

CSRD Berichterstattung Grundlagen & ESRS 2

Einordnung, praktische Tipps und Best Practices

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Tanso



Informationen zur Tanso Akademie

Dauer

45 Minuten Input (aufgezeichnet) + 15 min Q&A.

Aufzeichnung

Die Akademie wird aufgezeichnet. Die Aufzeichnung und Folien sind im Nachgang für unsere Kunden verfügbar.

FAQ

Nutzen Sie die FAQ-Funktion, um Ihre Fragen zu stellen.

Feedback

Wir freuen uns über Ihr Feedback – bitte nehmen Sie an der Umfrage in der Follow-Up E-Mail teil.

Überblick über die Tanso Akademie

Themen	Termine
CSRD Berichterstattung: Grundlagen & ESRS 2	30.04.2025
E1: Klimawandel	07.05.2025
S1: Arbeitskräfte des Unternehmens	14.05.2025
G1: Geschäftsführung E5: Kreislaufwirtschaft	21.05.2025
E2: Umweltverschmutzung E3: Wasser- & Meeresressourcen E4: Biologische Vielfalt und Ökosysteme	11.06.2025
S2: Arbeitskräfte der Wertschöpfungskette S3: Betroffene Gemeinschaften S4: Verbraucher und Endnutzer	25.06.2025
VSME	02.07.2025

Immer um 10:30

Inhalte dieser Folge

- 1 Einführung in die CSRD
- 2 Aufbau der ESRS
- 3 Start in die Datenerhebung
- 4 Fokus: ESRS 2
- 5 Zusammenfassung & Ausblick
- 6 Fragen & Antworten

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Die CSRD wurde 2021 als Teil des European Green Deals verabschiedet und gilt seit 2025 für große kapitalmarktorientierte Unternehmen

Wichtigste Fakten

- Konsequenz des European Green Deals
-> Ziel der Klimaneutralität bis 2050 & -55% bis 2030
- Seit 01.01.2025 Nachfolger der NFRD¹
- Eintritt in 4 Wellen/Gruppen:
 1. Kapitalmarktorientierte Unternehmen > 500 MA
 2. Private Unternehmen, die 2/3 Kriterien erfüllen
 - > 250 Mitarbeitende
 - > 50 M€ Umsatz
 - > 25 M€ Bilanzsumme
 3. Kleinere kapitalmarktorientierte Unternehmen²
 4. Ausländische Unternehmen mit
 - > 150 M€ EU-Umsatz und
 - > 40 M€ EU-Umsatz EU-Tochter o. Betrieb

Ursprünglich
geplanter Start:

GJ 2024

Omnibus:

Keine Änderung

GJ 2025

GJ 2026

frühestens ab
GJ 2027

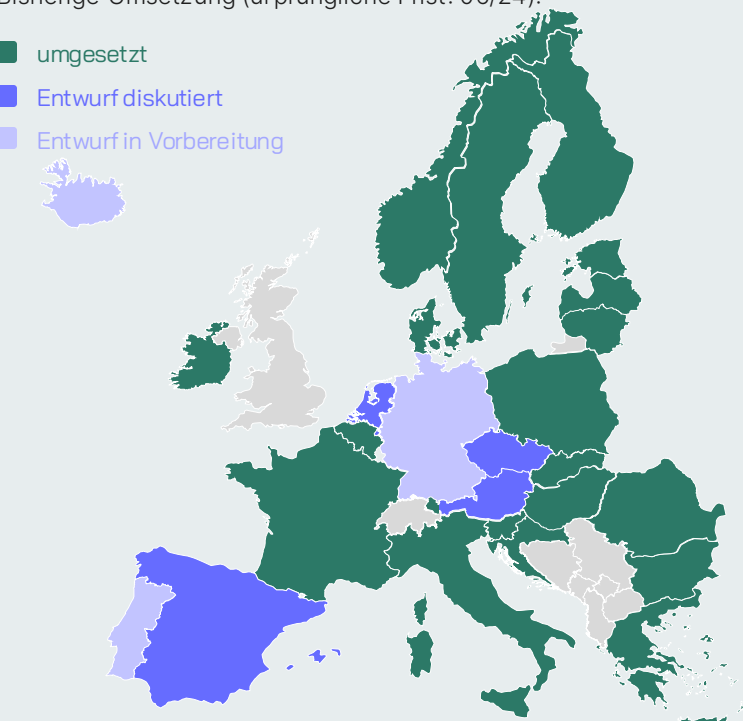
GJ 2027

Nationale Umsetzung

In Deutschland wurde die CSRD noch nicht umgesetzt, daher gilt für das GJ 2025 noch die NFRD inkl. EU-Taxo

Bisherige Umsetzung (ursprüngliche Frist: 06/24):

- umgesetzt
- Entwurf diskutiert
- Entwurf in Vorbereitung



¹) Non-financial Reporting Directive | ²) die 2 der 3 folgenden Kriterien erfüllen: >10 Mitarbeitende, >900 T€ Umsatz, >450 T€ Bilanzsumme

Der Omnibus Vorschlag soll die bestehende CSRD nun verändern – “Stop-the-clock“-Vorschlag bereits verabschiedet

Directive 80: „Stop-the-clock“



Level 1: Änderungen an der Timeline

- Verschiebung der CSRD-Berichtspflicht für alle noch nicht berichtenden Unternehmen um zwei Jahre auf 2028 (für das GJ 27)
- Verschiebung der Umsetzungsfrist der CSDDD (Sorgfaltspflicht) in nationales Recht auf Mitte 2027, somit Anwendung für Unternehmen ab Mitte 2028

Geplante Anwendung der neuen ESRS-Datenpunkte:

- Geschäftsjahr 25: aktuelle ESRS
- Geschäftsjahr 26: aktuelle oder neue ESRS (freiwillig)
- Ab Geschäftsjahr 27: neue ESRS

💡 Tanso Akademie basiert auf den aktuellen ESRS!



Directive 81: Nachhaltigkeitsberichterstattung



Level 1: Änderung der Unternehmen, die berichten müssen

- Erhöhung der Mitarbeitergrenze auf 1.000
- Ausschluss von kapitalmarktorientierten KMUs („listed SMEs“)
- EU-Taxonomie nur für Unternehmen EUR >450M Umsatz

Level 2: Inhaltliche Änderungen

- Reduktion der ESRS¹-Datenpunkte:
Auftrag an EFRAG² bis Ende Oktober Vorschlag zu entwickeln
 - Unwichtige Datenpunkte streichen
 - Mehr quantitativ, weniger qualitativ
 - Mehr freiwillige Datenpunkte
- Anpassung der VSME: 4 Monate nach Verabschiedung
- Weitere inhaltliche Änderungen an EU-Taxonomie und CSDDD

💡 Zusätzlich umfasst das Omnibus-Paket noch den Vorschlag #87 zu CBAM Änderungen und #84 zur Vereinfachung der europäischen Investitionsprogramme

1) European Sustainability Reporting Standards | 2) European Financial Reporting Advisory Group

Für Deutsche Unternehmen bedeutet das in den meisten Fällen **zwei Jahre mehr Zeit, Nachhaltigkeitsmanagement strategisch** aufzusetzen

Gruppe 1

- Weitermachen, wie bisher: CSRD-Bericht (ggf. NFRD) + EU-Taxonomie
- Geplante Überarbeitung der ESRS im Blick haben

Gruppen 2-4

- EU-Entscheidung zu #81 abwarten, insb. Grenzwerte
- Strategie in Bezug auf Nachhaltigkeitsberichte festlegen
 - **ESRS (Fokus)** ➤ GRI ➤ TCFD
 - **VSME (Plus)** ➤ ISSB ➤ etc.

Aktuelle EU-Standards für Nachhaltigkeitsberichte:

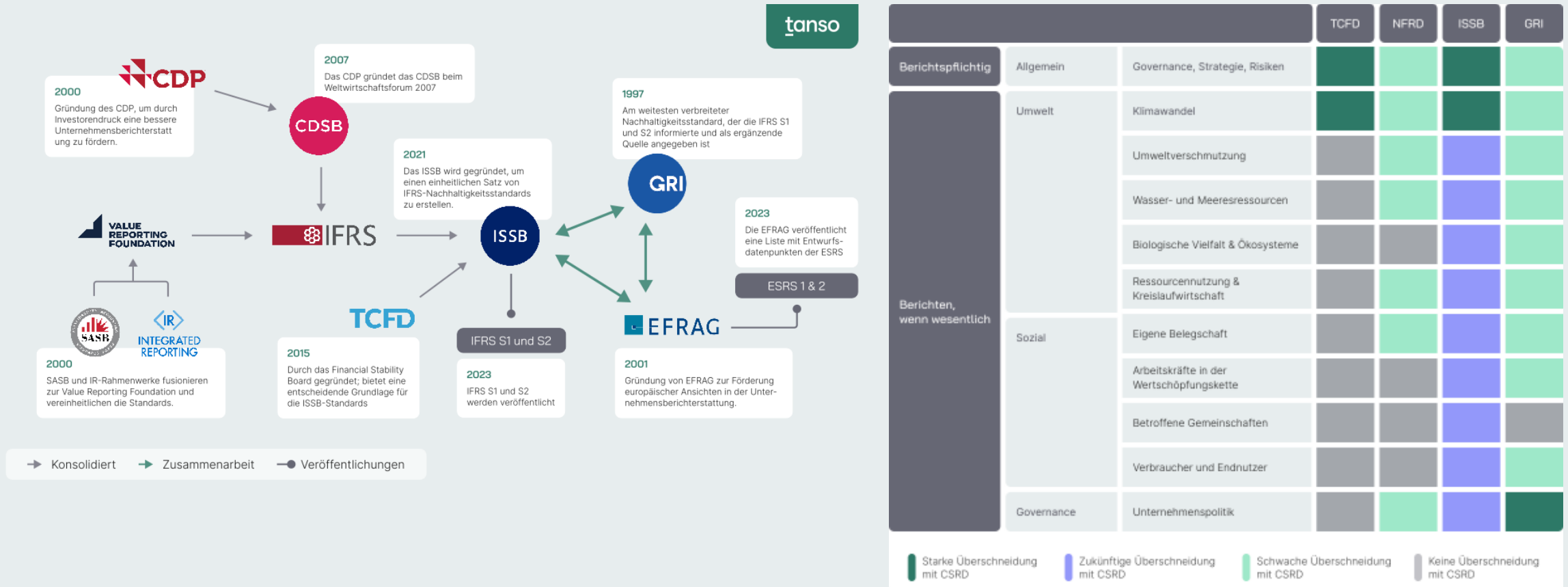


💡 Alle Standards wurden von der **EFRAG** (European Financial Reporting Advisory Group) im Auftrag der EU entwickelt

¹⁾ Kapitalmarktorientierte Unternehmen ≤ 250 Mitarbeitenden

Die ESRS der EFRAG setzen eine ausführliche Grundlage für internationale Standards für nichtfinanzielle Berichterstattung

ESG-Berichte behalten international an Relevanz



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1 Einführung in die CSRD

2 Aufbau der ESRS

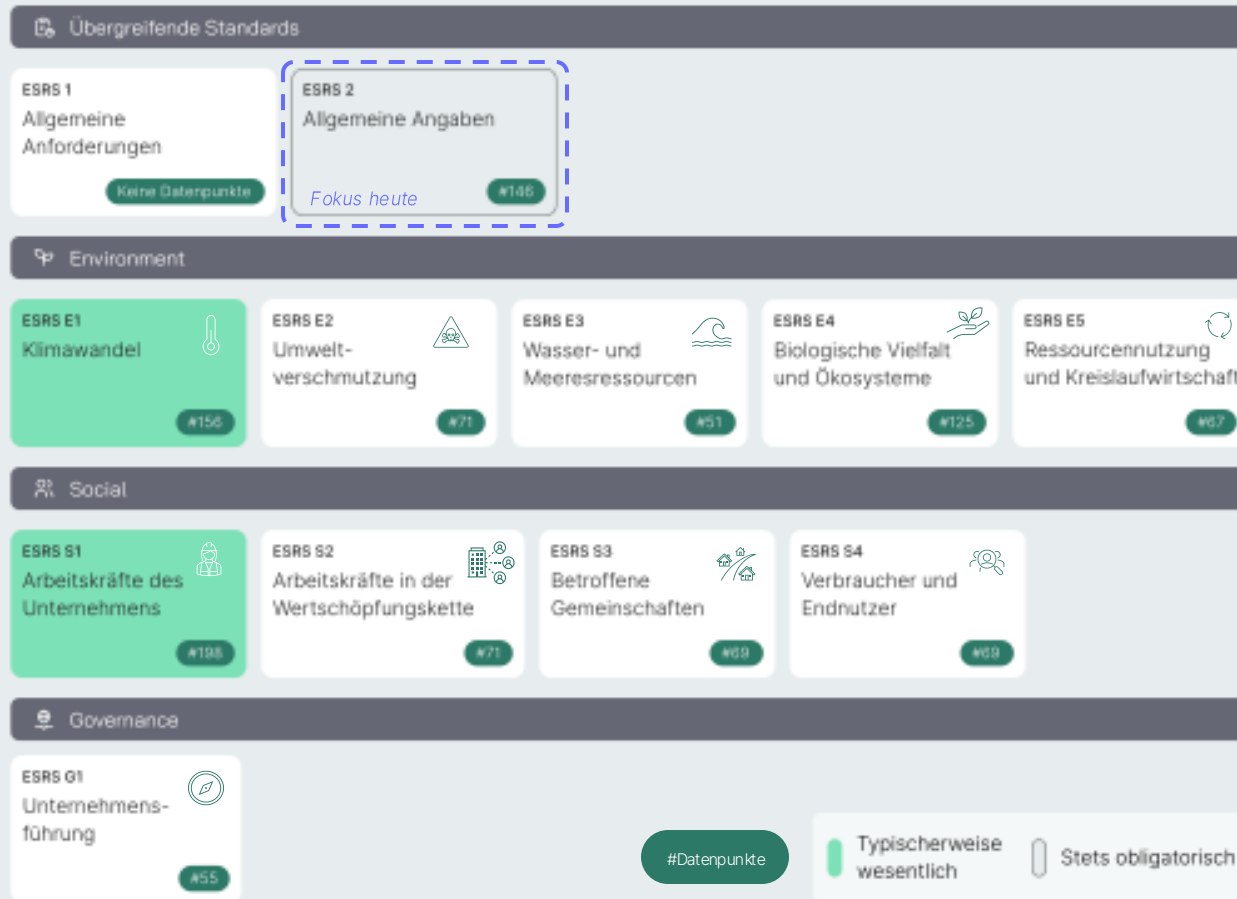
3 Start in die Datenerhebung

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Die ESRS verpflichten in zwei allgemeinen und **zehn thematischen Standards** zur Offenlegung von fast **1.200 Datenpunkten**

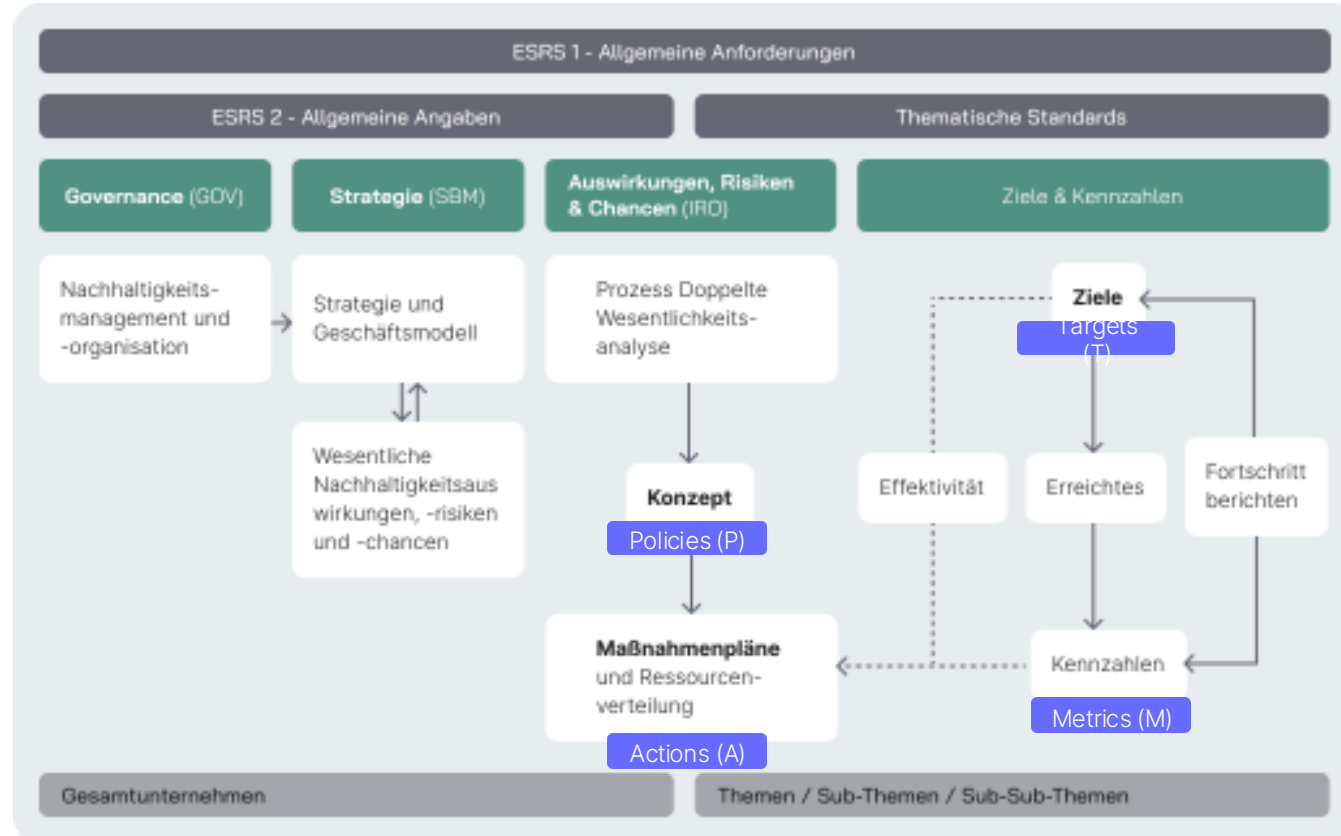


Die Europäischen Nachhaltigkeitsberichterstattungsstandards (ESRS)

- ✓ Entwickelt von **EFRAG** (European Financial Reporting Advisory Group), einer gemeinnützigen Organisation mit ExpertInnen für Finanz- und Nachhaltigkeitsberichterstattung
- ✓ Legen die konkreten **Offenlegungspflichten** der CSRD fest
- ✓ Bestehen aus **2 allgemeinen** und **10 themenspezifischen** Standards
- ✓ ESRS 2 ist verpflichtend für alle Unternehmen. Alle anderen Standards hängen von der **Doppelten Wesentlichkeitsanalyse (DWA)** ab
- ✓ Insgesamt enthalten die ESRS 1178 Berichtspflichten (Datenpunkte)
- ✓ Besonders relevant für Industrieunternehmen: ESRS E1 (Klima) und S1 (eigene Mitarbeitende)

Dabei sind die **ESRS** mehr als reine Offenlegungspflichten – sie bilden die Grundlage für ein **nachhaltiges Managementsystem**

Aufbau aller Standards



💡 Allgemeine Angaben

- **GOV – Governance**
-> Infos zur Unternehmensführung
- **SBM – Strategy & Business Model**
-> Infos zur Strategie
- **IRO – Impacts, Risks & Opportunities**
-> Infos zur Ermittlung & Steuerung wesentlicher Nachhaltigkeitsthemen

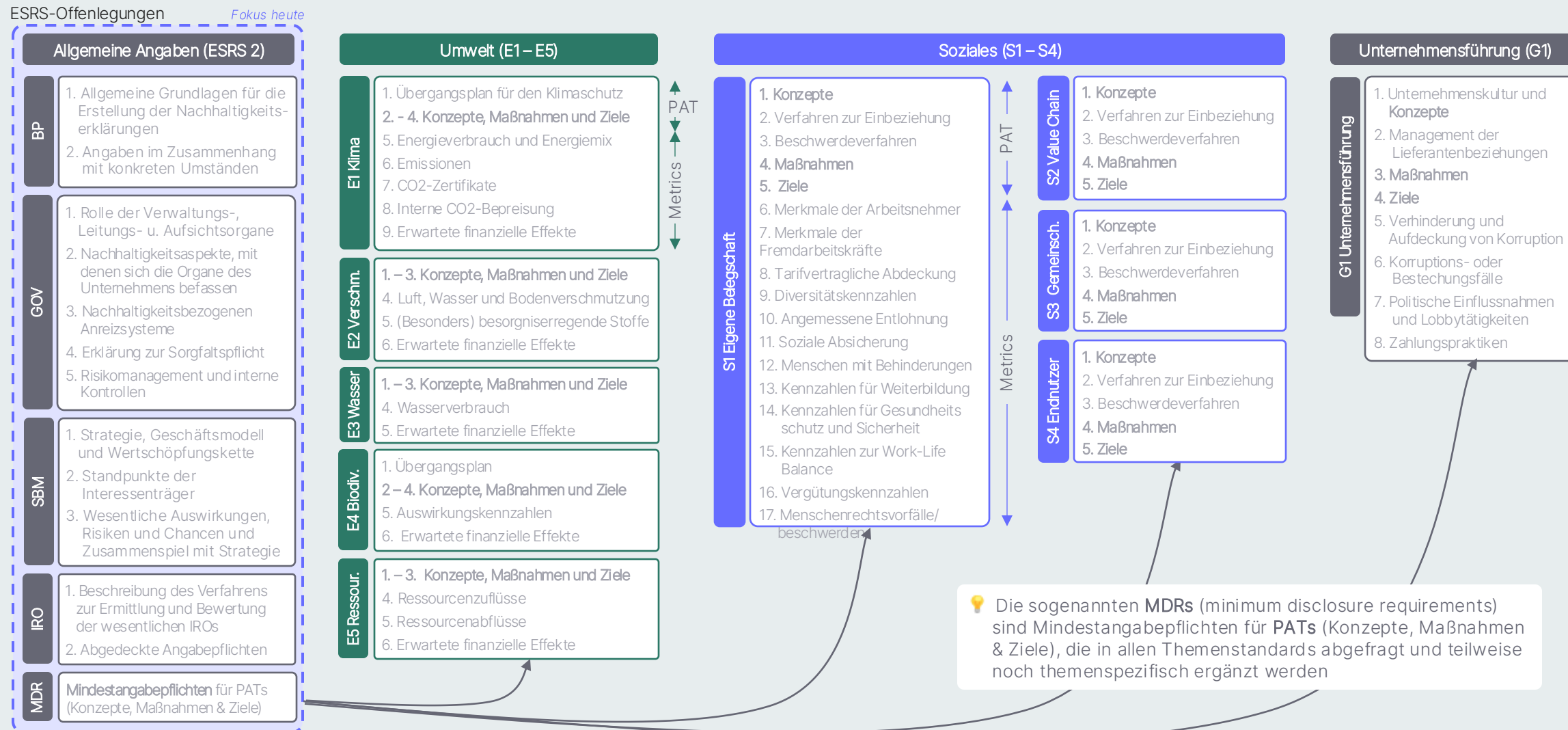
💡 Die sogenannten PATs

- **P – Policies** (Konzepte)
- **A – Actions** (Maßnahmen)
- **T – Targets** (Ziele)

kommen in **allen Themenstandards** vor. Dabei werden immer dieselben Angaben abgefragt.

Zusätzlich gibt es themenspezifische Kennzahlen (**M = Metrics**) pro Standard

Die zehn Themenstandards sind ähnlich aufgebaut, startend mit den MDRs



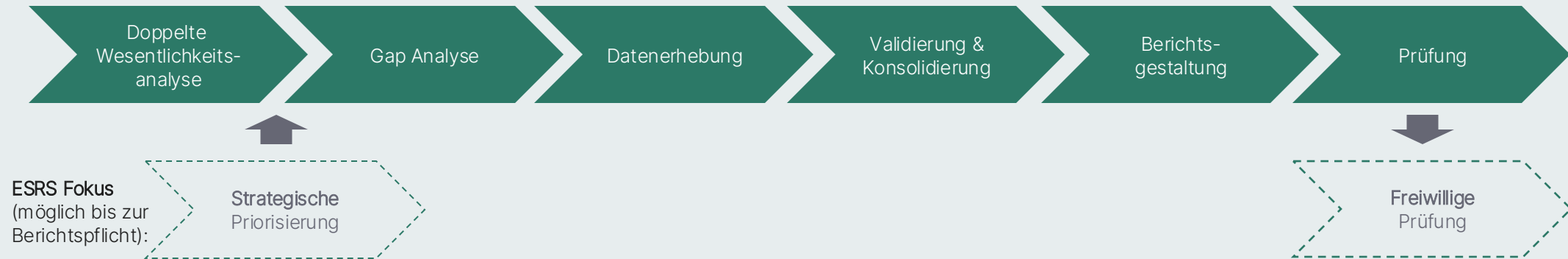
Beispiel – ESRS E1: Klimawandel



1) Disclosure Requirements

In 6 Schritten kommt ihr zum fertigen CSRD-Bericht nach ESRS

6 Schritte für ESRS:



💡 Mit dem Ansatz **ESRS Fokus** schränken Unternehmen ihren Berichtsumfang zusätzlich zum Wesentlichkeitskriterium bewusst weiter ein, um sich zunächst auf ihre **strategischen Prioritäten** zu fokussieren. Einzelne wesentliche Themen oder **Datenpunkte können weggelassen werden**, solange **noch keine gesetzliche Berichtspflicht** besteht.

ESRS Fokus bietet eine schrittweise Erweiterung des Berichtsumfangs bis zur vollständigen Berichtspflicht

ESRS Fokus vs wesentliche ESRS:

Achtung! Der Ansatz **ESRS Fokus** ist **nicht CSRD-konform**, sondern ermöglicht in den Jahren bis zur Berichtspflicht eine pragmatische und schrittweise Erarbeitung des vollständigen Berichtsumfangs (nach der Doppelten Wesentlichkeitsanalyse)

Unterschiede in Flexibilität, Berichtsumfang und Prüfungspflicht:

- **ESRS Fokus hat keine festen Vorgaben zum Umfang:** Unternehmen haben Flexibilität in der Auswahl der Themen und Datenpunkte
- **ESRS Fokus ermöglicht individuelle Priorisierung** der ESRS-Themen und somit die Option, den Berichtsumfang zu verringern
- **ESRS Fokus unterliegt keiner Prüfungspflicht**

Beispiel:	Umwelt					Soziales				Governance	# wesentliche Standards
Ergebnis DWA	E1	E2	E3	E4	E5	S1	S2	S3	S4	G1	7
GJ25: ESRS Fokus	E1	E2	E3	E4	E5	S1	S2	S3	S4	G1	3
GJ26: ESRS Fokus	E1	E2	E3	E4	E5	S1	S2	S3	S4	G1	5
GJ27: Wesentliche ESRS	E1	E2	E3	E4	E5	S1	S2	S3	S4	G1	7

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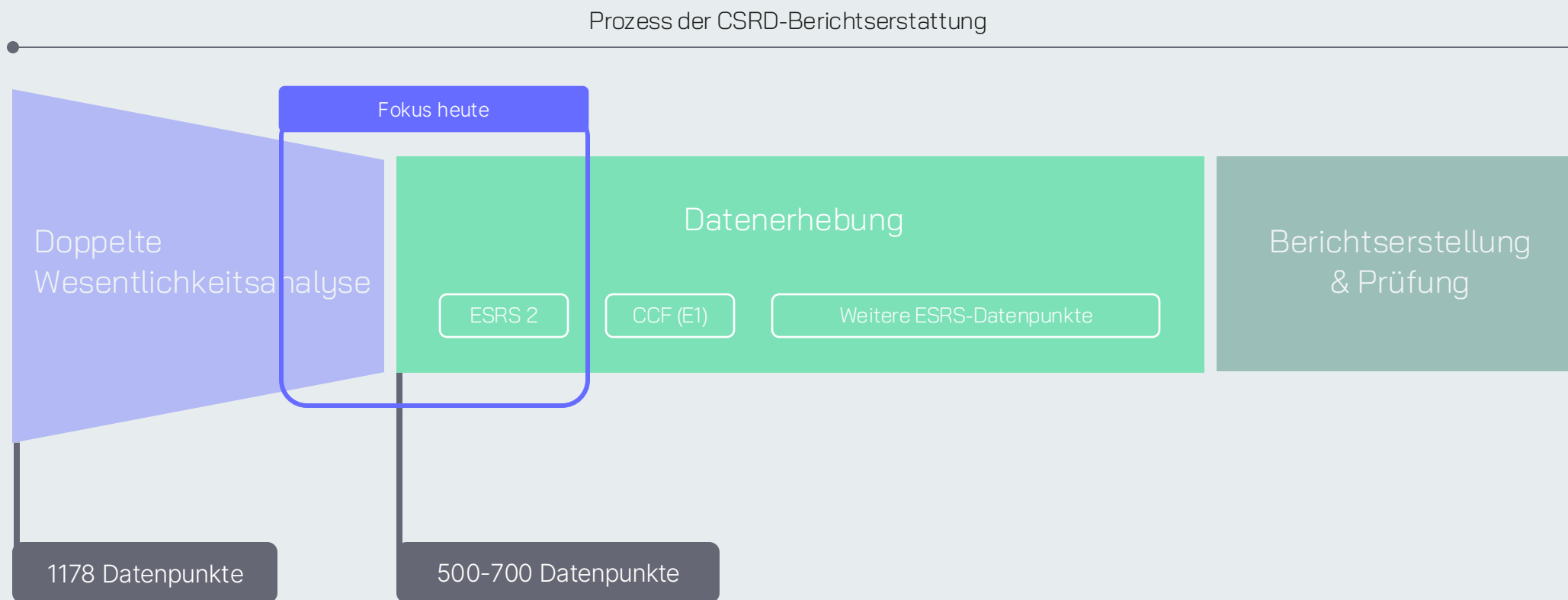
3 Start in die Datenerhebung

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Gemeinsam starten wir in die nächste Phase der CSRD-Berichtserstattung: Die Datenerhebung



1. Schritt: Den Umfang der Datenpunkte in vier Schritten reduzieren

Schritte:

1. Ergebnisse der DWA

2. Freiwillige Datenpunkte

3. Phase-In Datenpunkte

4. Begründeter Ausschluss

Beispiele:

Wurden für S2 keine (wesentlichen) IROs identifiziert: -71 Datenpunkte
Ist Sichere Beschäftigung in S1 nicht wesentlich: - 11 Datenpunkte

In E2 können bis zu 19 freiwillige Datenpunkte ausgeschlossen werden
In G1 können bis zu 7 freiwillige Datenpunkte ausgeschlossen werden

Unternehmen >750 Mitarbeiter können in S1 40 Datenpunkte im 1. Jahr auslassen
Unternehmen ≤750 MA können E4, S1, S2, S3 & S4 im 1. Jahr komplett auslassen¹

Wenn ein Unternehmen noch keinen E1-1 Übergangsplan für den Klimaschutz (Climate Transition Plan) hat, kann man dies erläutern und alle Datenpunkte ausschließen

Datenpunkte

400 - 600

270

122 bzw. 553

Ca. 130



Support

Automatischer Filter

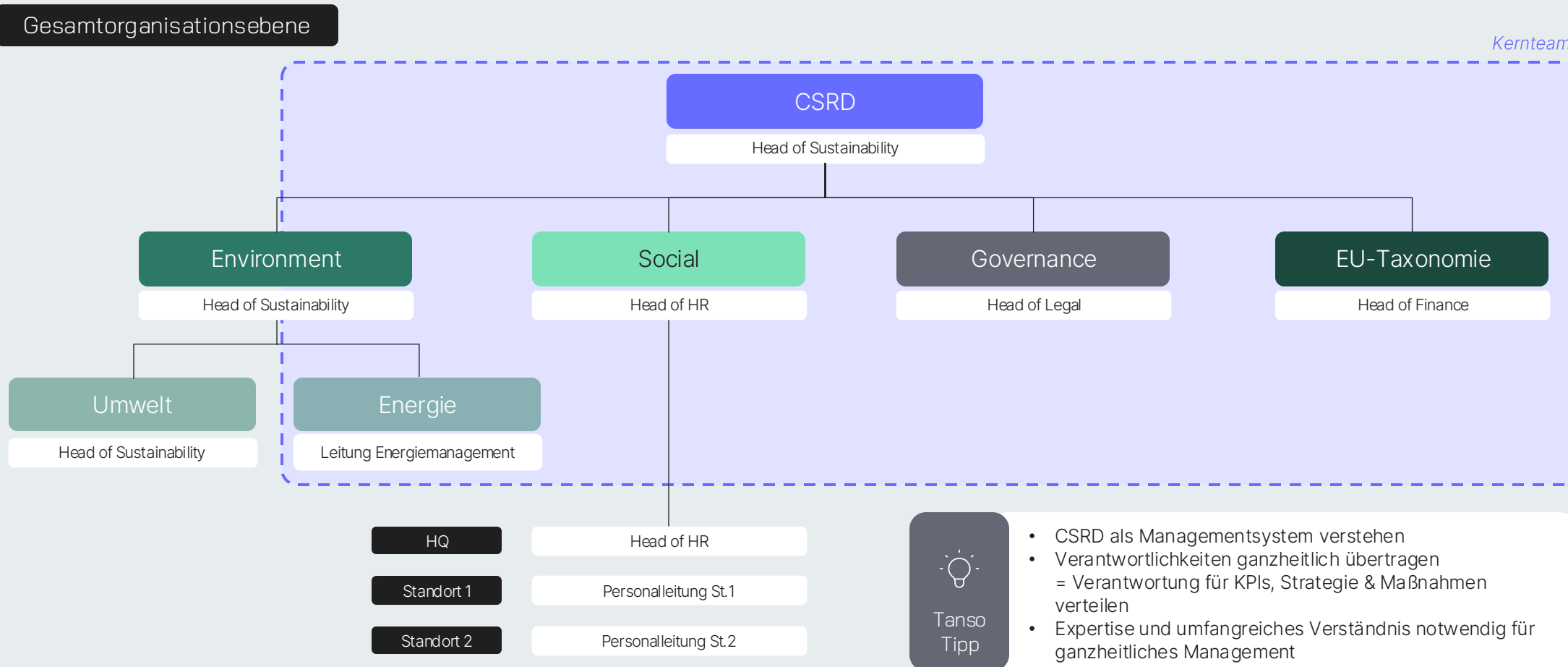
Automatischer Filter

Automatischer Filter

[Tanso Handbuch](#)
inkl. Excel-Vorlage

¹) Durch die sogenannte „phase-in provision“; E4, S2, S3 und S4 sogar die ersten zwei Jahre

2. Schritt: Verantwortlichkeiten früh und umfassend festlegen für effektive Projektsteuerung, -planung und Aufwandsverteilung



3. Schritt: Die **Gap Analyse** kann helfen, die **Datenerhebung bestmöglich zu planen**, zu priorisieren und anschließend umzusetzen

Gemeinsam mit dem Kernteam

A) Gap Analyse durchführen

- **Verantwortlichkeit** pro Datenpunkt festlegen (meist auf DR-Ebene)
- **Verfügbarkeit** jedes Datenpunkts mittels **benutzerdefinierten Datenfeldern** ermitteln
- **Komplexität bzw. Aufwand** zur Daten-erhebung hinterlegen, sollte ein Datenpunkt nicht oder nur teilweise vorhanden sein

B) Datenerhebung priorisieren

Empfehlung:

1. **Nicht vorhanden + quantitativ**
-> über standardisierte Prozesse sicherstellen, dass fehlende Daten zum Jahresende **über alle Standorte einheitlich** verfügbar sind
2. **Vorhanden + qualitativ o. quantitativ**
-> durch frühes Befüllen ermöglichen, dass der Bericht schnell möglichst vollständig und im Entwurf „vorzeigbar“ ist
3. **Nicht vorhanden + qualitativ**
-> mittels kurzer Wege abstimmen, dass quantitative Daten erklärt und PATs für den Umgang mit Nachhaltigkeitsthemen erarbeitet werden

💡 Zusätzlich können Datenpunkte einzelnen **strategischen Projekten oder Unternehmenszielen** zugeordnet werden, bspw. der Dekarbonisierung des Standorts oder der Erreichung einer Zertifizierung

C) Vorhandene Daten übertragen

Zum Beispiel:

- **Tanso CCF** mit einem Klick übertragen

- Prozess-Datenpunkte aus **DWA-Modul** übertragen
- **Qualitative Daten** wie die **Unternehmensbeschreibung**, **Liste der Tochterunternehmen** & Standorte oder Managementverantwortlichkeiten aus Lagebericht übernehmen
- **Quantitative Daten** wie **Abfallmengen**, **Unfallzahlen**, **Mitarbeitenden-Merkmale** aus bestehenden Berichtsformaten übernehmen

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BP-1 & 2) Grundlagen für die Erstellung

ESRS 2 – BP (Basis for preparation)

BP-1:

Allgemeine Grundlagen für die Erstellung der Nachhaltigkeitserklärung

BP-1_01: konsolidierter o. individueller Bericht

BP-1_02 (wenn konsolidiert): Bestätigung, dass gleicher Konsolidierungskreis wie in Finanzbericht

BP-1_03 (wenn konsolidiert): Angabe von Tochterunternehmen, die von der Nachhaltigkeitsberichterstattung befreit sind

Richtlinie 2013/34/EU
19a(9) o. 29a(8)

BP-1_04: Abgedeckte Bereiche der vor- und nachgelagerte Wertschöpfungskette

BP-1_05: Nutzung der Option zur Auslassung sensibler Informationen („Intellectual Property“)

BP-1_06 (wenn in dem Land erlaubt): Nutzung der Ausnahmeregelung zur Auslassung sensibler Informationen (bevorstehende Entwicklungen und Verhandlungssachverhalte)

Richtlinie 2013/34/EU
19a(3) o. 29a(3)

BP-2:

Angaben im Zusammenhang mit konkreten Umständen

BP-2_01 (bei Abweichung von Standard): Definition mittel- u. langfristiger Zeithorizonte

~~BP-2_02 (bei Abweichung von Standard): Gründe für die Abweichung~~

BP-2_03 (falls genutzt): geschätzte Kennzahlen aus Wertschöpfungskette

BP-2_04 (falls genutzt): Grundlage der geschätzten Kennzahlen

BP-2_05 (falls genutzt): Genauigkeit der geschätzten Kennzahlen

~~BP-2_06 (falls genutzt): geplante Maßnahmen zur Verbesserung der Genauigkeit~~

BP-2_07: Kennzahlen mit hoher Messunsicherheit

BP-2_08: Quellen der Messunsicherheit

~~BP-2_09: Genutzte Annahmen bei den Messungen~~

BP-2_10 (falls geschehen): Änderungen bei der Erstellung von Nachhaltigkeitsinfos.

BP-2_11 (falls geschehen): wenn möglich, angepasste Vergleichsinfos. zu vorher

~~BP-2_12 (falls geschehen): Differenz zwischen alten & korrigierten Zahlen~~

BP-2_13 (falls geschehen): Wesentlicher Fehler aus früheren Berichten

BP-2_14 (falls geschehen): wenn möglich, Korrektur der Fehler

BP-2_15 (falls geschehen): ggf. Grund weshalb Korrektur nicht möglich

BP-2_16 (falls zutreffend): angewandte andere Nachhaltigkeitsstandards

BP-2_17 (falls zutreffend): Verweis auf Absätze der anderen Standards

BP-2_18 (v): Nutzung europäische Normen (ISO etc.)

BP-2_19 (v): Umfang der Prüfung genutzter Normen (ISO etc.)

BP-2_20 (falls genutzt): Liste der durch Verweise einbezogenen DRs o. Datenpunkte

BP-2_21 (bei Nutzung der Übergangsregelung): Wesentliche Themen in E4, S1, S2, S3 & S4

BP-2_22: Liste wesentlichen Nachhaltigkeitsthemen in E4, S1, S2, S3 & S4

BP-2_23: Berücksichtigung dieser Nachhaltigkeitsthemen in Geschäftsmodell

BP-2_24: zeitgebundene Ziele & Fortschritte bei der Erreichung

BP-2_25: Strategien im Umgang mit diesen Nachhaltigkeitsthemen

BP-2_26: Maßnahmen gegen negative Auswirkungen

BP-2_27: relevante Kennzahlen

¹ Phase-in bei ≤750 MA:

- E4: 2 Jahre
- S1: 1 Jahr
- S2: 2 Jahre
- S3: 2 Jahre
- S4: 2 Jahre

BP-1 & 2) Grundlagen für die Erstellung - Beispiel



Sustainability statement

General disclosures

BASIS OF PREPARATION FOR CONSOLIDATED SUSTAINABILITY STATEMENT

Kemira previously disclosed non-financial information based on the Non-Financial Reporting Directive (NFRD) and prepared the sustainability information in accordance with the Global Reporting Initiative (GRI) disclosures. Starting from 2024, Kemira now reports according to the Corporate Sustainability Reporting Directive (CSRD) requirements.

As of 2024, Kemira will no longer publish a separate Sustainability Report based on the Global Reporting Initiative (GRI). As the disclosure requirements between CSRD and GRI differ, some previously reported KPIs and metrics required by GRI will no longer be reported in this Sustainability Statement. Kemira has compiled a GRI index to ease the transition to CSRD reporting. The GRI index is available on Kemira's website.

In 2023, the European Union implemented the Corporate Sustainability Reporting Directive (CSRD) to strengthen sustainability reporting practices within the EU. The Corporate Sustainability Reporting Directive is aligned with the EU's objective to achieve climate neutrality by 2050 and to elevate sustainability reporting to a level of importance equal to financial reporting. The Corporate Sustainability Reporting Directive builds upon the foundation of the Non-Financial Reporting Directive and also expands the scope of reporting obligations on companies operating within the EU.

Kemira Group's Sustainability Statement has been prepared in accordance with the European Sustainability Reporting Standards (ESRS), as issued by the European Financial Reporting Advisory Group (EFRAG) in 2023. The sustainability disclosures and key metrics are based on Kemira's Double Materiality Assessment. **The materiality assessment conducted during 2023-2024. The Sustainability Statement covers Kemira's value chain from upstream to downstream in full.** Metrics, identified under topical standards, cover Kemira's own operations, unless otherwise specified. Further details regarding Kemira's value chain, the materiality

assessment process and its findings are outlined under Business model, value chain and strategy, and Double Materiality Assessment.

The Sustainability Statement has been assured (limited assurance) by Ernst & Young Oy, an independent third-party. Assurance was conducted in accordance with the international assurance standards (ISAE 3000).

Structure and content

Kemira's Sustainability statement is structured based on the order and requirements of ESRS. It includes General disclosure and three main topical standard sections: Environmental information, Social information and Governance information. General disclosure includes e.g. Kemira's materiality assessment process, threshold and identified material impacts, risks and opportunities, Material impacts, risks and opportunities and a management summary are presented at the beginning of each material topic section, these are then followed by Kemira's policies, actions, targets and metrics which are connected in each instance. More detailed content index based on ESRS can be found end of this General disclosures section.

Scope of consolidation

The consolidated sustainability information comprises the parent company Kemira Oy and subsidiaries controlled by Kemira Oy. Subsidiaries are all legal entities that Kemira Oy has control over as defined in the Financial Statements (in note 6.2. The Group's subsidiaries and investments in associates). The scope of consolidation is the same as for the Financial Statements but associates are not included in the sustainability reporting. Consolidation of all sustainability data follows the principles above, unless otherwise specified.

The reporting period applicable to the Sustainability Statement coincides with the financial reporting period: January 1, 2024 to December 31, 2024. Comparisons in this statement are made to the corresponding period of 2023, and are provided when comparisons are available.

Sources of estimation and outcome uncertainty

When preparing the Sustainability Statement in accordance with ESRS, management is required to make estimates and assumptions on the metrics. As a basis for calculation and preparation of the sustainability metrics Kemira applies quality controls to ensure data completeness. Sustainability data collection includes direct measurements, calculations and estimations. Estimates and assumptions are continuously evaluated and are based on past experience and an expectation of future events that may have material implications and are considered to be reasonable under the circumstances. Sources of estimation and outcome uncertainty are described in the reporting principles of each section.

The Group's reporting principles

Kemira's data for water and marine resources in our own operations is limited to manufacturing sites with environmental permits. The following Kemira operations are excluded:

- Kemira's R&D centers are located in Atlanta, USA; Shanghai, China; and Espoo, Finland. In 2024, the total water consumption in R&D centers remained on the same level as in 2023 or was significantly below 1% with no changes in operations, and it is not considered material.
- Kemira's corporate headquarters in Helsinki, Finland and other corporate offices, sales offices and warehouses, if different from the sites' locations. Total water consumption at these facilities is well below 1% of Kemira's total water consumption.
- In 2024, less than 1% of Kemira sales volumes (in terms of quantity) came from tolling plants and contract manufacturers. On this basis, water consumption at toll and contract manufacturers is expected to be limited and not material.
- Kemira has former production sites with environmental liabilities but with no active manufacturing operations and no significant water consumption. Kemira's activity at these sites includes environmental monitoring and remediation measures. Site operation at the closed sites is limited to remediation and environmental monitoring operations, with no significant water consumption.

Calculated water consumption is compared to the reported data. The expectation for the sites is that the difference between the calculated and reported water consumption will be no more than ±5%. Water withdrawals and water discharges are measured at most sites. In case some stream in the water balances is not measured and if it cannot be calculated then it will be estimated as a final option.

Kemira has no significant operational expenditures (OpEx) or capital expenditures (CapEx) as defined in ESRS to report related to implementations of the actions.

The measurements of the metrics are not validated by an external body other than Ernst & Young Oy, through assurance.



General information

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General basis for preparation of the Sustainability Statement (BP-1)

Stora Enso's Sustainability Statement has been prepared on a consolidated basis in accordance with Chapter 7 of the Finnish Accounting Act and the European Sustainability Reporting Standards (ESRS). It follows the same consolidation principles as the Financial Statements prepared in accordance with the IFRS Accounting Standards. Unless otherwise stated, the Group's consolidated performance figures expressed in this report relate to the parent company, Stora Enso Oyj, and all companies in which the Group holds 50% or more of the voting rights, directly or indirectly. For more information on Group's structure, see Financial Statements, note 6.2 Group structure.

Joint control refers to the contractually agreed sharing of control of a joint arrangement, which exists only when decisions on relevant activities require the unanimous consent of all parties sharing control. Joint operations are joint arrangements in which the parties with joint control have rights to the assets, and obligations for the liabilities associated with the arrangement.

Stora Enso has two joint operations, Veracel in Brazil and Montes del Plata in Uruguay. In both companies, Stora Enso holds a 50% ownership. In the Group's Financial Statements, the joint operations are recognised and consolidated based on Stora Enso's share of the assets, liabilities, revenues, expenses, and cash flows of the joint operation.

In its current adopted form, ESRS lacks guidance on the consolidation principle for joint operations. Regarding its joint operations, Stora Enso does not have full authority to introduce and implement operating policies, practices, and targets, rendering most of the ESRS reporting requirements invalid. The same principle applies to financial reporting, where the Group's joint operations follow their own financial risk policies, which may differ from those of Stora Enso. Unlike financial reporting, where joint operations

Due to the nature of Stora Enso's operations, the time horizons differ from the definitions provided in the CSRD. For risks, Stora Enso defines short-term as up to one year, medium-term as two to ten years, and long-term as ten years or more. This definition aligns with Stora Enso's enterprise risk management process.

Stora Enso applies phase-in provisions in accordance with Appendix C of ESRS 1 and does not disclose anticipated monetary impacts of environmental risks for the financial year 2024. The phase-in provisions are applied to E1-9, E2-6, E3-5, E4-6, E5-6, S1-7, S1-8 (covers only EEA countries), S1-11, S1-13, and S1-14 (88 d. e).

In cases involving value chain estimation, outcome uncertainty, and disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements, the information is presented alongside the accounting principles of each metric. In ESRS E1-6, the metrics related to Scope 3 are subject to a higher level of measurement uncertainty, due to the data encompassing the full value chain.

Unless otherwise stated, the metrics disclosed in the Sustainability Statement have not been validated by an external body other than the assurance provider.

comply with IFRS accounting standards, joint operations do not adhere to ESRS.

To ensure consistency with Stora Enso's financial reporting, the Sustainability Statement covers information proportional to Group's ownership in the joint operations in the following ESRS disclosure requirements: E1-5, E1-6, E1-7, E2-4, E3-4, E4-5, E5-4, E5-5, and S1-6 (total number of employees). These disclosures encompass all intensity ratios related to the Group's financial revenue. However, due to the lack of full authority over daily operations, joint operations are not governed by Stora Enso's policies, internal controls, or targets.

Following the double materiality principle, Stora Enso's Sustainability Statement contains relevant upstream and downstream value chain information where necessary to understand the Group's material impacts, risks, and opportunities and to provide information that meets the qualitative characteristics outlined in the Corporate Sustainability Reporting Directive (CSRD). In the descriptions of material topics, joint operations are referred to as 'joint operations' to distinguish them from the Group's own operations, over which the Group has full authority regarding the operating policies.

Due to the sensitivity of information, Stora Enso has exercised the option to not to disclose specific details related to intellectual property know-how, or the outcomes of innovation. In accordance with the Finnish Accounting Act chapter 7 13 § (212.2023/248), Stora Enso does not disclose information on impending developments or matters under negotiation. Following the Finnish Accounting Act, Stora Enso has also opted to omit value chain metrics and comparative data from previous periods for the first reporting year.

This Sustainability Statement has been verified by an independent third-party assurance provider in accordance with the Finnish Auditing Act. PricewaterhouseCoopers Oy has provided a level of Limited Assurance, using the ESRS Standards and the requirements of the delegated acts of the Taxonomy Regulation serving as criteria, covering the Sustainability Statement as defined under BP-1. PricewaterhouseCoopers Oy applies the International Standard on Quality Management (ISQM) 1. Additionally, a level of Reasonable Assurance, using the GHG Protocol as criteria, has been provided for Stora Enso's reporting on direct and indirect greenhouse gas (GHG) emissions (Scope 1 and 2). The Assurance Reports are available on page 216 of the Annual Report.

Disclosures in relation to specific circumstances (BP-2)

Stora Enso's Sustainability Statement fulfills the characteristics of specific circumstances in some of its disclosures.

Energy consumption and mix (E1-5)

Accounting principles

The energy figures cover all Stora Enso production units. Aligned with the Financial Statements, the figures include the Group's joint operations according to the ownership share (50%). Energy consumption in offices is included in the figures based on estimates. Local factors are taken into account at the units when calculating the energy content of the fuels used.

Stora Enso applies a conservative approach according to ESRS in the split between renewable and non-renewable sources, and only classifies energy as renewable or nuclear-based if the origin of the purchased energy is clearly defined in the contractual arrangements with its suppliers. If the origin is not known, the source is classified as fossil. Some production units that purchase electricity from the grid have estimated their energy consumption, as invoices from the energy provider were not

Quellen: Kemira, Annual Report 2024, S. 83-84 & S. 125; Stora Enso, Annual Report 2024, S. 70-71 & S. 95

GOV-1 bis 5) Unternehmensführung

ESRS 2 – GOV (Governance)

GOV-1:

Rolle der Verwaltungs-, Leitungs- und Aufsichtsorgane

- GOV-1_01: Anzahl der geschäftsführenden Mitglieder
- GOV-1_02: Anzahl der nicht geschäftsführenden Mitglieder
- GOV-1_03: Vertretung von Arbeitnehmern
- GOV-1_04: relevante Erfahrung über Sektoren, Produkte & Standorte
- GOV-1_05: Anteil nach Geschlecht und anderen Diversitätsaspekten
- GOV-1_06: Geschlechtervielfalt im Vorstand (Verhältnis w : m)
- GOV-1_07: Anteil der unabhängigen Vorstandsmitglieder
- GOV-1_08: Verantwortliche für die Überwachung der IROs (Namen)
- GOV-1_09: Wirkung dieser Verantwortlichkeit auf Unternehmen & Strategie
- GOV-1_10: Rolle der Geschäftsführung bei der Überwachung von IROs
- GOV-1_11: Gremium oder Position, die diese Rolle ausübt
- GOV-1_12: Berichtspflichten an andere Mitglieder
- GOV-1_13: Kontrollen zum IRO-Mngt & Integration in andere Funktionen
- GOV-1_14: Festlegung von Zielen & Überwachung deren Erreichung
- GOV-1_15: Sicherstellung von Fachwissen zu Nachhaltigkeitsfragen
- GOV-1_16: vorhandenes nachhaltigkeitsbezogenes Fachwissen
- GOV-1_17: Zusammenhang dieses Fachwissens mit wesentlichen IROs

GOV-2:

Aspekte, mit denen sich die Organe des Unternehmens befassen

- GOV-2_01: Prozess zur Information der Managementorgane zu wesentlichen IROs
- GOV-2_02: Berücksichtigung dieser Informationen in Strategie & Entscheidungen
- GOV-2_03: Liste behandelter wesentlicher IROs im Berichtszeitraum
- GOV-2_04 (v): geeignete Mechanismen zur Überwachung der Unternehmensführung

GOV-3:

Einbeziehung der nachhaltigkeitsbezogenen Leistung in Anreizsysteme

- GOV-3_01: Existenz von Anreizprogramme und Vergütungspolitiken
- GOV-3_02: Wesentlichen Merkmale von Anreizsystemen
- GOV-3_03: verwendete Nachhaltigkeitsziele zur Leistungsbeurteilung
- GOV-3_04: Einbezug von nachhaltigkeitsbez. Leistungskennzahlen in Vergütung
- GOV-3_05: Anteil der variablen Vergütung abhängig von Nachhaltigkeitszielen
- GOV-3_06: Zuständigkeitsebene für Genehmigung & Aktualisierung der Anreize

GOV-4:

Sorgfaltspflicht

- GOV-4_01: Übersicht über Informationen zur Erfüllung der Sorgfaltspflicht im Nachhaltigkeitsbericht

GOV-5:

Risikomanagement und interne Kontrollen der Nachhaltigkeitsberichterstattung

- GOV-5_01: Umfang, Hauptmerkmale und Komponenten von Risikomanagement
- GOV-5_02: Verfolgter Risikobewertungsansatzes
- GOV-5_03: Identifizierten Hauptrisiken und Minderungsstrategie
- GOV-5_04: Integration in relevante interne Funktionen und Prozesse
- GOV-5_05: regelmäßige Berichterstattung an Managementorgane

GOV-1 bis 5) Unternehmensführung - Beispiel



The role of the administrative, management, and supervisory bodies (GOV-1)

The Board and the President and CEO (CSO) are responsible for the management of the Company. The Board supervises the operation and management of Stora Enso and decides on significant matters relating to strategy, investments, organisation, and finance. It is also responsible for overseeing the proper supervision of accounting and the control of financial and sustainability matters. The CSO is responsible for the day-to-day management of the Company in accordance with the Finnish Companies Act and the instructions and orders issued by the Board. Other governance bodies have an assisting and supporting role.

The duties of the various bodies within Stora Enso are determined by the laws of Finland and by the Company's corporate governance policy, which complies with the Finnish Companies Act and the Finnish Securities Market Act. The working order of the Board sets out the Board's working practices of the Board, and the tasks and responsibilities of the Board committees are defined in their charters. There is no employee representative on the Board.

The Corporate Governance Policy addresses corporate governance within Stora Enso. The Group Risk Policy outlines the overall approach to governance and the management of risk in accordance with the CSO (Committee of Supporting Organizations) framework and in line with ISO

2000. Both policies are approved by the Board of Directors. The Board's work is supported by its committees:

Financial and Audit Committee (FAC) Supports the Board in maintaining the integrity of the Company's financial and sustainability reporting, as well as the Board's control functions.

People and Culture Committee (PCC) Responsible for recommending and evaluating executive nominations and remuneration, and making recommendations to the Board on management and remuneration issues.

Sustainability and Ethics Committee (SEC) Responsible for overseeing the Company's sustainability and ethical business conduct impacts, risks, and opportunities, supporting the Board in approval of the Report of the Board of Directors, and approving sustainability targets.

The Board of Directors, the Sustainability and Ethics Committee and the Financial and Audit Committee charter to the President and CEO to make new regulatory requirements on sustainability reporting to address the sustainability and Ethics Committee's ongoing work assigned to the President and Audit Committee vice chairpersons. The Sustainability and Ethics Committee makes, evaluates, and approves the Company's sustainability assessment, including the identification of material impacts, risks, and opportunities, as well as the associated targets and action plans. The Board approves this sustainability assessment, including the Financial and Audit Committee review and supports the material content of the Sustainability Statement as recommended by the Sustainability and Ethics Committee, for inclusion in the Report of the Board of Directors, subject to Board approval.

As stipulated by the Board Diversity Policy, the members of the Board include knowledge of the Company's operational environment, its markets, and the industry in which it operates. The key diversity elements such as financial, sustainability or other specific competencies, geographical representation, and leadership diversity are required to achieve the appropriate balance of diversity, skills, experience, and expertise on the Board collectively in 2024.

- 1. The Board comprised eight members, all non-executive.
- 2. Diversity: 55% gender balance with an average ratio of female to male board members over the 10 years up to 2024, and the members represented five different nationalities.
- 3. 2/8 of the board members had industry experience, 3/8 had specific expertise in emerging markets, and all members had experience in global business and operational management.

80% of the Board members were independent of the Company. Three of the Board members were independent of the Company but not of its significant shareholders.

In 2024, five of the Board members possessed sustainability or ESG-related expertise as their primary skill. Additionally, two of the Board members had specific expertise in sustainability-driven innovation. These skills were aligned with the material topics identified as part of Stora Enso's transition plan: Climate change, Biodiversity and Circularity. Two out of the three members of the Sustainability and Ethics Committee possessed expertise in governance and compliance as their primary skill and all the members of the Financial and Audit Committee held the expertise of Board committees are allowed to engage external consultants and experts when necessary. To ensure access to sufficient and relevant sustainability expertise and skills, the Board subject matter experts present sustainability topics and updates to the committees. More details are provided under ESRS 2 GOV-2.

The Sustainability and Ethics Committee comprises two to four Board members who are nominated annually by the Board. At least one Committee member is expected to have sufficient prior knowledge and experience in handling sustainability and business ethics matters. To ensure the Board's insight and competence on the Company's material sustainability-related topics, the Board regularly reviews and discusses material impacts, risks and opportunities, targets, and related reporting as determined under ESRS 2 GOV-3.

The CSO is responsible for overseeing effective risk management and for overseeing the assessment and materiality reporting of the Company's material risks. The CSO oversees the Company's risk management processes and tools. Within the Board's control functions, the Board controls the processes within their respective domains. The Board of Directors, the President and CEO, and the Executive Vice President of Strategy and Sustainability, is responsible for designing, developing, and maintaining the implementation of the Group Risk Management Framework. To ensure consistency in the management of impacts, risks, and opportunities, Stora Enso has set procedures to update the Board on sustainability-related risks and opportunities. In addition, the Board is responsible for annually approving the updated Double Materiality Assessment and reviewing strategic and operational risks.

Sustainability work is led by the Executive Vice President (EVP) responsible for strategy and sustainability, who reports directly to the CSO and is part of the Group Leadership Team (GLT). The CSO holds ultimate responsibility for the successful implementation of Company's sustainability agenda. The Sustainability Council, which includes heads of Sustainability from the various Stora Enso's sustainability efforts in 2024. Created by the

Information provided to and sustainability matters addressed by the administrative, management, and supervisory bodies (GOV-2)

The Board of Directors, the President and CEO, and the Executive Vice President of Strategy and Sustainability, is responsible for designing, developing, and maintaining the implementation of the Company's sustainability agenda. The Sustainability Council, which includes heads of Sustainability from the various Stora Enso's sustainability efforts in 2024. Created by the

Information provided to and sustainability matters addressed by the administrative, management, and supervisory bodies (GOV-3)

The Board of Directors, the President and CEO, and the Executive Vice President of Strategy and Sustainability, is responsible for designing, developing, and maintaining the implementation of the Company's sustainability agenda. The Sustainability Council, which includes heads of Sustainability from the various Stora Enso's sustainability efforts in 2024. Created by the

Information provided to and sustainability matters addressed by the administrative, management, and supervisory bodies (GOV-3)	Information provided to and sustainability matters addressed by the administrative, management, and supervisory bodies (GOV-3)
Information provided to and sustainability matters addressed by the administrative, management, and supervisory bodies (GOV-3)	Information provided to and sustainability matters addressed by the administrative, management, and supervisory bodies (GOV-3)

Quelle: Stora Enso, Annual Report 2024, S. 70-73

GOV-1-01-07

SBM-1 bis 3) Strategie und Geschäftsmodell

ESRS 2 – SBM (Strategy & Business Model)

SBM-1: Strategie, Geschäfts- modell und Wertschöpf- ungskette

- SBM-1_01: Bedeutender Produktgruppen / angebotener Dienstleistungen
- SBM-1_02: Bedeutender Märkte / bedienter Kundengruppen
- SBM-1_03/04: Arbeitnehmer (Kopfzahl), am Ende / während des Zeitraums
- SBM-1_05 (falls vorhanden): verbotene Produkte & Dienstleistungen in bestimmten Märkten*
- SBM-1_06: Gesamterlöse
- SBM-1_07/08: Umsatz nach bedeutenden **ESRS-Sektoren** Noch nicht veröffentlicht
- SBM-1_09: Tätigkeit im Bereich fossiler Brennstoffe (Kohle, Öl und Gas)
- SBM-1_10: Einnahmen aus dem fossilen Brennstoffsektor (Kohle, Öl und Gas)*
- SBM-1_11-14: Einnahmen aus Kohle / Öl / Gas / taxonomiekonformen Gasaktivitäten*
- SBM-1_15: Tätigkeit im Bereich der Chemikalienproduktion*
- SBM-1_16: Einnahmen aus der Chemikalienproduktion*
- SBM-1_17: Tätigkeit im Bereich kontroverser Waffen*
- SBM-1_18: Einnahmen aus kontroversen Waffen*
- SBM-1_19: Tätigkeit im Anbau und der Produktion von Tabak*
- SBM-1_20: Einnahmen aus dem Anbau und der Produktion von Tabak*
- SBM-1_21: Ziele für Produkte/Dienstleistungen/Kunden, Gebiete & Interessensträger
- SBM-1_22: Bewertung aktueller wesentlicher Produkte / Dienstleistungen, Märkte und Kundengruppen im Zusammenhang mit diesen Zielen
- SBM-1_23: Strategieelementen mit Bezug / Einfluss auf Nachhaltigkeitsaspekte
- SBM-1_24 (sobald vorhanden): Liste der bedeutenden ESRS-Sektoren*
- SBM-1_25: Geschäftsmodell und Wertschöpfungskette (Beschreibung)
- SBM-1_26: Inputs und Ansatz zu deren Sammlung, Entwicklung und Sicherung
- SBM-1_27: Outputs und Nutzen für Kunden, Investoren & Interessensträger
- SBM-1_28: Hauptmerkmale der vor- und nachgelagerten Wertschöpfungskette

SBM-2: Interessen und Stand- punkte der Interessen- träger

- SBM-2_01: Einbindung von Interessengruppen (Zusammenfassung)
- SBM-2_02: Wichtigste Interessengruppen
- SBM-2_03: Kategorien von eingebundenen Interessengruppen
- SBM-2_04: Organisation der Einbindung von Interessengruppen
- SBM-2_05: Zweck der Einbindung von Interessengruppen
- SBM-2_06: Berücksichtigung des Ergebnisses der Einbindung
- SBM-2_07: Interessen und Ansichten wichtiger Stakeholder
- SBM-2_08: ggf. Änderungen an der Strategie / dem Geschäftsmodell*
- SBM-2_09: Beschreibung der (geplanten) Änderungen*
- SBM-2_10: Beschreibung weiterer geplanter Schritte und des Zeitrahmens*
- SBM-2_11: Erwartete Änderungen im Verhältnis zu Interessenträgern*
- SBM-2_12: Information der Managementorgane

SBM-3: Wesentliche Auswirkungen, Risiken und Chancen und ihr Zusammen- spiel mit Strategie und Geschäfts- modell

- SBM-3_01/02: Wesentlichen Auswirkungen / Risiken & Chancen der DWA
- SBM-3_03: Aktuelle & erwarteten Einflüsse wesentlicher IROs & Reaktion
- SBM-3_04: Wirkung wesentlicher Auswirkungen auf Menschen & Umwelt
- SBM-3_05: Verbindung wesentlicher Auswirkungen zur Strategie & Geschäft
- SBM-3_06: Erwarteten Zeiträume wesentlicher Auswirkungen
- SBM-3_07: Tätigkeiten / Geschäftsbeziehungen zu wesentlichen Auswirkungen
- SBM-3_08: Finanzielle Effekte wesentlicher Risiken & Chancen auf Geschäft
- SBM-3_09: Erwartete **finanziellen Effekte** wesentlicher Risiken & Chancen 1 Jahr phase-in
- SBM-3_10: Resilienz von Strategie & Geschäftsmodell ggü. wesentlichen IROs
- SBM-3_11: Änderungen bei wesentlichen IROs zum Vorjahr
- SBM-3_12: IROs mit unternehmensspezifischen Angaben

SBM-1 bis 3) Strategie und Geschäftsmodell - Beispiel



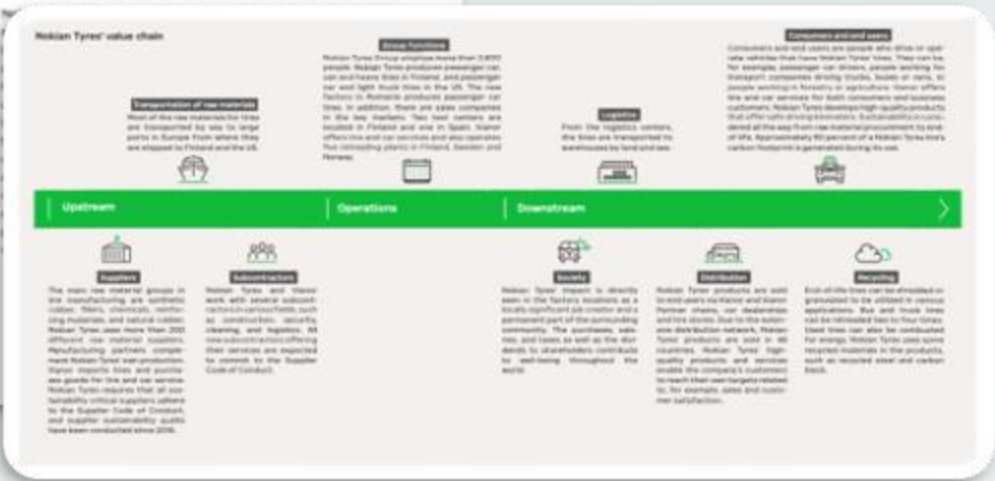
SBM-1 Sustainability is integrated into Nokian Tyres' strategy
Nokian Tyres' product portfolio includes winter, summer, all-weather, and all-season tires for passenger cars as well as special tires, wheels and retreading materials for heavy-duty machinery, trucks and buses. The Value chain provides tire and car services.

In 2024, Nokian Tyres' products were sold in 46 countries. Nokian Tyres' key markets are the Nordic countries, where the company is the market leader in premium passenger car tires, and North America and Central Europe, where the company seeks growth. Nokian Tyres' direct customers are business customers, the most significant of which are the dealers, car dealerships, and vehicle manufacturers. Winter service centers operate in Finland, Sweden, and Norway, serving both business customers and end users.

In 2024, Nokian Tyres employed 3,810 people at the end of the year, of which 2,722 in the Nordic countries, 698 in North America, and 470 in Central Europe.

- Nokian Tyres' sustainability-related goals regarding significant product groups and stakeholder relationships are the following:
- Maintain the status that tires do not contain Substances of Very High Concern
 - Increase the share of renewable or recycled raw materials in tires to 50 percent by 2030
 - Have at least 60 products in the best rolling resistance A class by 2028
 - Maintain the status that 100 percent of premium tires of the selected scope are in the best wet grip A or B class in the EU Tyre Labeling and that all of the Nokian Tyres Hakkapeliitta products meet the EU ice grip requirements
 - Decrease lost-time incident frequency (LTF) from 8.3 (Q08) to 1.5 by 2025
 - Develop personnel well-being
 - Maintain the status that 100 percent of sustainability high-risk suppliers have been audited
 - Maintain the status that 100 percent of natural rubber processor suppliers are either GPSNR members or have signed Nokian Tyres' sustainability commitment.

In 2024, Nokian Tyres' tires did not contain Substances of Very High Concern. In line with the 2030 goal related to renewable and recycled raw materials, an ISCC PLUS certified raw material and a new renewable raw material were taken into use in production of passenger car tires in the Finnish factory. There were 10 products in the rolling resistance A class at the end of the year. 100 percent of premium tires of the selected scope were in the best wet grip A or B class in the EU Tyre Labeling, and all Nokian Tyres Hakkapeliitta products met the EU ice grip requirements. The LTF improved to 4.6 (6.7), 100 percent of sustainability high-risk suppliers have been audited, and 100 percent of natural rubber processor suppliers are either GPSNR members or have signed Nokian Tyres' sustainability commitment.



SBM-3 Material sustainability-related impacts, risks and opportunities
Nokian Tyres' material impacts, risks, and opportunities are presented in the following tables, including the effects of the material impacts on people or the environment, reasonably expected time horizons of impacts that are not actual, and the connection to the company's strategy, business model, activities and business relationships.

Material impacts, risks and opportunities	Time	Effect on the company	Effects on stakeholders, society, environment, and business activities
Material impacts on people and the environment (Scope 1 and 2)	Short-term negative impact Long-term negative impact	Based on Tyres' Scope 1 and 2 emissions are highly generated through energy use in the factories and through the use of raw materials in the production of tires. Emissions are reduced through energy efficiency and sustainable raw material use.	Nokian Tyres' is in the tire industry leader in reducing CO2 emissions. The company's emissions are decreasing and are becoming more sustainable. The company is committed to the goal of achieving net-zero emissions by 2030, and supports the company's goal of becoming a carbon-neutral company. More information about what are the emissions of the company in the future can be found under ETC.
Material impacts on the environment (Scope 3)	Actual negative impact Potential negative impact	The majority of Nokian Tyres' Scope 3 emissions are from the production of tires. The company is committed to reducing its Scope 3 emissions by 2030. The company is committed to the goal of achieving net-zero emissions by 2030, and supports the company's goal of becoming a carbon-neutral company. More information about what are the emissions of the company in the future can be found under ETC.	Nokian Tyres' is committed to reducing greenhouse gas emissions from the value chain. The company will continue to work on reducing greenhouse gas emissions from its value chain. The company will continue to work on reducing greenhouse gas emissions from its value chain. The company will continue to work on reducing greenhouse gas emissions from its value chain.
Material impacts on people and the environment (Scope 3)	Material impacts on people and the environment (Scope 3)	The company is committed to reducing its Scope 3 emissions by 2030. The company is committed to the goal of achieving net-zero emissions by 2030, and supports the company's goal of becoming a carbon-neutral company. More information about what are the emissions of the company in the future can be found under ETC.	One of Nokian Tyres' sustainability goals is to increase the share of recycled and renewable raw materials in tires to 50 percent by 2030. The company aims to increase the share of recycled and renewable raw materials in tires to 50 percent by 2030. The company aims to increase the share of recycled and renewable raw materials in tires to 50 percent by 2030.
Material impacts on people and the environment (Scope 3)	Material impacts on people and the environment (Scope 3)	The company is committed to reducing its Scope 3 emissions by 2030. The company is committed to the goal of achieving net-zero emissions by 2030, and supports the company's goal of becoming a carbon-neutral company. More information about what are the emissions of the company in the future can be found under ETC.	One of Nokian Tyres' sustainability goals is to increase the share of recycled and renewable raw materials in tires to 50 percent by 2030. The company aims to increase the share of recycled and renewable raw materials in tires to 50 percent by 2030. The company aims to increase the share of recycled and renewable raw materials in tires to 50 percent by 2030.

Quelle: Nokian Tyres, Sustainability Statement 2024, S. 48ff

IRO-1 & 2) Auswirkungen, Risiken & Chancen

ESRS 2 – IRO (Impacts, Risks & Opportunities)

IRO-1:

Beschreibung des Verfahrens zur Ermittlung und Bewertung der wesentlichen Auswirkungen, Risiken und Chancen

- IRO-1_01: angewandten Methoden und Annahmen bei der Identifizierung
- IRO-1_02: Verfahren zur Identifizierung & Bewertung von Auswirkungen
- IRO-1_03: Konzentration auf Risikofaktoren für negative Auswirkungen
- IRO-1_04: Fokus auf Auswirkungen aus eigenen Tätigkeiten
- IRO-1_05: Konsultation betroffener Interessengruppen & externen Experten
- IRO-1_06: Verfahren zur Priorisierung von Auswirkungen
- IRO-1_07: Verfahren zur Identifizierung & Bewertung von Risiken & Chancen
- IRO-1_08: Berücksichtigung von Verbindungen zwischen IROs
- IRO-1_09: Bewertung von identifizierten Risiken und Chancen
- IRO-1_10: Priorisierung von Nachhaltigkeitsrisiken vs andere Risikotypen
- IRO-1_11: Entscheidungsprozesses und verbundene Kontrollverfahren
- IRO-1_12: Integration des IRO-Prozess in gesamten Risikomanagementprozess
- IRO-1_13 (falls gegeben): Integration von Chancen in Managementprozess*
- IRO-1_14: Kennzahlen zur Identifikation & Bewertung wesentlicher IROs
- IRO-1_15: Veränderung des IRO-Prozess zum vorherigen Berichtszeitraum

IRO-2:

In ESRS enthaltene von der Nachhaltigkeitserklärung des Unternehmens abgedeckte Angabepflichten

- IRO-2_01: Liste von Datenpunkten aus anderen EU-Rechtsvorschriften
- IRO-2_02: Liste der beinhaltenen ESRS-Offenlegungsanforderungen
- IRO-2_03 (falls zutreffend): Begründung falls E1 nicht wesentlich ist*
- IRO-2_04 (v): Begründung falls E2 nicht wesentlich ist*
- IRO-2_05 (v): Begründung falls E3 nicht wesentlich ist*
- IRO-2_06 (v): Begründung falls E4 nicht wesentlich ist*
- IRO-2_07 (v): Begründung falls E5 nicht wesentlich ist*
- IRO-2_08 (v): Begründung falls S1 nicht wesentlich ist*
- IRO-2_09 (v): Begründung falls S2 nicht wesentlich ist*
- IRO-2_10 (v): Begründung falls S3 nicht wesentlich ist*
- IRO-2_11 (v): Begründung falls S4 nicht wesentlich ist*
- IRO-2_12 (v): Begründung falls G1 nicht wesentlich ist*
- IRO-2_13: Prozess zur Ermittlung der wesentlichen Informationen

Nur bei Ausschluss von E1 – Klima ist eine Begründung verpflichtend

IRO-1 & 2) Auswirkungen, Risiken & Chancen - Beispiel



General information – Impact, risk and opportunity management

General information

Environmental reporting

Social reporting

Appendix

Description of the process to identify and assess material impacts, risks and opportunities

1. Evaluating HEINEKEN's current state and external context

We evaluated our current state and external context through a comprehensive desk-based assessment. This included internal sources such as international standards and frameworks, sector trends and an in-depth peer and competitor review, and company-specific sources, such as the risk management process and company strategy presentations. A media analysis was conducted to evaluate the public opinion about HEINEKEN and its sector. In assessing this, we considered the business context of HEINEKEN, including its geographical presence, nature of business activities and transactions (among others when assessing Business Conduct). We also screened our site locations and business activities for actual and potential impacts or risks related to pollution, both within our own operations and across the value chain. This screening was conducted through desktop research and inquiries with internal stakeholders. We did not engage in consultations with affected communities on this topic, as we found no indications of communities being directly impacted by pollution.

This process resulted in a list of 30 topics which was reviewed by a project team to analyse what topics should be included, which topics could be combined (for example, 'carbon emissions' and 'climate change'), and what topics should be excluded (for example, topics relevant for certain peers but not necessarily for HEINEKEN's operations, like animal welfare). The list was narrowed down to a shortlist of 17 topics.

2. Mapping the value chain and potential impacts

Part of the assessment focused on understanding our value chain and the (potential) impacts of the draft shortlist of sustainability topics within this chain. HEINEKEN's operations and relationships were summarised and categorised into upstream, operational and downstream activities.

The shortlisted topics were then mapped against these activities.

The outcomes of phases 1 and 2 were presented to a group of 30 subject matter experts selected from within HEINEKEN. The goal of this session was to validate the value chain map and shortlist, including definitions. As a result, a final shortlist of 15 topics was confirmed, after integrating 'Sustainable packaging' into 'Resilience and circularity', and removing 'Innovation', as it is considered an enabler for the other topics, rather than a standalone sustainability issue.

3. Engaging internal and external stakeholders

We gathered input from internal and external stakeholders to prepare HEINEKEN's most crucial sustainability topics. This involved engagement with internal stakeholders – both subject matter experts and senior managers – and external representatives from NGOs, investors, governments, customers and trade associations.

Double materiality six-phase process

Phase 1

Phase 2

Phase 3

Phase 4

Phase 5

Phase 6

Evaluating HEINEKEN's current state and external context

Mapping the value chain and potential impacts

Engaging internal and external stakeholders

Prioritising the material topics

Validating the outcomes with the group of subject matter experts

Confirming the results with the Executive Board

Internal stakeholders were assigned to a topic aligned with their area of expertise while external stakeholders were asked to select three to five topics from the shortlist of sustainability topics that they deemed most material.

We conducted 25 in-depth interviews. External stakeholders were specifically interviewed regarding impact materiality, while internal and financial internal stakeholders were interviewed on both impact and financial materiality. On top of their qualitative input, stakeholders were asked to score the sustainability topic based on the impacts, risks and opportunities they identified, and on severity and likelihood.

To further validate the outcomes, a survey was distributed to 119 stakeholders in 15 markets across all four regions, with a 60% response rate. Stakeholders represented a wide range of sectors ranging from governments and NGOs to trade associations and customers. They were asked to select and rank the five topics that they deemed could have the most significant impact on the economy, environment and people.

Additionally, the risk management team was engaged to use the yearly Risk Assessment Cycle as a source for determining the financial materiality of sustainability topics.

4. Prioritising the material topics

The final scoring for double materiality was determined based on the interview results and risk management assessment. Survey results were used to help validate the outcomes of the interviews.

The prioritisation of sustainability topics for impact materiality was determined by calculating the average score of internal and external interview inputs. The prioritisation for financial materiality was determined by calculating the average score of internal and external interview inputs and risk management inputs.

Based on the average scores, topics were prioritised and visualised in a matrix. The outcomes of the survey were used to validate and confirm the topic scoring, with no material differences identified.

IRO-1.05

General information – Impact, risk and opportunity management

General information

Environmental reporting

Social reporting

Appendix

5. Validating the outcomes with the group of subject matter experts

A second validation session was organised with the subject matter experts from within HEINEKEN to discuss the outcomes derived from interviews and surveys. Participants discussed how the prioritisation of the impact and financial materiality met the group's expectations and how to set the appropriate threshold to define which topics are deemed material for ESRS reporting purposes.

It was agreed to set the threshold at 2.5 (out of 5) for both impact and financial materiality as it represents the median value on the 5-point scoring table. This means that any topics scoring above 2.5 are considered to be material, while topics scoring below 2.5 are considered to be relevant, but not material for ESRS reporting purposes.

6. Confirming the results with the Executive Board

The outcomes of the double materiality assessment were presented to the Executive Board for discussion and validation. A management judgment was made to elevate two topics that were close to the materiality threshold – 'Labour practices and human rights' and 'Diversity, equity and inclusion' – into the materiality space, making them in-scope of the ESRS reporting requirements.

The annual assessment of the DMA requires sign-off by the Executive Board. The Sustainability and Responsibility Steering Committee, chaired by the Chief Executive Officer (CEO), oversees the implementation of the Company's sustainability strategy. It is involved in setting and monitoring targets and responding to identified impacts, risks and opportunities (see the section 'General information - Role of the Executive Board and Supervisory Board in sustainability matters' for more information).

Integration of the DMA into overall risk management process

The eight material topics identified through the DMA assessment have been mapped to the risks identified in our overall risk management process. As part of this process, these risks – along with other relevant risks – are identified, mitigated, and monitored on an ongoing basis as part of routine business. HEINEKEN applies a proactive approach to ensure that risk management is part of executive conversations and embedded in company processes. Risk management is integrated into overall management processes, and our ongoing commitment to managing risk in a conscious manner increases the likelihood of achieving our strategy, business, and sustainability objectives.

The Executive Board of HEINEKEN is accountable for overseeing risk management, risk oversight, and the protection of the company's reputation, assets, and brands. The Board is supported by the Risk Committee, chaired by the CFO, in conducting regular reviews of the group's risk assessment cycle. These reviews summarise the company's key risks, mitigating actions, and monitoring activities, and they also assess the level of risk HEINEKEN is willing to accept and the impact these risks may have on the company's objectives.

General disclosures relating to setting and monitoring ambitions and goals

Setting ambitions and goals

HEINEKEN's sustainability strategy (BuBWi) will continue to evolve due to stakeholder expectations, evolving requirements and regulations. Senior leaders across the business discuss and address the ambitions and goals before they are presented to the Executive Board and Supervisory Board for approval.

Monitoring performance

There is a clear governance process in place to review our progress on each of our BuBWi ambitions and goals, including a dedicated S&P Steering Committee with senior leadership to review progress on a quarterly basis. This is supported by regional and operating company reviews, identifying areas of focus and facilitating decision making to rebalance efforts to maximise progress. Forecasting and performance monitoring will be further embedded in 2025 to cover sustainability reported metrics beyond our BuBWi goals.

Identifying lessons or improvements

Our global, regional and operating company Steering Committees discuss learnings and areas for improvement. The recommendations and dilemmas discussed at these forums often emerge from management committees (e.g. our Environmental Steering Committee) and regular reviews within the delivery programmes.

Appendix mit allen IROs

Linking impacts, risks and opportunities to policies and actions					
Topic	Type	Impacts, risks and opportunities description	Related policy	Related key action	Related target
Climate change	Risk	Climate change is the primary driver through which governments regulate emissions and increase decarbonisation. The risk potentially exceeds the year of our strategy, energy requirement, and other material topics.	Renewable Energy Policy - Business Policy - Internal Carbon Pricing Policy	- Increase energy efficiency and reduce fossil fuel with renewables - Strengthen supplier - Reduce emissions across the value chain - Focus on regulatory matters (EU Emissions and energy regulation) - Carbon credits - Improve understanding of our water risks in our supply chain	- 100% renewable energy in Scope 1 and 2 - 100% renewable electricity in Scope 1 and 2 - Break down emissions across value chain - Reduce Scope 1 emissions
	Impact	The use of fossil energy sources to value chain continues to release carbon emissions into the atmosphere, which contributes to global warming.			
	Impact	Changes in water availability due to climate change, population growth, or regulatory shifts may lead to production constraints or disruption of services.	- Environmental Policy	- Increase internal and external water reuse and recycling - Reduce average water usage	- Reduce average water usage to 2.5 m³/m² worldwide
Water security	Risk	Through collaboration with third parties, water risks are increasingly being prioritised and materialised.			
	Impact	Water withdrawal in water stressed areas reduces water availability.	- Environmental Policy	- Reduce average water usage to 2.5 m³/m² water stressed areas - Fully balance water used in our products in water stressed areas	- Reduce average water usage to 2.5 m³/m² water stressed areas - Reach 100% water balancing in our products in water stressed areas

IRO-1.12

Quelle: Heineken, Annual Report 2024, S. 164f

MDRs) Mindestangabepflichten (PATs & Metrics)

ESRS 2 – MDRs (Minimal Disclosure Requirements)

MDR-P:

Konzepte für den Umgang mit wesentlichen Nachhaltigkeitsaspekten

MDR-P_01/02: Wesentlichen Inhalte / Anwendungsbereich des Konzepts
 MDR-P_03: Höchste Verantwortungsebene für die Umsetzung
 MDR-P_04 (falls zutreffend): Externer Standard oder Initiativen, die eingehalten werden
 MDR-P_05: Berücksichtigung der Interessen zentraler Stakeholder
 MDR-P_06: Austausch des Konzepts mit betroffenen Stakeholdern
 MDR-P_07 (falls zutreffend): Gründe für das Fehlen von Konzepten
 MDR-P_08 (v): ggf. angestrebter Zeitrahmen bis zu Einführung von Konzepten
 MDR-P_09: Angabe, dass es (aktuell noch) kein Konzept gibt

PATs vorhanden?



MDR-A:

Maßnahmen und Mittel im Bezug auf wesentliche Nachhaltigkeitsaspekte

MDR-A_01 (falls vorhanden): Angabe der zentralen Maßnahme
 MDR-A_02: Beschreibung des Anwendungsbereichs der zentralen Maßnahme
 MDR-A_03: Zeithorizont bis zum geplanten Abschluss der Maßnahme
 MDR-A_04: ergriffene Maßnahme und Ergebnisse zur Abhilfe geschädigter Personen
 MDR-A_05: Quantitative und qualitative Fortschritte zu Vorperioden
 MDR-A_06: Art aktueller & geplanter Ressourcen für den Aktionsplan (CapEx/OpEx)
 MDR-A_07: Bezug der aktuellen finanziellen Ressourcen auf Finanzabschluss
 MDR-A_08 (v): ggf. derzeitige und zukünftige finanzielle Ressourcen
 MDR-A_09: Zugewiesene Investitionsausgaben (Capex)
 MDR-A_10: Zugewiesene Betriebsausgaben (Opex)
 MDR-A_11: Zukünftig zugewiesene Investitionsausgaben (Capex)
 MDR-A_12: Zukünftig zugewiesene Betriebsausgaben (Opex)
 MDR-A_13 (falls zutreffend): Gründe für das Fehlen von Maßnahmen
 MDR-A_14 (v): ggf. angestrebter Zeitrahmen bis zur Umsetzung von Maßnahmen
 MDR-A_15: Angabe, dass es (aktuell noch) keine Maßnahmen gibt



MDR-T:

Nachverfolgung der Wirksamkeit von Konzepten und Maßnahmen durch Zielvorgaben

MDR-M:

Kennzahlen für wesentl. Nachhaltigkeitsasp.

MDR-T_01: Beziehung zu den Zielen des Konzepts
 MDR-T_02-07: Ziel, Art, Anwendungsbereichs, Basiswert & -jahr, Zeitraum
 MDR-T_08: Meilensteine oder Zwischenziele
 MDR-T_09: Methoden und wesentlichen Annahmen
 MDR-T_10: Basis auf fundierten wissenschaftlichen Erkenntnissen
 MDR-T_11: Einbindung von Stakeholder in die Zielsetzung
 MDR-T_12: Änderungen an Zielen, Kennzahlen, Messmethoden & Datengrundlagen
 MDR-T_13: Leistung im Vergleich zum angegebenen Ziel (realer Fortschritt)
 MDR-T_14 (v): Zeitrahmen für die Festlegung von messbaren Zielen
 MDR-T_15 (v): Gründe für das Fehlen von Zielen
 MDR-T_16: Wirksamkeit von Konzepten und Maßnahmen
 MDR-T_17: Überwachungsprozesse zur Wirksamkeit
 MDR-T_18: Ambitionsniveau und qual. / quant. Fortschrittsindikatoren
 MDR-T_19: Basisjahr, ab dem der Fortschritt gemessen wird
 MDR-T_20: Nachhaltigkeitsaspekte, für die keine Ziele festgelegt wurden
 MDR-T_21: Angabe, dass es (aktuell noch) keine Ziele gibt

PATs vorhanden?



Die MDRs werden einmal pro wesentlichem Standard (E1-G1) angegeben

MDR-P/A/T/M) Konzepte, Maßnahmen, Ziele & Kennzahlen - Beispiel



MDR-P_01/02

POLICIES RELATED TO POLLUTION

Kemira is committed to operating safely and responsibly and to reducing its impacts through its whole value chain whilst also continuously improving its sustainability performance, following strategy, the **Code of Conduct and other policies** and the Integrated Management System as set out in the **ET Climate change** section. All aspects of Health and Safety, the minimization of harmful releases into air, water and soil, the reduction of resource consumption and waste generation and the consistent quality of our products are a fundamental prerequisite for conducting our business in the chemical industry in a sustainable manner. **Sustainability Policy** is aligned with the Kemira Code of Conduct and other

ACTIONS RELATED TO POLLUTION

Actions to prevent environmental incidents in our own operations

Kemira's certified Integrated Management System includes the development of global and site-level standards and procedures to comply with permit and regulatory requirements associated with pollution. Kemira continuously improves performance to mitigate negative impacts related to pollution to air, water and soil, including preventative actions. For the minimum requirements to prevent environmental incidents Kemira has **spill prevention, process safety and maintenance standards**. All incidents resulting in impacts to air, water and soil and the related documentation, on incident investigations for example, are reported in **Kemira's incident reporting system**. Kemira's management systems are audited both internally and externally to evaluate conformance against the latest **ISO 9001, ISO 14001 and ISO 45001** standards.

MDR-A_07

Actions to manage environmental liabilities

Kemira has environmental liabilities related to former activities. Financial environmental provisions for the costs of remediation work have been made in cases where it has been possible to measure Kemira's liability for soil, groundwater or sediment contamination and any post-treatment or post-monitoring obligations. More detailed information on these environmental provisions can be found in the **Financial statement note 4.6 Provisions**. Kemira has a process to manage and to review the status of environmental liabilities. The status of environmental projects and associated provisions is reviewed quarterly by the EHSQ and Finance & Accounting functions. Kemira has ongoing remediation projects to manage environmental liabilities. In cases of mergers and acquisitions, the assessment of potential liabilities is always carried out in accordance with Kemira's Environmental Due Diligence process.

The 2024 key actions to manage environmental liabilities included continuation of a soil and landfill remediation project at a former manufacturing site located in Vaasa, Finland. Soil remediation started in 2022. The site was historically contaminated with heavy metals and pesticides. In addition to the project in Vaasa, Kemira also conducted some smaller scale remediation projects in 2024.

TARGETS RELATED TO POLLUTION

Kemira has several indicators that are followed internally for impacts, risks and opportunities related to pollution, however these are not defined as in ESRS. Kemira continues to evaluate and develop these indicators.

As part of the Integrated Management System Kemira has internal indicators and associated targets for its own operations related to pollution that include:

- Number of environmental incidents (ENV);
- Number of loss of primary containment incidents (LDPCI);
- Number of reportable process safety incidents (RPSI); and
- Number of environmental operating conditions (EOC)

Kemira is also further developing its Life Cycle Assessment (LCA) capabilities. Kemira intends to use this data for developing future pollution related indicators and metrics for its direct and upstream value chain operations.

METRICS RELATED TO POLLUTION

Datenpunkte aus E2

POLLUTION TO AIR, WATER AND SOIL

Kemira collects data centrally and annually on emissions of air pollutants and effluent from all manufacturing sites. The total emissions and amounts of each pollutant emitted to air and water were in accordance with ESRS E2-4. In 2024, Kemira had no significant emissions to soil.

Emissions to air, water and land by pollutant, tonnes	2024	2023
Ammonia (to air)	8.7	12.5
Non-methane volatile organic compounds (to air) ¹⁾	581.9	569.4

¹⁾ Cutting oil emission at a site located in the UK where cutting oil is classified as volatile organic compound.

The emissions to air from own operations are estimated based on direct measurements, published emission factors, mass balance or engineering calculations. Measurement methodologies, for example if based on continuous measurements or campaigns, vary between manufacturing sites. The environmental permits of all sites where emissions exceed the thresholds stated in the European Pollutant Release and Transfer Register (E-PRTR) regulation Annex II allow emission of these substances. The emissions reported in the tables represent the consolidated amount from all Kemira sites where the threshold is exceeded.

Quelle: Kemira, Annual Report 2024, S. 115ff

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2 Aufbau der ESRS

3 Start in die Datenerhebung

4 Fokus: ESRS 2

5 Zusammenfassung & Ausblick

6 Fragen & Antworten

Zusammenfassung

Die CSRD

- Die CSRD wurde 2021 als Teil des [European Green Deals](#) verabschiedet und gilt seit 2025 für große kapitalmarktorientierte Unternehmen.
- Der [Omnibus Vorschlag](#) soll die bestehende CSRD verändern – der “Stop-the-clock“-Vorschlag ist bereits verabschiedet.
- Für Deutsche Unternehmen bedeutet das in den meisten Fällen [zwei Jahre mehr Zeit](#), ihr Nachhaltigkeitsmanagement strategisch aufzusetzen.
- Die ESRS setzen dabei eine [ausführliche Grundlage](#) für internationale ESG-Berichtsstandards.

Die ESRS

- Die ESRS verpflichten in [2 allgemeinen und 10 thematischen Standards](#) zur Offenlegung von fast 1.200 Datenpunkten.
- Dabei sind sie mehr als reine Offenlegungspflichten – sie bilden die [Grundlage für ein nachhaltiges Managementsystem](#).
- Die 10 Themenstandards sind alle [ähnlich aufgebaut](#), startend mit den *Minimum Disclosure Requirements* (MDRs) über *Policies, Actions & Targets* (PATs).
- [ESRS Fokus](#) bietet eine schrittweise Erweiterung des Berichtsumfangs bis zur vollständigen Berichtspflicht.

Start in die Daten- erhebung

Gemeinsam starten wir in die nächste Phase der CSRD-Berichterstattung: [Die Datenerhebung](#)

1. Schritt: [Umfang](#) der Datenpunkte in vier Schritten reduzieren
2. Schritt: [Verantwortlichkeiten](#) früh und umfassend festlegen für eine effektive Projektsteuerung, -planung und Aufwandsverteilung
3. Schritt: Die [Gap Analyse](#) kann helfen, die Datenerhebung bestmöglich zu planen, zu priorisieren und anschließend umzusetzen

Ausblick und nächste Schritte

Themen	Termine
CSRD Berichterstattung: Grundlagen & ESRS 2	30.04.2025 ✓
E1: Klimawandel	07.05.2025
S1: Arbeitskräfte des Unternehmens	14.05.2025
G1: Geschäftsführung E5: Kreislaufwirtschaft	21.05.2025
E2: Umweltverschmutzung E3: Wasser- & Meeresressourcen E4: Biologische Vielfalt und Ökosysteme	11.06.2025
S2: Arbeitskräfte der Wertschöpfungskette S3: Betroffene Gemeinschaften S4: Verbraucher und Endnutzer	25.06.2025
VSME	02.07.2025

Immer um 10:30

Nächste Schritte für Euch

1. Datenreduktion & Gap Analyse

- Macht die Datenreduktion für euch. Bei wie vielen Datenpunkten kommt ihr raus?
- Definiert Datenfelder für die Gap Analyse und testet sie für die Datenpunkte in eurem Verantwortungsbereich. Könnt ihr so sinnvoll priorisieren?

2. Festlegen von Verantwortlichkeiten

- Legt Verantwortlichkeiten fest und organisiert einen Kick-off mit dem Kernteam
- Verstehen alle Ihre Verantwortlichkeiten? Bleiben Datenpunkte offen?

3. Zuweisung von Datenpunkten

- Weist euch selbst einen Datenpunkt zu und testet die Funktionen der App. Klappt alles?
- Weist die Datenpunkte den Verantwortlichen zu und priorisiert gemeinsam

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Ihre Fragen



The image features three concentric circles centered on a dark gray background. The circles are thin and light gray, with the innermost circle being the smallest and the outermost being the largest. In the center of these circles, the word "tanso" is written in a white, lowercase, sans-serif font. The first letter, "t", has a short horizontal bar extending to the left, resembling an underscore.

tanso