

Navigating through sustainability reporting: European Commission's FAQs clarify CSRD requirements

On August 7, 2024, the European Commission published a comprehensive set of Frequently Asked Questions (FAQs) regarding the Corporate Sustainability Reporting Directive (CSRD) (Directive (EU) 2022/2464). These FAQs clarify the interpretation of certain provisions related to sustainability reporting, particularly around the details of the regulatory framework of the CSRD.

With the implementation of the CSRD still in its very first stages, confusion about its exact implications is widespread. As companies try to find their way among a multitude of sustainability reporting regulations and a so-far limited supply of real-world examples of CSRD-compliant processes, identifying applicable information can be slow. The CSRD has been developed to build on existing regulations, which, in theory, reduces the administrative burden placed on companies already falling under these regulations. In practice, it expands an already extensive list of overlapping complex legal requirements. While there is a lot of potential to streamline reporting to be compliant with a broad range of requirements simultaneously, pinpointing and understanding these opportunities presents significant challenges.

The Commission's publication now sheds more light on these uncertainties by providing legal interpretations of the relevant provisions. Their document provides support to companies of different sizes, corporate structures and locations within and outside the EU. By increasing companies' understanding of their obligations and the extent to which the CSRD affects them, the Commission aims to facilitate compliance with regulatory requirements in a cost-effective manner and to ensure the usability and comparability of the reported sustainability information.

In our White Paper, we will contextualize this FAQ publication, discussing its value, its content, how to navigate it, and highlight the main takeaways to increase comprehensiveness for companies. In line with the FAQ publication, we will focus on the clarified details rather than re-establishing the general content.

Those interested in first reviewing an outline of the CSRD and the opportunities it brings can find it in [our previous White Paper](#) on the topic.

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INTRODUCTION

Scope of the FAQ Document

As stated, the Commission, considering inputs from various companies, released a compilation of FAQs on the CSRD, covering issues such as scope, application dates, and exemptions. The document is divided into several main sections, each addressing different aspects of the directive and its implications for reporting entities, statutory auditors, independent assurance service providers, and other stakeholders.

A brief breakdown of the structure of the FAQ document can be found below.

Section I – Glossary of Relevant Terms and Applicable Legislation

This section offers definitions and explanations of key terms and legislation referenced throughout the FAQs.

Section II – Overview of the Sustainability Reporting Requirements Introduced by the CSRD

Provides a general introduction to the new reporting requirements, setting the stage for the detailed, category-specific sections that follow.

Section III – FAQs on Sustainability Information to be Reported under Articles 19a/29a of the Accounting Directive

Focuses on the reporting obligations of public-interest entities (Article 19a) and large companies (Article 29a), covering scope, application dates, exemptions, European Sustainability Reporting Standards (ESRS), value chain, and other technical aspects regarding the publication of sustainability information.

Section IV – FAQs on Sustainability Information Reported under Article 40a of the Accounting Directive

Discusses the reporting requirements for entities outside the EU but with operations within the EU, addressing specific disclosures and application details.

Section V – FAQs on the Assurance of Sustainability Reporting

Concentrates on the assurance process, including the roles and responsibilities of statutory auditors, audit firms, and independent assurance service providers (IASPs), along with aspects such as confidentiality, assurance services, and fees.

Section VI – FAQs on Key Intangible Resources

Elaborates on the scope and significance of intangible resources, including their role with sustainability reporting.

Section VII – Additional FAQs on Requirements for Third-Country Undertakings

Addresses reporting requirements for entities based outside the EU but operating within it.

Section VIII – FAQ on SFDR

Provides guidance on the interplay between Sustainable Finance Disclosure Regulation (SFDR) and the CSRD requirements.

As information is often split up or repeated across several sections, this White Paper aims to provide more comprehensible insights by structuring the key takeaways based on topics. Care has been taken that the corresponding sections in the Commission's document can easily be found, while creating a cohesive overview.

How the Commission's FAQ Publication Differs from EFRAG Guidelines

This FAQ document focuses on procedural and administrative obligations and legal interpretation of specific clauses, distinguishing it from publications by the European Financial Reporting Advisory Group (EFRAG), which drafts the European Sustainability Reporting Standards (ESRS).

Until now, EFRAG has published guidance on the double materiality assessment, value chain analysis and reporting, as well as a list of data points contained in the ESRS.

In addition, EFRAG operates their own FAQ platform, updating its public compilation of responses every month.

While EFRAG provides clarifications regarding specific aspects of the ESRS, concepts like double materiality, and the content of a CSRD-compliant report, the Commission's publication aims to assist undertakings in implementing the relevant legal provisions.

However, where necessary, the Commission's FAQ document also includes limited clarifications on the interpretation of specific provisions in the first set of ESRS. This particularly concerns sustainability information regarding value chains and the terminology around intangible assets. Therefore, this publication provides support to companies looking for clarity on how to proceed with reporting requirements, especially concerning administrative duties and steps towards compliance. In situations in which companies are looking for clarifications or additional guidance on the content and implementation of the ESRS themselves, they are likely to find valuable support among EFRAG's publications.

Legal status of the document

It should be noted that while these FAQs are published to help companies understand and apply the rules of the CSRD, only the Court of Justice of the European Union can officially decide how these laws should be interpreted. As noted in the document, the opinions in the FAQs don't predict or determine how the Commission would behave in legal matters.

However, as the first set of guidelines from the Commission on CSRD, this document is still extremely valuable for companies trying to navigate the legal requirements of sustainability reporting.

SCOPING AND IMPLEMENTATION TIMELINE

The FAQ document identifies the in-scope companies by referring to specific articles of the Accounting Directive as amended by the CSRD. For consistency and thoroughness, we adopt the same approach throughout this document. To enhance clarity, we have outlined the relevant categories below. More extensive information on in-scope entities and consolidation options can also be found in our article on [CSRD Scoping](#) and [on the Dutch Implementation of the CSRD](#).

Companies under Article 19a of Accounting Directive

- Large undertakings, and small and medium-sized undertakings, except micro undertakings, which are public-interest entities (listed entities on EU regulated markets, credit institutions, insurance undertakings and other public-interest entities identified by member states)

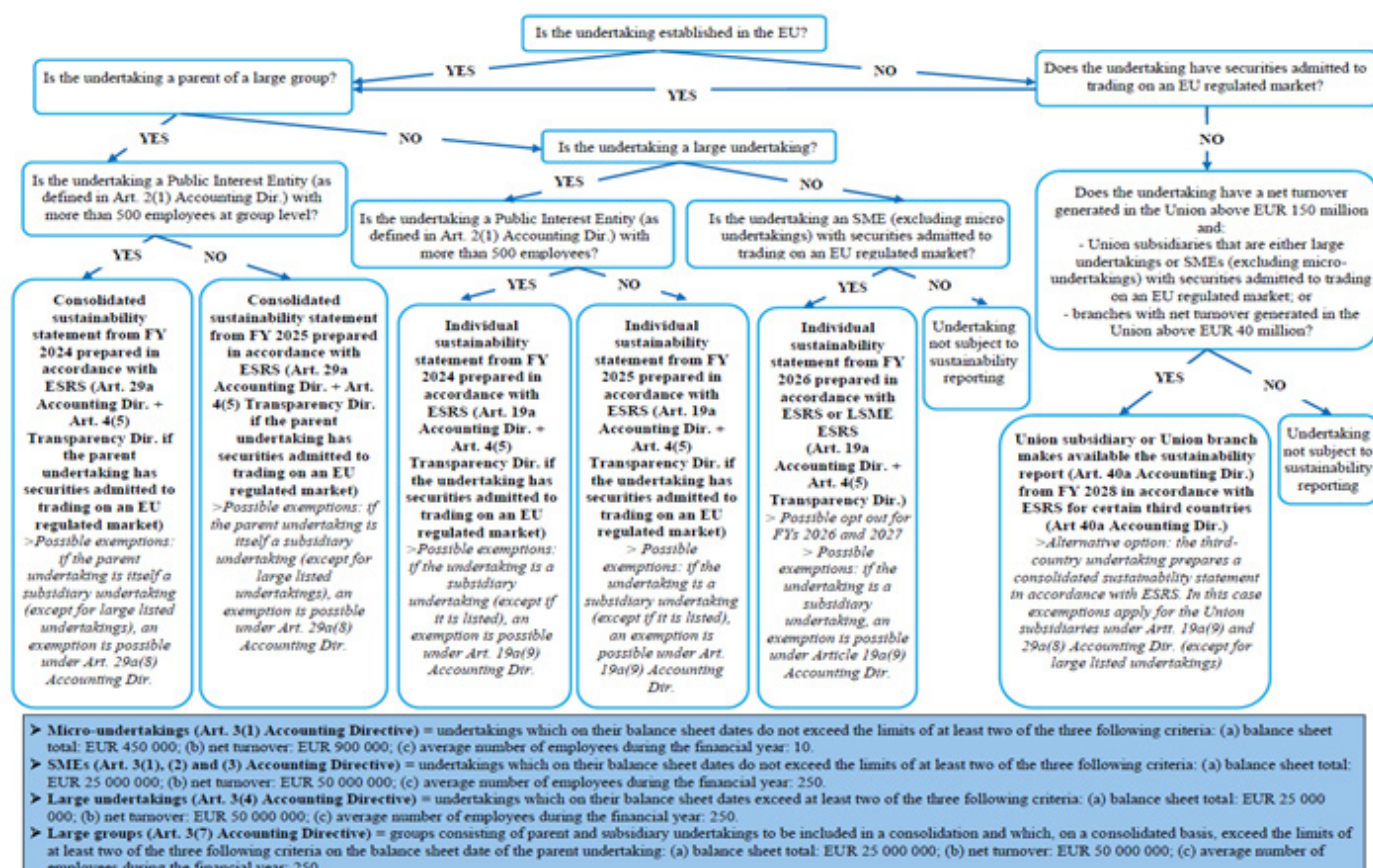
Companies under Article 29a of Accounting Directive

- Parent undertakings of a large group (consisting of parent and subsidiary undertakings to be included in a consolidation and which, on a consolidated basis, exceed the limits for large undertakings)

Companies under Article 40a of Accounting Directive

- Third-country (non-EU) undertakings with the following criteria:
 - Generating a net turnover of more than €150M in the European Union in each of the last two financial years and
 - Having at least:
 - One large subsidiary or
 - A subsidiary listed on an EU-regulated market, or
 - A branch (when there are no large or listed EU subsidiaries) in the European Union with more than €40M net turnover.

The document includes a self-assessment decision tree to help companies determine if they fall under the scope of the CSRD.



In addition to the self-assessment, the document presents a table that outlines the CSRD implementation dates for various categories of entities.

CLARIFICATIONS ON THE SUSTAINABILITY INFORMATION AND REPORT

While the European Commission largely focuses on the framework of the CSRD, they also provide some clarifications on the disclosures required by the ESRS.

This includes a high-level summary of the sustainability information required by the CSRD. Additional clarifications are provided about more general requirements for companies' business models and value chains. Since the ESRS include some instances of rather vague terminology, further explanation alongside with references to affected company types and implementation timeline are provided.

Content of the Sustainability Information and Reporting

For the companies under Article 19a/29a, the scope of the sustainability information that should be disclosed can be summarised as follows:

A. Business Model and Strategy

Resilience of the Business Model and Strategy

Description of how the company's business model and strategy are resilient in relation to risks associated with sustainability matters.

Opportunities Related to Sustainability Matters

Discussion of the opportunities for the company arising from sustainability matters.

Transition and Strategy Alignment

Details of the plans to ensure that the company's business model and strategy are aligned with the transition to a sustainable economy. This includes actions and financial plans related to limiting global warming to 1.5 °C in accordance with the Paris Agreement and achieving climate neutrality by 2050 as per Regulation (EU) 2021/1119.

Stakeholder Interests and Impact Consideration

Explanation of how the business model and strategy consider the interests of the company's stakeholders and the impacts on sustainability matters.

Strategy Implementation

Insights into how the company's strategy has been implemented with regard to sustainability matters.

B. Time-Bound Targets

Description of time-bound targets related to sustainability matters set by the company. This includes details on absolute greenhouse gas emission reduction targets for 2030 and 2050, progress made towards achieving these targets, and whether the targets are based on conclusive scientific evidence.

C. Governance

Description of the role of the administrative, management, and supervisory bodies concerning sustainability matters, including their expertise and skills or access to such expertise and skills.

D. Policies

Overview of the company's policies concerning sustainability matters.

E. Incentive Schemes

Information about the existence of incentive schemes related to sustainability matters offered to members of the administrative, management, and supervisory bodies.

F. Due Diligence and Impact Management

- **Due Diligence Process**
Description of the due diligence process implemented by the company concerning sustainability matters, aligned with Union requirements.
- **Adverse Impacts**
Details on the principal actual or potential adverse impacts connected with the company's operations and value chain, including mitigation and remediation actions.
- **Results of Actions**
Information on the actions taken to end or mitigate these impacts and the outcomes of such actions.

G. Risk Management

Description of the principal risks to the company related to sustainability matters, including how the company manages these risks and its principal dependencies on sustainability matters.

H. Indicators

Indicators relevant to the disclosures referred to in points A to G, providing quantitative and qualitative measures of performance and impact.

One key takeaway from the Commission's FAQ publication is that companies under Article 40a are not required to report on the resilience of their business models and opportunities related to sustainability. Therefore, the Directive's approach focuses the report more narrowly on actionable and strategic components of sustainability rather than broad conceptual risks and opportunities for this group of entities.

As a side note, for SMEs, excluding micro-undertakings, with securities traded on EU-regulated markets, there will be flexibility to use a more proportionate set of ESRS, known as LSME ESRS, to prepare their sustainability statements. These standards are currently being developed by EFRAG and are expected to be applicable from 2026. Their purpose is to ensure that the reporting requirements are tailored to the operational scale and capacity of smaller enterprises.

Value Chain

A comprehensive understanding and communication of the value chain are core foundations of CSRD-compliant sustainability reporting. On a general basis, companies are asked to provide information which enables users of the report to understand the value chain. It remains highly relevant throughout the double materiality assessment as impacts, risks and opportunities must be linked with the specific part of the value chain they occur in.

During the reporting stage, this means that thorough reporting on material matters often requires value chain information that the reporting company does not currently have access to. The ESRS contains several acknowledgements for the difficulties of collecting such information. It subsequently includes provisions which allow companies to use sector-average data and other proxies under certain circumstances. The exact nature of these circumstances is however described very vaguely in the standards. Companies must be unable to collect the data "after making reasonable efforts to do so". Since conditions vary, what is considered reasonable effort can differ between companies. Initially, the Commission expects companies to rely more on estimates for reporting, but this reliance should decrease over time as their ability to collect accurate data improves. The use of estimates can affect the quality of the reported information, either enhancing it by ensuring neutrality or reducing it if it leads to less accuracy.

The Commission introduces a range of criteria which can guide and influence what constitutes a reasonable effort. The size and resources of a company relative to the scale and complexity of its value chain are important to consider. The technical readiness of a company to collect value-chain information, as well as the availability of tools to access and share value-chain information, also affects the difficulty of data collection and, subsequently, what constitutes reasonable effort.

Particularly in the first years, as companies have less CSRD experience and supporting tools are still being developed, higher efforts are required. The characteristics of actors in the value chain, particularly their size and resources as well as their technical readiness, can be considered. The relationship between the reporting company and the value chain actor is also highlighted, particularly their relative level of influence and buying power, as well as their proximity.

Due to the overall expected difficulty, the ESRS includes transitional provisions which allow companies to restrict value chain information disclosures during the first three years of their reporting. Regarding unavailable data, companies are able instead explain the efforts they made to obtain this information, why they were unsuccessful and how they are planning to obtain the information in the future.

Companies may also limit value chain information to the data already available to them including publicly available information. Only metrics derived from other EU legislation, which can be found in ESRS 2 Appendix B, are strictly required to be disclosed in the first three years.

These transitional provisions, alongside the published criteria, are expected to protect many SMEs from additional resource demands through CSRD reporting. While they may be part of an in-scope entity's value chain, their small size and potential lower technical readiness form a good substantiation to avoid being included in data collection processes. In the first years, data collection efforts are likely to be largely restricted to SMEs that are Tier 1 suppliers or customers of in-scope entities, have previously reported sustainability information or are connected to severe negative impacts.

Dependencies on intangible resources

Part of the required general disclosures about the reporting company focus on their key dependencies. To enable users of the report to understand the company's business model and value creation, they must provide information about key resources that they depend on. This can be rather straightforward in the case of tangible resources. A manufacturing company may for instance include the materials they purchase from suppliers. As these materials are fundamentally necessary in the production process of the company's products, they are a clear dependency of the business model as well as highly relevant to the value creation. What constitutes an intangible resource can be a bit more complex. The Commission has therefore chosen to clarify that all key intangible resources, independently of whether they are recognised on the balance sheet, must be included.

Going beyond the criteria of the applicable accounting framework enables a better assessment of a company's market value. An intangible resource might not show up on the balance sheet because it was developed internally but would be listed if it was acquired externally. To form a fuller picture, which is comparable across different accounting frameworks, the CSRD therefore calls for all intangible resources. This could include aspects like intellectual property, reputation or skilled workforce. Large undertakings and listed SMEs falling under Article 19(1) of the Accounting directive, including credit institutions and insurance undertakings fulfilling Article 1(1), are required to report on these resources in their management report. The information does not necessarily have to be part of the sustainability statement but can also be provided in different sections of the management report.

Format (Language and Digitalisation)

The FAQs include several sections dedicated to the logistics of completing and publishing CSRD-compliant reporting. The reporting language is specified to depend on Member States. Companies must create and publish their report in one of the languages permitted by the language rules applicable to the Member State in which they report. While the digital taxonomy is still in development, further information about the digitalisation is provided. Companies will be required to prepare their management reports in the electronic reporting format specified in the ESEF Delegated Regulation, namely XHTML. Sustainability statements, including Article 8 Taxonomy Regulation disclosures, within this report must be marked up in accordance with the digital taxonomy.

Since this taxonomy is necessary to markup sections, this step is not required from companies until the adoption of the taxonomy. During this time, sustainability statements will subsequently not be machine-readable. For this reason, companies are also not required to prepare their management report in XHTML until the digital taxonomy makes readability possible. Reporting entities that fall under Article 40a are not held to a specific format but must submit their reports in a data-extractable format together with the relevant accompanying metadata. The Commission is empowered to adopt further implementation measures to specify further metadata and require a machine-readable format.

Publication and supervision

Regarding the publication timeline, companies have up to 12 months from the balance sheet date of the financial year they are reporting on, which is provided by each member state. The publication must include their management report, which includes their sustainability statement as well as the assurance opinion/report. This assurance must always be provided by a statutory auditor or, where allowed by a Member State, by an Independent Services Provider (IASP). Companies which issue securities admitted to trading on an EU-regulated market have the additional obligation to publish their financial report within four months of the end of the financial year.

Since the financial report includes the management report and, subsequently, the sustainability statement, these companies are facing a shorter deadline. The authorities tasked with supervising the compliance with these sustainability reporting requirements are not changed by the CSRD. The Accounting Directive previously instructed member states to establish penalties that are effective, proportionate, and dissuasive. Based on the Transparency Directive, member states also had to establish a national supervisory authority with powers to supervise compliance by issuers of transferable securities admitted to trading on an EU regulated market. The national sanctioning regimes subsequently created continue to be responsible for the supervision of the management report, which now must include a CSRD-compliant sustainability statement.

ASSURANCE

The Commission's FAQ document addresses several intricate aspects of assurance requirements for sustainability reporting. Clarifying these matters, the document outlines essential regulations and adjustments necessary for statutory auditors and audit firms engaged in sustainability assurance.

Requirements for Statutory Auditors and Audit Firms

The Commission emphasizes that statutory auditors and audit firms wishing to provide assurance on sustainability reporting must satisfy the conditions imposed by Articles 4 and 6 to 12 of the Audit Directive. This includes additional specific requirements from various subsections of the directive, ensuring auditors maintain good repute and adhere to professional ethics and independence standards. Importantly, even if an audit firm does not plan to provide sustainability assurance, individuals holding voting rights and those in administrative or managerial roles must still meet the same stringent conditions. This ensures a uniform standard of regulatory compliance across all operational levels of audit firms.

Per Article 3 of the Audit Directive, competent authorities can only approve auditors and firms that meet specified conditions, which are now tailored to include the nuances of sustainability reporting. Compliance with these standards is crucial, not only for the parties currently providing such assurances, but also as a prerequisite for approval under the broader regulatory framework.

Regarding the eligible auditors, the Commission states that:

- Statutory auditors approved before January 1, 2026, who were either already approved or undergoing the approval process by January 1, 2024, can provide sustainability assurance without meeting all new requirements immediately. However, they must acquire the necessary knowledge through ongoing education.
- For auditors or trainees to be approved for sustainability assurance, their mandatory three-year practical training must include at least eight months focused on sustainability assurance or related services. This ensures that auditors are not only theoretically equipped but also practically skilled in handling sustainability reports.

Requirements for Cross-Border Assurance Services

The provisions of both the Audit Directive and the CSRD are primarily designed to facilitate the mobility of assurance providers within the EU. The Commission's FAQ document reaffirms this approach.

Checking the details of cross-border assurance services, the FAQ indicates that statutory auditors approved to carry out statutory audits in one (home) Member State are eligible to be approved to providing sustainability assurance in another (host) Member State.

However, to obtain this approval, auditors must be registered in the host Member State not only as assurance service providers but also as statutory auditors. This dual registration ensures that auditors adhere to the high standards of professional conduct and competency required in the host Member State, aligning with local regulatory frameworks.

The transitional regime under Article 14a of the Audit Directive applies when auditors, approved before January 1, 2024, seek to extend their services to another Member State after this date. This provision facilitates a smoother transition and continuity of services by recognizing the qualifications and approvals obtained in one Member State across other states within the EU.

For auditors moving from one state to another, the host Member State retains the right to supervise the sustainability assurance activities carried out within its territory. This ensures that even if auditors are registered and approved based on their home state's credentials, they must still comply with the host state's specific requirements and oversight mechanisms. This layered oversight structure helps maintain a uniform standard of assurance quality across the EU.

Independent Assurance Services Providers (IASPs), that are established in one Member State, can also provide services in another Member State, provided they meet equivalent requirements set out in the Audit Directive. This equivalency ensures that IASPs uphold the same standards of assurance as statutory auditors, further promoting consistency in sustainability reporting assurance. If an IASP operates across borders, the supervisory responsibilities generally lie with the home Member State, unless the host Member State opts to oversee the assurance activities performed within its jurisdiction.

Assurance Framework for CSRD Compliance

Assurance of the Sustainability Statement Prepared in Accordance with Articles 19a and 29a of the Accounting Directive

The Commission's FAQs on CSRD provide pivotal clarifications regarding the assurance of sustainability statements under Articles 19a and 29a of the Accounting Directive. This segment ensures that undertakings comply with the stringent requirements set out for sustainability reporting, aiding stakeholders in evaluating the transparency and reliability of reported sustainability information.

The assurance provider must express an opinion on the compliance of the sustainability statement with the sustainability reporting requirements as defined by the Accounting Directive. This includes:

- Compliance with the European Sustainability Reporting Standards (ESRS) adopted under Articles 29b/29c.

- The adequacy of the double materiality assessment process utilized by the undertaking to identify the reported information.
- Adherence to the digital markup requirements under Article 29d of the Accounting Directive.
- Alignment with the reporting requirements stipulated in Article 8 of the Taxonomy Regulation.

Assurance is to be conducted on a limited assurance basis, focusing on:

- Whether the information within the sustainability statement is presented fairly, in all material respects, in line with the adopted ESRS.
- The comprehensive disclosure of all material sustainability-related impacts, risks, and opportunities as per the ESRS requirements.

As the law clearly states, the assurance opinion should be included in the assurance report. If the same auditor is responsible for both the audit of financial statements as well as sustainability assurance, Member States may permit the inclusion of the sustainability assurance opinion as a separate section within the assurance report. Union law is more lenient regarding the format for the publication of the assurance report, setting no specific requirements. However, companies must submit the assurance report to the designated collection body in a data-extractable or machine-readable format, with accompanying metadata as specified by Union or national laws.

Pending the adoption of specific Union assurance standards, Member States may apply national auditing standards. To prevent fragmentation and ensure uniformity, the Commission has tasked the Committee of European Auditing Oversight Bodies (CEAOB) to develop non-binding guidelines for this transitional period. These guidelines aim to uphold the qualitative characteristics of the ESRS, including relevance, faithful representation, comparability, verifiability, and understandability.

Assurance of the Sustainability Report Prepared in Accordance with Article 40a of the Accounting Directive

The Commission's document additionally addresses the conditions of the assurance of sustainability reports prepared under Article 40a of the Accounting Directive. This guidance is crucial for entities required to comply with these provisions, particularly those involving third-country undertakings and their EU subsidiaries or branches.

While the explanations in this part of the FAQs closely mirror those for Articles 19a and 29a of the Accounting Directive, an important aspect regarding third-country undertakings is highlighted. In cases in which such an undertaking fails to provide the required assurance opinion, the EU subsidiary or branch of this non-EU parent company must issue a statement indicating this lack of provision.

This statement is critical because it ensures transparency and informs stakeholders of the non-compliance, maintaining the integrity of the reporting framework established under the CSRD.

RELATIONSHIP WITH OTHER LEGISLATIONS

Taxonomy Regulation

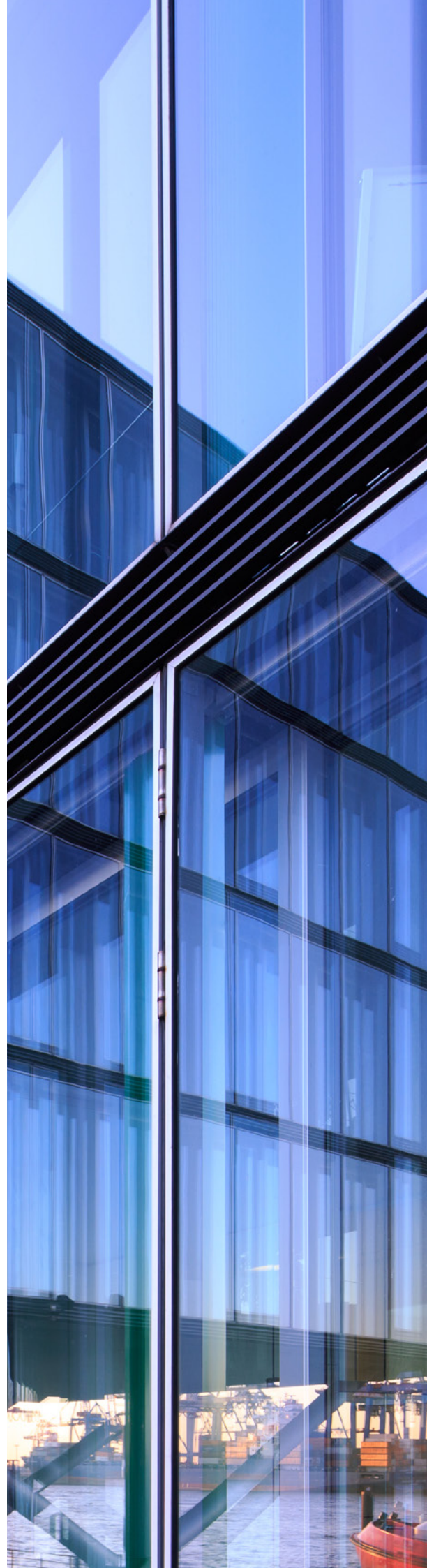
The FAQ document provides detailed guidance on the inclusion of Article 8 Taxonomy Regulation disclosures within CSRD disclosures. As previously established, all undertakings falling under Articles 19a or 29a of the Accounting Directive are required to include Article 8 Taxonomy Regulation disclosures in their sustainability statements. This requirement ensures that the extent and manner in which an entity's activities align with environmentally sustainable economic activities are transparently reported. If a subsidiary in the EU is exempt from publishing a sustainability statement under Article 19a (9) or 29a(8) because its parent company is based in a third country, it must still include Article 8 disclosures in its management report if these are not covered in the parent's consolidated sustainability reporting. This ensures transparency regarding the subsidiary's sustainable activities even if the parent is not required to comply fully with the CSRD.

On the other hand, entities reporting under Article 40a of the Accounting Directive are not required to include Article 8 Taxonomy Regulation disclosures in their sustainability reports. In other words, if a third-country parent opts to publish a consolidated sustainability statement in line with ESRS instead of a sustainability report under Article 40a, it is not required to include Article 8 disclosures. However, if the Union subsidiaries of that parent are exempt from their reporting requirements under Articles 19a/29a, the activities carried out by these subsidiaries must still be disclosed under Article 8 in either their own reports or the parent's consolidated reporting.

The Sustainable Finance Disclosure Regulation (SFDR)

Regarding the interplay between SFDR and CSRD, the FAQ document clarifies one particularly interesting point. The Commission addresses an important aspect of how financial market participants should interpret non-material indicators reported by investee companies under the CSRD. Financial market participants can assume that any indicator declared as non-material by an investee undertaking subject to the CSRD does not contribute to the corresponding indicator of principal adverse impacts for SFDR disclosures. This means that the value of that investment does not need to be considered in the numerator of the given SFDR principal adverse impact indicator.

This section also provides additional guidance for investee companies on bridging CSRD and SFDR. Under ESRS 1 paragraph 35, if an undertaking subject to the CSRD deems a specific data point derived from SFDR to be non-material, it must explicitly state this in its sustainability reporting. This transparency helps financial market participants determine the materiality and relevance of information for their SFDR disclosures. Similarly, ESRS 2, paragraph 56 requires that undertakings subject to the CSRD include a table in their sustainability statements listing all data points that derive from other EU legislation, including SFDR. This table must indicate where these data points can be found in the sustainability statement, and explicitly label those assessed as non-material as "Not material." This structured approach ensures clarity and ease of access to critical information for stakeholders, including financial market participants and regulatory compliance.



FORWARD THINKING

The information provided by the Commission's FAQ document forms an important stepping stone towards a comprehensive implementation of the CSRD. As EFRAG has shed more light on the requirements of the ESRS and its implementation, the Commission now contributes by further clarifying the CSRD and its requirements. By providing legal interpretation, many of the most pressing questions are addressed. Regarding the addressed topics, companies and auditors can now refer to this document to support and verify their understanding of the legal requirements. It is, however, undeniable that there are still many open questions remaining. The process towards widespread CSRD implementation continues to be marked by ongoing confusion about both the overall framework as well as the details of its requirements.

To enable cost-effective implementation, compiling and understanding the various regulations, clarifications, and guidance will be key. This is particularly relevant when looking for the applicable requirements for a specific type of company. Breaking down the most important applicable aspects of both the CSRD and connected legislations is the foundation of an effective process.

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