

CONTENT TABLE

1.	What does the EU Omnibus mean for how companies operating in the EU approach sustainability reporting?
2.	With adjustments expected to the ESRS, will alignment with the GRI Standards be maintained?
3.	How is GRI supporting companies to prepare for CSRD reporting rules, now and in the future?
4.	How does using the GRI Standards help a company respond to uncertainties as a result of changes to the ESRS?
5 .	Will there be changes to CSRD requirements for double materiality reporting – addressing an organization's impacts, risks and opportunities?
6.	What's the connection between reporting using standards set by GRI, EFRAG and the ISSB?
7.	What does GRI want to see as the outcome of the FII Omnibus process?



1. What does the EU Omnibus mean for how companies operating in the EU approach sustainability reporting?

The European Commission's Simplification Omnibus means that companies can expect a delay in the implementation timetable for the Corporate Sustainability Reporting Directive (CSRD), a reduction in the number of companies involved, and a cut of the mandatory datapoints for disclosure, as set out in the European Sustainability Reporting Standards (ESRS).

Hundreds of companies have already published or prepared their first ESRS report, since the CSRD came into force in 2024. The Omnibus recommends a two-year pause on extending CSRD compliance beyond the first wave of companies. The changes mean some companies can now expect reduced mandatory EU sustainability disclosure in the future, while other companies getting ready for CSRD compliance are no longer in scope.

However, irrespective of the legislative changes, it is worth remembering there is already a high level of voluntary sustainability reporting by companies in Europe. Indeed, in announcing the Omnibus, the Commission emphasized that companies can still file a sustainability statement on a voluntary basis. Recent analysis by KPMG found almost all major companies around the world publish a sustainability report, with the GRI Standards the most widely used, while nearly half of EU businesses make disclosures using the EU taxonomy.

2. With adjustments expected to the ESRS, will alignment with the GRI Standards be maintained?

GRI and EFRAG (the body mandated to develop the ESRS) have collaborated since 2021, which has ensured the ESRS is as <u>closely aligned as possible</u> on impact reporting with the widely-adopted GRI Standards. At a technical level, GRI supported EFRAG as a co-constructor of the ESRS and many of the impact-related disclosures included are based on those in the GRI Standards.

GRI's regular engagement in EFRAG's standard setting activities continues, and we will provide detailed advice through the forthcoming ESRS revision process. Our aim is to achieve a high degree of interoperability between the ESRS and the GRI Standards.

3. How is GRI supporting companies to prepare for CSRD reporting rules, now and in the future?

GRI offers resources, training and services to support companies in using the ESRS, and help reporters understand the implications of the CSRD. These skills and knowledge are highly relevant to embed effective sustainability reporting practices.



The support from GRI includes:

- <u>CSRD learning through the GRI Academy:</u> ESRS training on stakeholder engagement, materiality assessment, data collection, assurance, and digital reporting. The six courses can be taken individually or through the ESRS Certification Program.
- GRI-ESRS Interoperability Index and the ESRS-GRI Standards data
 point mapping: Tools for reporters to assess how the ESRS datapoints
 correspond with datapoints in the GRI Standards, supported by a training
 course for GRI reporters who want to report with the ESRS.
- <u>GRI-ESRS Linkage Service</u>: A tailored alignment review of GRI and ESRS linkages in an organization's sustainability report, with practical feedback on how to adapt and use relevant disclosures and datapoints.

All of these options are up-to-date with the disclosure requirements as currently included in the ESRS. GRI will adapt resources as needed, following any future changes as a result of the Omnibus process.

4. How does using the GRI Standards help a company respond to uncertainties as a result of changes to the ESRS?

The GRI Standards, comprehensively addresses the full sustainability spectrum, with 33 Topic Standards that companies can choose from to report on their impacts. So far, 10 ESRS topic standards have published. This means there are gaps in the coverage of ESRS topics that are likely material for companies, and which they are required to disclose on.

The Omnibus changes mean it is unclear when further ESRS standards will be added, while sector standards will no longer be delivered. Companies can use the appropriate GRI Standards to help comply with EU reporting requirements. This includes a growing set of GRI Sector Standards, which provide a fast-track for companies to focus on the impacts that matter most in their sector.

As set out in the ESRS implementation guidance, a materiality assessment using the GRI Universal Standards is an "excellent basis" for an assessment of impacts under the ESRS, further emphasizing how GRI reporting helps streamline the disclosure process for companies.

5. Will there be changes to CSRD requirements for double materiality reporting – addressing an organization's impacts, risks and opportunities?

The European Commission has stressed that the principle of double materiality has been retained as a key feature of the CSRD. This recognizes the strategic importance of transparency about the impacts of a company on the environment and society.

Double materiality means companies are required to report on their impacts as well as sustainability-related financial risks and opportunities. Reporting with the



GRI Standards provides a highly relevant input for reporting entities to comply with the impact related disclosure requirements as currently included in the ESRS.

6. What's the connection between reporting using standards set by GRI, EFRAG and the ISSB?

GRI is collaborating with key organizations in support of a streamlined global system for sustainability reporting. This includes close working to ensure interoperability between the GRI Standards and EFRAG on the ESRS, as well as the International Sustainability Standards Board (ISSB) and their IFRS Sustainability Disclosure Standards.

Each of these standards has a different but related focus: GRI addresses the impacts of an organization on the economy, environment and people (*impact* materiality), the ISSB focuses on risks and opportunities for the business (*financial* materiality) – while the ESRS combines both (*double* materiality).

By achieving alignment between the three standards, reporting can be streamlined and duplication minimized, enabling companies to meet their sustainability reporting requirements and expectations.

7. What does GRI want to see as the outcome of the EU Omnibus process?

While we understand the desire of the European Commission to simplify disclosure rules for companies and reduce reporting burden, this needs to be balanced with the need for improved corporate data on the environmental and social priorities of the EU and Member States. Significant changes to the CSRD contents and scope would undermine these aims, failing to deliver the level playing field needed to achieve sustainable growth and drive innovation.

Through the ongoing negotiations, we call on EU institutions and Member States to uphold the ambition of the CSRD. This is crucial for the European Commission to achieve the EU Green Deal and deliver on their stated aim of increasing competitiveness. The benchmark for success should be a discernible improvement in corporate reporting and information for all stakeholders including providers of capital.





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