

POSITION PAPER



Consultation Document

EFRAG public consultation on draft ESRS

ESBG (European Savings and Retail Banking Group)

Rue Marie-Thérèse, 11 - B-1000 Brussels

August 2022



3C. Adequacy of Disclosure Requirements – Social standards

For the purpose of the questions included in this section, respondents are encouraged to consider the following:

- when sharing comments on a given Disclosure Requirement, and as much as possible, reference to the specific paragraphs being commented on should be included in the written comments,
- in the question asked, for each ESRS, about the alignment with international sustainability standards, these include but are not limited to the IFRS Sustainability Standards and the Global Reporting Initiative Standards. Other relevant international initiatives may be considered by the respondents. When commenting on this particular question, respondents are encouraged to specify which international standards are being referred to.

A complete index of Disclosure Requirements and their corresponding Application Guidance can be found in Appendix I – Navigating the ESRS.



DR S1-1 – Policies relate to own workforce

The undertaking shall state its policies that address the management of its material impacts on own workforce, as well as associated material risks and opportunities; and provide a summary of the content of the policies and how they are communicated.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of material impacts on the undertaking’s own workforce specifically, as well as policies that cover impacts, risks and opportunities in one policy. It also aims to provide an understanding of how both the internal organisation, and the workers whose interests they address, are made aware of their existence and content.

1 Question 129: Please, rate to what extent do you think S1-1 – Policies relate to own workforce

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance						
F. Is sufficiently consistent with relevant EU policies and other EU legislation						
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						
H. Represent information that must be prioritised in first year of implementation						
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers



For part F, please specify what requirements existing European sustainability reporting obligation you think the disclosure misses to address adequately

For part G, please explain how you think further alignment could be reached

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DR S1-2 – Processes for engaging with own workers and workers’ representatives about impacts

The undertaking shall explain its general processes for engaging with its own workers and workers' representatives about actual and potential material impacts on its own workforce.

The principle to be followed under this Disclosure Requirement is to provide an understanding of how the undertaking engages, as part of its ongoing due diligence process, with its own workers and workers' representatives about material, actual and potential, positive and/or negative impacts that do, or may, affect its own workforce.

2 Question 130: Please, rate to what extent do you think S1-2 – Processes for engaging with own workers and workers’ representatives about impacts

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
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For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

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DR S1-3 – Channels for own workers and workers’ representatives to raise concerns

The undertaking shall describe:

- (a) the channels it has in place for own workers and workers’ representatives to raise their concerns or needs directly with the undertaking, and / or
- (b) the processes through which the undertaking supports the availability of such channels through the workplace of own workers, and
- (c) how it monitors issues raised and addressed.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the formal means by which the undertaking’s own workers and workers’ representatives can make their concerns and needs known directly to the undertaking and/or through which the undertaking supports the availability of grievance mechanisms in the workplace of their own workers and workers’ representatives, how follow up is done with these own workers and workers’ representatives regarding the issues raised, and the effectiveness of these channels.

3 Question 131: Please, rate to what extent do you think S1-3 – Channels for own workers and workers’ representatives to raise concerns

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
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H. Represent information that must be prioritised in first year of implementation						



I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities

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For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

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For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

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DR S1-4 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The undertaking shall explain any outcome-oriented targets it may have related to:

- (a) Reducing negative impacts on its own workforce, and/or
- (b) Advancing positive impacts on its own workforce, and/or
- (c) Managing material risks and opportunities related to its own workforce.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent to which the undertaking is using outcome-oriented targets to drive and measure its progress in addressing its negative impacts and/or advancing positive impacts on its own workforce, and/or in managing material risks and opportunities related to its own workforce.

4 Question 132: Please, rate to what extent do you think S1-4 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
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DR S1-5 – Taking action on material impacts on own workforce and effectiveness of those actions

The undertaking shall explain:

- (a) What action is planned or underway to prevent, mitigate or remedy material negative impacts on its own workforce that are connected to its operations, products or services,
- (b) Any additional initiatives or processes it has in place with the primary purpose of delivering positive impacts for its own workforce, and
- (c) How it assesses the effectiveness of these actions, programmes and processes in delivering outcomes or its own workforce.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the types of processes, initiatives or engagements through which the undertaking:

- (a) Works to prevent, mitigate and remedy material impacts on its own workforce, or
- (b) Seeks to achieve positive impacts for its own workforce, recognizing that in both instances, the ultimate aim is to deliver improved outcomes in workers' lives.

5 Question 133: Please, rate to what extent do you think S1-5 – Taking action on material impacts on own workforce and effectiveness of those actions

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance						



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DR S1-6 - Approaches to mitigating material risks and pursuing material opportunities related to own workforce

The undertaking shall explain:

- (a) What action is planned or underway to mitigate material risks for the undertaking arising from its impacts and dependencies on its own workers, and
- (b) What action is planned or underway to pursue material opportunities for the undertaking in relation to own workers.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the ways in which the undertaking is addressing material risks and pursuing material opportunities related to its own workforce.

6 Question 134: Please, rate to what extent do you think S1-6 - Approaches to mitigating material risks and pursuing material opportunities related to own workforce

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
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D. Meets the other objectives of the CSRD in term of quality of information						
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DR S1-7 – Characteristics of the undertaking’s employees

The undertaking shall describe key characteristics of employees in its own workforce

The principle to be followed under this Disclosure Requirement is, in conjunction with Disclosure Requirement ESRS S1-8, to provide insight into the undertaking’s approach to employment, including the scope and nature of impacts arising from its employment practices, to provide contextual information that aids an understanding of the information reported in other disclosures, and to serve as the basis for calculation for quantitative metrics to be disclosed under other Disclosure Requirements in this Standard, in particular on Working Conditions, Equal Opportunities and Other Work-Related Rights.

7 Question 135: Please, rate to what extent do you think S1-7 – Characteristics of the undertaking’s employees

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
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Further guidance is needed on the concept of “non-guaranteed hours employees” contained in paragraph 51 (a) iv.



DR S1-8 – Characteristics of non-employee workers in the undertaking’s own workforce

The undertaking shall describe key characteristics of non-employee workers in its own workforce.

The principle to be followed under this Disclosure Requirement is, in conjunction with Disclosure Requirement S1-7, to provide insight into the undertaking’s approach to employment, including the scope and nature of impacts arising from its employment practices, to provide contextual information that aids an understanding of the information reported in other disclosures, and to serve as the basis for calculation for quantitative metrics to be disclosed under other Disclosure Requirements in this Standard, in particular on Working Conditions, Equal Opportunities and Other Work-Related Rights.

8 Question 136: Please, rate to what extent do you think S1-8 – Characteristics of non-employee workers in the undertaking’s own workforce

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
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C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance		X				
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For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

We consider it burdensome in practice to obtain information from companies that the undertaking does not control.

Additionally, there can be legal limitations on the exchange of personal information between companies in order to meet the undertaking's disclosure requirements.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

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DR S1-9 – Training and skills development indicators

The undertaking shall disclose the extent to which training and development is provided to its own workforce.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the training and skills development-related activities that have been offered to own workers, within the context of continuous professional growth, to upgrade own workers' skills and facilitate continued employability.

9 **Question 137: Please, rate to what extent do you think S1-9 – Training and skills development indicators**

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance		X				
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DR S1-10 – coverage of the health and safety management system

The undertaking shall disclose information on the extent to which its own employees are covered by its health and safety management system.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the coverage of the undertaking’s management system to prevent harm and promote health amongst the undertaking’s employees.

10 Question 138: Please, rate to what extent do you think S1-10 – coverage of the health and safety management system

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
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DR S1-11 – Performance of the health and safety management system

The undertaking shall disclose the number of incidents associated with work-related injuries, ill health and fatalities of its own workers.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the quality and performance of the established health and safety management system to prevent work-related incidents. The undertaking shall provide the following information to comply with paragraph this Disclosure Requirement:

- (a) the number of fatalities as a result of work-related injuries and work-related ill health;
- (b) the number and rate¹ of recordable work-related injuries;
- (c) the number of cases of recordable work-related ill health; and
- (d) the number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health.

11 Question 139: Please, rate to what extent do you think S1-11 – Performance of the health and safety management system

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
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(Optional) DR S1-12 – Working hours

The undertaking shall disclose the percentage of its own workers that exceed 48 hours of work per week over the applicable reference period.

The principle to be followed under this Disclosure Requirement is to provide an understanding of whether the undertaking respects the thresholds established by the EU and ILO standards on weekly working hours (48 hours per week over a reference period) to protect own workers’ physical and mental health and their safety and work-life balance.

12 Question 140: Please, rate to what extent do you think S1-12 – Working hours

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
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DR S1-13 – Work-life balance indicators

The undertaking shall disclose to which extent the employees are entitled to and make use of family-related leaves.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the actual practices amongst the employees to take family-related leave in a gender equitable manner.

13 Question 141: Please, rate to what extent do you think S1-13 – Work-life balance indicators

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
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DR S1-14 – Fair remuneration

The undertaking shall disclose information on the remuneration of its lowest-paid own workers.

The principle to be followed under this Disclosure Requirement is to provide an understanding of whether all of an undertaking’s own workers are earning a fair wage, and, if this is not the case, an understanding of what percentage of own workers are earning less than a fair wage.

14 Question 142: Please, rate to what extent do you think S1-14 – Fair remuneration

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
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DR S1-15 – Social security eligibility coverage

The undertaking shall disclose the percentage of its own workers eligible for social security. The principle to be followed under this Disclosure Requirement is to understand whether there are own workers of the undertaking that are not eligible for social security and, as a result, are especially vulnerable to major social risks.

15 Question 143: Please, rate to what extent do you think S1-15 – Social security eligibility coverage

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
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B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
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DR S1-16 – Pay gap between women and men

The undertaking shall disclose the percentage gap in pay between women and men.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent of any gap in the pay between women and men amongst the undertaking’s employees.

16 Question 144: Please, rate to what extent do you think S1-16 – Pay gap between women and men

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
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DR S1-17 – Annual total compensation ration

The undertaking shall disclose the ratio between the compensation of its highest paid individual and the median compensation for its employees.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the level of compensation inequality inside the undertaking, whether wide pay disparities exist and how such disparities have evolved over time.

17 Question 145: Please, rate to what extent do you think S1-17 – Annual total compensation ration

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
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For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately



For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S1-18 – Discrimination incidents related to equal opportunities

The undertaking shall disclose the number of work-related discrimination incidents, any corrective actions taken during the reporting period and any related material fines or sanctions.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the incidence of work-related discrimination, including sexual and non-sexual harassment, the corrective actions that the undertaking has taken for its own workforce, and any related material fines and sanctions.

18 Question 146: Please, rate to what extent do you think S1-18 – Discrimination incidents related to equal opportunities

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance						
F. Is sufficiently consistent with relevant EU policies and other EU legislation						
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						
H. Represent information that must be prioritised in first year of implementation						
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

For part F, please specify what existing European sustainability reporting



obligation you think the disclosure requirements misses to address adequately

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S1-19 – Employment of persons with disabilities

The undertaking shall disclose the percentage of persons with disabilities amongst its own workforce.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent to which persons with disabilities are included in an undertaking’s workforce, and its composition by gender.

19 Question 147: Please, rate to what extent do you think S1-19 – Employment of persons with disabilities

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance						
F. Is sufficiently consistent with relevant EU policies and other EU legislation						
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						
H. Represent information that must be prioritised in first year of implementation						
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately



For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S1-20 – Differences in the provision of benefit to employees with different employment contract types

The undertaking shall disclose information on benefits which are standard for full-time permanent employees but are not provided to employees with temporary, part-time and non-guaranteed hour contracts.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent to which certain employees (those with temporary, part-time and/or non-guaranteed hour contracts) do not receive the same benefits as full-time, permanent employees.

20 Question 148: Please, rate to what extent do you think S1-20 – Differences in the provision of benefits to employees with different employment contract types

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance						
F. Is sufficiently consistent with relevant EU policies and other EU legislation						
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						
H. Represent information that must be prioritised in first year of implementation						
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers



For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S1-21 – Grievances and complaints related to other work-related rights

The undertaking shall state the number of grievances and complaints received and resolved relating to workers’ other work-related rights.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the undertaking’s grievance mechanism or channel. This is the mechanism or channel through which those workers whose other work-related rights are impacted by the undertaking are able to lodge a concern or complaint, and that can provide access to remedy by resolving those complaints. Furthermore, it is to provide an understanding of the number of complaints raised and resolved at National Contact Points for OECD Multinationals.

21 Question 149: Please, rate to what extent do you think S1-21 – Grievances and complaints related to other work-related rights

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance						
F. Is sufficiently consistent with relevant EU policies and other EU legislation						
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						
H. Represent information that must be prioritised in first year of implementation						
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers



For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S1-22 – Collective bargaining coverage

The undertaking shall disclose information on the extent to which the working conditions and terms of employment of its own workforce are determined or influenced by collective bargaining agreements.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the importance of collective bargaining agreements for its own workforce.

22 Question 150: Please, rate to what extent do you think S1-22 – Collective bargaining coverage

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance		X				
F. Is sufficiently consistent with relevant EU policies and other EU legislation						
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						
H. Represent information that must be prioritised in first year of implementation						
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

We consider it burdensome in practice to obtain information from companies that the undertaking does not control and to report on collective bargaining coverage of non-employee workers.



For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S1-23 – Work stoppages

The undertaking shall disclose the extent of major work stoppages (including both strikes and lockouts) because of disputes between the undertaking and its own workforce.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent of worker disputes and their impact on the undertaking’s operations.

23 Question 151: Please, rate to what extent do you think S1-23 – Work stoppages

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance						
F. Is sufficiently consistent with relevant EU policies and other EU legislation						
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						
H. Represent information that must be prioritised in first year of implementation						
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately



For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S1-24 – Social dialogue

The undertaking shall disclose the extent and functioning of social dialogue with workers’ representatives of its own workforce.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent to which the institutional prerequisites for social dialogue in the undertaking exist and the extent to which rights to social dialogue are respected in the undertaking’s operations, particularly for those which are located in the European Economic Area (EEA).

24 Question 152: Please, rate to what extent do you think S1-24 – Social dialogue

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance						
F. Is sufficiently consistent with relevant EU policies and other EU legislation						
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						
H. Represent information that must be prioritised in first year of implementation						
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

For part F, please specify what existing European sustainability reporting



obligation you think the disclosure requirements misses to address adequately

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S1-25 – Identified cases of severe human rights issues and incidents

The undertaking shall disclose the number of severe human rights issues and incidents connected to own workforce which occurred in the reporting year.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent to which severe human rights issues (e.g. forced labour, human trafficking or child labour) and incidents affecting the undertaking’s own workforce through its activities or business relationships occurred in the reporting year.

25 Question 153: Please, rate to what extent do you think S1-25 – Identified cases of severe human rights issues and incidents

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance		X				
F. Is sufficiently consistent with relevant EU policies and other EU legislation						
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						
H. Represent information that must be prioritised in first year of implementation						
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

We consider it burdensome in practice to obtain information from companies that the undertaking does not control.



For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S1-26 – Privacy at work

The undertaking shall disclose the right to privacy at work for its own workforce.

The principle underlying this Disclosure Requirement is to provide an understanding of an undertaking’s measures on personal data protection concerning its workforce and the nature and extent of worker surveillance that is conducted.

26 Question 154: Please, rate to what extent do you think S1-26 – Privacy at work

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered						
B. Requires information that is relevant for all sectors (sector-agnostic only information)						
C. Can be verified / assured						
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance						
F. Is sufficiently consistent with relevant EU policies and other EU legislation						
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						
H. Represent information that must be prioritised in first year of implementation						
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately



For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S2-1 - Policies related to value chain workers

The undertaking shall state its policies that address the management of its material impacts on value chain workers, as well as associated material risks and opportunities; and provide a summary of the content of the policies and how they are communicated.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of material impacts on value chain workers specifically, as well as policies that cover material risks or opportunities related to value chain workers, or policies that cover impacts, risks and opportunities in one policy. It also aims to provide an understanding of how both the internal organisation, and the value chain workers whose interests they address, are made aware of their existence and content.

27 Question 155: Please, rate to what extent do you think S2-1 – Policies related to value chain workers

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered				X		
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of information						
E. Reaches a reasonable cost / benefit balance		X				
F. Is sufficiently consistent with relevant EU policies and other EU legislation						X
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						X

For part E, please explain why costs would be unreasonable and / or what



particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data. This remark is applicable to all disclosure requirements in S2-S4.

Moreover, there is a lack of a clear definition of value chain and boundaries for financial institutions that might make it unfeasible to report on these aspects from their value chain.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

The reporting requirements outlined in ESRS S2-S4 require reporting on due diligence obligations across a corporate's entire value chain. Thus, these reporting requirements concern direct employees of the reporting entity, upstream or downstream employees, business partners as well as affected communities along the value chain and the final consumer. ESRS S2-S4 indicate that their reporting requirements should be compatible with specific legal frameworks concerning these due diligence obligations, such as the EU's Corporate Sustainability Due Diligence Directive (CSDDD). This compatibility is, in our view, currently not ensured. For now, only an initial proposal by the European Commission exists for the CSDDD, on which other legislative institutions must still be consulted.

Moreover, the CSDDD-proposal includes various obligations and definitions that require further clarification and/or are still subject to negotiations. These include defining the relevant product portfolios of banks – loans, credits and financial services, clarifying that the due diligence obligation only concerns the credit counterparty and not the end customer, and that the due diligence obligation only applies once at the beginning of the credit relationship. The CSDDD is, thus, clearly not finalised, but at a very early stage of negotiations. Including these aspects in the ESRS would preclude those legislative negotiations and circumvent the necessary implementation in the Member States.

As a result, we perceive the social pillar of the ESRS as being implemented at the wrong time in terms of comparability, applicability, and legal clarity. The social pillar of the ESRS should, thus, be postponed until the specific legislative frameworks addressing these aspects are finalised. Correspondingly, the consultation of those aspects and standards should also be postponed to a later point in time; consultations should now focus on general sustainability-related standards and climate-related standards. This would allow corporates in scope to implement the due diligence requirements properly and implement the associated reporting obligations alongside these processes. Additionally, it would eliminate the requirement for ESRS adjustments once the CSDDD is completed.

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S2-2 - Processes for engaging with value chain workers about impacts

The undertaking shall explain its general processes for engaging with value chain workers and their representatives about actual and potential material impacts on them.

The principle to be followed under this Disclosure Requirement is to provide an understanding of how the undertaking engages, as part of its ongoing due diligence process, with value chain workers and related trade union and worker representatives about material actual and potential positive and/or negative impacts that do or may affect them, and whether and how perspectives of value chain workers are taken into account in the decision-making processes of the undertaking.

28 Question 156: Please, rate to what extent do you think S2-2 – Processes for engaging with value chain workers about impacts

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered				X		
B. Requires information that is relevant for all sectors (sector-agnostic only information)				X		
C. Can be verified / assured						X
D. Meets the other objectives of the CSRD in term of quality of information						X
E. Reaches a reasonable cost / benefit balance		X				
F. Is sufficiently consistent with relevant EU policies and other EU legislation						X
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						X

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data. This remark is applicable to all disclosure requirements in S2-S4.



Moreover, there is a lack of a clear definition of value chain and boundaries for financial institutions that might make it unfeasible to report on these aspects from their value chain.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

The reporting requirements outlined in ESRS S2-S4 require reporting on due diligence obligations across a corporate's entire value chain. Thus, these reporting requirements concern direct employees of the reporting entity, upstream or downstream employees, business partners as well as affected communities along the value chain and the final consumer. ESRS S2-S4 indicate that their reporting requirements should be compatible with specific legal frameworks concerning these due diligence obligations, such as the EU's Corporate Sustainability Due Diligence Directive (CSDDD). This compatibility is, in our view, currently not ensured. For now, only an initial proposal by the European Commission exists for the CSDDD, on which other legislative institutions must still be consulted.

Moreover, the CSDDD-proposal includes various obligations and definitions that require further clarification and/or are still subject to negotiations. These include defining the relevant product portfolios of banks – loans, credits and financial services, clarifying that the due diligence obligation only concerns the credit counterparty and not the end customer, and that the due diligence obligation only applies once at the beginning of the credit relationship. The CSDDD is, thus, clearly not finalised, but at a very early stage of negotiations. Including these aspects in the ESRS would preclude those legislative negotiations and circumvent the necessary implementation in the Member States.

As a result, we perceive the social pillar of the ESRS as being implemented at the wrong time in terms of comparability, applicability, and legal clarity. The social pillar of the ESRS should, thus, be postponed until the specific legislative frameworks addressing these aspects are finalised. Correspondingly, the consultation of those aspects and standards should also be postponed to a later point in time; consultations should now focus on general sustainability-related standards and climate-related standards. This would allow corporates in scope to implement the due diligence requirements properly and implement the associated reporting obligations alongside these processes. Additionally, it would eliminate the requirement for ESRS adjustments once the CSDDD is completed.

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S2-3 – Channels for value chain workers to raise concerns

The undertaking shall describe:

- (a) the channels it has in place for value chain workers to raise their concerns or needs directly with the undertaking; and/or
- (b) the processes through which the undertaking supports the availability of such channels through the workplace of value chain workers; and
- (c) how it monitors issues raised and addressed.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the formal means by which value chain workers can make their concerns and needs known directly to the undertaking and/or through which the undertaking supports the availability of grievance mechanisms in the workplace of value chain workers, how there is follow up with these workers regarding the issues raised and the effectiveness of these channels.

29 Question 157: Please, rate to what extent do you think S2-3 – Channels for value chain workers to raise concerns

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered				X		
B. Requires information that is relevant for all sectors (sector-agnostic only information)				X		
C. Can be verified / assured				X		
D. Meets the other objectives of the CSRD in term of quality of information					X	
E. Reaches a reasonable cost / benefit balance		X				
F. Is sufficiently consistent with relevant EU policies and other EU legislation					X	
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						X



For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data. This remark is applicable to all disclosure requirements in S2-S4.

Moreover, there is a lack of a clear definition of value chain and boundaries for financial institutions that might make it unfeasible to report on these aspects from their value chain.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

The reporting requirements outlined in ESRS S2-S4 require reporting on due diligence obligations across a corporate's entire value chain. Thus, these reporting requirements concern direct employees of the reporting entity, upstream or downstream employees, business partners as well as affected communities along the value chain and the final consumer. ESRS S2-S4 indicate that their reporting requirements should be compatible with specific legal frameworks concerning these due diligence obligations, such as the EU's Corporate Sustainability Due Diligence Directive (CSDDD). This compatibility is, in our view, currently not ensured. For now, only an initial proposal by the European Commission exists for the CSDDD, on which other legislative institutions must still be consulted.

Moreover, the CSDDD-proposal includes various obligations and definitions that require further clarification and/or are still subject to negotiations. These include defining the relevant product portfolios of banks – loans, credits and financial services, clarifying that the due diligence obligation only concerns the credit counterparty and not the end customer, and that the due diligence obligation only applies once at the beginning of the credit relationship. The CSDDD is, thus, clearly not finalised, but at a very early stage of negotiations. Including these aspects in the ESRS would preclude those legislative negotiations and circumvent the necessary implementation in the Member States.

As a result, we perceive the social pillar of the ESRS as being implemented at the wrong time in terms of comparability, applicability, and legal clarity. The social pillar of the ESRS should, thus, be postponed until the specific legislative frameworks addressing these aspects are finalised. Correspondingly, the consultation of those aspects and standards should also be postponed to a later point in time; consultations should now focus on general sustainability-related standards and climate-related standards. This would allow corporates in scope to implement the due diligence requirements properly and implement the associated reporting obligations alongside these processes. Additionally, it would eliminate the requirement for ESRS adjustments once the CSDDD is completed.

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S2-4 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The undertaking shall explain the outcome-oriented targets it may have related to:

- (a) reducing negative impacts on value chain workers; and/or
- (b) advancing positive impacts on value chain workers; and/or
- (c) managing material risks and opportunities related to value chain workers.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent to which the undertaking is using outcome-oriented targets to drive and measure its progress in addressing negative impacts, and/or advancing positive impacts, on value chain workers, and/or in managing material risks and opportunities related to value chain workers.

30 Question 158: Please, rate to what extent do you think S2-4 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered			X			
B. Requires information that is relevant for all sectors (sector-agnostic only information)				X		
C. Can be verified / assured					X	
D. Meets the other objectives of the CSRD in term of quality of information					X	
E. Reaches a reasonable cost / benefit balance		X				
F. Is sufficiently consistent with relevant EU policies and other EU legislation					X	
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						X



For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data.

Moreover, there is a lack of a clear definition of value chain and boundaries for financial institutions that might make it unfeasible to report on these aspects from their value chain.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

The reporting requirements outlined in ESRS S2-S4 require reporting on due diligence obligations across a corporate's entire value chain. Thus, these reporting requirements concern direct employees of the reporting entity, upstream or downstream employees, business partners as well as affected communities along the value chain and the final consumer. ESRS S2-S4 indicate that their reporting requirements should be compatible with specific legal frameworks concerning these due diligence obligations, such as the EU's Corporate Sustainability Due Diligence Directive (CSDDD). This compatibility is, in our view, currently not ensured. For now, only an initial proposal by the European Commission exists for the CSDDD, on which other legislative institutions must still be consulted.

Moreover, the CSDDD-proposal includes various obligations and definitions that require further clarification and/or are still subject to negotiations. These include defining the relevant product portfolios of banks – loans, credits and financial services, clarifying that the due diligence obligation only concerns the credit counterparty and not the end customer, and that the due diligence obligation only applies once at the beginning of the credit relationship. The CSDDD is, thus, clearly not finalised, but at a very early stage of negotiations. Including these aspects in the ESRS would preclude those legislative negotiations and circumvent the necessary implementation in the Member States.

As a result, we perceive the social pillar of the ESRS as being implemented at the wrong time in terms of comparability, applicability, and legal clarity. The social pillar of the ESRS should, thus, be postponed until the specific legislative frameworks addressing these aspects are finalised. Correspondingly, the consultation of those aspects and standards should also be postponed to a later point in time; consultations should now focus on general sustainability-related standards and climate-related standards. This would allow corporates in scope to implement the due diligence requirements properly and implement the associated reporting obligations alongside these processes. Additionally, it would eliminate the requirement for ESRS adjustments once the CSDDD is completed.

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S2-5 - Taking action on material impacts on value chain workers and effectiveness of those actions

The undertaking shall explain:

- (a) what action is planned or underway to prevent, mitigate or remedy material negative impacts on value chain workers that are connected to its operations, products or services;
- (b) any additional initiatives or processes it has in place with the primary purpose of delivering positive impacts for value chain workers; and
- (c) how it assesses the effectiveness of these actions, programmes and processes in delivering intended outcomes for value chain workers.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the types of process, initiative or engagement through which the undertaking (a) works to prevent, mitigate and remedy material impacts on value chain workers, or (b) seeks to achieve positive impacts for value chain workers, recognising that in both instances, the ultimate aim is to deliver improved outcomes in workers' lives.

31 Question 159: Please, rate to what extent do you think S2-5 – Taking action on material impacts on value chain workers and effectiveness of those actions

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered				X		
B. Requires information that is relevant for all sectors (sector-agnostic only information)				X		
C. Can be verified / assured			X			
D. Meets the other objectives of the CSRD in term of quality of Information			X			
E. Reaches a reasonable cost / benefit balance		X				
F. Is sufficiently consistent with relevant EU policies and other EU Legislation					X	
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of	X					



implementation						
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						X

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data.

Moreover, there is a lack of a clear definition of value chain and boundaries for financial institutions that might make it unfeasible to report on these aspects from their value chain.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

The reporting requirements outlined in ESRS S2-S4 require reporting on due diligence obligations across a corporate's entire value chain. Thus, these reporting requirements concern direct employees of the reporting entity, upstream or downstream employees, business partners as well as affected communities along the value chain and the final consumer. ESRS S2-S4 indicate that their reporting requirements should be compatible with specific legal frameworks concerning these due diligence obligations, such as the EU's Corporate Sustainability Due Diligence Directive (CSDDD). This compatibility is, in our view, currently not ensured. For now, only an initial proposal by the European Commission exists for the CSDDD, on which other legislative institutions must still be consulted.

Moreover, the CSDDD-proposal includes various obligations and definitions that require further clarification and/or are still subject to negotiations. These include defining the relevant product portfolios of banks – loans, credits and financial services, clarifying that the due diligence obligation only concerns the credit counterparty and not the end customer, and that the due diligence obligation only applies once at the beginning of the credit relationship. The CSDDD is, thus, clearly not finalised, but at a very early stage of negotiations. Including these aspects in the ESRS would preclude those legislative negotiations and circumvent the necessary implementation in the Member States.

As a result, we perceive the social pillar of the ESRS as being implemented at the wrong time in terms of comparability, applicability, and legal clarity. The social pillar of the ESRS should, thus, be postponed until the specific legislative frameworks addressing these aspects are finalised. Correspondingly, the consultation of those aspects and standards should also be postponed to a later point in time; consultations should now focus on general sustainability-related standards and climate-related standards. This would allow corporates in scope to implement the due diligence requirements properly and implement the associated reporting obligations alongside these processes. Additionally, it would eliminate the requirement for ESRS adjustments once the CSDDD is completed.

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to





DR S2-6 - Approaches to mitigating material risks and pursuing material opportunities related to value chain workers

The undertaking shall explain:

- (a) what action is planned or underway to mitigate material risks for the undertaking arising from its impacts and dependencies on value chain workers; and
- (b) what action is planned or underway to pursue material opportunities for the undertaking in relation to value chain workers.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the ways in which the undertaking is addressing the material risks and pursuing the material opportunities related to workers in its value chain.

32 Question 160: Please, rate to what extent do you think S2-6 – Approaches to mitigating material risks and pursuing material opportunities related to value chain workers

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered				X		
B. Requires information that is relevant for all sectors (sector-agnostic only information)				X		
C. Can be verified / assured				X		
D. Meets the other objectives of the CSRD in term of quality of information					X	
E. Reaches a reasonable cost / benefit balance		X				
F. Is sufficiently consistent with relevant EU policies and other EU legislation					X	
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities						X



For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data.

Moreover, there is a lack of a clear definition of value chain and boundaries for financial institutions that might make it unfeasible to report on these aspects from their value chain.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

The reporting requirements outlined in ESRS S2-S4 require reporting on due diligence obligations across a corporate's entire value chain. Thus, these reporting requirements concern direct employees of the reporting entity, upstream or downstream employees, business partners as well as affected communities along the value chain and the final consumer. ESRS S2-S4 indicate that their reporting requirements should be compatible with specific legal frameworks concerning these due diligence obligations, such as the EU's Corporate Sustainability Due Diligence Directive (CSDDD). This compatibility is, in our view, currently not ensured. For now, only an initial proposal by the European Commission exists for the CSDDD, on which other legislative institutions must still be consulted.

Moreover, the CSDDD-proposal includes various obligations and definitions that require further clarification and/or are still subject to negotiations. These include defining the relevant product portfolios of banks – loans, credits and financial services, clarifying that the due diligence obligation only concerns the credit counterparty and not the end customer, and that the due diligence obligation only applies once at the beginning of the credit relationship. The CSDDD is, thus, clearly not finalised, but at a very early stage of negotiations. Including these aspects in the ESRS would preclude those legislative negotiations and circumvent the necessary implementation in the Member States.

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For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S3-1 – Policies related to affected communities

The undertaking shall state its policies that address the management of its material impacts on communities, as well as associated material risks and opportunities; and provide a summary of the content of the policies and how they are communicated.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of material impacts on local communities specifically, as well as policies that cover material risks or opportunities related to affected communities, or policies that cover impacts, risks and opportunities in one policy. It also aims to provide an understanding of how both the internal organisation, and the local communities whose interests they address, are made aware of their existence and content.

33 Question 161: Please, rate to what extent do you think S3-1 – Policies related to affected communities

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered			X			
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of information		X				
E. Reaches a reasonable cost / benefit balance			X			
F. Is sufficiently consistent with relevant EU policies and other EU legislation	X					
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities					X	

For part E, please explain why costs would be unreasonable and / or what



particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

The reporting requirements outlined in ESRS S2-S4 require reporting on due diligence obligations across a corporate's entire value chain. Thus, these reporting requirements concern direct employees of the reporting entity, upstream or downstream employees, business partners as well as affected communities along the value chain and the final consumer. ESRS S2-S4 indicate that their reporting requirements should be compatible with specific legal frameworks concerning these due diligence obligations, such as the EU's Corporate Sustainability Due Diligence Directive (CSDDD). This compatibility is, in our view, currently not ensured. For now, only an initial proposal by the European Commission exists for the CSDDD, on which other legislative institutions must still be consulted.

Moreover, the CSDDD-proposal includes various obligations and definitions that require further clarification and/or are still subject to negotiations. These include defining the relevant product portfolios of banks – loans, credits and financial services, clarifying that the due diligence obligation only concerns the credit counterparty and not the end customer, and that the due diligence obligation only applies once at the beginning of the credit relationship. The CSDDD is, thus, clearly not finalised, but at a very early stage of negotiations. Including these aspects in the ESRS would preclude those legislative negotiations and circumvent the necessary implementation in the Member States.

As a result, we perceive the social pillar of the ESRS as being implemented at the wrong time in terms of comparability, applicability, and legal clarity. The social pillar of the ESRS should, thus, be postponed until the specific legislative frameworks addressing these aspects are finalised. Correspondingly, the consultation of those aspects and standards should also be postponed to a later point in time; consultations should now focus on general sustainability-related standards and climate-related standards. This would allow corporates in scope to implement the due diligence requirements properly and implement the associated reporting obligations alongside these processes. Additionally, it would eliminate the requirement for ESRS adjustments once the CSDDD is completed.

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S3-2 – Processes for engaging with affected communities about impacts

The undertaking shall explain its general processes for engaging with affected communities and their representatives about actual and potential material impacts on them.

The principle to be followed under this Disclosure Requirement is to provide an understanding of how the undertaking engages as part of its ongoing due diligence process with affected communities about material actual and potential positive and/or negative impacts that do or may affect them, and whether and how perspectives of affected communities are taken into account in the decision-making processes of the undertaking.

34 Question 162: Please, rate to what extent do you think S3-2 – Processes for engaging with affected communities about impacts

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered			X			
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of information		X				
E. Reaches a reasonable cost / benefit balance			X			
F. Is sufficiently consistent with relevant EU policies and other EU legislation	X					
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities					X	

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers



Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

The reporting requirements outlined in ESRS S2-S4 require reporting on due diligence obligations across a corporate's entire value chain. Thus, these reporting requirements concern direct employees of the reporting entity, upstream or downstream employees, business partners as well as affected communities along the value chain and the final consumer. ESRS S2-S4 indicate that their reporting requirements should be compatible with specific legal frameworks concerning these due diligence obligations, such as the EU's Corporate Sustainability Due Diligence Directive (CSDDD). This compatibility is, in our view, currently not ensured. For now, only an initial proposal by the European Commission exists for the CSDDD, on which other legislative institutions must still be consulted.

Moreover, the CSDDD-proposal includes various obligations and definitions that require further clarification and/or are still subject to negotiations. These include defining the relevant product portfolios of banks – loans, credits and financial services, clarifying that the due diligence obligation only concerns the credit counterparty and not the end customer, and that the due diligence obligation only applies once at the beginning of the credit relationship. The CSDDD is, thus, clearly not finalised, but at a very early stage of negotiations. Including these aspects in the ESRS would preclude those legislative negotiations and circumvent the necessary implementation in the Member States.

As a result, we perceive the social pillar of the ESRS as being implemented at the wrong time in terms of comparability, applicability, and legal clarity. The social pillar of the ESRS should, thus, be postponed until the specific legislative frameworks addressing these aspects are finalised. Correspondingly, the consultation of those aspects and standards should also be postponed to a later point in time; consultations should now focus on general sustainability-related standards and climate-related standards. This would allow corporates in scope to implement the due diligence requirements properly and implement the associated reporting obligations alongside these processes. Additionally, it would eliminate the requirement for ESRS adjustments once the CSDDD is completed.

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S3-3 – Channels for affected communities to raise concerns

The undertaking shall describe:

- (a) the channels it has in place for affected communities to raise their concerns or needs directly with the undertaking; and/or
- (b) the processes through which the undertaking supports the availability of such channels by its business relationships; and
- (c) how it monitors issues raised and addressed.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the formal means by which affected communities can make their concerns and needs known directly to the undertaking, and/or through which the undertaking supports the availability of mechanisms by its business relationships, how there is follow up with these communities regarding the issues raised, and the effectiveness of these channels.

35 Question 163: Please, rate to what extent do you think S3-3 – Channels for affected communities to raise concerns

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered			X			
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of information		X				
E. Reaches a reasonable cost / benefit balance			X			
F. Is sufficiently consistent with relevant EU policies and other EU legislation	X					
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities					X	



For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

The reporting requirements outlined in ESRS S2-S4 require reporting on due diligence obligations across a corporate's entire value chain. Thus, these reporting requirements concern direct employees of the reporting entity, upstream or downstream employees, business partners as well as affected communities along the value chain and the final consumer. ESRS S2-S4 indicate that their reporting requirements should be compatible with specific legal frameworks concerning these due diligence obligations, such as the EU's Corporate Sustainability Due Diligence Directive (CSDDD). This compatibility is, in our view, currently not ensured. For now, only an initial proposal by the European Commission exists for the CSDDD, on which other legislative institutions must still be consulted.

Moreover, the CSDDD-proposal includes various obligations and definitions that require further clarification and/or are still subject to negotiations. These include defining the relevant product portfolios of banks – loans, credits and financial services, clarifying that the due diligence obligation only concerns the credit counterparty and not the end customer, and that the due diligence obligation only applies once at the beginning of the credit relationship. The CSDDD is, thus, clearly not finalised, but at a very early stage of negotiations. Including these aspects in the ESRS would preclude those legislative negotiations and circumvent the necessary implementation in the Member States.

As a result, we perceive the social pillar of the ESRS as being implemented at the wrong time in terms of comparability, applicability, and legal clarity. The social pillar of the ESRS should, thus, be postponed until the specific legislative frameworks addressing these aspects are finalised. Correspondingly, the consultation of those aspects and standards should also be postponed to a later point in time; consultations should now focus on general sustainability-related standards and climate-related standards. This would allow corporates in scope to implement the due diligence requirements properly and implement the associated reporting obligations alongside these processes. Additionally, it would eliminate the requirement for ESRS adjustments once the CSDDD is completed.

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S3-4 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The undertaking shall explain the outcome-oriented targets it may have related to:

- (a) reducing negative impacts on affected communities; and/or
- (b) advancing positive impacts on affected communities; and/or
- (c) managing material risks and opportunities related to affected communities.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent to which the undertaking is using outcome-oriented targets to drive and measure progress in addressing negative impacts, and/or advancing positive impacts, on affected communities.

36 Question 164: Please, rate to what extent do you think S3-4 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered			X			
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of information		X				
E. Reaches a reasonable cost / benefit balance			X			
F. Is sufficiently consistent with relevant EU policies and other EU legislation	X					
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities					X	



For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

The reporting requirements outlined in ESRS S2-S4 require reporting on due diligence obligations across a corporate's entire value chain. Thus, these reporting requirements concern direct employees of the reporting entity, upstream or downstream employees, business partners as well as affected communities along the value chain and the final consumer. ESRS S2-S4 indicate that their reporting requirements should be compatible with specific legal frameworks concerning these due diligence obligations, such as the EU's Corporate Sustainability Due Diligence Directive (CSDDD). This compatibility is, in our view, currently not ensured. For now, only an initial proposal by the European Commission exists for the CSDDD, on which other legislative institutions must still be consulted.

Moreover, the CSDDD-proposal includes various obligations and definitions that require further clarification and/or are still subject to negotiations. These include defining the relevant product portfolios of banks – loans, credits and financial services, clarifying that the due diligence obligation only concerns the credit counterparty and not the end customer, and that the due diligence obligation only applies once at the beginning of the credit relationship. The CSDDD is, thus, clearly not finalised, but at a very early stage of negotiations. Including these aspects in the ESRS would preclude those legislative negotiations and circumvent the necessary implementation in the Member States.

As a result, we perceive the social pillar of the ESRS as being implemented at the wrong time in terms of comparability, applicability, and legal clarity. The social pillar of the ESRS should, thus, be postponed until the specific legislative frameworks addressing these aspects are finalised. Correspondingly, the consultation of those aspects and standards should also be postponed to a later point in time; consultations should now focus on general sustainability-related standards and climate-related standards. This would allow corporates in scope to implement the due diligence requirements properly and implement the associated reporting obligations alongside these processes. Additionally, it would eliminate the requirement for ESRS adjustments once the CSDDD is completed.

For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S3-5 – Taking action on material impacts on affected communities and effectiveness of those actions

37 Question 165: Please, rate to what extent do you think S3-5 – Taking action on material impacts on affected communities and effectiveness of those actions

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered			X			
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of information		X				
E. Reaches a reasonable cost / benefit balance			X			
F. Is sufficiently consistent with relevant EU policies and other EU legislation	X					
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities					X	

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

The reporting requirements outlined in ESRS S2-S4 require reporting on due diligence obligations across a corporate's entire value chain. Thus, these reporting requirements concern direct employees of the reporting entity, upstream or downstream employees, business partners as well as affected communities along the value chain and the final consumer. ESRS S2-S4 indicate that their reporting requirements should be compatible with specific legal frameworks concerning these due diligence obligations, such as the EU's



Corporate Sustainability Due Diligence Directive (CSDDD). This compatibility is, in our view, currently not ensured. For now, only an initial proposal by the European Commission exists for the CSDDD, on which other legislative institutions must still be consulted.

Moreover, the CSDDD-proposal includes various obligations and definitions that require further clarification and/or are still subject to negotiations. These include defining the relevant product portfolios of banks – loans, credits and financial services, clarifying that the due diligence obligation only concerns the credit counterparty and not the end customer, and that the due diligence obligation only applies once at the beginning of the credit relationship. The CSDDD is, thus, clearly not finalised, but at a very early stage of negotiations. Including these aspects in the ESRS would preclude those legislative negotiations and circumvent the necessary implementation in the Member States.

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For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S3-6 - Approaches to mitigating material risks and pursuing material opportunities related to affected communities

The undertaking shall explain:

- (a) what action is planned or underway to mitigate material risks for the undertaking arising from its impacts and dependencies on local communities; and
- (b) what action is planned or underway to pursue material opportunities for the undertaking in relation to local communities.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the ways in which the undertaking is addressing the material risks and pursuing the material opportunities related to affected communities.

38 Question 166: Please, rate to what extent do you think S3-6 – Approaches to mitigating material risks and pursuing material opportunities related to affected communities

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered			X			
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of information		X				
E. Reaches a reasonable cost / benefit balance			X			
F. Is sufficiently consistent with relevant EU policies and other EU legislation	X					
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities					X	

For part E, please explain why costs would be unreasonable and / or what



particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

The reporting requirements outlined in ESRS S2-S4 require reporting on due diligence obligations across a corporate's entire value chain. Thus, these reporting requirements concern direct employees of the reporting entity, upstream or downstream employees, business partners as well as affected communities along the value chain and the final consumer. ESRS S2-S4 indicate that their reporting requirements should be compatible with specific legal frameworks concerning these due diligence obligations, such as the EU's Corporate Sustainability Due Diligence Directive (CSDDD). This compatibility is, in our view, currently not ensured. For now, only an initial proposal by the European Commission exists for the CSDDD, on which other legislative institutions must still be consulted.

Moreover, the CSDDD-proposal includes various obligations and definitions that require further clarification and/or are still subject to negotiations. These include defining the relevant product portfolios of banks – loans, credits and financial services, clarifying that the due diligence obligation only concerns the credit counterparty and not the end customer, and that the due diligence obligation only applies once at the beginning of the credit relationship. The CSDDD is, thus, clearly not finalised, but at a very early stage of negotiations. Including these aspects in the ESRS would preclude those legislative negotiations and circumvent the necessary implementation in the Member States.

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For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S4-1 – Policies related to consumers and end-users

The undertaking shall state its policies that address the management of its material impacts of its products and/or services on consumers and end-users, as well as associated material risks and opportunities; and provide a summary of the content of the policies and how they are communicated.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent to which the undertaking has policies that address the identification, assessment, management and/or remediation of impacts on consumers and end-users specifically, as well as policies that cover material risks or opportunities related to consumers and end-users, or policies that cover impacts, risks and opportunities in one policy. It also aims to provide an understanding of how both the internal organisation, and the consumers and end-users whose interests they address, are made aware of their existence and content.

39 **Question 167: Please, rate to what extent do you think S4-1 – Policies related to consumers and end-users**

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered		X				
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of information		X				
E. Reaches a reasonable cost / benefit balance	X					
F. Is sufficiently consistent with relevant EU policies and other EU legislation		X				
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities					X	



For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

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For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S4-2 – Processes for engaging with consumers and end-users about impacts

The undertaking shall explain its general processes for engaging with consumers and end-users and their representatives about actual and potential material impacts on them.

The principle to be followed under this Disclosure Requirement is to provide an understanding of how the undertaking engages as part of its ongoing due diligence process with consumers and end-users about material actual and potential positive and/or negative impacts that do or may affect them, and whether and how perspectives of consumers and end-users are taken into account in the decision-making processes of the undertaking.

40 Question 168: Please, rate to what extent do you think S4-2 – Processes for engaging with consumers and end-users about impacts

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered		X				
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of information		X				
E. Reaches a reasonable cost / benefit balance	X					
F. Is sufficiently consistent with relevant EU policies and other EU legislation		X				
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities					X	

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data.



For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

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For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S4-3 – Channels for consumers and end-users to raise concerns

The undertaking shall describe:

- (a) the channels it has in place for consumers and end-users to raise their concerns/complaints or needs directly with the undertaking; and/or
- (b) the processes through which the undertaking supports the availability of mechanisms by its business relationships; and
- (c) how it monitors issues raised and addressed.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the formal means by which consumers and end-users can make their concerns and needs known directly to the undertaking and/or through which the undertaking supports the availability of mechanisms by its business relationships, how there is follow up with these consumers and end-users regarding the issues raised, and the effectiveness of these channels.

41 Question 169: Please, rate to what extent do you think S4-3 – Channels for consumers and end-users to raise concerns

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered		X				
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of Information		X				
E. Reaches a reasonable cost / benefit balance				X		
F. Is sufficiently consistent with relevant EU policies and other EU Legislation		X				
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of Implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities					X	



For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

Generally, the reporting requirements as envisioned in ESRS S2-S4 are immensely detailed and may overwhelm both reporting entities as well as users of sustainability data.

For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

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For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S4-4 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The undertaking shall explain the outcome-oriented targets it may have related to:

- (a) reducing negative impacts on consumers and end-users; and/or
- (b) advancing positive impacts on consumers and end-users; and/or
- (c) managing material risks and opportunities.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the extent to which the undertaking is using outcome-oriented targets to drive and measure progress in addressing negative impacts, and/or advancing positive impacts, on consumers and end-users.

42 Question 170: Please, rate to what extent do you think S4-4 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered		X				
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of information		X				
E. Reaches a reasonable cost / benefit balance			X			
F. Is sufficiently consistent with relevant EU policies and other EU legislation		X				
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities					X	



For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

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For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

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For part G, please explain how you think further alignment could be reached

Please share any comments and suggestions for improvement you might have relating to the above questions, referring explicitly to the part of the question you are providing comment to



DR S4-5 – Taking action on material impacts on consumers and end-users and effectiveness of those actions

The undertaking shall explain:

- (a) what action is planned or underway to prevent, mitigate or remedy material negative impacts on consumers and end-users who are connected to its operations, products or services;
- (b) any additional initiatives or processes it has in place with the primary purpose of positively contributing to improved social outcomes for consumers and end-users; and
- (c) how it assesses the effectiveness of these actions, programmes and processes in contributing to intended outcomes for consumers and end-users.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the types of process, initiative or engagement through which the undertaking:

- (a) works to prevent, mitigate and remedy material impacts on consumers and end-users, and
- (b) seeks to achieve positive impacts for consumers and end-users, recognising that in both instances, the ultimate aim is to deliver improved outcomes for consumers' and end-users' lives.

43 Question 171: Please, rate to what extent do you think S4-5 – Taking action on material impacts on consumers and end-users and effectiveness of those actions

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered		X				
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of information		X				
E. Reaches a reasonable cost / benefit balance				X		



F. Is sufficiently consistent with relevant EU policies and other EU legislation		X				
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities					X	

For part E, please explain why costs would be unreasonable and / or what particular benefit this disclosure requirement offers

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For part F, please specify what existing European sustainability reporting obligation you think the disclosure requirements misses to address adequately

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For part G, please explain how you think further alignment could be reached

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DR S4-6 – Approaches to mitigating material risks and pursuing material opportunities related to consumers and end-users

The undertaking shall explain:

(a) what action is planned or underway to mitigate material risks for the undertaking arising from its impacts and dependencies on consumers and end-users; and

(b) what action is planned or underway to pursue material opportunities for the undertaking in relation to consumers and end-users.

The principle to be followed under this Disclosure Requirement is to provide an understanding of the ways in which the undertaking is addressing the material risks and pursuing the material opportunities related to consumers and end-users.

44 Question 172: Please, rate to what extent do you think S4-6 – Approaches to mitigating material risks and pursuing material opportunities related to consumers and end-users

1/ Not at all 2/ To a limited extent with strong reservations, 3/ To a large extent with some reservations 4/ Fully 5/ No opinion 6/ Not applicable

	1	2	3	4	5	6
A. Requires relevant information about the sustainability matter covered		X				
B. Requires information that is relevant for all sectors (sector-agnostic only information)		X				
C. Can be verified / assured		X				
D. Meets the other objectives of the CSRD in term of quality of information		X				
E. Reaches a reasonable cost / benefit balance			X			
F. Is sufficiently consistent with relevant EU policies and other EU legislation		X				
G. Is as aligned as possible to international sustainability standards given the CSRD requirements						X
H. Represent information that must be prioritised in first year of implementation	X					
I. Is well suited to be transformed in a digital reporting taxonomy that will avoid creating misunderstandings or practical complexities					X	



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Additional information

Should you wish to provide additional information (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below. **Please make sure you do not include any personal data in the file you upload if you want to remain anonymous.**

The maximum file size is 1 MB.

You can upload several files.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed



About ESBG (European Savings and Retail Banking Group)



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