



11 June 2020

## UK Finance response

### European Commission consultation on the review of the Non-Financial Reporting Directive

#### Introduction

UK Finance is the collective voice for the banking and finance industry operating within the UK. Representing more than 250 firms across the industry, we act to enhance competitiveness, support customers and facilitate innovation. We consider it appropriate to respond to the European Commission consultation as we view the issues raised as having relevance both in terms of changes that might be expected to be seen in the UK regime given the case for continued broad alignment and the relevance of the EU regime to many of our member firms.

UK requirements for non-financial or strategic reporting have been introduced within the context of the Non-Financial Reporting Directive (NFRD). In keeping with the NFRD, they apply to large listed companies, and large banks and insurance companies (whether listed or not) providing they have more than 500 employees.

The NFRD identifies four sustainability issues: environment; social and employee issues; human rights; and bribery and corruption. It requires companies to disclose information about their business models, policies (including due diligence), outcomes, risk and risk management and KPIs, but does not introduce a non-financial reporting standard or framework. In June 2019, the Commission published guidelines integrating TCFD recommendations.

Forthcoming regulations on sustainability disclosures and the classification system (or taxonomy) are dependent upon better non-financial information. The taxonomy regulation will require in-scope companies to disclose the proportion of their activities that are classified as sustainable according to the taxonomy.

UK Finance agrees that currently reported non-financial information overall is insufficiently comparable or reliable and are supportive in concept of the intention behind the review, which is to scale up sustainable finance by improving transparency. The consultation is divided into seven sections. In addition to submitting our response online, we replicate our answers to the multiple questions in the body of this paper and additionally show our qualitative responses to the themed questions directly below.

The Covid-19 crisis has brought into vivid focus the importance not only of environmental objectives, but social and governance goals. In the same way that we should be looking to align climate objectives to economic recovery measures as we seek to 'build back better' we see a case for strategic planning also taking account of social impact. While a key element of this will be ensuring that investment in support of net-zero emissions commitments is delivered in a way consistent with *just transition* principles there are clearly others. Improved non-financial, strategic reporting on the part of businesses and other organisations can be a significant contributory factor to this.

## **Consultation response**

### **Quality and scope of non-financial information (Qu 1-7)**

While we support the drive to increase the emphasis on non-financial reporting, and support the introduction of a more explicit statutory framework, we would also underline that aspects of non-financial reporting differ considerably from financial reporting and that qualitative aspects will continue to be of prime importance. These lend themselves less readily to frameworks developed purely by reference to quantitative reporting. It needs also needs to be appreciated that while the EU taxonomy is a step forward – and is to be complimented – firms are not as yet in a position to apply the taxonomy across their balance sheet, This is the topic of further developmental work being undertaken under a UNEP FI-EBF in which we are involved.

In response to the question about whether further information should be disclosed, we see a case for disaggregating climate-related information in support of the Paris Agreement and subsequent net-zero commitments.

In case not evident, improved quantitative reporting on the part of banks and other providers of finance is only possible once the quality of non-financial reporting is improved across the board.

### **Standardisation (Qu 8-21)**

The individual questions in this sector make reference to a good number of pre-existing reference points and organisations that can be said to have legitimate grounds for being involved in the dialogue on standardisation and a contribution to make. We view the key as the engendering of an inclusive dialogue in which as common a basis as possible can be found for global application. An issue that we have struggled with is whether these requirements, even simplified, should be mandated for SMEs. Our conclusion, on balance, is that they should on the grounds that the mainstreaming of sustainable finance, including but not exclusively in support of net-zero carbon objectives, will invariably bring information demands on their part and putting this within the context of a statutory framework can only help all round.

This said, it is arguable that the best way promote green approaches within SME community by offering green lending products incorporating an incentive for them. Some standardisation in support of this would be helpful, e.g. in respect of loans relating to green mortgage or energy efficiency upgrades. It is not unrealistic to think that within the foreseeable future the uptake of green or sustainable financial products could extend to 40-50% SMEs. This would arguably be a better way of proceeding than making reporting mandatory.

### **Materiality (Qu 22-24)**

We support the idea of a clear and simple definition of ‘materiality’ for non-financial information based upon a dual perspective based upon the impact on both the firm and the environment or society. This will help drive comparability and will need cover both quantitative and qualitative aspects.

### **Assurance (Qu 25-32)**

International Standard on Assurance Engagement - ISAE 3000 – provides a starting point. We agree assurance providers should be required to identify and publish key engagement risks, the provider’s response to those risks and related key observations. While ‘reasonable’ assurance engagement should be the medium term objective, we consider that ‘limited’ engagement might be more fitting to the stage of development of non-financial information and therefore a more appropriate basis for the next iteration of the NFRD regime. There may also be a role for internal assurance, particularly in the early years.

### **Digitisation (Qu 33-35)**

We see merit on setting out on a path that would involve digitisation but would caution against underestimation of the time and resource that this would involve. iXBRL took a considerable amount of time to develop and even longer to make capable of practical application. We see digitisation as a

longer-term objective, rather than a deliverable within the timeframe for updating the NFRD.

**Structure and location (Qu 36-39)**

We do not consider that the provision of non-financial information as part of a separate report creates insurmountable problems providing suitable disclosures are made in the management (or strategic) report and reflected in the reporting of performance against non-financial KPIs. This enables the breadth of non-financial information to be reflected and should not be misinterpreted as companies not needing to provide suitable information within their management (or strategic) report. There are plenty of good examples within the marketplace showing the extent to which non-financial reporting has improved in recent years. Signposting assists hugely where information is given in different locations within the ARA and in supplementary reports.

**Personal scope (which companies should disclose) (Qus 40-43)**

We see a case in particular for a simplified version of the NFRD being applied to SMEs, with a suitable emphasis placed on proportionality and materiality in their circumstances.

Paul Chisnall  
Director, Sustainability  
UK Finance



**EUROPEAN COMMISSION**

Directorate-General for Financial Stability, Financial Services and Capital Markets Union

FINANCIAL MARKETS

Corporate reporting, audit and credit rating agencies

## Consultation questions

### 1. QUALITY AND SCOPE OF NON-FINANCIAL INFORMATION TO BE DISCLOSED

Question 1.: To what extent do you agree or disagree with the following statements about possible problems with regard to non-financial reporting?

	1	2	3	4	5	Don't know
The lack of comparability of non-financial information reported by companies pursuant to the NFRD is a significant problem.			X			
The limited reliability of non-financial information reported by companies pursuant to the NFRD is a significant problem.			X			
Companies reporting pursuant to the NFRD do not disclose all relevant non-financial information needed by different user groups.			X			

*(1= mostly disagree, 2= mostly disagree, 3= partially disagree and partially agree, 4= mostly agree, 5= totally agree)*

Question 2.: Do you consider that companies reporting pursuant to the NFRD should be required to disclose information about other non-financial matters in addition to those currently set-out in Article 19a? Please specify (no more than three m

Question 3.: Are there additional categories of non-financial information related to a company's governance and management procedures, including related metrics where relevant, (for example,

We see a case for disaggregating climate-related information in support of the Paris Agreement and subsequent net-zero commitments.

scenario analyses, targets, more forward-looking information, or how the company aims to contribute to society through its business activities) that companies should disclose in order to enable users of their reports to understand the development, performance, position and impacts of the company? Please specify (no more than three).

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Question 4.: In light of the importance of intangibles in the economy, do you consider that companies should be required to disclose additional non-financial information regarding intangible assets or related factors (e.g. intellectual property, software, customer retention, human capital, etc.)?

Yes	No	Don't know
X		

Question 5.: To what extent do you think that the current disclosure requirements of the NFRD ensure that investee companies report the information that financial sector companies will need to meet their new disclosure requirements?

Not at all	To some extent but not much	To a reasonable extent	To a very great extent	Don't know
	X			

Question 6.: How do you find the interaction between different pieces of legislation (You can provide as many answers as you want)

It works well	There is an overlap	There are gaps	There is a need to streamline	It does not work at all	Don't know
			X		

Question 7.: In order to ensure better alignment of reporting obligations of investees and investors, should the legal provisions related to non-financial reporting define environmental matters on the

basis of the six objectives set-out in the taxonomy regulation: (1) climate change mitigation; (2) climate change adaptation; (3) sustainable use and protection of water and marine resources; (4) transition to a circular economy (5) pollution prevention and control; (6) protection and restoration of biodiversity and ecosystems?

Yes X	No	Don't know
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Please provide any comments or explanations to justify your answers to questions 1 to 7.  
 While we support the drive to increase the emphasis on non-financial reporting, and support the introduction of a more explicit statutory framework, we would also underline that aspects of non-financial reporting differ considerably from financial reporting and that qualitative aspects will continue to be of prime importance. These lend themselves less readily to frameworks developed purely by reference to quantitative reporting. It needs also needs to be appreciated that while the EU taxonomy is a step forward – and is to be complimented – firms are not as yet in a position to apply the taxonomy across their balance sheet, This is the topic of further developmental work being undertaken under a UNEP FI-EBF in which we are involved. In case not evident, improved quantitative reporting on the part of banks and other providers of finance is only possible once the quality of non-financial reporting is improved across the board.

**2. STANDARDISATION**

Question 8.: In your opinion, to what extent would a requirement on companies to apply a common standard for non-financial information resolve the problems identified?

Not at all	To some extent but not much	To a reasonable extent X	To a very great extent	Don't know
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Question 9.: In your opinion, is it necessary that a standard applied by a company under the scope of the Non-Financial Reporting Directive should include sector-specific elements?

Yes X	No	Don't know
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Question 10.: To what extent would the application of one of the following standards or frameworks, applied on its own, resolve the problems identified while also enabling companies to comprehensively meet the current disclosure requirements of the Non- Financial Reporting Directive, taking into account the double-materiality perspective (See section 4)?

	1	2	3	4	Don't know
<u>Global Reporting Initiative</u>		X			
<u>Sustainability Accounting Standards Board</u>		X			
<u>International Integrated Reporting Framework</u>		X			

*1= not at all, 2= to some extent but not much, 3= to a reasonable extent, 4= to a very great extent*

**Question 11.:** If there were to be a common European non-financial reporting standard applied by companies under the scope of the NFRD, to what extent do you think it would be important that such a standard should incorporate the principles and content of the following existing standards and frameworks:

	1	2	3	4	Don't know
<u>Global Reporting Initiative</u>			X		See below
<u>Sustainability Accounting Standards Board</u>			X		
<u>International Integrated Reporting Framework</u>			X		
<u>Task Force on Climate-related Financial Disclosures (TCFD)</u>			X		
<u>UN Guiding Principles Reporting Framework (human rights)</u>			X		
<u>CDP</u>			X		
<u>Carbon Disclosure Standards Board (CDSB)</u>	X				
<u>Organisation Environmental Footprint (OEF)</u>	X				
<u>Eco-Management and Audit Scheme (EMAS)</u>	X				

Another framework or standard *					
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*1= not at all, 2= to some extent but not much, 3= to a reasonable extent, 4= to a very great extent*

\*Please specify other framework or standard (no more than three).

	1	2	3	4	5
The need is for a non-duplicative international framework				X	

*1= not at all, 2= to some extent but not much, 3= to a reasonable extent, 4= to a very great extent*

**Question 12.:** If your organisation *fully* applies any non-financial reporting standard or framework when reporting under the provisions of the NFRD, please indicate the recurring annual cost of applying that standard or framework (including costs of retrieving, analysing and reporting the information)

NA

Name of standard or framework (max 3)	Estimated cost of application per year, excluding any one-off start-up costs.

**Question 13.:** In your opinion, would it be useful for there to be a simplified standard and/or reporting format for SMEs?

Yes X	No	Don't know
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Question 14.: To what extent do you think that a simplified standard for SMEs would be an effective means of limiting the burden on SMEs arising from information demands they may receive from other companies, including financial institutions?

Not at all	To some extent but not much	To a reasonable extent X	To a very great extent x	Don't know
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Question 15.: If the EU were to develop a simplified standard for SMEs, do you think that the use of such a simplified standard by SMEs should be mandatory or voluntary?

Mandatory X	Voluntary	Don't know
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Question 16.: In light of these responses, to what extent do you agree that the body responsible for developing a European non-financial reporting standard should also have expertise in the field of financial reporting in order to ensure “connectivity” or integration between financial and non-financial information?

Not at all	To some extent but not much	To a reasonable extent X	To a very great extent	Don't know
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Question 17.: The key stakeholder groups with an interest in and contributing to the elaboration of financial reporting standards have historically been investors, preparers of financial reports (companies) and auditors/accountants. To what extent do you think that these groups should also be involved in the process of developing a European non-financial reporting standard?

	1	2	3	4	Don't know
Investors				X	
Preparers				X	
Auditors/accountants				X	

*1= not at all, 2= to some extent but not much, 3= to a reasonable extent, 4= to a very great extent*

Question 18.: In addition to the stakeholders referred to in the previous question, to what extent do you consider that the following stakeholders should be involved in the process of developing a European non-financial reporting standard?

	1	2	3	4	Don't know
Civil society representatives/NGOs				X	

Academics				X	
Other*					

*1= not at all, 2= to some extent but not much, 3= to a reasonable extent, 4= to a very great extent*

\*Please specify other categories (no more than three).

	1	2	3	4
1.rating agencies				X
2.industry representatives				X
3.				

*1= not at all, 2= to some extent but not much, 3= to a reasonable extent, 4= to a very great extent*

Question 19.: To what extent should the following European public bodies or authorities be involved in the process of developing a European non-financial reporting standard?

	1	2	3	4	Don't know
European Securities Markets Authority (ESMA)			X		
European Banking Authority (EBA)			X		
European Insurance and Occupational Pensions Authority (EIOPA)			X		
European Central Bank (ECB)			X		
European Environment Agency (EEA)			X		
Platform on Sustainable Finance <sup>3</sup>			X		

*1= not at all, 2= to some extent but not much, 3= to a reasonable extent, 4= to a very great extent*

\*Please specify other European public bodies or authorities that you consider should be involved in the process of developing a European non-financial reporting standard (no more than three).

	1	2	3	4
1.EFRAG			X	
2.				
3.				

*1= not at all, 2= to some extent but not much, 3= to a reasonable extent, 4= to a very great extent*

Question 20.: To what extent do you consider that the following national authorities or bodies should be involved in the process of developing European non-financial reporting standards?

	1	2	3	4	Don't know
National accounting standards-setters		X			
Environmental authorities				X	
Other*					

1= not at all, 2= to some extent but not much, 3= to a reasonable extent, 4= to a very great extent

\*Please specify other type of European public bodies or authorities that you consider should be involved in the process of developing a European non-financial reporting standard (no more than three).

	1	2	3	4
1.				
2.				
3.				

1= not at all, 2= to some extent but not much, 3= to a reasonable extent, 4= to a very great extent

Please provide any comments or explanations to justify your answers to questions 8 to 20.

The individual questions in this section make reference to a good number of pre-existing reference points and organisations that can be said to have legitimate grounds for being involved in the dialogue on standardisation and a contribution to make. We view the key as the engendering of an inclusive dialogue in which as common a basis as possible can be found for global application. An issue that we have struggled with is whether these requirements, even simplified, should be mandated for SMEs. Our conclusion, on balance, is that they should on the grounds that the mainstreaming of sustainable finance, including but not exclusively in support of net-zero carbon objectives, will invariably bring information demands on their part and putting this within the context of a statutory framework can only help all round.

This said, it is arguable that the best way promote green approaches within SME community by offering green lending products incorporating an incentive for them. Some standardisation in support of this would be helpful, e.g. in respect of loans relating to green mortgage or energy efficiency upgrades. It is not unrealistic to think that within the foreseeable future the uptake of green or sustainable financial products could extend to 40-50% SMEs. This would arguably be a better way of proceeding than making reporting mandatory.

### 3. APPLICATION OF THE PRINCIPLE OF MATERIALITY

Question 21: Do you think that the definition of materiality set-out in Article 2(16) of the Accounting Directive is relevant for the purposes of determining which information is necessary to understand *a company's development, performance and position*?

No, not at all	To some extent but not much	To a reasonable extent	Yes, to a very great extent X	Don't know
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Question 22.: Do you think that the definition of materiality set-out in Article 2(16) of the Accounting Directive is relevant for the purposes of determining which information is necessary to understand *a company's impacts on society and the environment*?

No, not at all	To some extent but not much	To a reasonable extent	Yes, to a very great extent X	Don't know
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Question 23.: If you think there is a need to clarify the concept of 'material' non- financial information, how would you suggest to do so?

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Question 24.: Should companies reporting under the NFRD be required to disclose their materiality assessment process?

Yes X	No	Don't know
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Please provide any comments or explanations to justify your answers to questions 21 to 24.

We support the idea of a clear and simple definition of 'materiality' for non-financial information based upon a dual perspective based upon the impact on both the firm and the environment or society. This will help drive comparability and will need cover both quantitative and qualitative aspects.

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**4. ASSURANCE**

Question 25.: Given that non-financial information is increasingly important to investors and other users, are the current differences in the assurance requirements between financial and non-financial information justifiable and appropriate?

No, not at all	To some extent but not much X	To a reasonable extent	Yes, to a very great extent	Don't know
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Question 26.: Should EU law impose stronger assurance requirements for non-financial information reported by companies falling within the scope of the NFRD?

Yes X	No	Don't know
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Question 27.: If EU law were to require assurance of non-financial information published pursuant to the NFRD, do you think that it should require a *reasonable* or *limited* assurance engagement on the non-financial information published?

Reasonable	Limited X	Don't know
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Question 28.: If EU law were to require assurance of non-financial information published pursuant to the NFRD, should the assurance provider assess the reporting company's materiality assessment process?

Yes X	No	Don't know
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Question 29.: If assurance of non-financial information was required by EU law, should the assurance provider be required to identify and publish the key engagement risks, their response to these risks and any related key observations (if applicable)?

Yes X	No	Don't know
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Question 30.: If assurance of non-financial information was required by EU law, do you think that assurance engagements should be performed based on a common assurance standard?

Yes X	No	Don't know
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If you answered yes in reply to the previous question, please explain whether there is an existing assurance standard that could be used for this purpose or whether a new standard would need to be developed.

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International Standard on Assurance Engagement - ISAE 3000 – provides a starting point.

Question 31.: Do you think that an assurance requirement for non-financial information is dependent on companies reporting against a specific non-financial reporting standard?

Yes X	No	Don't know
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Question 32.: If you publish non-financial information and that information is assured, please indicate the annual costs of such assurance.

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N/A

If you provided an answer to the previous question, please describe the scope of the assurance services provided (issues covered, reasonable/limited, etc.).

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N/A

Please provide any comments or explanations to justify your answers to questions 25 to 32.

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We agree assurance providers should be required to identify and publish key engagement risks, the provider’s response to those risks and related key observations. While ‘reasonable’ assurance engagement should be the medium term objective, we consider that ‘limited’ engagement might be more fitting to the stage of development of non-financial information and therefore a more appropriate basis for the next iteration of the NFRD regime. There may also be a role for internal assurance, particularly in the early years.

**5. DIGITISATION**

Question 33.: To what extent do you agree or disagree with the following statements regarding digitalisation of non-financial information?

	1	2	3	4	5	Don't know
It would be useful to require the tagging of reports containing non-financial information to make them machine-readable.					X	
The tagging of non-financial information would only be possible if reporting is done against standards.					X	
All reports containing non-financial information should be available through a single access point.					X	

*(1= totally disagree, 2= mostly disagree, 3= partially disagree and partially agree, 4= mostly agree, 5= totally agree)*

Question 34.: Do you think that the costs of introducing tagging of non-financial information would be proportionate to the benefits this would produce?

No, not at all	To some extent but not much	To a reasonable extent	Yes, to a very great extent X	Don't know
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Question 35.: Please provide any other comments you may have regarding the digitalisation of sustainability information:

Please provide any comments or explanations to justify your answers to questions 33 to 35.

We see merit on setting out on a path that would involve digitisation but would caution against underestimation of the time and resource that this would involve. iXBRL took a considerable amount of time to develop and even longer to make capable of practical application. We see digisation as a longer-term objective, rather than a deliverable within the timeframe for updating the NFRD.

**6. STRUCTURE AND LOCATION OF NON-FINANCIAL INFORMATION**

Question 36.: Other consequences may arise from the publication of the non-financial statement as part of a separate report. To what extent do you agree with the following statements:

	1	2	3	4	5	Don't know
The option to publish the non-financial statement as part of a separate report creates a significant problem because the non-financial information reported by companies is hard to find (e.g: it may increase search costs for investors, analysts, ratings agencies and data aggregators).		X				
The publication of financial and non-financial information in different reports creates the perception that the information reported in the separate report is of		X				



secondary importance and does not necessarily have implications in the performance of the company.						
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*1= not at all, 5= to a very great extent]*

Question 37.: Do you believe that companies should be required to disclose all necessary non-financial information in the management report?

Yes	No X	Don't know
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Question 38.: If companies are allowed to publish the required non-financial information in a report that is separate from the management report, to what extent do you agree with the following approaches?

	1	2	3	4	5	Don't know
Legislation should be amended to ensure proper supervision of information published in separate reports.				X		
Legislation should be amended to require companies to file the separate report with Officially Appointed Mechanisms (OAMs).					X	
Legislation should be amended to ensure the same publication date for management report and the separate report.		X				

*(1= totally disagree, 2= mostly disagree, 3= partially disagree and partially agree, 4= mostly agree, 5= totally agree)*

Please provide any comments regarding the location of reported non-financial information.

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We do not consider that the provision of non-financial information as part of a separate report creates unsurmountable problems providing suitable disclosures are made in the management (or strategic) report and reflected in the reporting of performance against non-financial KPIs. This enables the breadth of non-financial information to be reflected and should not be misinterpreted as companies not needing to provide suitable information within their management (or strategic) report. There are plenty of good examples within the marketplace showing the extent to which non-financial reporting has improved in recent years. Signposting assists hugely where information is given in different locations within the ARA and in supplementary reports.

Question 39.: Do you consider that the current segregation of non-financial information in separate non-financial and corporate governance statements within the management report provides for effective communication with users of company reports?

No, not at all	To some extent but not much	To a reasonable extent X	Yes, to a very great extent	Don't know
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Please provide any comments or explanations to justify your answers to questions 36 to 39.

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We have nothing further to add to our answer in response to question 38.

**7. PERSONAL SCOPE (WHICH COMPANIES SHOULD DISCLOSE)**

Question 40.: If the scope of the NFRD were to be broadened to other categories of PIEs, to what extent would you agree with the following approaches?

	1	2	3	4	5	Don't know
Expand scope to include all EU companies with securities listed in regulated markets, regardless of their size.					X	
Expand scope to include all <i>large</i> public interest entities (aligning the size criteria with the definition of <i>large undertakings</i> set out in the Accounting Directive: 250 instead of 500 employee threshold).					X	
Expand scope to include <i>all</i> public interest entities, regardless of their size.				X		

(1= totally disagree, 2= mostly disagree, 3= partially disagree and partially agree, 4= mostly agree, 5= totally agree)

Question 41.: If the scope of the NFRD were to be broadened to non-PIEs, to what extent would you agree with the following approaches?

	1	2	3	4	5	Don't know
Expand the scope to include <i>large non-listed</i> companies.					X	
Remove the exemption for companies that are subsidiaries of a parent company that reports non-financial information at group level in accordance with the NFRD.		X				
Expand the scope to include large companies established in the EU but listed outside the EU.				X		
Expand the scope to include large companies not established in the EU that are listed in EU regulated markets.					X	
Expand scope to include <i>all</i> limited liability companies regardless of their size.		X				

(1= totally disagree, 2= mostly disagree, 3= partially disagree and partially agree, 4= mostly agree, 5= totally agree)

Question 42.: If *non-listed* companies were required to disclose non-financial information, do you consider that there should be a specific competent authority in charge of supervising their compliance with that obligation?

Yes X	No	Don't know
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If yes, please specify who in your opinion should carry out this task (National Competent Authorities, European Supervisory Authorities, other...) and how.

A national competent authority

Question 43.: To what extent do you agree with the following statements relating to possible changes of the personal scope of the NFRD for financial institutions?

	1	2	3	4	5	Don't know
The threshold criteria for determining which banks have to comply with the NFRD provisions should be different from those used by Non-Financial Corporates.				X		
The threshold criteria for determining which insurance undertakings have to comply with the NFRD provisions should be different from those used by Non-Financial Corporates.				X		

*(1= totally disagree, 2= mostly disagree, 3= partially disagree and partially agree, 4= mostly agree, 5= totally agree)*

Please provide any comments or explanations to justify your answers to questions 40 to 43.

We see a case in particular for a simplified version of the NFRD being applied to SMEs, with a suitable emphasis placed on proportionality and materiality in their circumstances.

## 8. SIMPLIFICATION AND REDUCTION OF ADMINISTRATIVE BURDENS FOR COMPANIES

Question 44.: If your company publishes non-financial information pursuant to the NFRD, please state how much time the employees of your company spend per year carrying out this task, including time of retrieving, analysing and reporting the information? Please provide your answer in terms of full-time-equivalents (FTEs, 1 FTE= 1 employee working 40h a week during 250 working days per year). Please provide your answer for reports published in 2019, covering financial year 2018.

N/A

Question 45.: To what extent do you agree with the following statements?

	1	2	3	4	5	Don't know
Companies reporting pursuant to the NFRD face uncertainty and complexity when deciding what non-financial information to report, and how and where to report such information.			X			
Companies are under pressure to respond to individual demands for non-financial information from sustainability rating agencies, data providers and civil society, irrespective of the information that they publish as a result of the NFRD.					X	
Companies reporting pursuant to the NFRD have difficulty in getting the information they need from business partners, including suppliers, in order to meet their disclosure requirements.				X		

*(1= totally disagree, 2= mostly disagree, 3= partially disagree and partially agree, 4= mostly agree, 5= totally agree)*

Please provide any comments or explanations to justify your answers to questions 44 to 45.

We have nothing further to add.