

# A Study in Connectivity: Analysis of 2022 UK Company Annual Reports

September 2023



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# I. Context

**The UKEB recognises that sustainability disclosure reporting and its relationship with the financial statements is at an early stage of development and that significant effort is being made by UK entities to provide consistent and connected information for users in Annual Reports, where considered material.**

The aim of this report is solely to promote discussion and awareness of potential issues regarding connectivity between sustainability and financial reporting observed in the UK. The report does not seek to judge the current state of reporting in the UK, comment on the approach taken by any particular entity or on areas of improvement, identify good or poor practice, or draw any representative conclusions as to the quality of reporting.

Individual entities have not been named as the aim of the research is to identify the nature of potential inconsistencies based on information available in the market. The examples selected from the FTSE 350 2022 Annual Reports illustrate the most common connectivity areas identified.

## International Accounting Standards Board (IASB) and climate

- 1.1 In November 2019<sup>1</sup>, November 2020<sup>2</sup> and July 2023<sup>3</sup> the IASB published educational articles on IFRS Standards and climate-related disclosures. These communicated that IASB Standards adequately catered for all material risks, whether climate-related or not, and that companies ‘must consider climate-related matters in applying IFRS Accounting Standards when the effect of those matters is material in the context of the financial statements taken as a whole’.
- 1.2 The IASB also commented in its Feedback Statement on the Third Agenda Consultation<sup>4</sup> that the future ISSB Standards and IASB Standards were intended to provide investors with a ‘connected financial reporting package’ to meet their information needs’. Refer to Appendix B ‘Differences and similarities between IASB and ISSB standards’.
- 1.3 In March 2023 the IASB Chair published an article<sup>5</sup> entitled ‘Connectivity in practice’ emphasising the importance of connectivity between the IASB and ISSB and announcing the activation of a narrow scope maintenance project on Climate-related risks in Financial Statements.

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1 [IFRS Standards and climate-related disclosures](#) (November 2019)

2 [Effects of climate-related matters on financial statements](#) (November 2020)

3 [Effects of climate-related matters on financial statements](#) (July 2023)

4 [Third Agenda Consultation Feedback Statement](#) (July 2022)

5 [Connectivity in practice](#): the IASB’s new project on Climate-related Risks (March 2023)

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## International Sustainability Standards Board (ISSB)

- 1.4 The establishment of the ISSB was announced at COP 26 in November 2021 by the IFRS Foundation Trustees. The objective of the ISSB is to enable a comprehensive global baseline of sustainability disclosures focused on the needs of investors and the financial markets<sup>6</sup>.
- 1.5 In May 2023, the ISSB issued a Request for Information<sup>7</sup> to inform its initial two-year work plan. One of the proposed research projects is 'integration in reporting' which will explore how to integrate information in financial reporting beyond the requirements related to connected information in [draft] IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and [draft] IFRS S2 *Climate-related Disclosures*.
- 1.6 In June 2023 the ISSB issued two sustainability disclosure standards— IFRS S1<sup>8</sup> (S1) and IFRS S2 (S2)<sup>9</sup>.

## UKEB Role and Remit

- 1.7 The UK Endorsement Board (UKEB) adopts and endorses IFRS Accounting Standards for use in the UK. For further details on the sustainability reporting requirements in the UK please refer to Appendix A 'UK Sustainability Reporting Requirements'.
- 1.8 To assist with the assessment and endorsement of IFRS S1 and IFRS S2, the UK government has established a Policy Implementation Committee (PIC) and a Technical Assessment Committee (TAC), both of which include representatives from the UKEB<sup>10</sup>.
- 1.9 The UKEB is assisting the UK Government by carrying out work in this area to consider the overlap or impact of the proposed ISSB IFRS Sustainability Disclosure Standards with IFRS Accounting Standards. In addition, the data gathered will help the UKEB to obtain insight on UK companies' existing experience of reporting on climate-related matters.

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<sup>6</sup> [ISSB delivers proposals that create comprehensive global baseline of sustainability disclosures](#) (March 2022)

<sup>7</sup> [Request for Information IFRS® Sustainability Disclosure Standards](#) (May 2023)

<sup>8</sup> IFRS S1 [General Requirements for Disclosure of Sustainability-related Financial Information](#) (June 2023)

<sup>9</sup> IFRS S2 [Climate-related Disclosures](#) (June 2023)

<sup>10</sup> [UK Sustainability Disclosure Standards](#) – 2 August 2023

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## 2. Objectives and approach

### Objectives

- 2.1 The intention of this research is to support the UKEB in providing a case study-based response to both the IASB, on its project on climate-related risks in financial statements, and to the ISSB, on its Request for Information on its future agenda setting.
- 2.2 Per the Project Initiation Plan<sup>11</sup> the research aims to promote discussion on the current landscape of sustainability disclosures and financial reporting. Specifically, the research aims to:
- a) Identify potential disconnects or perceived inconsistencies between sustainability narrative disclosures in the front half of 2022 Annual Reports and the disclosure of the associated financial effects in the financial statements, using a limited sample of FTSE 350 annual reports.
  - b) Seek initial stakeholder perspectives on the potential impact of the ISSB disclosure requirements [draft] IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* (S1) and [draft] S2 *Climate-related Disclosures* (S2).
  - c) Support the work of the UKEB in responding to the ISSB Request for Information and in providing input to the IASB Climate-related risks in Financial Statements project.
- 2.3 At the time the research was conducted the ISSB standards [draft] IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* (S1)<sup>12</sup> and [draft] S2 *Climate-related Disclosures* (S2)<sup>13</sup> were not final. The research is therefore based on the Task Force on Climate-Related Financial Disclosures (TCFD)<sup>14</sup> as an appropriate proxy for the proposed ISSB Standards as they are both based on the TCFD architecture. Please refer to Appendix C 'A comparison of TCFD and [draft] IFRS S2' and Appendix D 'A comparison of SECR and [draft] IFRS S2'.
- 2.4 The objective of the research was to provide a user's perspective of consistency and connectivity in the front and back half of the Annual Report where an entity was exposed to material climate-related matters.

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<sup>11</sup> [Project Initiation Plan: Climate-related Matters](#) (May 2023)

<sup>12</sup> [draft] IFRS S1 [General Requirements for Disclosure of Sustainability-related Financial Information](#) (March 2022)

<sup>13</sup> [draft] IFRS S2 [Climate-related Disclosures](#) (March 2022)

<sup>14</sup> Please refer to Appendix E for a comparison between TCFD and S2 requirements and a summary of additional S2 requirements.

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## Areas out of scope

- 2.5 The research excludes any assessment of interoperability with other jurisdictional sustainability requirements, nor does it seek to assess or comment on the current level of compliance with TCFD or Streamlined Energy and Carbon Report (SECR) reporting requirements in the UK.

## Approach

- 2.6 The assessment was desktop-based and utilised an external investor-focused analyst to carry out an initial assessment of connectivity between the sustainability narrative disclosures and the financial effects reported in the financial statements. UKEB Working and Advisory Groups also reviewed the assessment and considered the potential inconsistencies.
- 2.7 Based on the profile of the entities in the sample, UKEB Advisory and Working Group members agreed that the sustainability disclosures in relation to climate-related business and financial risks would potentially create user expectations of financial statement risk.

## Sample selection

- 2.8 Nine entities were selected taking into consideration the expected timeline for publication of the ISSB Request for Information and UKEB resources available. The sample was selected based on the following factors:
- a) Entities in an industry where climate change was likely to have a material impact on their operations.
  - b) A range of sizes i.e., a spread of FTSE 100 and 250 entities.
  - c) Availability of 2022 Annual reports with comprehensive sustainability disclosures.
  - d) Avoiding companies that have already been heavily assessed in TCFD research by other parties.
- 2.9 All entities researched were exposed to climate-related risks and had communicated the significance of these risks through their comprehensive sustainability disclosures. The text provided in the illustrative examples are those that are available to market users and were sourced directly from the Annual Reports.
- 2.10 Two thirds of the companies in the sample had committed to achieving Net Zero emissions across their value chain by 2050 or sooner (ranging from 2030 to 2045). For the remaining third, it appeared that the commitment on Scope 3 emissions had not yet been set.

2.11 An analysis of the sample of nine companies is shown in the table below. Individual entities have not been identified as the aim of the research was not to judge the state of reporting nor to comment on areas of improvement.

Industry	FTSE 100	FTSE 250	Total
Aerospace and defence	–	1	1
Electricity	–	1	1
General Industrials	–	1	1
Industrial Metals and Mining	1	–	1
Financial Services	1	–	1
Oil, Gas, Coal	–	1	1
Pharmaceuticals	1	–	1
Travel and Leisure	1	1	2
<b>Total</b>	<b>4</b>	<b>5</b>	<b>9</b>

2.12 The sample is not intended to provide a representative result for the FTSE 350. Rather, it is intended to enable the identification and deeper analysis of potential inconsistency and connectivity gaps as a basis for consideration and discussion of potential solutions using current examples from across a range of entities and industries expected to be materially impacted by climate change.

## Methodology

2.13 The analysis approach was conducted on the following basis:

- a) A review of the TCFD and SECR disclosures as well as considering other relevant sustainability information in the Annual Report for context.
- b) Identification of areas that a user of the annual report would reasonably expect could have a financial impact on the financial statements.
- c) A review of the financial statements for those anticipated financial impacts.
- d) Identification of possible reasons for the disclosure, or non-disclosure, of the information in the financial statements.
- e) For areas where the consideration of financial effect was reasonably expected but not disclosed in the financial statements, a consideration of



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the impact the sustainability disclosure requirements in [draft] IFRS S1 and [draft] IFRS S2 may have to support users' expectations.

- f) For any remaining areas unlikely to be addressed by ISSB disclosures, a consideration of possible solutions, the action that could be taken and by whom.
- g) Presentation of the analysis at a summary level to a meeting of the UKEB Sustainability Working Group as well as seeking comments from other UKEB Advisory Groups with final review and approval from the UKEB.

### **Identifying sustainability disclosures in Annual Reports**

- Many of the points that may give rise to expectations for the financial statements, for example information on the entity's climate risk assessment and the entity's own climate-related commitments and targets, were also addressed in other sections of the Annual Report. In some cases, a topic was covered in multiple sections, but varied in the level of detail and specificity.
- Consequently, the approach to the research considered all sections of the annual report outside of the financial statements and audit report, to identify climate-related information which could potentially lead to an expectation of material information being included in disclosures to the Financial Statements.
- The text used in the illustrative examples therefore provides the most insightful information relative to considering potential financial statement consequences. However, in some cases it may not have been sourced from limited information labelled formally as TCFD.

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## 3. Potentially inconsistent and disconnected information

### Chapter overview

- 3.1 This chapter contains the analysis of the following connectivity areas of accounting interest based on a detailed review of nine FTSE 350 Annual Reports. The areas identified are:
- a) Section One: Property, Plant and Equipment (PPE) and intangibles assets
  - b) Section Two: Commitments, contingencies, and other provisions
  - c) Section Three: Emissions reduction targets
  - d) Section Four: Other connectivity areas identified
- 3.2 For each area of accounting interest, the context and the potential inconsistency leading to a possible disconnect with the financial statements are illustrated with examples sourced directly from the entities' Annual Reports i.e., the information users have access to in the market.
- 3.3 The illustrative examples in this chapter are in the context of *material* financial statement risk regarding climate-related risks or opportunities. The examples are based on the disclosures in each entity's Annual Report regarding the significance of climate-related risks and opportunities to the organisation.

### General differences and similarities between ISSB and IASB Standards

- 3.4 There are several differences between proposed IFRS Sustainability Disclosure Standards and the current IFRS Accounting Standards. Due to the forward-looking nature and longer time frames of sustainability risks and opportunities, the ISSB standards are likely to require reporting entities to provide descriptions, numbers, or ranges of numbers in the narrative disclosures that do not necessarily connect directly to the financial statements.
- 3.5 As the information is prepared on a different basis to accounting standards, it is unlikely to be identical. However, users still need to be able to make connections, where appropriate, and understand the financial effects of sustainability matters, in both the narrative disclosures and the financial statements, to the extent relevant.

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## Key differences identified so far include:

- 3.6 **Timeframe** – sustainability disclosures require the disclosure of the financial effects over the short, medium, and long term but do not define those periods. IAS 1 *Presentation of Financial Statements* requires management to look at least 12 months from the end of the reporting period and requires the distinction to be made between current and non-current assets and liabilities.
- 3.7 **Perspective** – while accounting standards consider forward-looking information such as with impairment testing and useful economic lives, the amounts generally reflect a historical perspective<sup>15</sup>. Sustainability disclosures are forward-looking in nature and use scenarios, assumptions and estimates to forecast a range of possible future outcomes.
- 3.8 **Scope** – sustainability disclosures require material information about sustainability-related risks and opportunities across an entity's 'value chain'. The value chain is defined as the 'full range of activities, resources and relationships related to an entity's business model and the external environment in which it operates'. Accounting standards have a narrower definition of scope related to the legal reporting entity or group of entities<sup>16</sup>.
- 3.9 **Recognition** – Reporting levels of greenhouse gas emissions require measurement and there is an increased focus on emissions and emission rights which may lead to an expectation around recognition of related assets or liabilities. This would not necessarily lead to an immediate recognition of an asset or liability in the financial statements<sup>17</sup> but may lead to their recognition in a later period.
- 3.10 **Assurance** – IFRS financial statements are typically subject to independent audit by an established network of experienced audit professionals. It is yet to be determined what level of assurance will be required for sustainability disclosures or who might undertake that work.

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<sup>15</sup> Conceptual Framework [paragraphs 3.4-3.6] notes that financial statements are prepared for a specified period of time and provide comparative information and under certain circumstances forward-looking information.

<sup>16</sup> Conceptual Framework [paragraph 3.10] A reporting entity is an entity that is required, or chooses, to prepare financial statements. A reporting entity can be a single entity or a portion of an entity or can comprise more than one entity. A reporting entity is not necessarily a legal entity.

<sup>17</sup> Conceptual Framework [paragraph 5.6] Only items that meet the definition of an asset, a liability or equity are recognised in the statement of financial position.

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## Key similarities

- 3.11 **Adapted from IFRS Accounting Standards** – primarily IAS 1 *Presentation of Financial Statements* and IAS 8 *Accounting Policies, Changes in Accounting Estimates and Errors*. For example, entities are required to use information that is ‘reasonable and supportable and available without undue cost or effort’ which is consistent with IFRS 9 *Financial Instruments*.
- 3.12 **Materiality** – the ISSB redeliberated and tentatively agreed to use the same definition of “material” as IFRS Accounting Standards to ensure investors understand sustainability risks and opportunities i.e., ‘Information is material if omitting, misstating or obscuring it could reasonably be expected to influence investor decisions.’
- 3.13 **Publication and reporting period** – entities are required to disclose sustainability-related financial information as a part of general-purpose financial reporting (at the same time and for the same period). This is intended to ensure that financial statement information and sustainability-related financial disclosures can be considered together.
- 3.14 Please refer to Appendix B ‘Differences and similarities between IASB and ISSB draft standards’ for further information.

## Section One: Property, Plant and Equipment (PPE) and intangibles

### Section One A: Depreciation and amortisation

#### Context

- 3.15 This area of accounting focus includes consideration of how climate-related risks may impact depreciation or depletion of property, plant and equipment (PPE) assets, and amortisation of finite-lived intangibles.
- 3.16 Reduced estimates of remaining asset lives may result from the need to retire carbon-intensive PPE earlier than was previously expected. Additionally, estimated residual values may decline if carbon intensive assets become less desirable. Carbon intensity may be ascribed to various categories of PPE, for example fossil fuels reserves themselves (coal, oil, gas reserves), assets powered by fossil fuels (machinery and vehicles that run on fossil fuels), assets used to produce inventory that is powered by fossil fuels (machinery that produces internal combustion engines), etc. As a result, decreases in such asset lives and residual values may lead to higher depreciation expense.

## Potential inconsistencies with the financial statements

- 3.17 Users might expect visibility of how climate-related matters such as climate risks and emissions reduction targets have been considered in the estimates of remaining useful life/production and residual values. To the extent that changes in depreciation result, these should be disclosed, if material, in accordance with IAS 8 *Accounting Policies, Accounting Estimates and Errors* (paragraph 39).
- 3.18 If no adjustments are made, users may expect disclosure explaining why this is reasonable in consideration of the sustainability issues identified. In some cases, it may be expected that the carrying amount of relevant carbon-intensive assets, and information on their assumed remaining lives/residual values be disclosed to provide an understanding of the situation.
- 3.19 From a user perspective, even if sustainability reporting outside the financial statements discloses sufficient information to understand the lack of financial statement adjustment, IAS 1 still requires that sufficient information is disclosed within the financial statements.

## Examples of potential disconnects or inconsistencies

### Depreciation and amortisation

Example 1: Depreciation and amortisation – Fleet renewal (1)	
Travel and leisure	Annual Report disclosures relating to information on fleet renewals to reduce emissions are noted below for the Travel and leisure industry (emphasis added).
Sustainability disclosures	<p><b>Company A</b></p> <p>“A modern fleet of aircraft is instrumental in driving down emissions and so <b>we will be making a list price investment of \$21 billion over the coming years to continue to renew our fleet. All 168 new aircraft deliveries, scheduled between FY23 and FY29</b>, will be Airbus NEO aircraft, which are at least 15% more fuel efficient and 50% quieter than the aircraft they replace.”</p> <p><b>Company B</b></p> <p>“Over the course of 2022, <b>we signed agreements with Airbus and Boeing to acquire 87 new aircraft</b> which will reduce our emissions by up to 20 per cent and we thank our shareholders for their approval.... plans to make a EUR 13.5bn investment between 2023-30 for 192 new, efficient aircraft.”</p>

**Example 1: Depreciation and amortisation – Fleet renewal (1)**

<p><b>Financial statement disclosure</b></p>	<p><b>Company A</b></p> <p>Residual values are reviewed annually against prevailing market rates for equivalently aged assets at the end of the reporting period, and depreciation rates are adjusted accordingly on a prospective basis. The carrying value of PPE assets is part of the Airline CGU and is therefore reviewed for impairment at least annually or when there is any indication of impairment within the CGU. ... Future developments, such as the impact of climate change on the technological, market, economic or legal environment, are considered when assessing residual values and useful economic lives.</p> <p><b>Company B</b></p> <p>“Long term fleet plans and useful economic lives. ... During the course of 2020 as a result of the impact of COVID-19, the Group permanently stood down 82 aircraft (of which ten were subsequently stood back up), their associated engines and rotatable inventories. ...”</p> <p>“With the permanent standing down of these aircraft, coupled with the future committed delivery of 192 fuel efficient aircraft as detailed in note 15 (commitments), the Group considers the existing fleet assets align with the long-term fleet plans to achieve its climate strategy. All aircraft in the fleet, and those due to be delivered in the future, have the capability to utilise SAF<sup>18</sup> in their operations without impediment. Accordingly, no impairment has arisen in the current or prior year, nor have the useful lives and residual values of aircraft been amended, as a result of the Group’s decarbonisation plans.”</p>
<p><b>Potential inconsistency leading to a possible disconnect</b></p>	<p>There may be an expectation of information on whether these significant new additions to the fleet have implications for the existing fleet. For example, whether the retirement of existing (more carbon intensive) fleet may be brought forward, or whether the need to reduce residual values was considered. Company B went beyond accounting policy information to confirm that it had considered the existing fleet (once augmented), and that no changes to depreciation assumptions were required.</p>

<sup>18</sup> Sustainable Aviation Fuel.

Example 2: Depreciation and amortisation – Fleet renewal (2)	
<b>Industrial Metals and Mining</b>	Annual Report disclosures relating to information on fleet renewals to reduce emissions are noted below for the Metals and mining industry (emphasis added).
<b>Sustainability disclosures</b>	“We are <b>introducing 10 fuel bulk carriers, ... to our roster of vessels, with the first vessel delivered in December 2022 – the remaining vessels are expected to be delivered by mid-2024.</b> They offer significant environmental benefits, having the potential to cut CO2 emissions by up to 35% compared with vessels fuelled by conventional marine oil alone, while adoption of new technologies will eliminate the release of unburnt methane, as well as removing sulphur oxides, and reducing the volume of nitrogen oxides and particulate matter.”
<b>Financial statement disclosure</b>	Accounting policy disclosure includes: ‘Depreciation methods, residual values and estimated useful lives are reviewed at least annually.’ PPE note disclosure includes: ‘Depreciation is calculated with reference to the Group’s best estimate of the impact of climate change on useful economic lives.’
<b>Potential inconsistency leading to a possible disconnect</b>	There may be an expectation of information on whether these significant new additions to the fleet have implications for the existing fleet. For example, whether existing (more carbon intensive) fleet may be retired earlier than expected, or whether the need to reduce residual values was considered. The disclosures made are of the nature of general policy information rather than providing an understanding of how this topic was considered in the current period.

Example 3: Depreciation and amortisation – Replacement of PPE	
<b>General industrials</b>	Annual Report disclosures relating to abating fossil fuel heat energy used to power production assets. The company disclosed that meeting its post-2030 emissions targets would require abatement of emissions associated with heat energy used in the dyeing process, including replacement of fossil fuel burning boilers. (Emphasis added below):
<b>Sustainability disclosures</b>	“Post-delivery of our 2030 near-term targets, ... the key elements that will require continued abatement are the heat energy used in dyeing, the emissions from energy used by our suppliers and the emissions coming from product and people transportation. ...The emissions from heat energy in dyeing currently come from the burning of fossil fuels to produce steam which is used to heat the water used in dyeing. We see two emissions reduction roadmaps for this. <b>Our steam generating boilers will all require normal replacement before 2050 and any replacements will be done with biomass or electric boilers.</b> In parallel we will be continuing to expand the use of dyeing technologies that don’t require high temperature water... <b>We do not, at this stage, anticipate any additional capital or operational costs for achieving net-</b>

<b>Example 3: Depreciation and amortisation – Replacement of PPE</b>	
	<b>zero that would not occur anyway in terms of asset replacement cycles.”</b>
<b>Financial statement disclosure</b>	“Fixed asset useful lives - Consideration was given as to whether the impact of physical risks relating to extreme weather events (e.g. flood risk damage) may require a reassessment of the estimated useful lives of fixed assets. As noted in the physical risks section in our TCFD disclosures, no significant impacts are currently expected in the short to medium term (pre-2045), after which point the majority of the Group’s current fixed asset portfolio will be fully depreciated. As such, the reassessment of fixed asset useful lives to reflect potential impacts of climate change was not deemed necessary. In light of the above, the Group’s current assessment is that the climate related risks detailed in the TCFD disclosures section of the Strategic Report do not have a material impact on the key accounting policies, estimates and judgements that form the basis of these consolidated financial statements.”
<b>Potential inconsistency leading to a possible disconnect</b>	While the financial statement disclosure addressed climate-related physical risk, the company did not appear to reference in its financial statements, the replacement of boilers planned in order to meet its emissions targets. With information appearing wholly outside the financial statements, there may be an appearance of disconnect. Users may benefit from an explanation of how the company assessed its own transition steps including the lack of need for additional capital or operating costs, and why it is reasonable that this resulted in no change in asset lives and residual values for its boilers. It might also be considered material information to identify the carrying values of the associated asset pool, and information on remaining useful lives that correspond to the lack of a need for change.

<b>Example 4: Depreciation and amortisation – Mitigation of physical risk</b>	
<b>Aerospace and defence</b>	Annual Report disclosures relating to physical risk and infrastructure rebuild noted the that the most significant physical risk associated with climate was from flooding and storm surges. Specifically (emphasis added):
<b>Sustainability disclosures</b>	<p>“ESG Strategy disclosure: <b>Our most significant physical risk is dockyard disruption and we have assessed the risk of increased flooding and storm surges.</b> The highest risk is seen in a 3oC scenario, where we expect to see more extreme weather patterns.”</p> <p>“Risk: Dockyard disruption – <b>Dockyards owned/operated may be flooded due to an increase in sea level and higher frequency of extreme weather, resulting in storm surges. Our site is currently undertaking a</b></p>



<b>Example 4: Depreciation and amortisation – Mitigation of physical risk</b>	
	<b>significant infrastructure rebuild and climate-related risk is being factored into rebuild decisions.</b> In the medium to longer term as the site develops, for the design of rebuild and new facilities we will consider climate-related risk in line with the latest standards.”
<b>Financial statement disclosure</b>	There did not appear to be any financial statement disclosures related to this sustainability disclosure.
<b>Potential inconsistency leading to a possible disconnect</b>	Users may require clarity regarding the accounting for the existing assets and whether they are impaired, or the depreciation schedule has been altered for the assessment of physical risk and steps taken toward mitigation. An indication of the significance of the carrying value of the associated assets, and the costs involved and whether they are operating, or capital costs would also be relevant to connect this information to the financial statements.

## Section One B: Impairment

### Context

- 3.20 Impairment of PPE and intangible assets includes the consideration of indicators of impairment, which give rise to requirements for the testing of impairment which entails the calculation of the recoverable amount of an asset and comparing this with the asset’s carrying amount. This also includes consideration of climate-related risks and opportunities in impairment testing, regardless of whether it is required based on a climate-related indicator that requires testing or some other indicator, or as an annual test of goodwill or indefinite lived assets.
- 3.21 IAS 36 *Impairment of Assets* defines the recoverable amount of an asset or a cash-generating unit as the higher of its fair value less costs of disposal and its value in use.
- 3.22 Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date (IAS 36 paragraph 6), while the value in use is the present value of the future cash flows expected to be derived from an asset or cash generating unit (paragraph 6 of IAS 36).
- 3.23 Determining value in use is based on best estimates of expected cash flows over a forecast period, growth rates for periods thereafter, and a discount rate. The result must be risk adjusted, either via the cash flows being adjusted for risk or the discount rate. This approach is often used as well to determine fair value less costs of disposal.
- 3.24 Fair value less costs of disposal emphasises assumptions that would be used by a market participant and provides greater latitude for consideration of how a market participant would use the asset if improvements were possible, whereas

value in use is restricted to consideration of the value of the asset in its current condition. Most of the companies reviewed appeared to use the value in use approach to determining recoverable values.

## Potential inconsistencies with the financial statements

- 3.25 Users might expect information on how climate-related matters have been considered relative to indicators of impairment. As for impairment testing, users might expect information on how climate has been considered in determining the fair value or the risk-adjusted best estimates of cash flows and discount rates used to determine recoverable amount. Disclosure of assumptions and estimates made, and any climate-related adjustments to them, might be considered material information for disclosure.
- 3.26 Articulating how climate-related risks and mitigation steps or opportunities have been considered relative to indicators of impairment would enable users to consider the reasonableness of an entity's consideration of these matters, given that many assets will not be tested at all unless such testing is triggered by the identification of an indicator.

## Examples of potential disconnects or inconsistencies

### Impairment – Transition risks and associated costs

Example 5: Impairment – Carbon taxes and cost of remediation	
General Industrials	A company highlights that future carbon taxes represent its most significant transitional risk. It also indicated the expected carbon tax prices and expected costs before remediation and after. Specific disclosure included (emphasis added):
Sustainability disclosures	<p>“As a major identified risk, we have also <b>reviewed and updated our model for future carbon taxes. ...our current most significant transitional risk remains linked to the potential introduction of carbon emission taxes...</b>Risk 1 Emerging regulation: Introduction of carbon taxes leading to increased energy prices. Under the company's low carbon scenario SSP1: <b>Under SSP1 we expect that the range of carbon taxes could be between \$90 and \$160 per tonne of CO<sub>2</sub>e, and we anticipate that this would apply to our Scope 1 and 2 emissions. Without remediation,</b> and hence based on current emissions levels persisting, the potential for carbon taxes under scenario SSP1 would see an <b>additional annual cost of between \$27m and \$48m by 2030.</b></p> <p>...Post-mitigation, where mitigation is taken as delivery of our Science Based Targets for reduction of Scope 1 and 2 emissions (reduction of Scope 1 and 2 emissions by 46.2% in absolute terms from a 2019 base year), <b>this annual cost increase would range from \$15m to \$26m</b> based on our above assumptions of carbon tax rates. We see the pre-mitigation potential costs remaining broadly constant through 2045 and</p>

<b>Example 5: Impairment – Carbon taxes and cost of remediation</b>	
	2070 while the post-mitigation costs would drop to immaterial levels by 2045 and beyond.”
<b>Financial statement disclosure</b>	‘The key climate related risks considered were the introduction of carbon taxes, disruption of water supply and extreme weather events (floods and extreme heat). These risks as well as any potential mitigations were considered when assessing the appropriateness of the assumptions used to project future cash flows to support the value in use of a CGU. No specific significant financial impacts were identified in relation to the CGUs that were subject to an impairment review during the year ended 31 December 2022 (see note 13). In addition, no significant short to medium term (pre-2045) climate related impacts have been identified for individual assets or other CGUs in the Group.
<b>Potential inconsistency leading to a possible disconnect</b>	<p>The company provides general information that confirms the risk of carbon taxes and ‘any potential mitigations’ were considered. It also confirms that no ‘specific significant financial impacts were identified’, which appears to focus on the result of the impairment test.</p> <p>With no information provided on the actual risk/mitigation factors considered, users may expect more transparency regarding the input assumptions including carbon prices or costs used in the estimated cash flows for impairment testing, and whether those assumptions were consistent with the amounts disclosed in the sustainability disclosures.</p> <p>Additionally, if some risks were not considered in the cash flow estimates, information on whether and how such risks were taken into account in the discount rate used could be expected.</p>

<b>Example 6: Impairment – Impact on fleet</b>	
<b>Travel and leisure</b>	A company made the following disclosure regarding carbon tax, Sustainable Aviation Fuel, fleet renewals (emphasis added):
<b>Sustainability disclosures</b>	“The future impact of climate change on the business has been incorporated into <b>strategic plans, including the estimated financial impact within the base case cash flow projections of the future estimated price of ETS permits, the phasing out of the free ETS permits from 2024, the expected price and quantity required of Sustainable Aviation Fuel usage and fleet renewals.</b> ”

<p><b>Financial statement disclosure</b></p>	<p>The company disclosed that such costs had been included in financial statement assumptions and estimates across several areas but did not appear to provide any quantitative disclosure. The company did mention the following areas where costs had been included in the financial statement assumptions:</p> <ul style="list-style-type: none"> <li>a) the estimates of future cash flows used in impairment assessments of the carrying value of non-current assets;</li> <li>b) the estimates of future profitability used in our assessment of the recoverability of deferred tax assets in the UK; and</li> <li>c) the useful economic lives and related residual values for our less fuel-efficient aircraft.</li> </ul>
<p><b>Potential inconsistency leading to a possible disconnect</b></p>	<p>Users may need greater transparency on the price/cost assumptions that are included in the estimated cash flows for impairment testing to enable them to form a view on the reasonableness of these assumptions and resiliency of the reported values.</p>

<p><b>Example 7: Impairment - Carbon removal costs</b></p>	
<p><b>Travel and leisure</b></p>	<p>A company made the following disclosure on ‘carbon removals’ (emphasis added):</p>
<p><b>Sustainability disclosures</b></p>	<p>“Based on the latest roadmap ..., the Group <b>expects to use approximately 100 MT of carbon removals between 2022 and 2050 to mitigate Scope 1 emissions and could potentially be removing 2 MT annually in 2030</b>, conditional on clear and globally agreed verification and quality standards for removals, inclusion of removals in ETS schemes, and stable policy support.”</p>
<p><b>Financial statement disclosure</b></p>	<p>The financial statements did not appear to address either the inclusion of these amounts or provide an indication of their quantitative significance.</p>
<p><b>Potential inconsistency leading to a possible disconnect</b></p>	<p>Users may expect visibility on how these costs have been incorporated in determining the recoverable values used in impairment testing, and an indication of the quantitative assumptions made. Users may be particularly interested in the progress toward the 2030 target.</p>

## Section One C: Research and development costs

### Context

- 3.27 This area of accounting interest includes consideration of the costs incurred to address climate-related risks and to take advantage of climate-related opportunities. There are at least two aspects to consider with respect to the appropriate accounting treatment of new climate-related costs incurred:
- Existing carbon-intensive assets which may be subject to the energy transition (e.g., by being phased out, modified, etc.) and physical assets that are at risk from climate change (e.g., by being made more resilient against flood or heat risk).
  - New assets, for example new intangibles for costs capitalised for the development of low carbon technologies. Some of these new technologies may be at risk of being unsuccessful, and decisions to expense or capitalise (subject to amortisation and impairment) taken accordingly.

### Potential inconsistencies with the financial statements

- 3.28 Users may expect visibility in the financial statements of material expenses and newly capitalised assets (if any) suggested by sustainability disclosures.

### Examples of potential disconnects or inconsistencies

#### Research and Development

Example 8: Research and development - Costs incurred on customer decarbonisation	
<b>Industrial Metals and Mining</b>	A company disclosed an R&D collaboration to help customers develop new technologies. The company disclosed that it is working to decarbonise its value chain, specifically (emphasis added):
<b>Sustainability disclosures</b>	“Collaborating across industry to decarbonise our value chain: “As part of the Group’s ambition to reduce our Scope 3 emissions by 50% by 2040, we are focusing on hard-to-abate sectors such as steel – from which most of our value chain emissions derive. We are working with steelmakers in Europe and Asia to <b>research</b> efficient feed materials – capitalising on the premium physical and chemical qualities of our minerals, including iron ore pellets and lump iron ore. These premium products are suited for use in the direct reduced iron (DRI) process, a <b>technically proven and significantly less carbon intensive steel production method</b> . The collaboration agreements ...signed in 2022, are an example of this approach.”
<b>Financial statement disclosure</b>	There does not appear to be any disclosure on this area in the financial statements.

Example 8: Research and development - Costs incurred on customer decarbonisation	
Potential inconsistency leading to a possible disconnect	Users may expect to see visibility in the financial statements of the related expenses and newly capitalised assets (if any) suggested by the sustainability disclosures. If such amounts are below quantitative materiality levels, these may still be qualitatively material to users in terms of progress toward and likelihood of achieving the company's emissions targets.

Example 9: Research and development - Regulatory risk mitigation	
Pharmaceutical	A company disclosed its programme to develop a new delivery system for a product that, when used, would substantially reduce the Greenhouse Gas emissions (GHG) produced, specifically (emphasis added):
Sustainability disclosures	“Risk Management – Potential financial impact/timeframe: High (> £250m)/ medium (3-10 years): Regulations governing the use of high global warming potential (GWP) substances are being updated in the EU and UK and were updated recently in the US. This <b>could lead to increasing costs and restrict the ability to manufacture our products that use a high GWP propellant</b> . We are <b>investing in an R&amp;D programme</b> to reduce greenhouse gas emissions ...and have made good progress towards reformulating an alternative gas that could potentially reduce the climate impact by up to 90%, if the clinical trials are successful. “
Financial statement disclosure	There does not appear to be any disclosure related to this in the financial statements. The company does, however, confirm consideration of climate, but this appears to only be in relation to impairment of intangible assets.
Potential inconsistency leading to a possible disconnect	Users may expect to see visibility in the financial statements of the related expenses and any newly capitalised assets suggested by the sustainability disclosures. If such amounts are below quantitative materiality levels, this may still be material to users in terms of progress toward and likelihood of achieving, emissions targets.

Example 10: Research and development - Investment in new technologies	
<b>Travel and leisure</b>	A company made numerous references to new technologies and partnerships established to pursue R&D. Specifically (emphasis added):
<b>Sustainability disclosures</b>	<p>a) “A partnership that will pioneer the <b>development of hydrogen combustion engine technology</b> capable of powering a range of aircraft...</p> <p>b) A programme dedicated to <b>developing hydrogen-powered zero emissions aircraft</b>.</p> <p>c) The <b>development of hydrogen ecosystems</b> to support the introduction of aircraft,</p> <p>d) A consortium led by Airbus that is <b>investing in Direct Air Carbon Capture and Sequestration (DACCS)</b>, a form of technical carbon removal.</p> <p>e) A <b>multi-million-pound fleet-wide investment into the latest technology</b> from Airbus to achieve further carbon emission reduction through Descent Profile Optimisation.</p> <p>f) Harnessing the power of AI and big data through initiatives such as the <b>deployment of a fuel management tool.</b>”</p> <p>It was also disclosed that the company had announced its pathway to net zero. ‘This roadmap references several partnerships with other commercial companies to explore certain technologies which may assist with the overall goal to decarbonise the aviation industry. <b>The majority of these partnerships are in fact agreements to work together on the areas identified and do not involve a financial commitment ...</b> other than the time and effort involved in the collaboration over an agreed period. Where there may be areas requiring a financial commitment ... in the future, these are still subject to negotiation and there is no binding commitment on the company at the date of publication of these financial statements’</p>
<b>Financial statement disclosure</b>	There does not appear to be any reference to development assets or research expenses. The value of software has increased, but there is no accompanying disclosure.
<b>Potential inconsistency leading to a possible disconnect</b>	The comments appear to suggest that the costs associated with these will be the company’s own costs (not via investee entities), so users may expect visibility in the accounts of the related expenses and newly capitalised assets (if any) suggested by the sustainability disclosures. If such amounts are below quantitative materiality levels, this too may be material to users in terms of progress toward and likelihood of achieving the company’s emissions targets.

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## Section Two: Commitments and other provisions

### Context

- 3.29 This area of accounting interest includes consideration of how climate-related risks and steps to mitigate them may impact the accounting for provisions and disclosure of provisions and commitments. In practice, this area may cover a wide range of potential topics, for example and not exclusively: onerous contracts, asset retirement obligations, restructuring provisions, and various commitments such as for future investment in capital expenditure, operating expenditure, or joint ventures/associates, etc.
- 3.30 This area does not include any suggestion that provisions for emissions targets and commitments are expected. Such targets are addressed in the next area.

### Potential inconsistencies with the financial statements

- 3.31 Users may expect visibility in the financial statements of various arrangements or developments suggested by the sustainability reporting. This may appear in various places within the note disclosures, for example in a commitments provisions note, or in relation to relationships with investee companies or partner-suppliers for outsourced functions.
- 3.32 With respect to Asset Retirement Obligations, climate risks may result in the bringing forward of steps to fulfil obligations, to the extent the associated assets are retired sooner than previously expected. Both Asset Retirement Obligation liabilities and the value of the associated property plan and equipment may increase as a result. For example:
- a) For Asset Retirement Obligations that are currently recognised on the balance sheet as liabilities (and therefore already included in the value of the PPE assets) a shortened useful life may result in an increase to both the liability and the asset as the period of discounting is reduced.
  - b) Asset Retirement Obligations may not currently be recognised as a liability due to their timing being indeterminate. A shortened useful life could result in the full value of the liability becoming recognised. In other cases, companies may assert that assets will be repurposed, for example a fossil fuel refining plant converted to producing hydrogen.
- 3.33 Users may expect to see information on how the entity has considered the impact of climate on the timing of Asset Retirement Obligations being met, and any resulting adjustment to the liability that was recognised.



## Examples of potential disconnects or inconsistencies

### Commitments and other provisions

Example 11: Commitments and provisions – Power purchase agreements and innovation funding	
<b>General Industrials</b>	A company disclosed various steps being taken to transform its raw materials supply and electricity source in order to meet its emissions reduction commitments (emphasis added):
<b>Sustainability disclosures</b>	<p>“Our priority objective is to use our electricity demand to promote the creation of new renewable energy assets. We have already made good progress through collaboration with renewables suppliers in many geographic locations resulting in installation of new roof-top solar arrays as well as <b>contracting to off-site wind-farm energy supply through Power Purchase Agreements.</b></p> <p>” and separately “Our Innovation Hub in Shenzhen, China has been repurposed to focus on its new mission to accelerate the transition from oil-based to recycled and renewable materials. We announced a <b>\$10m fund to advance green technologies and materials, including bio-materials relevant to our industry supply chain.</b></p>
<b>Financial statement disclosure</b>	The company discloses a total amount for commitments in respect of contracts placed for future capital expenditure, but there does not appear to be any disclosure on these arrangements in the financial statements.
<b>Potential inconsistency leading to a possible disconnect</b>	Users may expect to see such arrangements disclosed in the financial statements, for example information on the nature of commitments made, whether there are implications for potentially onerous contracts in relation to the current supply, etc. Additionally, it does not appear to be clear in the annual report whether the innovation fund is an internal budgetary commitment or involves external commitments. Clarification on the nature of the innovation fund would also provide a better understanding for users.

Example 12: Commitments and provisions – Sustainable fuel investment, new fleet, and carbon removals	
<b>Travel and leisure</b>	A company disclosed commitments to the purchase of new aircraft fleet, Sustainable Aviation Fuel investment, and investment in carbon removals. Specifically (emphasis added):
<b>Sustainability disclosures</b>	“Over the course of 2022, we signed agreements with Airbus and Boeing to acquire 87 new aircraft which will reduce our emissions by up to 20 per cent and we thank our shareholders for their approval. We have also increased our investment in Sustainable Aviation Fuels (SAF) to power our fleet in a way that will reduce its impact on the

<b>Example 12: Commitments and provisions – Sustainable fuel investment, new fleet, and carbon removals</b>	
	<p>environment. This is part of our commitment to meet at least 10 per cent of our fuel needs with SAF by 2030. We estimate that this will cut at least two million tonnes of CO2 in 2030.”</p> <p>Disclosure on the transition plan details the following components:</p> <ul style="list-style-type: none"> <li>• <b>"New aircraft and operations: €13.5 billion investment between 2023-30 for 192 new, efficient aircraft</b></li> <li>• <b>SAF: US\$865 million committed</b> to date on SAF offtake and agreements, based on assumed energy prices</li> <li>• Carbon removals: Refining the company’s carbon removals roadmap”</li> </ul> <p>This disclosure also lists venture investments/key innovation partners for each element.</p>
<b>Financial statement disclosure</b>	<p><b>Note: Capital expenditure commitments.</b> Capital expenditure authorised and contracted but not provided for in the accounts, including outstanding aircraft commitments, at December 31, 2022 amounted to €13,749 million (December 31, 2021: €10,911 million). ... In May 2022, the Group agreed to purchase 25 Boeing 737-8200 and 25 737-10 aircraft, with 100 options to purchase further such aircraft. In addition, in July 2022, the Group agreed to exercise its option over 12 Airbus A320neos/A321neos and to purchase 25 Airbus A320neos/A321neos with 50 options to purchase further such aircraft. The determination of the split between A320neos and A321neos will be made closer to delivery. ... Under the terms of the committed purchase agreements, the Group is required to make periodic advance payments towards the purchase price, with the commitments above stated net of advance payments that have been made at the reporting date. The Group has certain rights to defer aircraft deliveries and to cancel commitments in the event of significant delays to aircraft deliveries caused by the aircraft manufacturers. No such rights had been exercised as at December 31, 2022.”</p> <p>Additional disclosure is found in the note on climate change: “The details regarding the inputs and assumptions used in the determination of the Flightpath Net Zero climate strategy include, but are not limited to, the following that are within the control of the Group: • the additional cost of the Group’s commitment to increasing the level of Sustainable Aviation Fuels (SAF) to ten per cent by 2030 and to seventy per cent by 2050; • the cost of incurring an increase in the level of carbon offsetting and carbon capture schemes; and • the impact of introducing more fuel-efficient aircraft and being able to operate these more efficiently.</p>
<b>Potential inconsistency leading to a possible disconnect</b>	<p>In addition to the information provided on the capital commitments for fleet renewal, users may expect to see additional information to clarify the nature of relationships with the various venture investments/key innovation partners named in the sustainability reporting, and commitments associated with capital and operating expenditure,</p>

<b>Example 12: Commitments and provisions – Sustainable fuel investment, new fleet, and carbon removals</b>	
	including quantification of these amounts, given the critical nature of them to the company's strategy on emissions reduction.

<b>Example 13: Commitments and provisions – Decommissioning obligations and restructuring</b>	
<b>Electricity</b>	A company disclosed a delay to its plans, specifically (emphasis added):
<b>Sustainability disclosures</b>	<p>“In July 2022 the Group confirmed that, at the request of the UK Government, it had entered into an agreement with the National Grid to make our two coal-fired units ...available to operate as a winter contingency to the UK power system until the end of March 2023. The units will only operate if and when we are instructed to do so by the National Grid. Whilst this means prolonging the UK's dependence on fossil fuels, which is not aligned with the Group's strategy, we recognise that as part of the UK's critical national infrastructure, we play a key role in providing security of energy supply and take this responsibility seriously.</p> <p>The winter contingency service agreement is not expected to interfere with our plans for developing BECCS<sup>19</sup> at (the site). Site preparation works for BECCS are ongoing and will continue following formal closure of the coal units at the end of March 2023 on conclusion of the contract...”</p>
<b>Financial statement disclosure</b>	<p><b>Decommissioning:</b></p> <p>The decommissioning provision is based on the assumption that the decommissioning and reinstatement will take place at the end of the expected useful economic life (UEL) of the Power Station, currently estimated to be 2039. This has been estimated using existing technology at current prices based on independent third-party advice, updated on a triennial basis as a minimum, but more regularly where deemed appropriate due to changes in plans for decommissioning the site that would impact the expected costs. The most recent update took place in December 2020.</p> <p>This cost of decommissioning was estimated to be £56.0 million. An inflation curve was then applied to estimate the decommissioning costs in 2039. This value was then discounted to calculate the present value of the provision to be recognised. The discount rate used is a nominal risk-free rate that reflects the duration of the liability. The discount rate is estimated using forward UK Gilt curves as a proxy for risk-free rates.</p>

<sup>19</sup> Bioenergy with Carbon Capture Storage (BECCS)

<b>Example 13: Commitments and provisions – Decommissioning obligations and restructuring</b>	
	<p>The use of a risk-free rate reflects the fact that the estimated future cash flows have built-in risks specific to the liability. The discount rate used for the Group’s decommissioning provision is 4.05% (2021: 1.16%). ...</p> <p>The cost of decommissioning a site the size of the Power Station will be impacted by things such as the exact composition and volumes of materials used in the structures to be decommissioned, and the presence of contaminants. Full site surveys and investigations will need to be performed once the site ceases operation to ascertain further information necessary to decommission the site which could impact the potential costs. Notwithstanding this, due to the high degree of estimation and uncertainty regarding the potential costs and timing of decommissioning the Power Station, there remains a risk of a material adjustment to the carrying amount in the longer-term.</p> <p><b>Restructuring</b></p> <p>The restructuring provision consists of redundancy costs relating to the formal closure of the coal units at the Power Station which was initially planned for September 2022. It also includes costs for engineering works required to make the coal units and related assets safe when they cease operating. ... delayed ... formal closure of the coal units ... has resulted in the utilisation of certain amounts of the restructuring provision also being delayed. This has not materially impacted the expected costs.</p> <p>The amount of the restructuring provision utilised in the year predominantly relates to engineering and redundancy costs. Of the balance remaining at 31 December 2022, £11.6 million relates to engineering works, of which £3.2 million is expected to be utilised in 2023 with the remaining amounts expected to be utilised in the period 2024 to 2026. A further £0.6 million relates to redundancy costs, which are expected to be utilised in 2023, and the remaining £0.5 million relates to other costs, which are expected to be utilised in the period 2024 to 2026.</p>
<b>Potential inconsistency leading to a possible disconnect</b>	<p>These disclosures provide good visibility of the provisioning and what it relates to, as well as amounts involved. For example, on decommissioning obligations, the disclosure includes the current cost estimate, the timing of the assumed decommissioning activities, the assumed discount rate, and the present value reflected as a liability.</p> <p>There may be expectations of further clarity on the assumption of the asset’s useful economic life and timing of the decommissioning running to 2039 relative to closure that is expected to be in 2023. There also appears to be a significant contingency relating to the timing of transitioning the former coal units to biofuel. The company discloses that a “change in useful economic lives in relation to the [entity’s] Power</p>

<b>Example 13: Commitments and provisions – Decommissioning obligations and restructuring</b>	
	Station’s biomass assets has been disclosed as a key source of estimation uncertainty. If Bioenergy with carbon capture and storage (BECCS) is deployed at [entity’s] Power Station this could result in an extension of the end of station life beyond the current assumed end date of 2039.” The company provided a sensitivity analysis of depreciation expense should the lives become lengthened, but it does not appear to be clear how the timing of retirement obligations relates to the current useful economic life or potential changes

## Section Three: Emissions reduction targets

### Context

- 3.34 Most of the entities analysed appear to have committed to Net Zero Greenhouse gas emissions by 2050 or sooner, and all had set various targets to reduce their emissions profile over time.
- 3.35 This area of accounting interest includes consideration of whether the extent to which the entity had considered its targets in its accounting, can be determined. That is, this addresses a question of consistency across reporting and whether it is clear how the targets disclosed in the Sustainability reporting have been considered in the Financial Statements (as appropriate under IFRS). This does not include any assertion that the financial statements should include provisions relating to the targets alone.

### Potential inconsistencies with the financial statements

- 3.36 Users may expect that the current information on targets has been incorporated in the financial statements, or clarification on the extent of inclusion or reasons for any differences. While further changes may be made to best estimates based on internal and external factors, those could be expected to require changes to both the sustainability and financial reporting when they occur.
- 3.37 While there may be an expectation that the targets and steps to meet them have been fully incorporated into the accounting considerations (for example assumptions and estimates) this may not be the case or it may not be possible for users to determine whether it is the case from the disclosure provided. Thus, the question ‘to what extent they have been incorporated’ could be asked.

### Examples of potential disconnects or inconsistencies

- 3.38 For several of the companies reviewed, it did not appear possible to ascertain whether meeting their emissions targets had been fully considered in the assumptions and estimates used in preparing the financial statements. The examples provided below illustrate more specific aspects for consideration.

## Emissions reductions targets

Example 14: Emissions targets – Best estimate caveats	
<b>Travel and leisure</b>	A company disclosed the following emissions targets:
<b>Sustainability disclosures</b>	<p>Flightpath Net Zero climate strategy commits the Group to net zero emissions by 2050, with removals for any residual emissions. Interim targets (vs 2019):</p> <p>2025:</p> <ul style="list-style-type: none"> <li>• 11% better carbon efficiency, to 80 gCO<sub>2</sub>/pkm; 2030:</li> <li>• 10% Sustainable Aviation Fuel (SAF)</li> <li>• 20% drop in net Scope 1 emissions, to 22 MT;</li> <li>• 20% drop in net Scope 3 emissions, to 6.6 MT</li> </ul>
<b>Financial statement disclosure</b>	<p>“As a result of climate change the Group has designed and approved its Flightpath Net Zero climate strategy, which commits the Group to net zero emissions by 2050. While approved business plans currently have a duration of three years, the Flightpath Net Zero climate strategy impacts both the short, medium and long-term operations of the Group.</p> <p>The details regarding the inputs and assumptions used in the determination of the Flightpath Net Zero climate strategy include, but are not limited to...:</p> <ul style="list-style-type: none"> <li>• the additional cost of the Group’s commitment to increasing the level of Sustainable Aviation Fuels (SAF) to ten per cent by 2030 and to seventy per cent by 2050;</li> <li>• the cost of incurring an increase in the level of carbon offsetting and carbon capture schemes; and</li> <li>• the impact of introducing more fuel-efficient aircraft and being able to operate these more efficiently....</li> <li>• the impact on passenger demand for air travel as a result of both passenger trends regarding climate change and government policies;</li> <li>• investment and policy regarding the development of SAF production facilities;</li> <li>• investment and improvements in air traffic management; and • the price of carbon through the EU, Swiss and UK Emissions Trading Schemes (ETS) and the UN Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA).</li> </ul> <p>The Board approved the Group three-year business plan in the fourth quarter of the year. Adjustments have been made to the final year of the business plan cash flows to incorporate the impacts of climate</p>

**Example 14: Emissions targets – Best estimate caveats**

	<p>change <b>that the Group can reliably estimate at the reporting date</b>. However, given the long-term nature of the Group’s sustainability commitments, there are <b>other aspects of these commitments that cannot be reliably estimated and accordingly have been excluded from the value-in-use calculations</b>. The business plan cash flows used in the value-in-use calculations also reflect all restructuring of the business where relevant that has been approved by the Board and which can be executed by management under existing labour agreements.</p> <p>...the Group adjusts the final year of the three-year business plans to incorporate the <b>medium-term impacts of climate change from the Group’s Flightpath Net Zero climate strategy</b>. These adjustments include the following key assumptions: (i) a 10 per cent level of SAF consumption out of the overall fuel mix with an assumed price of €2,275 per metric tonne; (ii) a kerosene tax of €325 per metric tonne on all intra-EU flights; (iii) for costs of carbon, prices of €130, €130, €175 and €25 for EU ETS allowances, Swiss ETS allowances, UK ETS allowances and CORSIA allowances, respectively, per tonne of CO2 equivalents emitted; and (iv) the removal of all free ETS and CORSIA allowances.”</p>
<p><b>Potential inconsistency leading to a possible disconnect</b></p>	<p>This disclosure provides far more detail than many companies on, for example, the quantitative climate-related assumptions used in the Flightpath Net Zero climate strategy that is used in accounting estimates.</p> <p>Nonetheless, the caveat <b>‘that the Group can reliably estimate at the reporting date’</b> leaves users unable to understand the extent to which the assumptions used have and have not been updated to consider the current targets.</p> <p>Users may expect to see further material information on the <b>‘other aspects of these commitments that cannot be reliably estimated and accordingly have been excluded from the value-in-use calculations’, and perhaps these relate to beyond ‘the medium term’</b>. However, it is difficult to understand the consistency of current information on targets and current information incorporated in the financial statements, or the extent of and reason for any differences, without additional clarification. While further changes may be made to best estimates of internal and external factors such as those listed by this company, those could be expected to require changes to both the sustainability and financial reporting when they occur.</p>

**Example 15: Emissions targets – Best estimates: changes in specific asset estimates vs overall changes required**

<p><b>Industrial Metals and Mining</b></p>	<p>A company disclosed the following emissions targets:</p>
<p><b>Sustainability disclosures</b></p>	<p>“2040: Scopes 1&amp;2 carbon neutral; and Scope 3 50% reduction vs 2020. 2030: Reduce Scope 1 and 2 GHG emissions by 30% (2016 baseline); and improve energy efficiency by 30%; carbon neutral at 8 sites.”</p>
<p><b>Financial statement disclosure</b></p>	<p>The company’s financial statements disclose the following (emphasis added):  “Cash flow projections are based on financial budgets and Life of Asset Plans or, for non-mine assets, an equivalent appropriate long-term forecast. ... The cost and benefits of achieving the Group’s emissions reduction ambitions and targets and the implementation of projects to mitigate physical climate risk are included when the Group has a <b>high degree of confidence that a project is technically feasible and it is included in the Life of Asset Plan, which typically aligns with the related capital project being internally approved.</b>”</p>
<p><b>Potential inconsistency leading to a possible disconnect</b></p>	<p>The Financial Statement disclosure suggests that the Life of Mine plans for its carbon intensive assets provide key inputs considered in the accounting. Information on the procedural approach to updating these plans is helpful.</p> <p>Nonetheless, the caveat around including in cash flows amounts when there is a ‘high degree of confidence that a project is technically feasible, and it is included in the Life of Asset Plan’ does not provide an understanding of the extent to which such plans have been updated for steps needed to meet the company’s current emissions targets. Users may expect to see further material information to provide an understanding of this as it implies that not all required changes will have been implemented at the level of a specific asset in the respective Life of Mine Plan, albeit additional changes will likely be required over the portfolio in order to meet the company’s emissions targets.</p> <p>It is difficult to understand the consistency of current information on targets and current information incorporated in the financial statements, or the extent of and reason for any differences, without additional clarification. While further changes may be made to best estimates of internal and external factors such as those listed by this company, these could be expected to require changes to both the sustainability and financial reporting when they occur.</p>



<b>Example 16: Emissions targets – Extent to which considered</b>	
<b>Electricity</b>	A company disclosed the following emissions targets:
<b>Sustainability disclosures</b>	<p>'We have been resolute in our focus on reducing GHG emissions from our operations throughout 2022 with a particular focus on reducing methane intensity, underpinned by our clearly defined targets (relative to a 2020 baseline):</p> <ul style="list-style-type: none"> <li>a) 30% reduction in Scope 1 methane intensity by 2026;</li> <li>b) 50% reduction in Scope 1 methane intensity by 2030; and</li> <li>c) A longer-term goal of achieving net zero Scope 1 and 2 GHG emissions by 2040.'</li> </ul>
<b>Financial statement disclosure</b>	<p>The company's financial statements disclose only the following relevant to consideration of climate:</p> <p>'IMPAIRMENT ASSESSMENT FOR NATURAL GAS AND OIL PROPERTIES For the period ended 31 December 2022, the Directors assessed the indicators of impairment, noting volatile pricing in near term and resilient commodity price on the forward curve after the near-term volatility subsides which supports a healthy outlook for the Group. This assessment also included a comparison of the carrying value of the Group's natural gas and oil properties to their fair values and an assessment of the projected impact of climate change on the Group. As a result of their assessments no impairment indicators were identified.'</p> <p>However, the auditor's report explains that 'These goals do not directly impact the current financial reporting, as management is still developing its pathway to deliver on these goals and will only model the impact when such a pathway has been developed.'</p>
<b>Potential inconsistency leading to a possible disconnect</b>	<p>The Financial Statements do not appear to provide a basis for understanding the extent to which (or whether) the company has considered the impact of the company's existing emissions targets. For example, while there is disclosure of there being no impairment indicators identified in relation to gas and oil properties, it is not clear whether the targets were considered or not, or whether any aspects of climate risk were considered. There are several potential financial statement implications that may be expected to be linked to climate related uncertainties in the financial statements, including the valuation and depreciation of gas and oil properties and of PPE, as well as associated liabilities for asset retirement obligations, acquisition accounting etc.</p>

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## Section Four: Other connectivity areas noted

- 3.39 In the limited sample reviewed, no expectations were identified relating to financial statement topics such as inventory valuation, recoverability of trade or lease receivables, grant accounting or changes in segment reporting related to climate risk and the response to it, for example in the context of restructuring the business.
- 3.40 However, in addition to the areas in this report, there were several other topics identified as potentially giving rise to expectations for visibility in the financial statements.

### Current accounting for offsetting and carbon costs

- 3.41 This relates to the transactional accounting for carbon credits and any associated assets or liabilities, and any liabilities relating to offsetting obligations, depending on the level of emissions produced up to the balance sheet date.
- 3.42 Such items could be expected to become more quantitatively material in the future as, for example, governments bring in new systems to tax or otherwise charge for excess emissions, or entity obligations become recognisable as provisions for offsetting.
- 3.43 In the meantime, quantitative disclosure of amounts within various financial statement lines could potentially be considered information that is needed to provide an understanding of such mechanisms that are material at least by their nature.

### Deferred Tax Assets

- 3.44 For this topic, financial statement risk relating to climate typically focuses on the recoverability of assets associated with tax loss and tax credit carry forwards. For example, recoverability through future profitability may be dependent on those profits being sufficient. A few of the companies reviewed had significant deferred tax assets recognised on the balance sheet.

### Debt

- 3.45 There were several examples of climate-related borrowings in the sample of reports reviewed. An example was sustainability linked debt, and what appeared to be interest rate triggers linked to climate target achievement (for example the meeting of emissions targets).

### Investments and Insurance

- 3.46 This relates to the valuation of debt and equity instruments at fair value and amortised cost under the methods applied by the entity. For fair value, the question is focused on consideration of climate factors in estimating Level 3 fair values.

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- 3.47 At least one entity also addressed climate in the context of valuing assets in its pension fund. For amortised cost, the question relates to consideration of climate in assessing credit risk.
- 3.48 This was a particularly relevant topic for the review of the insurance sector entity's annual report. The entity identified that investments were the largest source of emissions in their value chain, representing over 90% of Scope 3 emissions. It also indicated that its principal risks impacted by climate change were credit and market risk (pertaining to investments), as well as general and life insurance risk.
- 3.49 While it did not appear that consideration of climate was disclosed in the financial statements in relation to insurance risk, the entity did provide a few sentences of disclosure on climate in its footnote on fair value methodology. These related to valuation of UK investment property using a methodology that was said to include climate, and the valuation of mortgage loans which included climate-related adjustments to capex and growth assumptions that were associated with climate actions and potential legislative changes.

## **Joint ventures and associates accounted for under the equity method**

- 3.50 The measurement of these holdings under the equity method and the potential for impairment relating to climate risk, raises many of the same issues identified in the separate areas (PPE depreciation and impairment, commitments, and provisions, etc.)
- 3.51 References were noted to such entities and some new arrangements with 'partners' that could be or become such investees. However, we have not separately identified these as an area of expectations for the financial statements as the underlying climate risk issues are already covered relative to the consolidated group entities.

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## 4. Initial stakeholder feedback

- 4.1 The UKEB Sustainability Working Group<sup>20</sup>, Advisory Groups of Preparers<sup>21</sup>, Accounting Firms and Institutions<sup>22</sup> and Investors<sup>23</sup> considered a draft of the illustrative examples and discussed possible causes, potential impacts of ISSB Standards and inconsistencies that may remain.
- 4.2 For context the members of each group considered the overarching requirements of IAS 1 *Presentation of Financial Statements* (IAS 1), the scope of the IASB project *Climate-related risks in Financial Statements* and an overview of the proposed disclosure requirements of S1 and S2.
- 4.3 As per the research methodology the members of these groups were asked to discuss and comment on:
- a) Identification of possible reasons for why the information was or was not disclosed in the financial statements.
  - b) For areas where the consideration of financial effect was reasonably expected but not disclosed in the financial statements, the impact the sustainability disclosure requirements in draft IFRS and S2 may have to support users' expectations.
  - c) For any remaining areas unlikely to be addressed by ISSB disclosures, possible solutions, what action could be taken and by whom.

### Identification of possible reasons for the disclosure, or non-disclosure, of the information in the financial statements

- 4.4 Advisory and Working Group members did not consider that existing accounting standards were deficient or that a specific Climate-related standard was required. It was also noted that members considered that connectivity was an important area for the UKEB to be leading on and encouraged further work.
- 4.5 AFIAG members noted that in relation to climate-related risks there was disparity between investor expectations and preparer's ability and willingness to disclose potential impacts of climate in the financial statements. It was also noted that all parties were at an early stage of understanding the potential changes required.

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<sup>20</sup> UKEB [Sustainability Working Group](#)

<sup>21</sup> [Preparer Advisory Group](#) (PAG)

<sup>22</sup> [Accounting Firms & Institutes Advisory Group](#) (AFIAG)

<sup>23</sup> [Investor Advisory Group](#) (IAG)

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## Inconsistent application of IAS 1 *Presentation of Financial Statements*

- 4.6 Members noted a general assertion or accounting policy disclosure that climate-related matters had been considered could be a helpful disclosure for users. However, when climate-related matters were considered material, this level of disclosure (or none), may be insufficient to provide connectivity, and in addition, may not satisfy the IAS 1 test for providing an overall understanding of the impact on the financial statements.
- 4.7 The Sustainability Working Group observed that users placed significant reliance on the requirements of IAS 1 in relation to providing sufficient material information on climate-related matters in financial statements, noting both the quantitative and qualitative characteristics of materiality. However, it was also noted that preparers more typically interpret the materiality requirements of IAS 1 as rationale for excluding information in order to avoid unnecessary clutter in the financial statements.

### Application of materiality

- 4.8 It was observed by several members that the last guidance issued by the IASB was several years ago<sup>24</sup> and the new Climate-related risks in Financial Statements was a welcome development. However, it was also observed that guidance on long terms risks may be more aligned to the IASB principles-based approach rather than further specific guidance regarding climate.
- 4.9 Preparers noted that users can incorrectly perceive inconsistencies or disconnects in the financial statements if they are unaware of the differences between the prospective nature of sustainability disclosures and the measurement and recognition criteria applied in financial reporting.
- 4.10 They observed that when they had assessed climate-risks as immaterial, the accounting standards do not require disclosure in the financial statements. However, some users could incorrectly assume that, if climate-related risks commentary was not disclosed in the financial statements, the management had failed to consider it.
- 4.11 Users observed that IASB guidance on the application of materiality<sup>25</sup> stated that information could be both quantitatively and qualitatively material. For example, even where no adjustments or disclosures were required in the financial statements by standards outside of IAS 1, information may still be material to disclose for an understanding of the financial statements under IAS 1.

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<sup>24</sup> [Effects of climate-related matters on financial statements](#) (November 2020)

<sup>25</sup> IFRS [Practice Statement 2: Making Materiality Judgements](#) (September 2017)

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## Organisational design and timing of reporting

- 4.12 Preparers noted that often separate teams prepare the sustainability and financial reports. These tended to be specialist teams generally without commonality of skill sets. In addition, as the sustainability information can be published months after the financial statements there can be an internal disconnect between the reporting teams. This in turn can lead to unintended disconnects in the final reports when consolidated in the Annual Report.

## Potential impact of the IFRS Sustainability Disclosure Standards

### Increased granularity of disclosures and volume of Annual Reports

- 4.13 Preparers anticipated a significant increase in the level of granularity and therefore volumes of Annual Reports. This may risk obfuscation and challenge the ability of users to identify key business and financial risks to connect in the financial statements.
- 4.14 It was noted by preparers that disclosures of potential financial impacts of climate-related risks and opportunities under S2 may increase the perception financial statement risk by users. They noted a concern that without resolving the existing issues, user frustration may increase.
- 4.15 Preparers observed that some entities may be hesitant to adopt due to the disclosure of speculative information and the potential exposure to both litigation and commercial sensitivities.
- 4.16 Users also noted concerns over the anticipated significant increase in data and expansion of the Annual Report in particular in relation to the additional sustainability disclosures required over the entity's value chain.

### Application of the same definition of materiality

- 4.17 The Sustainability Working Group commented that boiler plate disclosures and potential green washing may be reduced as sustainability disclosures may focus more on material information. However, the ISSB Standards would need time to be applied in practice before a conclusion could be reached.
- 4.18 Preparers were concerned that it may not be possible to apply the same definition of materiality to sustainability information due to the longer timeframes and prospective nature of the disclosures. They noted a risk of inconsistent interpretation and application in Annual Reports.

## Remaining areas and possible solutions

### Joint implementation approach

- 4.19 Overall members considered that the responsibility for managing the changes brought in by the adoption of ISSB standards should be equally and jointly shared across standard setters, regulators, and preparers.

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- 4.20 Members noted the significant number of examples in the report from a small sample of entities. They considered it critical and a priority for the IASB and ISSB to work collaboratively to fully understand and assess the impacts, both intentional and unintentional, of connections between the requirements.

### **Application guidance for IAS 1**

- 4.21 There may be an application question regarding IAS 1 for the IASB to consider as users and preparers may be applying it for different purposes.

### **Materiality**

- 4.22 Members of the Sustainability Working Group commented that the guidance regarding the application of qualitative materiality could usefully bridge the gap between sustainability disclosures and the financial statements. Most members considered a new joint Practice Statement from the IASB and ISSB would be beneficial.
- 4.23 Additional guidance may also be required during the transition phase to ISSB Standards to support users to understand the types of situations when the absence of information in the financial statements does not automatically indicate an inappropriate inconsistency between the front and back of an Annual Report. This might arise, for example, when an aspiration transition plan has been outlined in the sustainability disclosures but is not at a level of certainty that meets the recognition or measurement criteria for the accounting standards.

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## 5. Next Steps

- 5.1 The ISSB issued final versions of both [draft] IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and [draft] S2 *Climate-related Disclosures* on 26 June 2023. The UKEB will continue to assist with the work on connectivity between the ISSB and IASB Standards.
- 5.2 The IASB is currently in the research phase of the *Climate-related risks in Financial Statements* project and is actively seeking feedback from stakeholders.
- 5.3 Engage with both the UK Policy Implementation and Technical Advisory Committee on the formal adoption process of the final ISSB Standards.



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# Appendix A: UK Sustainability Reporting Requirements

## Companies Act 2006

- A1. All UK companies, except micro-entities, must prepare a Directors' Report; companies that are medium-sized or larger must also produce a Strategic Report; for Limited Liability Partnerships (LLPs) there is no requirement to produce a Directors' Report or Strategic Report (or equivalent).
- A2. The Directors Report for all quoted companies, as well as large unquoted companies, and groups, includes a Streamlined Energy and Carbon Report (SECR) which discloses greenhouse gas emissions, energy consumption and energy efficiency action taken. Please refer to Appendix D: 'A comparison of SECR and [draft] IFRS S2' for a detailed comparison.
- A3. Large LLPs are required to include their SECR disclosures in an Energy and Carbon Report, as they are not, by their nature as a partnership, required to file a Directors' Report. The legislation bringing these requirements into force was made in 2018 and applies to financial years beginning on or after 1 April 2019<sup>26</sup>.
- A4. The Strategic Report<sup>27</sup> requires large companies to explain how the directors are acting to promote the success of the company, including 'the impact of the company's operations on the community and the environment'. Public interest entities (PIEs), companies traded on the Alternative Investment Market (AIM), and companies (and LLPs) with more than £500m turnover, and in all cases having more than 500 employees, must also include a Non-financial and Sustainability Information (NFSI) statement.
- A5. The NFSI statement must include 'information, to the extent necessary for an understanding of the company's development, performance and position and the impact of its activity, relating to, as a minimum ... environmental matters (including the impact of the company's business on the environment)' as well as 'climate-related financial disclosures'.
- A6. This disclosure requirement is set out in secondary legislation mandating TCFD-aligned climate disclosure requirements, which applies to reporting for financial years starting on or after 6 April 2022. The requirements apply to all large companies (listed and private<sup>28</sup>) with a turnover in excess of £500 million and

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<sup>26</sup> [The Companies \(Directors' Report\) and Limited Liability Partnerships \(Energy and Carbon Report\) Regulations 2018](#)

<sup>27</sup> Section 172 of the Companies Act

<sup>28</sup> [The Companies \(Strategic Report\) \(Climate-related financial disclosure\) Regulations 2022](#)

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more than 500 employees; and, traded or banking LLPs<sup>29</sup> with over 500 employees.

## UK listing rules and TCFD

- A7. In December 2020, the Financial Conduct Authority (FCA), introduced listing rules, requiring commercial companies with a UK premium listing to disclose against the recommendations of the TCFD framework on a “comply or explain basis”. The rule came into effect for accounting periods beginning on or after 1 January 2021.
- A8. In December 2021, the FCA extended that rule to issuers of standard listed shares and standard listed global depository receipts representing equity shares (excluding standard listed investment entities and shell companies). The rule applies for accounting periods beginning on or after 1 January 2022.
- A9. The FCA also introduced new TCFD-aligned disclosure rules for asset managers and certain asset owners, which came into force for the largest firms on 1 January 2022 and will apply to smaller firms one year later. The disclosures required under these rules are directed at clients and are separate to the listing rules.
- A10. UK companies in scope of both the Companies Act regulations and the relevant FCA rules will be subject to both sets of requirements. However, whilst the Listing Rules require entities to disclose on a comply or explain basis, the Companies Act requirements are mandatory.
- A11. Stakeholders appear to be giving increasing importance to connectivity between sustainability disclosures and financial reporting, as demonstrated by several recent studies and reports in the UK highlighting the disconnect between TCFD disclosures on climate-related risks to companies’ business models in the front half of companies’ Annual Reports and information disclosed in their financial statements.
- A12. To avoid duplication and repetition, UKEB research seeks to build upon existing TCFD-based research. In particular, the approach will seek to reference previous work in the UK by other organisations<sup>30</sup>.

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<sup>29</sup> [The Limited Liability Partnerships \(Climate-related Financial Disclosure\) Regulations 2022](#)

<sup>30</sup> [Climate-Related Matters: Summary of Connectivity Research](#) – Draft Report (April 2023)

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# Appendix B: Differences and similarities between IASB and ISSB standards

B1. This appendix provides a summary level overview of the components of IFRS Accounting and the draft IFRS Sustainability Disclosures Standards for comparison.

## IASB accounting standards: disclosure requirements

- B2. IAS 1 provides several overall disclosure requirements that are in addition to requirements specified in other topic-specific standards (for example those in IAS 36 *Impairment of Assets* and IAS 16 *Property, Plant and Equipment*). These overall requirements provide an ‘understanding’ for stakeholders in relation to:
- a) **Fair presentation** (para. 17) and Materiality and aggregation (para. 31): ‘provide additional disclosures when compliance with the specific requirements in IFRSs is insufficient to enable users to understand the impact of particular transactions, other events and conditions on the entity’s financial position and financial performance.’
  - b) **Structure of the notes** (para. 112c): The notes shall: ... ‘(c) provide information that is not presented elsewhere in the financial statements but is relevant to an understanding of any of them.’
  - c) **Accounting policy information** (para. 117): ‘disclose material accounting policy information – i.e., when considered together with other information included in an entity’s financial statements, it can reasonably be expected to influence decisions that the primary users of general-purpose financial statements make on the basis of those financial statements.’
  - d) **Judgements** (para. 122): ‘judgements that management has made in the process of applying the entity’s accounting policies and that have the most significant effect on the amounts recognised in the financial statements.’
  - e) **Sources of estimation uncertainty**: a further requirement (paras. 125, 129) to: ‘disclose information about the assumptions [the entity] makes about the future, and other major sources of estimation uncertainty at the end of the reporting period, that have a significant risk of resulting in a material adjustment to the carrying amounts of assets and liabilities within the next financial year.’

## ISSB sustainability disclosure standards: requirements

- B3. Draft IFRS S1 and draft IFRS S2 require the disclosure of the *financial effects* of sustainability and climate-related risks and opportunities. Draft IFRS S2 specifically requires the disclosure of information regarding an entity's exposure to climate-related risks and opportunities, including current and anticipated impacts on its business model, financial statements and cash flows.
- B4. Draft IFRS S1 and draft IFRS S2 require disclosure of quantitative information (single amounts or a range) unless an entity is unable to do so. In that situation, an entity must disclose qualitative information. The objective of the approach is to allow investors to connect between different sustainability-related risks and opportunities and to understand how those items relate to the entity's financial statements.
- B5. Specific disclosures are required for physical risks (e.g. flood risk), transition risks (e.g. regulatory change risk) and climate-related opportunities (e.g. new technology) in relation to their current and anticipated financial effects:
- a) **Financial impacts:** how significant climate-related risks and opportunities have affected its most recently reported financial position, financial performance and cash flows.
  - b) **Quantitative and qualitative:** if the entity is unable to disclose quantitative information, an explanation of why that is the case is required and qualitative disclosures are required.
  - c) **Material risk:** for information identified in (a) above for which there is a significant risk that there will be a material adjustment to the carrying amounts of assets and liabilities reported in the financial statements within the next financial year.
  - d) **Changes in financial position:** how the entity expects its financial position to change over time, given its strategy to address significant climate-related risks and opportunities, reflecting:
    - i. its current and committed investment plans and their anticipated effects on its financial position (for example, capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas and asset retirements); and,
    - ii. its planned sources of funding to implement its strategy.
  - e) **Timeframe:** how an entity expects its financial performance to change over the short, medium and long terms, given its strategy to address significant climate-related risks and opportunities (for example, increased revenue from or costs of products and services aligned with a lower-carbon economy, consistent with the latest international agreement on climate

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change; physical damage to assets from climate events; and the costs of climate adaptation or mitigation).

- f) **Reporting Boundary** – disclosures are required regarding significant climate-related risks and opportunities in an entity's value chain and where in that chain the significant climate-related risks and opportunities are concentrated.

## Issuing new standards or amending existing standards

- B6. In developing their respective standards, the IASB and ISSB may need to retain at the forefront of their decision-making that, both investors and entities think in a 'connected' way about the link between financial statements and sustainability disclosures.
- B7. The pressure for this connectivity is expected, in the first instance, for items that are material to communicate in both the financial statements and the sustainability disclosures. However, the need for connectivity is likely to become pervasive as further standards are developed by the ISSB.
- B8. The draft IFRS Sustainability Disclosure Standards have highlighted that entities cannot consider sustainability and climate-related issues in isolation. Consideration of how the sustainability-related reporting relates to the financial statements is essential, especially if any additional or new risks to the entity are identified because of that process.
- B9. It is, therefore, possible that the new sustainability disclosure standards also have implications for the application of existing IFRS Accounting Standards. Some examples of the potentially affected application of IFRS Accounting Standards, include:
- a) Assets:
    - i. Recognition.
    - ii. Measurement (depreciation and revaluation models).
    - iii. Impairment.
    - iv. Expected credit losses related to financial assets.
  - b) Liabilities and provisions:
    - i. Confidential and commercially sensitive information.
    - ii. Recognition.
  - c) Fair value measurement.

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- d) Disclosures:
    - i. Purpose and objectives of sustainability disclosures.
    - ii. Scope of estimation uncertainty.
    - iii. Communicating levels of uncertainty – hierarchy of disclosures.
    - iv. Risk disclosures relating to financial assets, non-financial assets and liabilities.
    - v. Sustainability policy disclosures.
    - vi. Reporting of outcomes against previously disclosed plans.
    - vii. Internal transfer pricing vs internal carbon pricing.
  - e) Other considerations
    - i. Scope of consolidated information.
    - ii. Control.
    - iii. Exemption from disclosure.
  - f) Conceptual Framework and materiality: Implications for the Conceptual Framework.

B10. It is also likely that, in this new way in which entities need to consider, the opposite is also true, and that issuing new or amended IFRS Accounting Standards may also have implications for the IFRS Sustainability Disclosure Standards.

# Appendix C: A comparison of TCFD and [draft] IFRS S2

## TCFD disclosures - observations

1. The research used TCFD as an appropriate proxy for the proposed ISSB Standards as both [draft] IFRS S1 and [draft] IFRS S2 are based on the TCFD disclosure architecture.
  2. It was noted in the Annual Reports reviewed that there were significant variations in the format as well as the content of TCFD disclosures.
    - a) Two indicated partial compliance / that they were working toward full compliance.
    - b) Many provided narrative and/or tabular information labelled as TCFD reporting which addressed each of the TCFD Framework topics, with cross references to other parts of the annual report.
    - c) Several referenced sections of separate reports on climate which could be found on their websites.
  3. One included a short TCFD cross reference table in their annual report, with cross references being to a separate report on climate rather than other sections of the annual report.
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- C1. This appendix contains a comparison between the Task Force on Climate-related Financial Disclosures (TCFD)<sup>31</sup> and International Sustainability Standards Board (ISSB) Exposure Draft *Climate-related Disclosures (S2)*<sup>32</sup>
  - C2. TCFD contains eleven disclosure recommendations that span four areas: governance, strategy, risk management, and metrics and targets. In March 2022, the ISSB published [draft] IFRS S2 which built upon the recommendations of TCFD, and incorporated industry-based disclosure requirements derived from SASB Standards (*these are excluded from the comparison*).

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<sup>31</sup> [Task Force on Climate-related Financial Disclosures](#)

<sup>32</sup> Exposure Draft [IFRS S2 Climate-related Disclosures](#)

C3. The sections below provide a summary comparison between the TCFD and the [draft] IFRS S2 requirements and a detailed comparison table format following each section.

## Governance disclosure requirements

- C4. [draft] IFRS S2 is consistent with the TCFD governance recommendations a) and b) but also includes the following additional requirements:
- a) identity of the body or individual within a body responsible for oversight of climate-related risks and opportunities,
  - b) how the body's responsibilities for climate-related risks and opportunities are reflected in the entity's terms of reference, board mandates and other related policies,
  - c) how the body ensures that the appropriate skills and competencies are available to oversee strategies designed to respond to climate-related risks and opportunities, and
  - d) information about whether dedicated controls and procedures are applied to management of climate-related risks and opportunities and, if so, how they are integrated with other internal functions

Detailed governance disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
<p><b>Disclosure of the organization's governance regarding climate-related risks and opportunities.</b></p> <p>Recommended disclosures</p> <p>a) Describe the board's oversight of climate-related risks and opportunities.</p>	<p>4 The objective of climate-related financial disclosures on governance is to enable users of general-purpose financial reporting to understand the governance processes, controls and procedures used to monitor and manage climate-related risks and opportunities.</p> <p>5 To achieve this objective, an entity shall disclose information about the governance body or bodies (which can include a board, committee or equivalent body charged with governance) with oversight of climate-related risks and opportunities, and information about management's role in those processes. Specifically, an entity shall disclose:</p>



Detailed governance disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
<p>b) Describe management’s role in assessing and managing climate-related risks and opportunities.</p>	<p>a) the identity of the body or individual within a body responsible for oversight of climate-related risks and opportunities;</p> <p>b) how the body’s responsibilities for climate-related risks and opportunities are reflected in the entity’s terms of reference, board mandates and other related policies;</p> <p>c) how the body ensures that the appropriate skills and competencies are available to oversee strategies designed to respond to climate-related risks and opportunities;</p> <p>d) how and how often the body and its committees (audit, risk or other committees) are informed about climate-related risks and opportunities;</p> <p>e) how the body and its committees consider climate-related risks and opportunities when overseeing the entity’s strategy, its decisions on major transactions, and its risk management policies, including any assessment of trade-offs and analysis of sensitivity to uncertainty that may be required;</p> <p>f) how the body and its committees oversee the setting of targets related to significant climate-related risks and opportunities, and monitor progress towards them (see paragraphs 23–24), including whether and how related performance metrics are included in remuneration policies (see paragraph 21(g)); and</p> <p>g) a description of management’s role in assessing and managing climate related risks and opportunities, including whether that role is delegated to a specific management-level position or committee and how oversight is exercised over that position or committee. The description shall include information about whether dedicated controls and procedures are applied to management of climate-related risks and opportunities and, if so, how they are integrated with other internal functions.</p> <p>6* In preparing disclosures to fulfil the requirements in paragraph 5, an entity shall avoid unnecessary duplication in accordance with [draft] IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information (see paragraph 78). For example, although an entity shall provide the information required by paragraph 5, when its</p>

Detailed governance disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
	oversight of sustainability-related risks and opportunities is managed on an integrated basis, providing integrated governance disclosures rather than separate disclosures for each significant sustainability-related risk and opportunity would reduce duplication.

### Strategy disclosure requirements

- C5. [draft] IFRS S2 is consistent with the TCFD strategy recommendations a) and b) but requires additional, more granular requirements describing the impact of risks and opportunities:
  - a) how the entity is directly responding to risks and opportunities, including changes to its business model, strategy, resource allocation, production processes, workforce;
  - b) how it is indirectly responding to risks and opportunities, including working with customers and suppliers;
  - c) how its strategy and plans will be resourced;
  - d) expected changes in financial position over time, including investment plans and sources of funding;
  - e) expected changes in financial performance over time (revenue and costs)
- C6. [draft] IFRS S2 requires transition plans to be referenced as a part of an entity’s strategy, and hence subject to strategic disclosure requirements, with explicit requirements around disclosure of emission reduction targets and use of carbon offsets

- C7. [draft] IFRS S2 is also consistent with the TCFD strategy recommendation c) but requires additional information on resilience regarding:
- a) significant areas of uncertainty for strategy resilience;
  - b) an entity's capacity to adjust and adapt its strategy over time;
  - c) details on how any resilience analysis or assessment has been conducted

Strategy disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
<p><b>Disclosure of the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning where such information is material.</b></p> <p>Recommended disclosures</p> <ol style="list-style-type: none"> <li>a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.</li> <li>b) Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.</li> <li>c) Describe the resilience of the organization's strategy, taking into consideration different climate-</li> </ol>	<ol style="list-style-type: none"> <li>7 The objective of climate-related financial disclosures on strategy is to enable users of general purpose financial reporting to understand an entity's strategy for addressing significant climate-related risks and opportunities.</li> <li>8 To achieve this objective, an entity shall disclose information about:               <ol style="list-style-type: none"> <li>a) the significant climate-related risks and opportunities that it reasonably expects could affect its business model, strategy and cash flows, its access to finance and its cost of capital, over the short, medium or long term (see paragraphs 9–11);</li> <li>b) the effects of significant climate-related risks and opportunities on its business model and value chain (see paragraph 12);</li> <li>c) the effects of significant climate-related risks and opportunities on its strategy and decision-making, including its transition plans (see paragraph 13);</li> <li>d) the effects of significant climate-related risks and opportunities on its financial position, financial performance and cash flows for the reporting period, and the anticipated effects over the short, medium and long term—including how climate-related risks and opportunities are included in the entity's financial planning (see paragraph 14); and</li> <li>e) the climate resilience of its strategy (including its business model) to significant physical risks and significant transition risks (see paragraph 15).</li> </ol> </li> </ol>

Strategy disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
related scenarios, including a 2°C or lower scenario.	<p><b>Climate-related risks and opportunities</b></p> <p>9 An entity shall disclose information that enables users of general purpose financial reporting to understand the significant climate-related risks and opportunities that could reasonably be expected to affect the entity’s business model, strategy and cash flows, its access to finance and its cost of capital, over the short, medium or long term. Specifically, the entity shall disclose:</p> <ul style="list-style-type: none"> <li>a) a description of significant climate-related risks and opportunities and the time horizon over which each could reasonably be expected to affect its business model, strategy and cash flows, its access to finance and its cost of capital, over the short, medium or long term.</li> <li>b) how it defines short, medium and long term and how these definitions are linked to the entity’s strategic planning horizons and capital allocation plans.</li> <li>c) whether the risks identified are physical risks or transition risks. For example, acute physical risks could include the increased severity of extreme weather events such as cyclones and floods, and examples of chronic physical risks include rising sea levels or rising mean temperatures. Transition risks could include regulatory, technological, market, legal or reputational risks.</li> </ul> <p>10 In identifying the significant climate-related risks and opportunities described in paragraph 9(a), an entity shall refer to the disclosure topics defined in the industry disclosure requirements (Appendix B of IFRS S2)</p> <p>11 In preparing disclosures to fulfil the requirements in paragraphs 12–15, an entity shall refer to and consider the applicability of cross-industry metric categories and the industry-based metrics associated with disclosure topics, as described in paragraph 20.</p> <p>12 An entity shall disclose information that enables users of general purpose financial reporting to understand its assessment of the current and anticipated effects of</p>

<b>Strategy disclosure requirements</b>	
<b>TCFD</b>	<b>[Draft] S2 (these numbers are the paragraph numbers in S2)</b>
	<p>significant climate-related risks and opportunities on its business model. Specifically, an entity shall disclose:</p> <ul style="list-style-type: none"> <li>a) a description of the current and anticipated effects of significant climate-related risks and opportunities on its value chain; and</li> <li>b) a description of where in its value chain significant climate-related risks and opportunities are concentrated (for example, geographical areas, facilities or types of assets, inputs, outputs or distribution channels).</li> </ul> <p><b>Strategy and decision-making</b></p> <p>13 An entity shall disclose information that enables users of general purpose financial reporting to understand the effects of significant climate-related risks and opportunities on its strategy and decision-making, including its transition plans. Specifically, an entity shall disclose:</p> <ul style="list-style-type: none"> <li>a) how it is responding to significant climate-related risks and opportunities including how it plans to achieve any climate-related targets it has set. This shall include: <ul style="list-style-type: none"> <li>i. information about current and anticipated changes to its business model, including: <ul style="list-style-type: none"> <li>(1) about changes the entity is making in strategy and resource allocation to address the risks and opportunities identified in paragraph 12. Examples of these changes include resource allocations resulting from demand or supply changes, or from new business lines; resource allocations arising from business development through capital expenditures or additional expenditure on operations or research and development; and acquisitions and divestments. This information includes plans and critical assumptions for legacy assets, including strategies to manage carbon energy- and water-intensive operations, and to decommission carbon-energy- and water-intensive assets.</li> </ul> </li> </ul> </li> </ul>

Strategy disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
	<p>(2) information about direct adaptation and mitigation efforts it is undertaking (for example, through changes in production processes, workforce adjustments, changes in materials used, product specifications or through introduction of efficiency measures).</p> <p>(3) information about indirect adaptation and mitigation efforts it is undertaking (for example, by working with customers and supply chains or use of procurement).</p> <p>ii. how these plans will be resourced.</p> <p>b) Information regarding climate-related targets for these plans including:</p> <p>i. the processes in place for review of the targets;</p> <p>ii. the amount of the entity's emission target to be achieved through emission reductions within the entity's value chain;</p> <p>iii. the intended use of carbon offsets in achieving emissions targets. In explaining the intended use of carbon offsets the entity shall disclose information including:</p> <p>(1) the extent to which the targets rely on the use of carbon offsets;</p> <p>(2) whether the offsets will be subject to a third-party offset verification or certification scheme (certified carbon offset), and if so, which scheme, or schemes;</p> <p>(3) the type of carbon offset, including whether the offset will be nature-based or based on technological carbon removals and whether the amount intended to be achieved is through carbon removal or emission avoidance; and</p> <p>(4) any other significant factors necessary for users to understand the credibility and integrity of offsets intended to be used by the entity (for example, assumptions regarding the permanence of the carbon offset).</p>

Strategy disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
	<p>c) quantitative and qualitative information about the progress of plans disclosed in prior reporting periods in accordance with paragraph 13(a)–(b). Related requirements are provided in paragraph 20.</p> <p><b>Financial position, financial performance and cash flows</b></p> <p>14 An entity shall disclose information that enables users of general purpose financial reporting to understand the effects of significant climate-related risks and opportunities on its financial position, financial performance and cash flows for the reporting period, and the anticipated effects over the short, medium and long term— including how climate-related risks and opportunities are included in the entity’s financial planning. An entity shall disclose quantitative information unless it is unable to do so. If an entity is unable to provide quantitative information, it shall provide qualitative information. When providing quantitative information, an entity can disclose single amounts or a range. Specifically, an entity shall disclose:</p> <p>a) how significant climate-related risks and opportunities have affected its most recently reported financial position, financial performance and cash flows;</p> <p>b) information about the climate-related risks and opportunities identified in paragraph 14(a) for which there is a significant risk that there will be a material adjustment to the carrying amounts of assets and liabilities reported in the financial statements within the next financial year;</p> <p>c) how it expects its financial position to change over time, given its strategy to address significant climate-related risks and opportunities, reflecting:</p> <p>i. its current and committed investment plans and their anticipated effects on its financial position (for example, capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas and asset retirements);</p> <p>ii. its planned sources of funding to implement its strategy;</p>

Strategy disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
	<p>d) how it expects its financial performance to change over time, given its strategy to address significant climate-related risks and opportunities (for example, increased revenue from or costs of products and services aligned with a lower-carbon economy, consistent with the latest international agreement on climate change; physical damage to assets from climate events; and the costs of climate adaptation or mitigation); and</p> <p>e) if the entity is unable to disclose quantitative information for paragraph 14(a)–(d), an explanation of why that is the case.</p> <p><b>Climate resilience</b></p> <p>15 An entity shall disclose information that enables users of general purpose financial reporting to understand the resilience of the entity’s strategy (including its business model) to climate-related changes, developments or uncertainties—taking into consideration an entity’s identified significant climate-related risks and opportunities and related uncertainties. The entity shall use climate-related scenario analysis to assess its climate resilience unless it is unable to do so. If an entity is unable to use climate-related scenario analysis, it shall use an alternative method or technique to assess its climate resilience. When providing quantitative information, an entity can disclose single amounts or a range. Specifically, the entity shall disclose:</p> <p>a) the results of the analysis of climate resilience, which shall enable users to understand:</p> <ul style="list-style-type: none"> <li>i. the implications, if any, of the entity’s findings for its strategy, including how it would need to respond to the effects identified in paragraph 15(b)(i)(8) or 15(b)(ii)(6);</li> <li>ii. the significant areas of uncertainty considered in the analysis of climate resilience;</li> </ul>



<b>Strategy disclosure requirements</b>	
<b>TCFD</b>	<b>[Draft] S2 (these numbers are the paragraph numbers in S2)</b>
	<ul style="list-style-type: none"> <li>iii. the entity’s capacity to adjust or adapt its strategy and business model over the short, medium and long term to climate developments in terms of:               <ul style="list-style-type: none"> <li>(1) the availability of, and flexibility in, existing financial resources, including capital, to address climate-related risks, and/or to be redirected to take advantage of climate-related opportunities;</li> <li>(2) the ability to redeploy, repurpose, upgrade or decommission existing assets; and</li> <li>(3) the effect of current or planned investments in climate related mitigation, adaptation or opportunities for climate resilience.</li> </ul> </li> <li>b) how the analysis has been conducted, including:               <ul style="list-style-type: none"> <li>i. when climate-related scenario analysis is used:                   <ul style="list-style-type: none"> <li>(1) which scenarios were used for the assessment and the sources of the scenarios used;</li> <li>(2) whether the analysis has been conducted by comparing a diverse range of climate-related scenarios;</li> <li>(3) whether the scenarios used are associated with transition risks or increased physical risks;</li> <li>(4) whether the entity has used, among its scenarios, a scenario aligned with the latest international agreement on climate change;</li> <li>(5) an explanation of why the entity has decided that its chosen scenarios are relevant to assessing its resilience to climate-related risks and opportunities;</li> <li>(6) the time horizons used in the analysis;</li> <li>(7) the inputs used in the analysis, including—but not limited to—the scope of risks (for example, the scope of physical risks included in the scenario analysis), the scope of operations covered (for example, the operating locations used), and</li> </ul> </li> </ul> </li> </ul>

Strategy disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
	<p>details of the assumptions (for example, geospatial coordinates specific to entity locations or national- or regional-level broad assumptions); and</p> <p>(8) assumptions about the way the transition to a lower carbon economy will affect the entity, including policy assumptions for the jurisdictions in which the entity operates; assumptions about macroeconomic trends; energy usage and mix; and technology.</p> <p>ii when climate-related scenario analysis is not used:</p> <p>(1) an explanation of the methods or techniques used to assess the entity’s climate resilience (for example, single-point forecasts, sensitivity analysis or qualitative analysis);</p> <p>(2) the climate-related assumptions used in the analysis including whether it includes a range of hypothetical outcomes;</p> <p>(3) an explanation of why the entity has decided that the chosen climate-related assumptions are relevant to assessing its resilience to climate-related risks and opportunities;</p> <p>(4) the time horizons used in the analysis;</p> <p>(5) the inputs used in the analysis, including—but not limited to—the scope of risks (for example, the scope of physical risks included in the analysis), the scope of operations covered (for example, the operating locations used), and details of the assumptions (for example, geospatial coordinates specific to entity locations or national- or regional-level broad assumptions);</p> <p>(6) assumptions about the way the transition to a lower carbon economy will affect the entity, including policy assumptions for the jurisdictions in which the entity operates; assumptions about macroeconomic trends; energy usage and mix; and technology; and</p>

Strategy disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
	(7) an explanation of why the entity was unable to use climate-related scenario analysis to assess the climate resilience of its strategy.

### Risk Management disclosure requirements

- C8. [draft] IFRS S2 is consistent with the TCFD governance recommendations a) but with the following additions:
  - a) inclusion of processes used to identify and prioritise opportunities;
  - b) the input parameters is uses to identify risks; and
  - c) whether it has changed the processes used compared to the prior period
- C9. [draft] IFRS S2 is consistent with the TCFD recommended disclosures b) and c)

Risk Management disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
Disclosure of how the organization identifies, assesses, and manages climate-related risks. Recommended disclosures a) Describe the organization’s processes for identifying and assessing climate-related risks.	16 The objective of climate-related financial disclosures on risk management is to enable users of general purpose financial reporting to understand the process, or processes, by which climate-related risks and opportunities are identified, assessed and managed. 17 To achieve this objective, an entity shall disclose: a) the process, or processes, it uses to identify climate-related: i. risks; and

<b>Risk Management disclosure requirements</b>	
<b>TCFD</b>	<b>[Draft] S2 (these numbers are the paragraph numbers in S2)</b>
<p>b) Describe the organization’s processes for managing climate-related risks.</p> <p>c) c. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization’s overall risk management.</p>	<ul style="list-style-type: none"> <li>ii. opportunities;</li> <li>b) the process, or processes, it uses to identify climate-related risks for risk management purposes, including when applicable:               <ul style="list-style-type: none"> <li>i. how it assesses the likelihood and effects associated with such risks (such as the qualitative factors, quantitative thresholds and other criteria used);</li> <li>ii. how it prioritises climate-related risks relative to other types of risks, including its use of risk-assessment tools (for example, science-based risk-assessment tools);</li> <li>iii. the input parameters it uses (for example, data sources, the scope of operations covered and the detail used in assumptions); and</li> <li>iv. whether it has changed the processes used compared to the prior reporting period;</li> </ul> </li> <li>c) the process, or processes, it uses to identify, assess and prioritise climate-related opportunities;</li> <li>d) the process, or processes, it uses to monitor and manage the climate-related:               <ul style="list-style-type: none"> <li>i. risks, including related policies; and</li> <li>ii. opportunities, including related policies;</li> </ul> </li> <li>e) the extent to which and how the climate-related risk identification, assessment and management process, or processes, are integrated into the entity’s overall risk management process; and</li> <li>f) the extent to which and how the climate-related opportunity identification, assessment and management process, or processes, are integrated into the entity’s overall management process.</li> </ul> <p>18 In preparing disclosures to fulfil the requirements in paragraph 17, an entity shall avoid unnecessary duplication in accordance with [draft] S1 General Requirements for Disclosure of Sustainability-related Financial Information (see paragraph 78). For example, although an entity shall provide the information required by paragraph 17, when</p>

Risk Management disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
	its oversight of sustainability-related risks and opportunities is managed on an integrated basis, providing integrated risk management disclosures rather than separate disclosures for each significant sustainability-related risk and opportunity would reduce duplication.

### Metrics and Targets disclosure requirements

- C10. [draft] IFRS S2 requires the same categories of cross-industry metrics as per TCFD disclosure requirement a). However, it differs in requiring disclosure of the industry-based metrics (based on the SABS standards) relevant to and entity's industry and activities.
- C11. For TCFD disclosure requirement b), [draft] IFRS S2 requires a different disclosure treatment of greenhouse gases, as follows:
  - a) Scope 1 and Scope 2, a separate disclosure of emissions for (1) the consolidated accounting group, and for (2) associates, joint ventures, unconsolidated subsidiaries or affiliates not included in the consolidated accounting group. [This requirement is to provide transparency on the emissions related to those companies that are *not consolidated for accounting purposes* but are within the operational control of the parent company],
  - b) Disclosure of the total emissions of the consolidated group and unconsolidated investees should reconcile to the total scope 1 and 2 emissions. [This disclosure aims to connect emissions disclosures to the financial statements];
  - c) Scope 3 disclosure is required
  - d) Disclosure of the approach used and the reasons for choosing the approach to determine the scope boundaries is also required.
- C12. [draft] IFRS S2 does not explicitly mention WACI or the use of the PCAF methodology for calculating banks' and asset managers' financed emissions. However, the proposed industry-based disclosure requirements for financed and facilitated emissions are based on PCAF.

C13. [draft] IFRS S2 differs from the TCFD guidance c) in the following disclosure requirements:

- a) how the target compares with those created in the latest international agreement on climate change and whether it has been validated by a third party; and
- b) whether the target was derived using a sectoral decarbonisation approach using industry-based metrics which are associated with disclosure topics and relevant to entities that participate within an industry, or whose business models and underlying activities share common features with those of the industry;

<b>Metrics and Targets disclosure requirements</b>	
<b>TCFD</b>	<b>[Draft] S2 (these numbers are the paragraph numbers in S2)</b>
<p>Disclosure of the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.</p> <p>Recommended disclosures</p> <ul style="list-style-type: none"> <li>a) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.</li> <li>b) Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks.</li> <li>c) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.</li> </ul>	<p>19 The objective of climate-related financial disclosures on metrics and targets is to enable users of general purpose financial reporting to understand how an entity measures, monitors and manages its significant climate-related risks and opportunities. These disclosures shall enable users to understand how the entity assesses its performance, including progress towards the targets it has set.</p> <p>20 To achieve this objective, an entity shall disclose:</p> <ul style="list-style-type: none"> <li>a) information relevant to the cross-industry metric categories (see paragraph 21), which are relevant to entities regardless of industry and business model;</li> <li>b) industry-based metrics (as set out in Appendix B of IFRS S2) which are associated with disclosure topics and relevant to entities that participate within an industry, or whose business models and underlying activities share common features with those of the industry;</li> <li>c) other metrics used by the board or management to measure progress towards the targets identified in paragraph 20(d); and</li> <li>d) targets set by the entity to mitigate or adapt to climate-related risks or maximise climate-related opportunities.</li> </ul> <p>21 An entity shall disclose information relevant to the cross-industry metric categories of:</p> <ul style="list-style-type: none"> <li>a) greenhouse gas emissions—the entity shall disclose:</li> </ul>

## Metrics and Targets disclosure requirements

TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
	<ul style="list-style-type: none"> <li>i. its absolute gross greenhouse gas emissions generated during the reporting period, measured in accordance with the Greenhouse Gas Protocol Corporate Standard, expressed as metric tonnes of CO2 equivalent, classified as:               <ul style="list-style-type: none"> <li>(1) Scope 1 emissions;</li> <li>(2) Scope 2 emissions;</li> <li>(3) Scope 3 emissions;</li> </ul> </li> <li>ii. its greenhouse gas emissions intensity for each scope in paragraph 21(a)(i)(1)–(3), expressed as metric tonnes of CO2 equivalent per unit of physical or economic output;</li> <li>iii. for Scope 1 and Scope 2 emissions disclosed in accordance with paragraph 21(a)(i)(1)–(2), the entity shall disclose emissions separately for:               <ul style="list-style-type: none"> <li>(1) the consolidated accounting group (the parent and its subsidiaries);</li> <li>(2) associates, joint ventures, unconsolidated subsidiaries or affiliates not included in paragraph 21(a)(iii)(1);</li> </ul> </li> <li>iv. the approach it used to include emissions for the entities included in paragraph 21(a)(iii)(2) (for example, the equity share or operational control method in the Greenhouse Gas Protocol Corporate Standard);</li> <li>v. the reason, or reasons, for the entity’s choice of approach in paragraph 21(a)(iv) and how that relates to the disclosure objective in paragraph 19;</li> <li>vi. for Scope 3 emissions disclosed in accordance with paragraph 21(a)(i)(3):               <ul style="list-style-type: none"> <li>(1) an entity shall include upstream and downstream emissions in its measure of Scope 3 emissions;</li> <li>(2) an entity shall disclose the categories included within its measure of Scope 3 emissions, to enable users of general purpose financial reporting to understand which Scope 3 emissions have been included in, or excluded from, those reported;</li> </ul> </li> </ul>

<b>Metrics and Targets disclosure requirements</b>	
<b>TCFD</b>	<b>[Draft] S2 (these numbers are the paragraph numbers in S2)</b>
	<p>(3) when the entity’s measure of Scope 3 emissions includes information provided by entities in its value chain, it shall explain the basis for that measurement;</p> <p>(4) if the entity excludes those greenhouse gas emissions in paragraph 21(a)(vi)(3), it shall state the reason for omitting them, for example, because it is unable to obtain a faithful measure;</p> <p>b) transition risks—the amount and percentage of assets or business activities vulnerable to transition risks;</p> <p>c) physical risks—the amount and percentage of assets or business activities vulnerable to physical risks;</p> <p>d) climate-related opportunities—the amount and percentage of assets or business activities aligned with climate-related opportunities;</p> <p>e) capital deployment—the amount of capital expenditure, financing or investment deployed towards climate-related risks and opportunities;</p> <p>f) internal carbon prices:</p> <ul style="list-style-type: none"> <li>i. the price for each metric tonne of greenhouse gas emissions that the entity uses to assess the costs of its emissions;</li> <li>ii. an explanation of how the entity is applying the carbon price in decision-making (for example, investment decisions, transfer pricing and scenario analysis);</li> </ul> <p>g) remuneration:</p> <ul style="list-style-type: none"> <li>i. the percentage of executive management remuneration recognised in the current period that is linked to climaterelated considerations; and</li> <li>ii a description of how climate-related considerations are factored into executive remuneration (also see paragraph 5(f)).</li> </ul> <p>22 In preparing disclosures to fulfil the requirements in paragraph 21(b)–(g), an entity shall</p>



<b>Metrics and Targets disclosure requirements</b>	
<b>TCFD</b>	<b>[Draft] S2 (these numbers are the paragraph numbers in S2)</b>
	<p>a) consider whether industry-based metrics associated with disclosure topics, as described in paragraph 20(b), including those defined in an applicable IFRS Sustainability Disclosure Standard or those that otherwise satisfy [draft] IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information could be used in whole or part to meet the requirements; and</p> <p>b) in accordance with paragraphs 37–38 of [draft] IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information, consider the relationship of these amounts with the amounts recognised and disclosed in the accompanying financial statements (for example, the carrying amount of assets used should be consistent with amounts included in the financial statements and when possible the connections between information in these disclosures and amounts in the financial statements should be explained).</p> <p>23 An entity shall disclose its climate-related targets. For each climate-related target, an entity shall disclose:</p> <p>a) metrics used to assess progress towards reaching the target and achieving its strategic goals;</p> <p>b) the specific target the entity has set for addressing climate-related risks and opportunities;</p> <p>c) whether this target is an absolute target or an intensity target;</p> <p>d) the objective of the target (for example, mitigation, adaptation or conformance with sector or science-based initiatives);</p> <p>e) how the target compares with those created in the latest international agreement on climate change and whether it has been validated by a third party;</p> <p>f) whether the target was derived using a sectoral decarbonisation approach;</p> <p>g) the period over which the target applies;</p>

Metrics and Targets disclosure requirements	
TCFD	[Draft] S2 (these numbers are the paragraph numbers in S2)
	<p>h) the base period from which progress is measured; and</p> <p>i) any milestones or interim targets.</p> <p>24 In identifying, selecting and disclosing the metrics described in paragraph 23(a), an entity shall refer to and consider the applicability of industry-based metrics, as described in paragraph 20(b), including those defined in Appendix B of IFRS S2, those included in an applicable IFRS Sustainability Disclosure Standard, or those that otherwise satisfy [draft] IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information.</p>

# Appendix D: A comparison of SECR and [draft] IFRS S2

## SECR disclosures - observations

- The research noted that, while each Annual Report contained SECR disclosures, not all clearly identified these disclosures as related to the SECR requirements. These disclosures did not appear to give rise to any expectations for the financial statements, but did provide a common source of information, on Green House Gas (GHG) emissions.
- Two of the entities assessed had not completed analysis of their scope three emissions, and one reported Scope three on a 1-year delayed basis. For the remainder of the sample, variations in the emissions profile were significant. Scope 3 emissions ranged from less than 5% to nearly 90% of total emissions, reflecting the range of sectors in the sample.
- This information was helpful contextually for considering the aspects of each company's operations that gave rise to carbon intensity, and potential climate-related implications for its financial statements.

D1. This appendix contains a comparison between the Streamlined Energy and Carbon Reporting (SECR) and International Sustainability Standards Board (ISSB) Exposure Draft *Climate-related Disclosures (S2)*<sup>33</sup>.

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<sup>33</sup> Exposure Draft [IFRS S2 Climate-related Disclosures](#)

- D2. This is the principal regulatory regime for reporting emissions and associated information and is intended to complement the TCFD framework. Quoted companies<sup>34</sup> of any size that are required to prepare a Directors' Report under Part 15 of the Companies Act 2006, large<sup>35</sup> unquoted companies and LLPs.
- D3. SECR requires quoted and large unquoted companies to include their greenhouse gas emissions, energy consumption and energy efficiency action in their annual Directors' report and large LLPs to report that information in an Energy and Carbon Report. The requirements apply to financial years beginning on or after 1 April 2019. The SECR includes one set of reporting requirements for quoted companies, and another for large unquoted companies and LLPs.

SECR	[Draft] S2 <sup>36</sup>
<p><b><u>Governance and risk management:</u></b></p> <p>Disclose in the Directors' report any measures taken for the purpose of increasing the company's energy efficiency, including a description of the principal measures taken for that purpose.</p> <p><b><u>Metrics:</u></b></p> <p><u>Quoted companies</u> within the scope of the legislation must continue as a minimum to disclose in their Directors' Report their:</p> <ul style="list-style-type: none"> <li>• Global scope 1 and 2 GHG emissions. Reporting scope 3 emissions is voluntary, but strongly recommended.</li> </ul>	<p>21 An entity shall disclose information relevant to the cross-industry metric categories of:</p> <p>a) greenhouse gas emissions—the entity shall disclose:</p> <p style="margin-left: 20px;">i. its absolute gross greenhouse gas emissions generated during the reporting period, measured in accordance with the Greenhouse Gas Protocol Corporate Standard, expressed as metric tonnes of CO2 equivalent, classified as:</p> <p style="margin-left: 20px;">(1) Scope 1 emissions;</p> <p style="margin-left: 20px;">(2) Scope 2 emissions;</p>

34 Quoted companies in this respect are those whose equity share capital is officially listed on the main market of the London Stock Exchange; or is officially listed in a European Economic Area State; or is admitted to dealing on either the New York Stock Exchange or NASDAQ

35 The definition of "large" is the same as applies in the existing framework for annual accounts and reports, based on sections 465 and 466 of the Companies Act 2006. The qualifying conditions are met by a company or LLP in a year in which it satisfies two or more of the following requirements:

- a) Turnover of £36 million or more,
- b) Balance sheet total of £18 million or more;
- c) Employees of 250 or more

Under changes made by the 2018 Regulations, unquoted companies incorporated in the UK which are required to prepare a Directors' Report under Part 15 of the Companies Act 2006, and which are "large" are required to prepare and file energy and carbon information in their Directors' Reports. This applies to both registered companies and to unregistered companies which are required to prepare company accounts and reports. Under the 2018 Regulations, LLPs which are "large" are also required to prepare and file energy and carbon information in their accounts and reports (in a new 'Energy and Carbon Report').

36 Paragraph 21 and 22 of IFRS S2 which are specific to greenhouse gas emissions are included here for comparison with IFRS S2

SECR	[Draft] S2 <sup>36</sup>
<ul style="list-style-type: none"> <li>• At least one emissions intensity ratio. Intensity ratios compare emissions data with an appropriate business metric or financial indicator, such as sales revenue or square metres of floor space, and allow for comparability.</li> <li>• Underlying global energy use for the current reporting year.</li> <li>• Previous year's figures for energy use and GHG.</li> <li>• Energy efficiency actions, with a narrative description of the main measures taken to increase energy efficiency in the relevant financial year.</li> <li>• Methodology used. It is recommended that companies use a widely recognized independent standard, such as: GHG Reporting Protocol (Corporate Standard), International Organisation for Standardization, ISO (ISO 14064-1:2018), Climate Disclosure Standards Board (CDSB), The Global Reporting Initiative Sustainability Reporting Guidelines.</li> </ul> <p><u>Large unquoted companies and LLPs must report:</u></p> <ul style="list-style-type: none"> <li>• UK energy use and associated GHG emissions.</li> <li>• Previous year's figures for energy use and GHG emissions.</li> <li>• At least one intensity ratio.</li> <li>• Energy efficiency actions.</li> <li>• Methodology used.</li> </ul>	<ul style="list-style-type: none"> <li>(3) Scope 3 emissions; <ul style="list-style-type: none"> <li>ii. its greenhouse gas emissions intensity for each scope in paragraph 21(a)(i)(1)–(3), expressed as metric tonnes of CO2 equivalent per unit of physical or economic output;</li> <li>iii. for Scope 1 and Scope 2 emissions disclosed in accordance with paragraph 21(a)(i)(1)–(2), the entity shall disclose emissions separately for: <ul style="list-style-type: none"> <li>(1) the consolidated accounting group (the parent and its subsidiaries);</li> <li>(2) associates, joint ventures, unconsolidated subsidiaries or affiliates not included in paragraph 21(a)(iii)(1);</li> </ul> </li> <li>iv. the approach it used to include emissions for the entities included in paragraph 21(a)(iii)(2) (for example, the equity share or operational control method in the Greenhouse Gas Protocol Corporate Standard);</li> <li>v. the reason, or reasons, for the entity's choice of approach in paragraph 21(a)(iv) and how that relates to the disclosure objective in paragraph 19;</li> <li>vi. for Scope 3 emissions disclosed in accordance with paragraph 21(a)(i)(3): <ul style="list-style-type: none"> <li>(1) an entity shall include upstream and downstream emissions in its measure of Scope 3 emissions;</li> <li>(2) an entity shall disclose the categories included within its measure of Scope 3 emissions, to enable users of general purpose financial reporting to understand</li> </ul> </li> </ul> </li> </ul>

SECR	[Draft] S2 <sup>36</sup>
	<p>which Scope 3 emissions have been included in, or excluded from, those reported;</p> <p>(3) when the entity's measure of Scope 3 emissions includes information provided by entities in its value chain, it shall explain the basis for that measurement;</p> <p>(4) if the entity excludes those greenhouse gas emissions in paragraph 21(a)(vi)(3), it shall state the reason for omitting them, for example, because it is unable to obtain a faithful measure;</p> <p>b) transition risks—the amount and percentage of assets or business activities vulnerable to transition risks;</p> <p>c) physical risks—the amount and percentage of assets or business activities vulnerable to physical risks;</p> <p>d) climate-related opportunities—the amount and percentage of assets or business activities aligned with climate-related opportunities;</p> <p>e) capital deployment—the amount of capital expenditure, financing or investment deployed towards climate-related risks and opportunities;</p> <p>f) internal carbon prices:</p> <ol style="list-style-type: none"> <li>i. the price for each metric tonne of greenhouse gas emissions that the entity uses to assess the costs of its emissions;</li> <li>ii. an explanation of how the entity is applying the carbon price in decision-making (for example, investment decisions, transfer pricing and scenario analysis);</li> </ol>

SECR	[Draft] S2 <sup>36</sup>
	<p>g) remuneration:</p> <ul style="list-style-type: none"> <li>i. the percentage of executive management remuneration recognised in the current period that is linked to climate-related considerations; and</li> <li>ii. a description of how climate-related considerations are factored into executive remuneration (also see paragraph 5(f)).</li> </ul> <p>22 In preparing disclosures to fulfil the requirements in paragraph 21(b)–(g), an entity shall</p> <ul style="list-style-type: none"> <li>a) consider whether industry-based metrics associated with disclosure topics, as described in paragraph 20(b), including those defined in an applicable IFRS Sustainability Disclosure Standard or those that otherwise satisfy [draft] IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information could be used in whole or part to meet the requirements; and</li> <li>b) in accordance with paragraphs 37–38 of [draft] IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information, consider the relationship of these amounts with the amounts recognised and disclosed in the accompanying financial statements (for example, the carrying amount of assets used should be consistent with amounts included in the financial statements and when possible the connections between information in these disclosures and amounts in the financial statements should be explained).</li> </ul>

## Appendix E Glossary of terms

<b>Term</b>	<b>Description</b>
Annual Report	A document that public corporations must provide annually to shareholders that describes their operations and financial conditions.
Amortisation	The systematic allocation of the depreciable amount of an intangible asset over its useful life. (IAS 38, paragraph 8)
Carbon tax	A carbon tax is an indirect tax designed to reduce greenhouse gas emissions by increasing prices of the fossil fuels that emit them when burned.
CGU	A cash-generating unit is the smallest identifiable group of assets that generates cash inflows that are largely independent of the cash inflows from other assets or groups of asset. (IAS 36, paragraph 6)
Companies Act 2006	The Companies Act 2006 is legislation that governs companies in the UK.
Companies (Strategic Report)	The strategic report provides a company's shareholders with a holistic and meaningful picture of a company's business model, strategy, risks, development, performance, position and future prospects including relevant non-financial information.
COP 26	The 2021 United Nations Climate Change Conference, more commonly referred to as COP26, was the 26th United Nations Climate Change conference, held at the SEC Centre in Glasgow, Scotland, United Kingdom, from 31 October to 13 November 2021.
CO2	Carbon dioxide (CO <sub>2</sub> ) is an important heat-trapping gas, or greenhouse gas, that comes from the extraction and burning of fossil fuels (such as coal, oil, and natural gas), from wildfires, and from natural processes like volcanic eruptions.



<b>Term</b>	<b>Description</b>
Depreciation	Depreciation is the systematic allocation of the depreciable amount of an asset over its useful life. (IAS 16, paragraph 6)
DRI	Direct reduced iron (DRI), also called sponge iron is produced from the direct reduction of iron ore (in the form of lumps, pellets, or fines) into iron by a reducing gas or elemental carbon produced from natural gas or coal.
ESG	Environmental, social, and corporate governance, also known as environmental, social, governance, is a business framework for considering environmental issues and social issues in the context of corporate governance.
ETS	Emissions Trading Schemes
FCA	The Financial Conduct Authority regulates financial services firms and financial markets in the UK.
Financial Statements	Report financial results of an entity for a given period.
FRC	The Financial Reporting Council regulate auditors, accountants and actuaries, and set the UK's Corporate Governance and Stewardship Codes.
FTSE 100	A share index of the 100 largest companies traded on the London Stock Exchange (LSE).
FTSE 250	A share index of the 250 largest companies traded on the London Stock Exchange (LSE).
FTSE 350	A share index of the 350 largest companies traded on the London Stock Exchange (LSE). The FTSE 350 index is made up of the constituents of the FTSE 100 and FTSE 250 index
GHG	Greenhouse gases
Greenwashing	Greenwashing is the process of conveying a false impression or misleading information about how a company's products are environmentally sound.
IAS 1	International Accounting Standard <i>Presentation of Financial Statements</i>

<b>Term</b>	<b>Description</b>
IAS 8	International Accounting Standard <i>Accounting Policies, Changes in Accounting Estimates and Errors</i>
IASB	International Accounting Standards Board
IFRS	International Financial Reporting Standard
Intangible assets	An identifiable non-monetary asset without physical substance.
ISSB	International Sustainability Standards Board
Material/Materiality	<p>Material: Information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements, which provide financial information about a specific reporting entity. (IAS 1, paragraph 7)</p> <p>Materiality depends on the nature or magnitude of information, or both. An entity assesses whether information, either individually or in combination with other information, is material in the context of its financial statements taken as a whole. (IAS 1, paragraph 7)</p>
Net Zero	Net zero refers to a state in which the greenhouse gases going into the atmosphere are balanced by removal out of the atmosphere.
PPE	Property, plant and equipment are tangible items that: (a) are held for use in the production or supply of goods or services, for rental to others, or for administrative purposes; and (b) are expected to be used during more than one period. (IAS 16, paragraph 6)
R&D	Research and Development
RFI	Requests for information are formal requests for feedback or other information, including on technical projects, post-implementation reviews and broader consultations.

<b>Term</b>	<b>Description</b>
Residual value	The residual value of an asset is the estimated amount that an entity would currently obtain from disposal of the asset, after deducting the estimated costs of disposal, if the asset were already of the age and in the condition expected at the end of its useful life. (IAS 16, paragraph 6)
Scope 3 emissions	Scope 3 emissions are the result of activities from assets not owned or controlled by the reporting organization, but that the organization indirectly affects in its value chain.
SECR	Streamlined Energy and Carbon Reporting is a mandatory scheme that applies to large UK companies. Businesses within scope must collect information relating to their energy use and associated carbon emissions, then submit this as part of their annual reporting to Companies House.
SAF	Sustainable Aviation Fuel (SAF)
Sustainability linked debt	Sustainability-linked loans are loans where a portion of the interest rate is linked to the borrower's ability to meet sustainability targets.
TCFD	The Financial Stability Board created the Task Force on Climate-related Financial Disclosures (TCFD) to improve and increase reporting of climate-related financial information.
The Listing Rules	The Listing Rules set out mandatory standards for any company wishing to list its shares or securities for sale to the public, and are subject to the oversight of the Financial Conduct Authority (FCA).
Useful life	The period over which an asset is expected to be available for use by an entity or the number of production or similar units expected to be obtained from the asset by an entity.
UKEB	United Kingdom Endorsement Board

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