



Normes européennes de *reporting* sur la durabilité (ESRS) : focus sur les normes sociales

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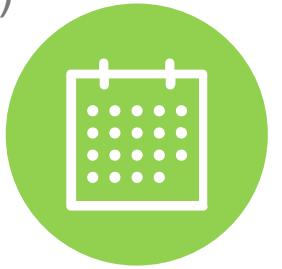
Ce document fait référence au **projet d'acte délégué de la Commission européenne** publié le 9 juin 2023 (traduction libre)

1. Actualité de l'EFRAG et vue d'ensemble du référentiel ESRS
2. Grands principes et évolutions des normes ESRS S
3. Focus sur ESRS S1 et ses évolutions
4. Focus sur les autres normes sociales

01

Actualité de l'EFRAG et vue d'ensemble du
référentiel ESRS

Calendrier de mise en œuvre attendue des ESRS (en attente de l'acte délégué final)



Directive UE

⇒ Transposition par les Etats membres dans le droit national

Réglementation UE

⇒ Applicable dans tous les Etats membres UE sans besoin de transposition

Règlement / Acte délégué UE

ESRS

04/2022
EFRAG –
Consultation
Projet pour le
1^{er} lot ESRS

22/11/2022
EFRAG –
Projet pour le
1^{er} lot ESRS
envoyé à la CE

Eté 2023 ?
EFRAG –
Guidance pour
1^{er} lot des
projets ESRS

- CE : Commission européenne
- JO : Journal Officiel

09/06/2023
CE –
**Projet d'Acte délégué
1^{er} lot ESRS**
Consultation : 4 sem.
jusqu'au 7/07/23

Fin juillet/août 2023 ?
CE –
Approbation
Acte délégué
1^{er} lot ESRS

Période de scrutin par
le Parlement UE et le Conseil UE

2 mois + 2 mois possibles

Q4 2023 ?
Publication
au JO UE
Acte délégué
1^{er} lot ESRS

1/1/2024
ESRS
entrent en
vigueur

Q3/Q4 2023 ?
EFRAG –
Consultations
Projets pour 2^{ème} lot
- Taxonomie digitale
- ESRS PME cotées / non
cotées
- Normes sectorielles...

Le calendrier prévu par la CSRD pour le 2^{ème}
lot des ESRS (30/6/2024) ne sera pas tenu

Programme de travail de l'EFRAG

Développement d'un écosystème de soutien au 1^{er} lot des ESRS

- Très court terme : accompagner l'application / interprétation du 1^{er} lot ESRS
 - Développement de **guidance / FAQs** sur l'évaluation de la **double matérialité** et la **chaîne de valeur** – Consultation ?
 - Possibilité de poser des questions sur le site web de l'EFRAG – Timing ?
- Très court terme : rendre l'accès aux ESRS plus facile
 - Mise à disposition de la liste des data points ?

Autres activités du programme de travail à court terme

- ESRS pour les **PME cotées (LSME)** ; ESRS pour les **autres PME** à appliquer sur une base volontaire (**VSME**) - Consultation : Q4 2023 ?
- **Taxonomies digitales XBRL pour 1) les ESRS (et 2) la taxonomie environnementale de l'article 8 de l'UE** - Consultation : Q3/Q4 2023 ?
- **Normes sectorielles** : lot 1 : Finalisation des EDs pour ESRS SEC 1 *Classification sectorielle* et approche générale des ESRS spécifiques aux secteurs, et des ESRS SEC pour 1) L'extraction minière, les carrières et le charbon, 2) Le pétrole et le gaz - Consultation : Q4 2023 ?

Activités du programme de travail à moyen terme

- Guidance pour le **secteur financier** : chaîne de valeur
- **Secteurs** – 2^{ème} lot : agriculture, élevage et pêche ; transport routier ; 3^{ème} lot : y compris le secteur financier... etc... Il faudra au moins 5 ans pour couvrir les 40 secteurs identifiés.
- ESRS pour **les groupes non-européens**

Eléments de contexte

- 15 mars : annonce de la présidente [Von der Leyen](#) demandant d'envisager une réduction de 25 % des exigences UE en matière de rapports émis par les entreprises.
- 21 mars : annonce de la [Commissaire McGuinness](#) demandant à l'EFRAG de revoir ses priorités et de se concentrer sur les activités de mise en œuvre du 1^{er} lot des ESRS.

Le premier jeu de normes ESRS

[Projet de Réglementation Délégée](#) publié par la Commission européenne le 9 juin 2023 – Commentaires avant le 7 juillet

Une présentation par la CE du projet de DA a été faite lors d'une réunion de l'EFRAG SRB le 14 juin (support et replay disponibles [ici](#)).

Les projets de l'EFRAG de novembre 2022 ainsi que les bases de conclusion et des vidéos éducatives (mises en ligne en mars 2023) sont disponibles [ici](#).

Environ 80 “Disclosure Requirements” - DR

- 2/3 informations qualitatives –
1/3 informations quantitatives

Informations sélectionnées selon le principe de la double matérialité

- Matérialité d'impact
- Matérialité financière

3 niveaux d'informations à fournir

- Tous secteurs ('Sector-agnostic')
- Spécifiques au secteur – à venir
- Spécifiques à l'entité

4 domaines sur lesquels reporter

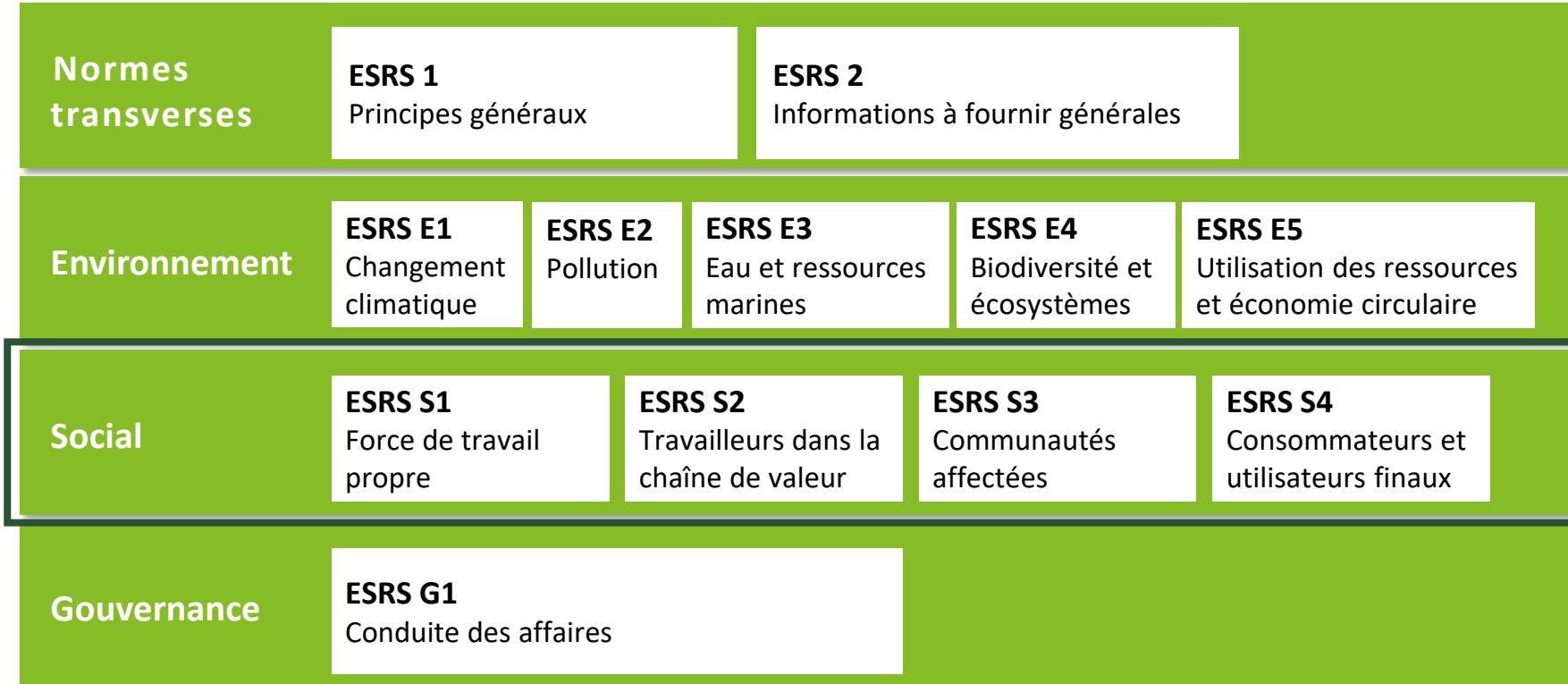
- Gouvernance
- Stratégie (et modèle d'affaire)
- Gestion des impacts, risques et opportunités ('IROs')
- Indicateurs et objectifs ('targets')

Normes transverses	ESRS 1 Principes généraux	ESRS 2 Informations à fournir générales			
Environnement	ESRS E1 Changement climatique	ESRS E2 Pollution	ESRS E3 Eau et ressources marines	ESRS E4 Biodiversité et écosystèmes	ESRS E5 Utilisation des ressources et économie circulaire
Social	ESRS S1 Force de travail propre	ESRS S2 Travailleurs dans la chaîne de valeur	ESRS S3 Communautés affectées	ESRS S4 Consommateurs et utilisateurs finaux	
Gouvernance	ESRS G1 Conduite des affaires				

02

Grands principes et évolutions des normes ESRS S

Les normes sociales : une approche selon la chaîne de valeur



Calendrier de 1^{ère} application des normes sociales

	Entreprises dont les effectifs > 750	Entreprises dont les effectifs < 750
ESRS S1 (*)	<ul style="list-style-type: none">Soumise à analyse de matérialité dès la 1^{ère} année => Informations à présenter obligatoirement pour tous les sujets matériels identifiés qui sont couverts par ESRS S1	
ESRS S2	Idem	<ul style="list-style-type: none">Pas d'obligation de publier des informations en année 1 même si des sujets sont matérielsSoumise à analyse de matérialité à compter de la 2^{ème} année
ESRS S3	Idem	<ul style="list-style-type: none">Pas d'obligation de publier des informations en années 1 & 2 même si des sujets sont matérielsSoumise à analyse de matérialité à compter de la 3^{ème} année
ESRS S4	Idem	Idem

(*) Possibilité de différer d'un an la présentation de certains indicateurs sociaux (personnes handicapées, couverture sociale, congés protection sociale, santé et sécurité, congés familiaux, etc.) quelle que soit la taille de l'entreprise (voir Annexe C d'ESRS 1)

Les nouvelles dispositions transitoires et volontaires encadrant ESRS S1 (1/2)

			Employees		Non-employees	
ESRS S1	S1-6	Characteristics of the undertaking's employees			Due date	Approach
					Due date	Approach
	S1-7	Characteristics of non-employee workers	Breakdown per country (subject to threshold) Breakdown per type of contract (permanent, temporary, non-guaranteed hours) and by gender	From the 1st year	Subject to materiality	Not applicable
			Breakdown per full/ part-time Breakdown by region	From the 1st year	Voluntary	
			Total number or FTE of non-employee workers (KPI)	Not applicable		1-year phase-in Subject to materiality
			Most common types of non-employee workers and relationship with the undertaking (qualitative)	Not applicable		1-year phase-in Voluntary
			Type of work (qualitative)	Not applicable		1-year phase-in Voluntary
	S1-8	Collective bargaining and social dialogue	Methodologies and assumptions (qualitative)	Not applicable		1-year phase-in Subject to materiality
			Contextual information (qualitative)	Not applicable		1-year phase-in Subject to materiality
			All data points except: <ul style="list-style-type: none">- Clarification regarding employees not covered by collective bargaining agreements- Breakdown by country and type of employee for employees not covered by social protection	1-year phase-in for non-EEA countries	Subject to materiality	Voluntary
	S1-10	Adequate wages	All data points		Voluntary	1-year phase-in for non-EEA countries Voluntary
		Voluntary				

Les nouvelles dispositions transitoires et volontaires encadrant ESRS S1 (1/2)

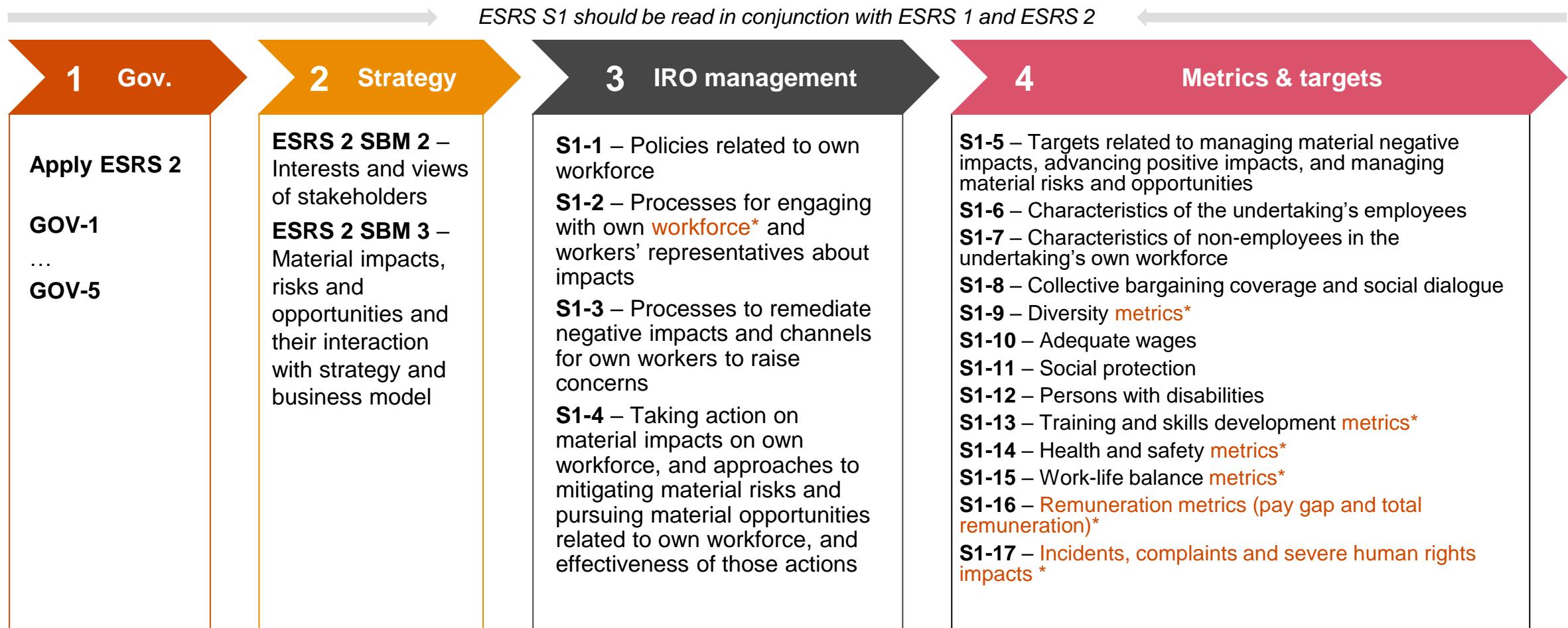
			Employees		Non-employees					
ESRS S1				Due date		Approach		Due date		Approach
	S1-11	Social protection	All data points	1-year phase-in	Subject to materiality		1-year phase-in		Voluntary	
	S1-12	Persons with disabilities	All data points	1-year phase-in	Subject to materiality				Non applicable	
	S1-13	Training and skills development indicators	Breakdown by employee category regarding participation in training	From the 1st year	Voluntary		From the 1st year		Voluntary (all data points)	
	S1-14	Health and safety	All data points except:	From the 1st year	Subject to materiality		From the 1st year		Subject to materiality	
			- Work-related ill-health	1-year phase-in	Subject to materiality		1-year phase-in		Voluntary	
			- Number of days lost to accidents	1-year phase-in	Subject to materiality		1-year phase-in		Voluntary	
			- Number of days lost to work-related ill-health	1-year phase-in	Subject to materiality		1-year phase-in		Voluntary	
	S1-15	Work-life balance	All data points	1-year phase-in	Subject to materiality				Not applicable	

03

Focus sur ESRS S1 et ses évolutions

ESRS S1 - Own workforce

Overview



38 pages

17 DRs

21 Quantitative metrics

5 Templates

ESRS S1 - Own Workforce

Quantitative metrics 1/2



high level metrics

General

1 The total **number** and **rate** of employee turnover

2 The total **number** of employees
(*by gender, country* & employment type by gender and by region***)

3 The total **number** of non-employee workers (own workforce) 

Working conditions

4 The **percentage** of employees covered by collective bargaining
(*by country* or region if outside EEA*) 

5 The **percentage** of employees covered by workers' representatives for social dialogue (*by country****) 

6 The **percentage** of workers paid below adequate wages
(*by country*)

Working conditions

7 The **percentage** of people in its own workforce covered by health & safety management system

8 The **number** of work-related fatalities

9 The **number** and **rate** of recordable work-related accidents

10 The **number** of cases of recordable work-related ill health 

11 The **number** of days lost to work-related employees' injuries, accidents, fatalities and ill health 

12 The **percentage** of employees entitled to take family-related leaves 

13 The **percentage** of entitled employees that took family-related leaves (*by gender*) 

 Phase-in provisions applicable

 includes a financial component

* for countries in which the undertaking has 50 or more employees representing at least 10% of its total number of employees

** voluntary datapoint

*** for countries in which the unundertaking has significant employment

ESRS S1 - Own Workforce

Quantitative metrics 2/2



high level metrics

Equal treatment and opportunities

14 The **percentage** and **number** of employees at top management by gender - *NB: different than gender diversity on the board from ESRS 2*

15 The **distribution of employees** by age group (*below, above or in 30-50 yrs old bracket*)

16 The **percentage** of employees with disabilities (by **gender****)



17 The **percentage** of employees with regular performance/career development reviews (by **employee type**** and gender)

18 The average **number** of training hours per employee (by **employee type**** and gender)

Equal treatment and opportunities

18 The male-female pay gap expressed as a **percentage** of average gross hourly earnings of male paid employees

19 The annual **total remuneration ratio** of the highest paid individual to the median annual total remuneration for all employees

Other work-related rights

20 The **number** of work-related, incidents and/or complaints and severe human rights incidents within its own workforce

21 The **total amounts** of material fines, penalties, and compensation for damages for social/human rights issues or incidents



Important reminder: S2, S3 and S4 do not have quantitative metrics at the agnostic-level. They are currently being developed at the sector-level

★ Phase-in provisions applicable € includes a financial component

** voluntary datapoint

ESRS S1 - Own workforce

Main changes compared to draft ESRS S1 (November 2022)

Smaller scope of data collection	Reporting threshold adjustment
<p>ESRS 2 SBM-3 (IROs and interaction w/ strategy & business models): disclose whether material IROs cover people in own workforce who “are likely to be” impacted. <i>Before:</i> workforce who “can be” impacted.</p>	<p>Employee headcount required at country level where undertaking has ≥ 50 employees which represents 10% of undertaking’s total workforce. <i>Before:</i> countries with ≥ 50 employees, regardless of representation %.</p>
<p>S1-1 (Policies): Only policies on “non-discrimination” are now required. <i>Before:</i> requirement to have policies on “non-discrimination” AND “diversity”.</p>	<ul style="list-style-type: none">→ Employee headcount required at country level in S1-6 (Characteristics of employee workers)→ In EEA, employee coverage % by a bargaining agreement at country level in S1-8 (Collective bargaining coverage & social dialogue)
<p>S1-2 (Processes for engaging about impacts): Disclose engagement with own workforce regarding impacts that are “likely” to affect them. <i>Before:</i> impacts that “may” affect them.</p>	
<p>Data subject to relevant privacy regulations</p> <ul style="list-style-type: none">→ S1-14 – Health & safety metrics NEW→ S1-12 – Persons with disabilities→ S1-17 – Incidents, complaints and severe human rights impacts and incidents	<p>Coherence with EU legal framework</p> <p>S1-16 (Remuneration metrics): datapoints adjusted to align with Pay Transparency Directive and Shareholder Rights Directive.</p>

Diagram of S1 Own workforce



S1

All DR

Only DR 14

Own workforce (*sometimes referred as “own workers” in the standards*)

Employee worker

Non-employee worker

By contract type

- Permanent
- Temporary
- Full-time
- Part-time
- Non-guaranteed hours

By category:

- **Level**
 - Executive vs. non-executive
 - Management level (Lower/middle/senior)
- **Function**
 - Technical
 - Administrative
 - Production...

Self-employed worker
(Independent contractor)

Temporary agency worker
(code NACE)

Other workers covered by S1

Other worker working on site

Person working on the company’s site, but neither an employee nor a non-employee, meaning NOT part of own workforce but covered by S1

Employee worker

S1

All DR

Only DR 14

Own workforce (*sometimes referred as “own workers” in the standards*)

Employee
worker

Non-employee
worker

By contract type:

- Permanent
- Temporary
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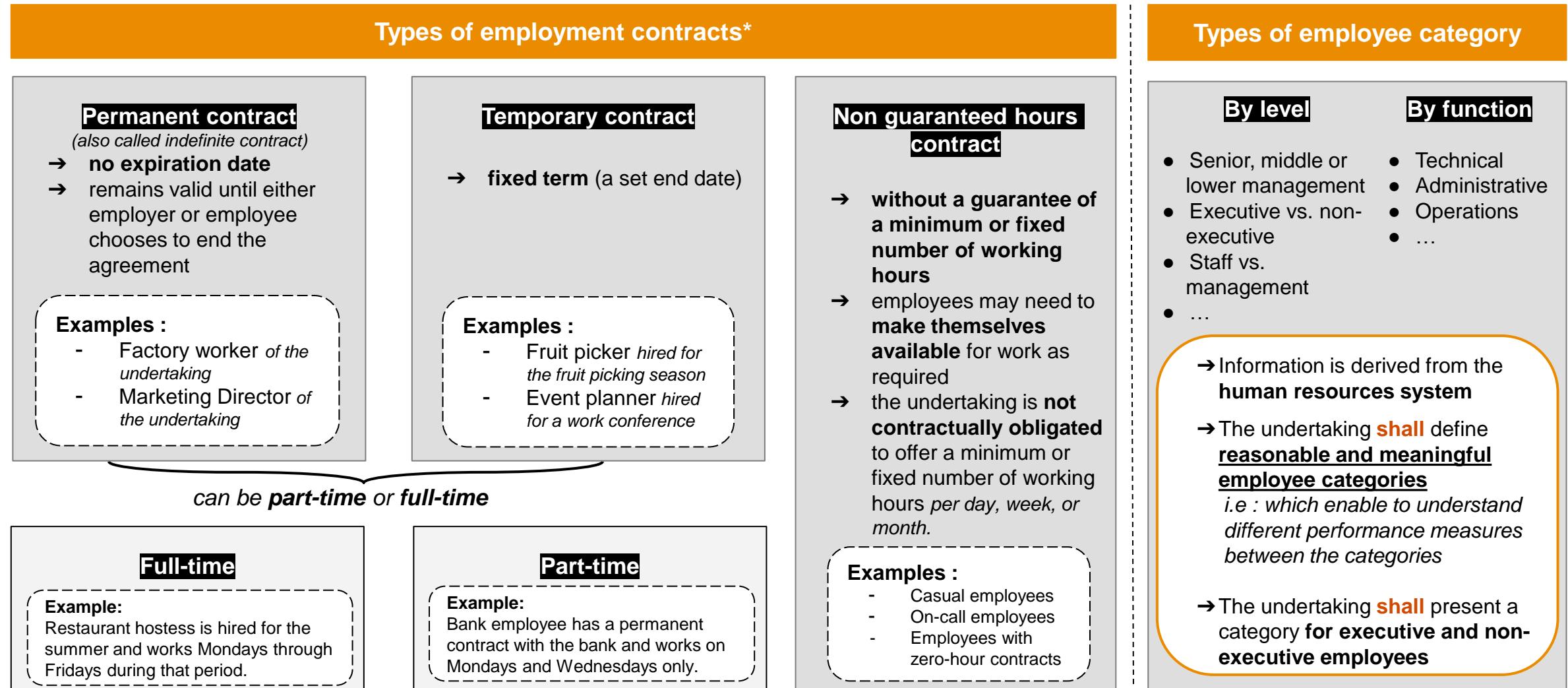
Other workers
covered by S1

Other worker
working on site

Person working on
the company’s
site, but neither an
employee nor a
non-employee,
meaning NOT part
of own workforce
but covered by S1

Employee workers: employment contracts and employee category

Workers in an employment relationship according to the national law or practice



*Disclaimer: employment contract is defined by national law of each country

Non-employee workers

S1

All DR

Only DR 14

Own workforce (*sometimes referred as “own workers” in the standards*)

Employee worker

Non-employee worker

By contract type:

- Permanent
- Temporary
- Full-time
- Part-time
- Non-guaranteed hours

By category:

- **Level**
 - Executive vs. non-executive
 - Management level (Lower/middle/senior)
- **Function**
 - Technical
 - Administrative
 - Production...

Self-employed worker
(Independent contractor)

Temporary agency worker
(code NACE)

Other workers covered by S1

Other worker working on site

Person working on the company's site, but neither an employee nor a non-employee, meaning NOT part of own workforce but covered by S1

Non-employee workers: self-employed and temporary workers

Independent contractors and workers from employment agencies



Self-employed worker (independent, contractor)

- Contractors hired by the undertaking to perform work that would otherwise be carried out by an employee
- Contractors hired by the undertaking to perform work in a public area (e.g., on a road, on the street).
- Contractors hired by the undertaking to deliver the work/service directly at the workplace of a client of the undertaking.

Examples:

- External consultants (freelancers) hired directly by the undertaking to work on a particular project
- Independent gardener hired by the undertaking to maintain the gardens of the undertaking's headquarters

Worker provided by employment agency

Workers who perform the same work that employees carry out, including:

- Workers who fill in for employees who are temporarily absent (due to illness, holiday, parental leave, etc.)
- Workers performing work additional to regular employees
- Workers who are dispatched temporarily from another EU member state to work for the undertaking ('posted workers')

Examples:

- Security guard hired by an interim/employment agency to ensure authorized access to the undertaking's headquarters
- Catering services provided by an interim/employment agency to prepare a buffet for an event planned by the undertaking

Other workers working on the undertaking's site

S1

All DR

Only DR 14

Own workforce (*sometimes referred as “own workers” in the standards*)

Employee worker

Non-employee worker

By contract type:

- Permanent
- Temporary
- Full-time
- Part-time
- Non-guaranteed hours

By category:

- **Level**
 - Executive vs. non-executive
 - Management level (Lower/middle/senior)
- **Function**
 - Technical
 - Administrative
 - Production...

Self-employed worker
(Independent contractor)

Temporary agency worker
(code NACE)

Other workers covered by S1

Other worker working on site

Person working on the company’s site, but neither an employee nor a non-employee, meaning NOT part of own workforce but covered by S1

What are the different definitions of Own Workforce?

'Other workers working on site' described in DR 14 Health & Safety

Who are the “Other workers working on site”

- Workers **working on the company's sites** who don't fit in the category of “own workforce”, i.e. neither an employee worker nor a non-employee worker. This type of worker is covered by ESRS S2.
- Examples:
 - ◆ trainee, apprentice
 - ◆ worker on secondment
 - ◆ board member
 - ◆ maintenance worker from a supplier routinely working on a photocopier at the undertaking's site



Why is it included in S1?

- Health and safety is one of the most important DRs of the standards because lack of safety have lead to disasters like factory collapses and thus fueled the CSRD initiative.
- The undertaking must report all fatalities resulting from work-related injuries and ill-health, i.e. employee workers, non-employee workers AND **other workers working on site**.

Not to confuse with... (NOT part of Own Workforce)

- A worker from another company **working on the other company's site**
- **Former** employees and non-employees of the company
- Consultants working on a project ordered by the undertaking **at their consulting firm**

ESRS 2 - SBM-3 - Material IROs and their interaction with strategy and business model(s)

What	Its material impacts, risks and opportunities and how they interact with its strategy and business model(s) . (<i>ESRS 2 para 44</i>)
Why	To provide an understanding of the material IROs resulting from the undertaking's materiality assessment and how they originate from and trigger adaptation of the undertaking's strategy and business model(s). (<i>ESRS 2 para 45</i>)
How	<p>What is the nature of the problem? <i>material impacts, risks...</i> → ex: pollution + new law</p> <p>What about this problem in the ST/MT/LT?</p> <p>...</p> <p>What is the size of the problem? Consequences on turnover, cash flows, assets...?</p> <p>What is my action plan (strategy and business model resilience)</p>

ESRS S1, SBM-3

Material IROs and their interaction with strategy and business model(s)

Own Workforce

In relation to value chain workers

The undertaking **shall include:**

<i>For impacted own workers</i>	<i>For material negative impacts</i>	<i>For material positive impacts</i>	<i>For material risks & opportunities</i>
<p>Definitions of the types of impacted own workers:</p> <ul style="list-style-type: none">→ Employee workers→ Self-employed workers→ Agency interim workers→ Among those, the particularly vulnerable groups of workers (<i>workers handling chemicals</i>) + how undertaking developed the understanding that they are at greater risk of harm <p>Where there is risk of forced labour* / child labour*</p> <ul style="list-style-type: none">→ Types of operations (<i>manufacturing plant</i>)→ Countries or geographic areas	<ul style="list-style-type: none">→ Widespread / systemic impacts (<i>child labour in cocoa supply chain</i>)→ Individual incidents (<i>oil spill</i>)→ Specific business operations, including impacts from transition to greener operations (<i>closure of mines</i>)	<ul style="list-style-type: none">→ Description of the activities leading to positive impacts (<i>job creation</i>)→ Types of workers impacted→ Geography of the workers impacted→ Specific business operations, including impacts from transition to greener operations (<i>upskilling</i>)	<ul style="list-style-type: none">→ R&O from impacts & dependencies on specific groups of workers, i.e. particular age group, factory or region (<i>using low-paid workers in region with no social protection</i>)→ R&O from impacts & dependencies affecting the entire own workforce (<i>a general pay cut</i>)

DR 6 – Employee characteristics

What	<ul style="list-style-type: none">Total # of employees + breakdown by gender + breakdown by country when country has ≥ 50 employees representing $\geq 10\%$ of total employeesTotal # of permanent, temporary & non-guaranteed hours employees + breakdown by gender + breakdown by region*Total # of full-time and part-time employees* + breakdown by gender* + breakdown by region*Total # and % of employee turnoverDescription of methodologies, assumptions & contextual information used to compile/understand the data
Why	<ul style="list-style-type: none">Provide insight into the approach to employmentProvide contextual information that aids understanding other disclosuresServe as basis for calculation for other disclosures under S1 (<i>e.g. DR 13 on training</i>)
How	<p>Employee turnover calculation</p> <p>Total # of employees who leave (voluntarily/dismissal/ retirement/death in service)</p> <p>Total # of employees (determined by undertaking)</p> <p>+ use of mandatory templates for disclosure</p> <p>Contextual information</p> <ul style="list-style-type: none">Needs to be assessed individually if such information is required <p>Example: disclosure if it is a standard practice to offer a temporary contract before an offer of permanent employment is made</p> <p>If data is not available for detailed information → use an estimation</p> <ul style="list-style-type: none">clearly identify where the use of estimates has taken place.



Working conditions

Equal treatment

Other rights



If data is not available

for detailed information

→ **use an estimation**

- + clearly identify where the use of estimates has taken place.

ESRS S1, par. AR 60

DR 6 – Employee characteristics

Mandatory templates

Presenting information on employee **head count** by gender

Gender	Number of employees (head count)
Male	
Female	
Other	
Not reported	
Total Employees	

Presenting employee **head count in countries** with at least 50 employees representing at least 10% of own workforce

Country	Number of employees (head count)
Country A	
Country B	
Country C	
Country D	

DR 6 – Employee characteristics

Mandatory templates

Presenting information on **employees by contract type**, broken down by gender (head count or FTE)

[Reporting period]				
FEMALE	MALE	OTHER*	NOT DISCLOSED	TOTAL
Number of employees (head count / FTE)				
Number of permanent employees (head count / FTE)				
Number of temporary employees (head count / FTE)				
Number of non-guaranteed hours employees (head count / FTE)				
Number of full-time employees (head count / FTE)				
Number of part-time employees (head count / FTE)				

* Gender as specified by the employees themselves.

Presenting information on **employees by contract type**, broken down by region (head count or FTE)
(reporting on full-time and part-time employees is voluntary)

[Reporting period]		
Country A	Country B	TOTAL
Number of employees (head count / FTE)		
Number of permanent employees (head count / FTE)		
Number of temporary employees (head count / FTE)		
Number of non-guaranteed hours employees (head count / FTE)		
Number of full-time employees (head count / FTE)		
Number of part-time employees (head count / FTE)		

DR 16 – Remuneration metrics

Pay gap & Total remuneration

What

- Male-female **pay gap expressed as a percentage***
- Ratio of the annual **total remuneration***
- Breakdown of the pay gap and adjusted pay gap (e.g. for purchasing power differences in countries) are good practice

Why

- Allow an understanding of the extent of any gap in the pay between women and men
- Provide insight into the level of compensation inequality



Working conditions



Equal treatment



Other rights

How

Male-female pay gap

$$\frac{(\text{Average } \underline{\text{gross}} \text{ hourly earnings of male employees} - \text{average } \underline{\text{gross}} \text{ hourly earnings of female employees})}{\text{average } \underline{\text{gross}} \text{ hourly earnings of female employees}} \times 100$$

If reported → include the previous two reporting periods

Annual remuneration Ratio

Annual total remuneration**
for the undertaking's highest paid individual

Median employee annual total remuneration
(excluding the highest paid individual)

**Total remuneration = Base salary + Benefits in Cash + Benefits in kind +
Long-term incentive payments

DR 16 – Compensation indicators



Important definitions

Base pay (salary/wage)
<ul style="list-style-type: none">• Guaranteed cash compensation• Short-term cash compensation• Non-variable cash compensation <p><i>Includes overtime pay and shift premiums</i></p>

Benefits in Cash
<ul style="list-style-type: none">• Base pay (salary/wage)• Cash allowances• Bonuses• Commissions• Cash Profit-Sharing• Other forms of variable cash payments

Benefits in kind
<ul style="list-style-type: none">• Cars• Private health insurance• Life insurance• Wellness program• ...

Long-term incentives
<ul style="list-style-type: none">• Stock option awards, restricted stock shares or units, performance stock shares or units, phantom stock shares, and stock appreciation rights• long-term cash awards• non-equity incentive plan compensation,• change in pension value• nonqualified deferred compensation earnings provided over the course of a year• ...

Total Annual Direct Compensation / Earnings / Remuneration
<p>Base salary or base wage</p> <p>+ Benefits in cash</p> <p>+ Benefits in kind</p> <p>+ <u>Long-term incentives (at total fair value)</u></p> <p>= Annual Total Remuneration</p>

Compensation items to consider are in line with the directives on Pay Transparency & Shareholder Rights

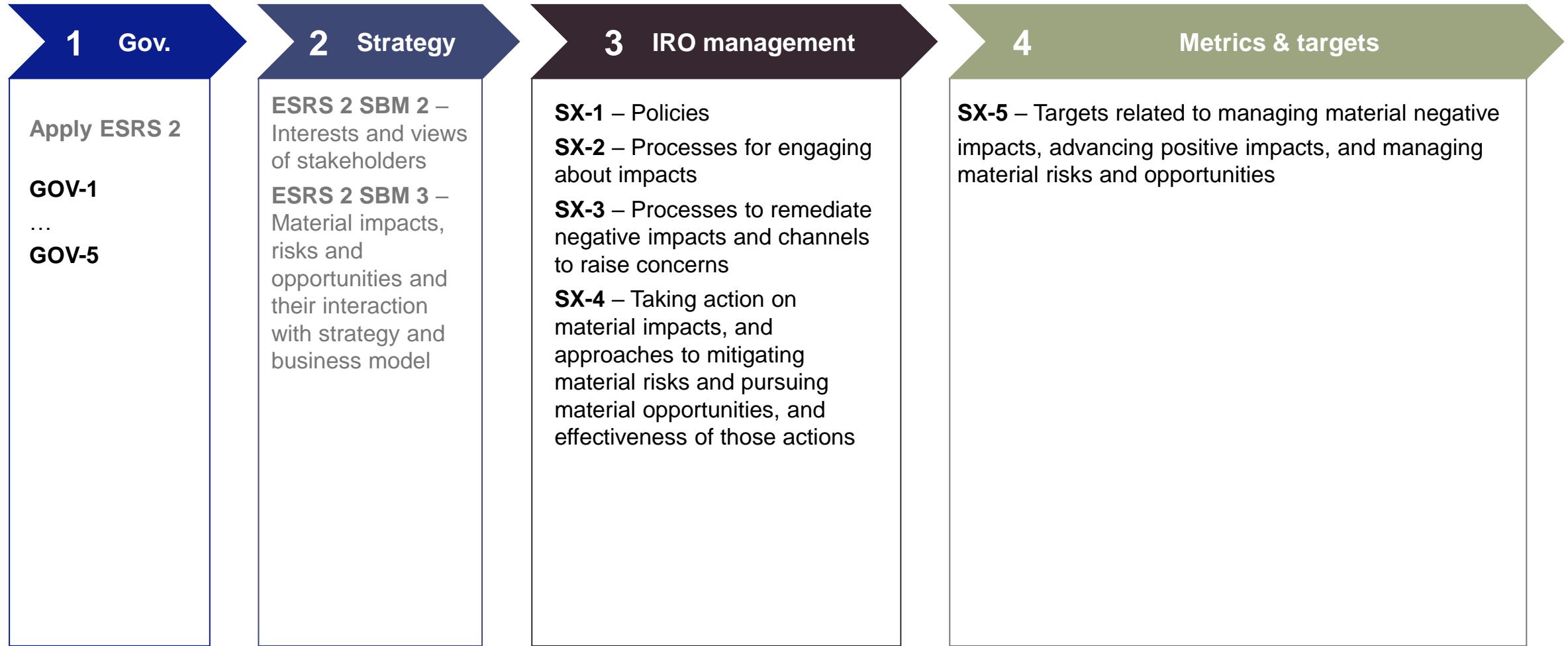
* At Total Fair Value

04

Focus sur les autres normes sociales

Structure des normes ESRS S2, S3 et S4

ESRS S2 should be read in conjunction with ESRS 1 and ESRS 2



Around 15 pages

7 DRs

0 quantitative metric

0 Templates

Principales évolutions relatives à ESRS S2

Scope of data collection	Metrics & Targets
<p>ESRS 2 SBM-3 (IROs and interaction w/ strategy & business models): disclose whether material IROs covers all value chain workers who “are likely to be” impacted. <i>Before:</i> value chain workers who “can be” impacted.</p> <p>The undertaking may also disclose whether the positive impacts occur in specific countries or regions *NEW*</p>	<p>S2-5</p> <p>The undertaking shall disclose the time-bound and outcome-oriented targets it may have set related to:</p> <p>“shall consider disclosing” replaced by “may disclose”</p>
<p>S2-1 (Policies): No more summary required *NEW*</p>	
<p>S2-2 (Processes for engaging about impacts): Disclose engagement with value chain workers regarding impacts that are “likely” to affect them. <i>Before:</i> impacts that “may” affect them.</p>	

ESRS S2 – DR 1 – Policies related to value chain workers

Cutting standard

What	Policies that address the management of material IROs related to value chain workers <ul style="list-style-type: none">- Content of the policy or policies of each social subject matter assessed material- Policy related to value chain workers may be stand-alone or be included in a broader document disclosed under ESRS (i.e. supplier code of conduct)		
Why	<ul style="list-style-type: none">- Enable an understanding of how identification, assessment, management and/or remediation of material impacts on the undertaking's value chain workers are addressed in the undertaking's policies		
How	Policy itself <i>including key concepts, objectives and related IROs</i>	Scope <i>activities, value chain, geographies, affected stakeholders</i>	Specification which groups or all of the undertaking's value chain workers are covered
	Availability <i>whether and how the policy is available to potentially affected stakeholders</i>	Accountability for implementation <i>most senior level accountable</i>	Reference to third-party standards <i>that the undertaking commits to respect</i>
	Key information <i>for faithful representation, such as significant policy changes during the FY</i>		

ESRS S2 – DR 1 – Policies related to value chain workers

Disclosure content	Further details
<p>A summary of the policies reported in ESRS 2</p> <p>Human rights policy commitments* Processes and mechanisms to monitor compliance with UN Guiding Principles.</p> <p>Focus on*:</p> <ul style="list-style-type: none">- Human rights matters, incl. labour rights, of workers- Engagement with stakeholders- Remedy measures <p>Statements on policy-coverage</p> <p>Whether policy-coverage explicitly addresses:</p> <ul style="list-style-type: none">- Trafficking in human beings*- Forced or compulsory labour- Child labour- Workplace accident prevention*- Elimination of discrimination*- Collective bargaining+ supplier code of conduct+ cover specific groups of value chain workers or all value chain workers.+ cases of non-respect of the UN Guiding Principles and the nature of such cases	<p>Necessary consideration for policy-alignment with UN Guiding Principles on Business and Human Rights:</p> <ul style="list-style-type: none">- UN Guiding Principles on Business and Human Rights- ILO Declaration on Fundamental Principles and Rights at Work- OECD Guidelines for Multinational Enterprises

* required by EU-law (therefore disclosure irrespective of size and materiality)

Principales évolutions relatives à ESRS S3 & S4

➤ En complément, des changements identifiés pour ESRS 2 qui s'appliquent également à ces deux normes :

ESRS S3

- ESRS 2 SBM-2 – Interests and views of stakeholders :
 - The scope for negative impact is the undertaking's own operations
 - Voluntary disclosure about the positive impacts in specific countries or regions
- Certains AR deviennent volontaires : AR 12, AR 16 et AR 47

ESRS S4

- The unlawful use or misuse of the undertaking's products and services by consumers and end-users fall outside the scope of this standard.
- Certains AR deviennent volontaires : AR 4 et AR 42

Concordance avec les dispositifs du devoir de vigilance

Strategy

ESRS 2 SBM 2 – Interests and views of stakeholders

ESRS 2 SBM 3 – Material impacts, risks and opportunities and their interaction with strategy and business model

IRO management

SX-1 – Policies

SX-2 – Processes for engaging about impacts

SX-3 – Processes to remediate negative impacts and channels to raise concerns

SX-4 – Taking action on material impacts, and approaches to mitigating material risks and pursuing material opportunities, and effectiveness of those actions

Metrics & targets

SX-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities



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