shortlist)



Due to methodological strict and open components the DMA is challenging in both initial concept and execution





An example of open methodological concepts such as scale determination shows how complex the DMA can get



Input of client's Risk Management Approach	Determination of scale values for materiality assessment within the Capgemini DMA Tool	
Folgende Kategorien von Eintrittswahrscheinlichkeiten werden unterschieden:	Impact Materiality	
Ül wa m ur (fa		lation value - 5 4 2 1
		lation value
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Hell Ster	Work in progress	4
wer bez		3
Folç Aus		2
		1
ur ge be sc bestandsgetanrdend >50,0		
bestandsgetanrdend >50,0	2 ->1% - 5% Unlikely (the impact scenario will occur every four to ten years) 2 1 - 0% - 1% (Almost) impossible (the impact scenario will occur in ten years or less) 1	

DMA REVIEW: IMPACT, RISKS AND OPPOR-TUNITIES ASSESSMENT



Client's challenge

- The client falls under the scope of the CSRD, to report on FY 2025 for the first time in 2026
- The client started with first CSRD activities with an external partner but the conducted activities were deemed insufficient for audit readiness
- The client identified the need for an experienced partner to establish a basis to comply with the CSRD requirements, specifically regarding the IRO assessment (including IRO catalog and action roadmap)

Key challenges

- Enabling stakeholders from more than 30 different departments to recognize the new principle of double materiality
- Identifying and assessing company-specific IROs
- Aligning with risk management to validate the applied methodology and scales
- Interpreting the CSRD in unspecified areas such as materiality thresholds and corresponding management of uncertainty

Results



Ready-to-use DMA tool

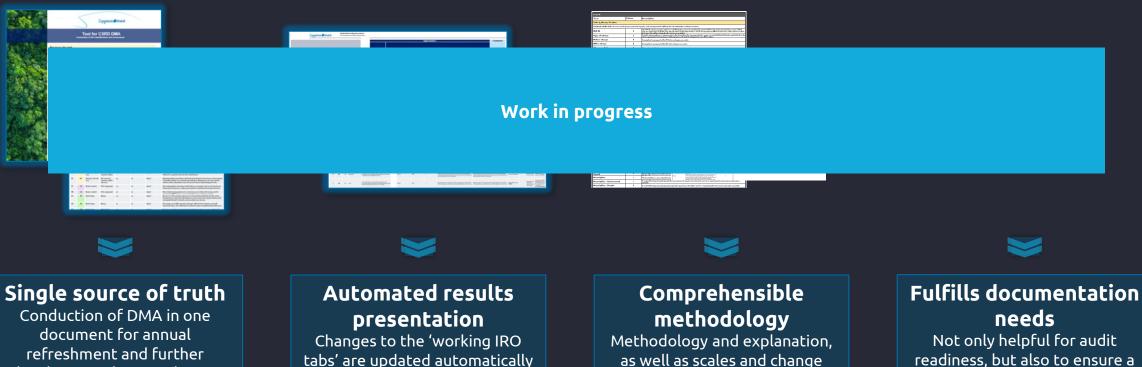


Overview of the ESRS data point analysis

Our approach

- The aim was to evaluate and analyze the methodology of the IROs in the context of the DMA:
 - Conduction of a status quo analysis
 - Identification of Gaps
 - Review of the existing IRO methodology
 - Development of a target IRO assessment process (inclusion of ERM)
 - Conduction of stakeholder workshops
 - Creation of a topic-specific IRO catalog

To face these challenges Capgemini has developed an automated 🤿 audit-proven DMA tool



tracker are available and enable

a quick and seamless

onboarding and understanding.

refreshment and further development keeps relevant data in a single place, avoids confusion and makes collaboration easier.

in the summary and ESRS

mapping tabs that allow an

automated update and quicker

analysis of reporting

requirements.

holistic documentation and to

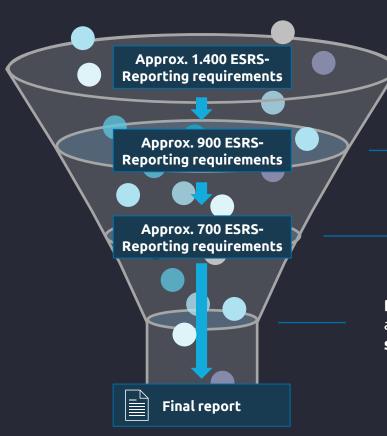
understand the implementation

and processes in the following

years.

In summary the DMA is the most important filter to reduce the CSRD reporting requirements





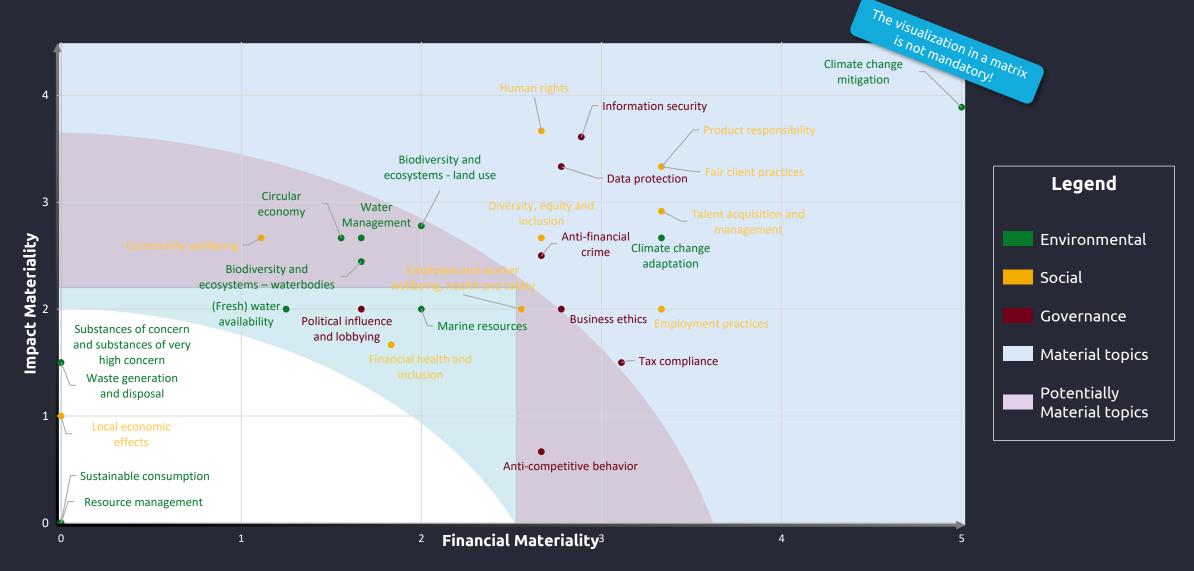
Implementation of the **DMA** as the **central** and **most important lever** for determining the **scope** of the **reporting obligation**

Applying all possible **phase-in options**, and check the **materiality** of **relevant data points** within the **ESRS Gap Analysis**

Determining the **final scope** of **reporting**, taking into account the **minimum legal requirements** while **supporting CSRD compliance**

While the DMA is the biggest lever for reducing reporting requirements, it also holds an immense possibility for strengthening your sustainability management!







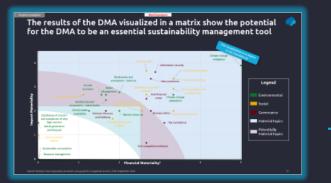




Code: 12345678

Once material topics have been identified the reporting scope and to be delivered data points are clear – and associated work!





What does the overall result of the DMA mean for reporting?

All topics identified as material must be reported in accordance with the mapped ESRS requirements and transferred to a reporting structure



If a **topic is identified as material** that has **not yet been reported**, you can omit reporting on strategic management (policies, targets and actions) however with a documented plan on when those will be implemented

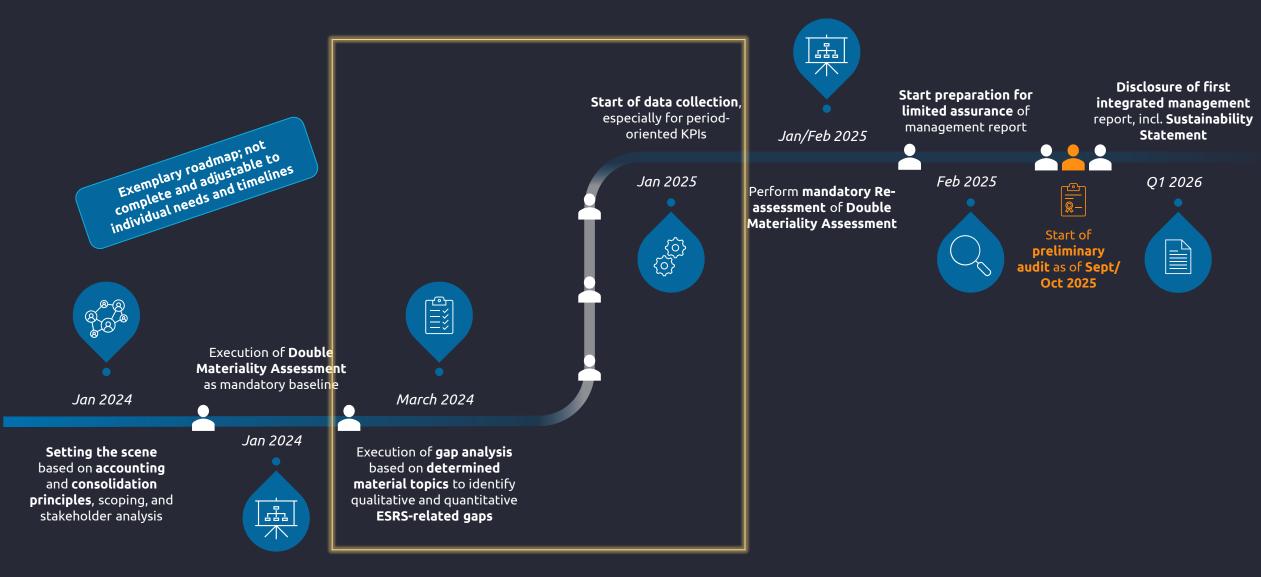
However, **reporting on the corresponding KPI is still required** even through rough estimation. This includes information for the upand downstream value chain as well!

F o

If not, all information is available in the **first three years**, this must be pointed

out and the **status reported annually** in the form of a **progress report**

To know the current status of reporting before data collection a gap analysis has proven most efficient



Project examples

Work in progress

Our Capgemini gap analysis framework and tool builds the basis for a comprehensive implementation of material data points



Key components and structure of the CSRD framework for the ESRS Gap Analysis

ESRS requirements matched to DMA result

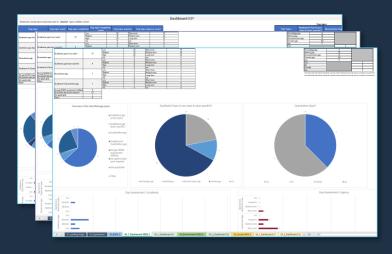
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Our established CSRD framework is continuously adapted to CSRD updates (last update EFRAG data point list dated 31.05.2024)

Extract from requirement and gap types (qualitative and quantitative)



Identified gaps in dashboard format supplemented by detailed gap descriptions



Following the same approach as for the DMA, the ESRS Gap Analysis will start with the pilot site HME Italy. Afterwards, synergies are leveraged for the remaining sites while at the same time considering individualities. This will be conducted in parallel for efficient resource management.

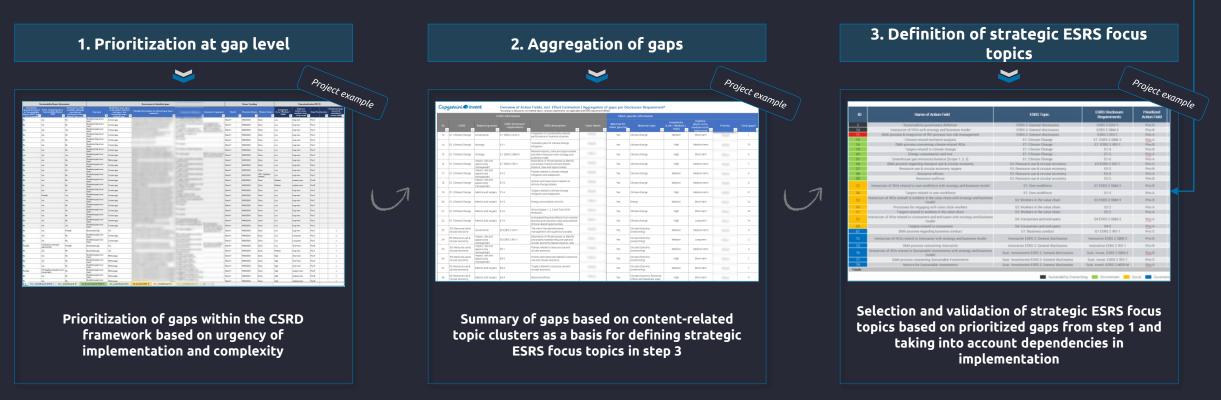
Project examples

Work in progress

Based on prioritized gaps strategic ESRS focus topics for further development can be defined



Strategic ESRS focus topics are defined on the basis of prioritized gaps, taking dependencies in implementation into account



For efficient processing, we aggregate the prioritized gaps from Module 2 into thematic clusters.

We have identified various challenges for customers in implementing the ESRS gap analysis results

Work in progress

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Various characteristics of the energy sector are reflected in DMA
 results and consequentially on procurement activities

	Material IRO	Consequence	Challenges of potential gaps
Power Purchasing	 Material impact: the biggest CO2 emissions stem from power purchasing 	 ESRS E1 mandatory to be reported, including the disclosure of a transition plan and decarbonization levers 	 The current energy trade is anonymous and lacking in data transparency. Accessing data requires complex systems, high effort and offers little security and accuracy
Expansion of Renewables	 Main risk: wind turbines, solar panels etc. have a very complex supply chain based on critical raw materials with limited availability and high local regulatory dynamics 	 ESRS E5 mandatory to be reported, including KPIs on the amount of materials used 	 Many purchases are currently not set up in terms of supplier management, e.g. requesting more data than the compliance to a Code of Conduct Purchases are rather spend- based, requiring a shift to material-based purchasing to access supplier data

CSRD PROCUREMENT DATA REQUIREMENTS



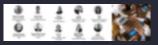
Client's challenge

- The client falls under the scope of the CSRD, to report on FY 2025 for the first time in 2026
- Many procurement related topics were assessed as material with corresponding data points, such as data from the value chain for all E-standards
- The current status-quo showed that the data was neither existing not any knowledge about how to approach those requirements



- The current procurement was based on a spendprincipal with only necessary supplier management to be compliant (e.g. code of conduct)
- With the expansion of renewables, the focus would shift drastically towards purchased goods and therewith the need to deliver CSRD data
- Purchasing across the group was very decentralized with different processes and business models (purchasing needs) to cover

Results



Sustainable procurement steer-co covering all subsidiaries



Three step ambition model for data requirements

The approach

- Determination of a three-step ambition model to be able to deliver the necessary data fast for the reporting in FY2025
- Usage of multiplies for the spend of the FY to be able to estimate the data
- Governance model for a "sustainable procurement" vision

The DMA and gap analysis are the baseline to streamline sustainability reporting in internal management opportunities

We discussed a lot of details regarding the DMA, we would now like to zoom out a bit and summarize:

The DMA determines the **scope** of your **sustainability reporting**,

enables an **allocation** of the **resources** needed to **achieve CSRD compliance** and

provides indispensable **insights** for **shaping company strategy**.

The defined level of ambition and the associated availability of data are crucial.



Please note that, the topic of purchasing only covers a small part. All aspects of a company must be considered within the framework of the CSRD.

Key takeaways for a successful CSRD implementation journey to enable the company and stakeholders for the future



Plan **enough time** for it, **prepare** the **relevant stakeholders** and **do not underestimate** the effort

The DMA is essential as a basis, here there is the most room to set a strategic framework and use the scope for interpretation of the CSRD





It offers the **opportunity** to bring previously **deprioritized topics** into the **management's view** and **to anchor** them **strategically** in a **holistic sustainability strategy**

This is a learning process for everyone - companies, auditors, consultants, etc., it will be a long journey and the first CSRD reports need to be benchmarked



Time to review what you have learned and think about it further: *CSRD - bureaucratic hell or competitive advantage?*

There is no doubt that the CSRD involves a considerable amount of work and, in case of doubt, additional resources and IT capacities are required, **but...**

"If you can't measure it, you can't manage it" Peter Drucker ...by making ESG indicators measurable, **long-term value drivers** are identified in order to meet the ever-increasing demands on society and the environment

...the CSRD promotes a **culture** of **innovation** and **efficiency**. Based on newly acquired knowledge, new technologies and innovations can be used to efficiently achieve ESG goals

...in the future, it can be expected that companies with good ESG scores will also be granted lower interest rates and are already attractive to potential employees

The CSRD should be understood as an instrument to anchor ESG in the company, to make a contribution to society and the environment and at the same time to ensure long-term success.

STAY CONNECTED AND CALL US TO ...

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... develop ESG strategies and set targets

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... comply with ESG regulations

... set up a sustainability data management

... set up ESG Governance

... enable data driven sustainability management

> ... shift towards a green economy

...

Contact us if you have questions, see opportunities within current project &/or potential projects!

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Getting to

Capgemini

Sustainable

Futures with

Julia Gernert julia.gernert@capgemini.com

Montel Seminar: How corporate consumers can go green | Capgemini Invent | 25th September 2024

Any questions?



Felicitas Nagel





Julia Gernert



Capgemini I invent

About Capgemini Invent

As the digital innovation, design and transformation brand of the Capgemini Group, Capgemini Invent enables CxOs to envision and shape the future of their businesses. Located in over 30 studios and more than 60 offices around the world, it comprises a 12,500+ strong team of strategists, data scientists, product and experience designers, brand experts and technologists who develop new digital services, products, experiences and business models for sustainable growth.

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