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Fact Sheet

Boursa Kuwait ESG Reporting Guide 2026

2026 Edition: **What Listed Companies Must Know**

Overview

Boursa Kuwait's **2026 ESG Reporting Guide** marks a decisive regulatory shift: ESG disclosure is no longer a best-practice aspiration for Kuwait's listed companies; it is now a regulatory requirement for Premier Market companies. Issued under CMA Circular No. 04 of 2025, the updated Guide mandates that Premier Market companies publish their sustainability reports for FY 2025 by end of Q2 2026.

This brief, prepared by **RSM in Kuwait**, summarises the material changes in the 2026 Guide, the revised metrics framework, and the actions companies should prioritise. Clients on the Main Market are advised to treat this as proactive early-adoption guidance.

FY 2025	Q2 2026	26	2060
First mandatory reporting for Premier Market companies	Regulatory deadline: Premier Market	Recommended ESG metrics	Kuwait carbon neutrality commitment

ABOUT THE 2026 GUIDE

Boursa Kuwait has amended the Guide pursuant to CMA Resolution No. 136 of 2022 and Article 13 –17 Module Twelve (Listing Rules) of the Executive Regulations of Law No. 7 of 2010. The 2026 edition reflects CMA Circular No. 04 of 2025 and the latest updates to Boursa Kuwait's Rulebook.

Regulatory Mandate: Premier Market

- Sustainability reports mandatory for Premier Market companies starting from 2026, covering FY 2025
- Publication deadline: before the end of Q2 2026
- Companies are required to notify the CMA; reports published on Boursa Kuwait's website
- Main Market companies are encouraged but not yet mandated

National Strategic Context

- Aligned with Kuwait Vision 2035 economic diversification, human capital and environmental pillars
- Supports Kuwait's commitment to achieving carbon neutrality by 2060
- Responds to growing demand from global and regional institutional investors for standardised ESG data

Key changes: The Headline Shift

Area	Previous	Current
Regulatory status	Voluntary guidance	Mandatory (Premier Market)
Reporting deadline	No deadline	Q2 2026 (FY 2025 data) for Premier Market. But no deadline yet for Main Market
Scope of companies	All listed — guidance only	Premier Market mandatory; Main Market encouraged
Framework alignment	GRI, SDGs, WFE	GRI, ISSB (IFRS S1 & S2), SASB, TCFD, CDP, SDGs
Materiality approach	General discussion	Formal double-materiality assessment
Climate disclosure	Metrics recommended	Scope 1 and 2 required; Scope 3 encouraged where material
Climate scenario analysis	Not mentioned	Encouraged; assess and disclose strategy resilience under different climate scenarios
Climate transition plans	Not mentioned	Encouraged; outline transition to low-carbon economy aligned with Kuwait's 2060 target
Governance of ESG	Encouraged	Board-level oversight expected to be disclosed

2026 RECOMMENDED ESG METRICS

The Guide recommends 26 metrics across three pillars. All are considered a baseline sector-specific additions are encouraged, and omissions may be made where a metric is immaterial, provided a brief explanation is given.

Environmental (10)

- GHG Emissions Scope 1 & 2
- GHG Emissions Scope 3
- Emissions Intensity
- Energy Consumption
- Energy Intensity
- Energy Mix (Renewables %)
- Water Usage
- Environmental Policy & Management
- Climate Governance & Risk Mitigation
- Climate Risk Mitigation Investments

Social (10)

- Employee Turnover
- Gender Diversity (Workforce Composition)
- Training and Learning NEW
- Temporary & Contract Workers
- Non-Discrimination Policy
- Injury Rate (Health & Safety)
- Occupational Health & Safety Policy
- Human Rights Policy
- Nationalization (Kuwaitization)
- Community Investment

Governance (6)

- Board Diversity
- Board Independence & CEO/Chair Separation
- Supplier Code of Conduct
- Ethics & Anti-Corruption
- Data Privacy
- External Assurance of ESG Data

KEY METRIC-LEVEL CHANGES VS. PREVIOUS EDITION

The 2026 Guide refines the ESG metrics framework across all three pillars. The table below captures selected key changes from the previous edition; it is not an exhaustive list, but a focused summary of the most significant updates relevant to compliance preparation.

Pillar	Selected Metric	Change from Previous Guide
Environmental	GHG Scope 1 & 2 / Scope 3	Previously one combined metric now split into two standalone disclosures.
Environmental	Emissions Intensity	Retained; narrowed to GHG intensity only (previously included non-GHG).
Environmental	Energy Consumption	Renamed from 'Energy Usage'; substance unchanged.
Environmental	Climate Governance & Risk Mitigation	Reframed to require explicit board-level climate oversight disclosure.
Environmental	Climate Risk Mitigation Investments	Clarified as annual CAPEX/R&D directed at mitigation and adaptation.
Social	Training and Learning	New standalone metric not present in previous guide.
Social	Community Investment	New standalone metric not present in previous guide.
Social	Nationalization (Kuwaitization)	Explicitly linked to sector Kuwaitization quotas and fines for non-compliance.
Social	Gender Pay Ratio	Removed as a standalone metric in 2026
Social	Incentivised Pay	Removed as a standalone metric in 2026
Social	Collective Bargaining	Removed as a standalone metric in 2026
Social	Child & Forced Labour	Removed as a standalone metric; related expectations retained under Human Rights Policy and Supplier Code of Conduct
Governance	Data Privacy	Broadened from GDPR/policy to encompass cyber resilience and information security governance.
Governance	Board Independence & CEO/Chair Separation	CEO/Chair separation made explicit in metric title; substance retained.

ALIGNMENT WITH INTERNATIONAL REPORTING FRAMEWORKS — 2026 UPDATE

The 2026 Guide significantly strengthens its alignment with the global sustainability disclosure architecture. The table below provides a summary of each framework's role and its current status in Kuwait.

Framework	Role in 2026 Guide	Kuwait Status
GRI (2021)	Comprehensive multi-stakeholder reporting. Universal, Sector and Topic Standards. Covers double materiality.	Recommended; widely referenced
ISSB (IFRS S1 & S2)	Investor-focused global baseline. S1: all sustainability risks. S2: climate-specific, fully incorporates TCFD.	Not mandated; strong early-alignment value
SASB Standards	Industry-specific metrics. Referenced under IFRS S1 for industry-specific disclosures.	Embedded within ISSB; sector-dependent
TCFD	Climate governance framework (four pillars). Its structure is reflected in IFRS S2	Recommended; basis for scenario analysis
CDP	Annual environmental disclosure. Scores range from A to D. Aligned with TCFD.	Voluntary; useful preparatory tool
UN Global Compact	Ten principles human rights, labour, environment, anti-corruption. Annual progress report required.	Voluntary; enhances credibility

RECOMMENDED ACTIONS

Immediate for Premier Market; optional for Main Market.

- Assign board-level accountability for ESG oversight.
- Conduct a formal materiality assessment process, considering both financial and impact materiality, in line with double-materiality practice.
- Begin collecting FY 2025 data: Scope 1 and 2 GHG emissions, energy, water, and core workforce metrics.
- Select a reporting framework such as GRI, ISSB (IFRS S1 & S2), or a combination of both, and document the choice.
- Publish the sustainability report on Boursa Kuwait's website before the end of Q2 2026 and notify the CMA.

Medium-Term All Listed Companies

- Develop a climate transition plan aligned with Kuwait's 2060 carbon-neutrality target.
- Introduce climate scenario analysis in line with TCFD/IFRS S2 guidance.
- Extend ESG boundary to cover supply chain Scope 3 emissions and Supplier Code of Conduct.
- Formalise quantitative tracking for Training & Learning and Community Investment.
- Evaluate external assurance for GHG emissions, injury rates and other high-estimation metrics.
- Monitor ISSB (IFRS S1 & S2) developments — early alignment future-proofs disclosures.

FREQUENTLY ASKED QUESTIONS (FAQs)

Is ESG reporting now mandatory?

CMA Circular No. 04 of 2025 mandates sustainability reports for Premier Market listed companies covering FY 2025, published by end of Q2 2026. Main Market companies are strongly encouraged but not yet required.

Which reporting framework should we use?

The Guide states that ESG report should be prepared in accordance with one or more internationally recognised reporting standards or frameworks. GRI is the broadest starting point. Companies with institutional investors should also align with ISSB (IFRS S1 & S2) for investor-grade financial-materiality disclosure. SASB is embedded within ISSB for sector-specific guidance.

What is a materiality assessment and is it required?

The 2026 Guide expects companies to identify and report on their most material ESG topics and provides guidance on how to conduct a materiality assessment. Best practice is to consider double materiality: (a) topics that affect enterprise value, and (b) topics where the company impacts society or the environment. Results must be board- or management-approved and disclosed in the report.

Do we need to report all 26 recommended metrics?

No. The metrics are a recommended starting point. Immaterial metrics may be omitted with a brief explanation. Sector-specific additions (e.g., green loans for banks; flaring intensity for oil and gas) are encouraged and can be guided by SASB standards.

Is external assurance of the ESG report required?

External assurance is not currently mandated in Kuwait. However, the Guide recommends it, particularly for GHG emissions and injury rates. Third-party assurance is increasingly expected by international investors and may become a future regulatory requirement.

What if we are on the Main Market or the Emerging Companies segment?

The Guide provides proportional guidance for smaller and newly listed companies. A phased approach is acceptable: begin with governance practices, key workforce metrics and 5–10 ESG data points, then expand coverage annually.

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How RSM in Kuwait Can Help

RSM in Kuwait provides integrated ESG advisory services, including, but not limited to, materiality assessments, framework selection, ESG report development, data governance, ESG compliance, ESG strategy, and ESG assurance services. Our professionals support listed companies in efficiently meeting the new Boursa Kuwait requirements while positioning their organisations for long-term investor confidence.

Contact us by scanning the QR code or by reaching out to our ESG Leader at **kareem.abueid@rsm.com.kw**

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