



CONNECTING THE DOTS WITH IMPACT PATHWAYS

## Prioritize efforts and drive value: Examples from the first wave reporters for the EU's Corporate Sustainability Reporting Directive (CSRD)





# Introduction and contents



The CSRD is designed to accelerate progress towards a sustainable economy. The urgency of the climate crisis demands business must transform their business models and modernize their reporting of performance

## First year of CSRD reporting

We like to begin with the end in mind. As mandatory sustainability reporting expands, many companies are navigating new territory. Based on our experience with regulatory readiness and voluntary reporting, we offer insights grounded in first wave CSRD disclosures and proven practices.

Most companies at this stage have completed applicability assessments, value chain mapping and double materiality assessments. As others work to close gaps and begin planning their disclosures, the first wave of CSRD reports—published in Q1 and Q2 of 2025 by large EU companies previously subject to the Nonfinancial Reporting Directive (NFRD)—offers practical guidance on applying CSRD concepts, aligning with European Sustainability Reporting Standards (ESRS), and embedding sustainability into corporate reporting.

Amid this first wave of reporting, the European Commission proposed simplifications to CSRD in the Omnibus package. While revisions to CSRD scoping, ESRS and EU Taxonomy are under negotiation, the European Parliament agreed in April 2025 to “stop the clock”, delaying CSRD reporting for second and third waves companies.

Despite the two-year extension, the anticipated CSRD requirements remain daunting. In light of ongoing regulatory uncertainty, [we recommend organizations continue to rely on their double materiality assessments, focus on value drivers and stay the course with a focus on “no regrets” actions.](#)

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# Overview of CSRD

A transformative step towards regulated sustainability reporting



As part of the EU's broader Green Deal aimed at building a more equitable and sustainable society, the CSRD provides updated reporting rules concerning a corporate's environmental and social performance. The scope of companies required to report under CSRD significantly expands NFRD to include companies operating in or doing business in the EU, not just listed companies.

## EU GREEN DEAL

Broad regulatory agenda aims to set the EU on the path to a green transition, with the ultimate goal of reaching climate neutrality by 2050

### OBJECTIVES

- Redirect capital flows towards sustainable companies
- Increase transparency
- Reduce greenwashing



#### CSRD: CORPORATE SUSTAINABILITY REPORTING DIRECTIVE

Modernized reporting rules concerning a corporate's environmental and social performance



#### EU TAXONOMY

Classification system that establishes a list of environmentally sustainable economic activities



#### SFDR: SUSTAINABLE FINANCE DISCLOSURE REGULATION

Regulation to improve transparency in the capital markets for sustainable investment products



#### EU GBS: EUROPEAN GREEN BOND STANDARD

Voluntary rules to improve the effectiveness, transparency, comparability and credibility of EU green bond market participants



#### CSDDD: CORPORATE SUSTAINABILITY DUE DILIGENCE DIRECTIVE

Rules to ensure that businesses address adverse impacts of their actions across their value chains inside and outside the EU

## COMPANIES TAKE 18+ MONTHS TO PREPARE FOR CSRD, WITH THESE STEPS

### 01 ASSESS APPLICABILITY BASED ON ESTABLISHED THRESHOLDS

- Determine reporting requirements at the entity level and parent company level

### 02 CONDUCT A DOUBLE MATERIALITY ASSESSMENT

- Consider financial materiality, wherein a topic potentially triggers financial effects on the organization ("outside in") and impact materiality, wherein a topic is connected to actual or potential impacts on people or the environment ("inside out")

### 03 PREPARE DISCLOSURES USING EUROPEAN SUSTAINABILITY REPORTING STANDARDS (ESRS)

- Assess gaps against ESRS disclosure requirements and data points and develop a strategy or remediation plan to enable compliance

### 04 REPORTING AND ASSURANCE

- CSRD reporting will be annual and needs to be tagged using the ESRS XBRL taxonomy; CSRD reports will require limited assurance

Note: The Omnibus package proposes changes to the thresholds for large undertakings which may impact the number of companies in scope of CSRD. The ESRS are also expected to be simplified through the Omnibus, and the standards are undergoing consultation initiated in April 2025.

# Overview of CSRD

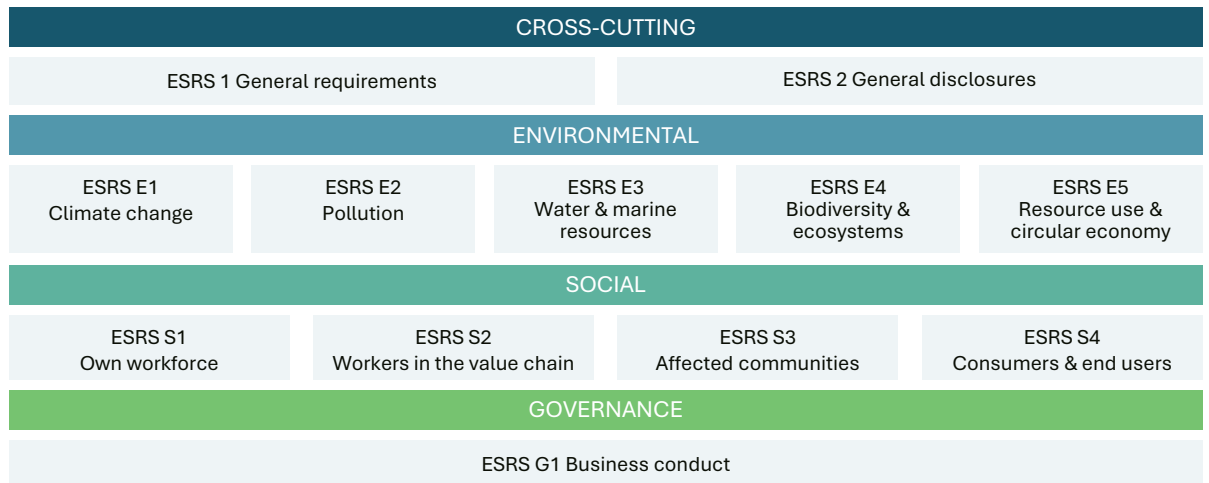
## Navigating the ESRS at the core of CSRD



### WHAT DO I NEED TO REPORT ON?

The ESRS provide the cross-cutting and topical standards covering environmental, social and governance topics for company reporting. Companies are also expected to report on relevant sector- and entity-level topics that are financially material or material from an impact perspective.

Climate change is presumed to be a material topic for companies, and disclosure is required if it is not deemed material.



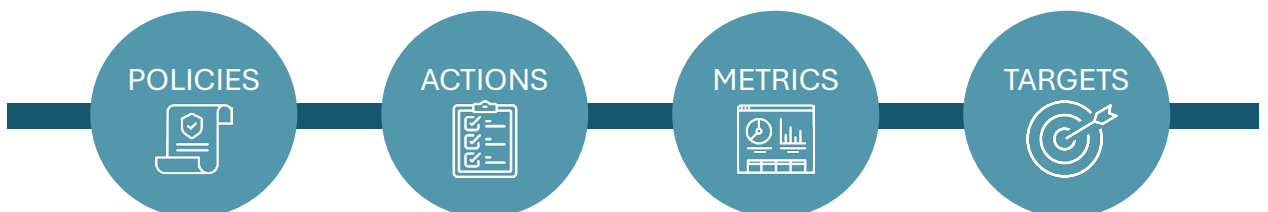
The topics are further broken down into subtopics and sub-subtopics, each accompanied by specific disclosure requirements and associated data points.

### ESRS BY THE NUMBERS

- 2 cross-cutting standards
- 10 topical standards
- 94 subtopics and sub-subtopics
- 84 disclosure requirements
- 1,144 data points



The ESRS establishes a common framework for sustainability disclosures with four primary disclosure requirements:





# Overview of EU Taxonomy

A legal classification system for sustainable economic activities

To better understand a company’s financial contributions toward environmental objectives, companies required to report under CSRD need to disclose economic activities based on the EU Taxonomy, a classification system of environmentally sustainable economic activities.

The EU Taxonomy has been phased in for companies already reporting under NFRD. Its application will be expanded to companies scoped into CSRD and will be subject to assurance.

## HOW ALIGNED IS YOUR BUSINESS TO THE TRANSITION?

The EU Taxonomy includes reporting on the share of *taxonomy-eligible* and *taxonomy-aligned activities* with the following KPIs. You will also report the relevant methodology, eligible activities considered, assessment conducted and contextual information on any changes.

- Turnover
- Capital expenditures (CapEx)
- Operating expenditures (OpEx)

Financial undertakings (e.g., loan or investment portfolios) will report on similar metrics but adjusted for their activities, for example based on share of investments and assets.

## HOW ARE ACTIVITIES DETERMINED? A TWO-PART TEST.

### ELIGIBLE ACTIVITIES

*Does my business contribute to the transition?*

An economic activity is eligible if it contributes to at least one of six environmental objectives:

- Climate change mitigation
- Climate change adaptation
- Sustainable protection of water and marine resources
- Transition to a circular economy
- Pollution prevention and control
- Protection and restoration of biodiversity and ecosystems

### ALIGNED ACTIVITIES

*Do we contribute in a sustainable manner?*

An eligible activity is considered aligned if it meets all three:

#### Technical Screening Criteria (TSC)

the activity makes a substantial contribution to at least one of the six objectives

#### Do No Significant Harm (DNSH)

the activity does not create a negative effect on any of the other five environmental objectives

#### Minimum Safeguards (MS)








the activity adheres to minimum social safeguards for labor and human rights

Note: The Omnibus package proposes an opt-in approach to the EU Taxonomy for large undertakings with revenue less than €450M. The Omnibus also aims to simplify the Taxonomy reporting templates, reducing the number of datapoints to be disclosed.

# Insights and recommendations from first wave CSRD reports



By March 2025, about 100 EU companies published their CSRD reports, providing insights which help validate or adjust approach for others based on real examples. This table summarizes analysis performed by PwC and Anthesis.

 <b>Report length</b>	<ul style="list-style-type: none"><li>• Average 98+ pages</li></ul>
 <b>Typical count of material topics</b>	<ul style="list-style-type: none"><li>• 6-7 of 10 topical standards</li></ul>
 <b>Material impact, risk and opportunity statements (IROs)</b>	<ul style="list-style-type: none"><li>• Range from 9-120 IROs</li><li>• Average of 32 IROs</li><li>• About 50% of reports 20-50 IROs</li></ul>
 <b>Most reported standards</b>	<ul style="list-style-type: none"><li>• E1 Climate Change</li><li>• S1 Own Workforce</li><li>• G1 Business Conduct</li></ul>
 <b>Least reported standards</b>	<ul style="list-style-type: none"><li>• E2 Pollution</li><li>• E3 Water and Marine Resources</li><li>• E4 Biodiversity and Ecosystems</li><li>• S3 Affected Communities</li></ul>
 <b>Most common entity-specific topics</b>	<ul style="list-style-type: none"><li>• Data governance, cybersecurity and AI</li><li>• A few companies included total tax contribution</li></ul>
 <b>Net zero targets</b>	<ul style="list-style-type: none"><li>• About one-third set net zero targets before 2050</li></ul>



## OUR RECOMMENDATIONS

- **Start with focus, not overload:** Don't go overboard on material topics in Year 1. Prioritize what truly matters to your business and stakeholders then build from there.
- **Compliance is a heavy lift, and that's okay:** Most companies are currently focused on meeting baseline requirements. Think in terms of clarity and usability — provide a clear index, use the expected format, and explain complexity in a straightforward way.
- **Simplicity beats perfection:** You don't need to have all the answers in your first report. Transparency about the challenges, especially around long-term goals like climate, builds trust. Acknowledge uncertainty while staying committed.
- **Stay alert to fast-moving topics:** Topics like biodiversity may not seem material now, but that can shift quickly. Even if you haven't made progress yet, flagging emerging issues shows awareness and intent.
- **Think evolution, not reinvention:** CSRD is a journey. Treat it as a structured evolution of your reporting and sustainability strategy, not a wholesale restart.

Sources: [Antithesis: Unpacking the First CSRD Reports: What Can We Learn](#): based on review of CSRD reports as of March 2025 (~75 reports)

[PwC: Insights from the first 100 CSRD reports](#)

# First wave examples for CSRD: Reporting clarity and meeting the baseline

Merck's 2024 Annual Report demonstrates clear, structured CSRD reporting by using ESRS alignment, transparent methodologies and consistent, navigable reporting.

## MERCK GROUP

Merck's sustainability strategy is embedded within its overall business model, with clear links to strategic goals such as achieving climate neutrality by 2040. The use of key performance indicators (KPIs) and alignment with ESRS disclosures demonstrate a cohesive integration of sustainability objectives into corporate strategy.



Strategic goal	Value chain	Sustainability key indicator	2024	2023	More information
1	Downstream	Number of people treated with our Healthcare products (in million) <sup>1</sup>	184	177	<a href="#">S4</a>
2	Own operations	Percentage of women in leadership positions	39	39	<a href="#">S1</a>
2	Own operations	Environment, health and safety (EHS) incident rate	2.2	2.4	<a href="#">S1</a>

Clear formatting, hyperlinks, and consistent terminology throughout the report help readers trace information across different sections (e.g., from general governance to topic-specific KPIs), which is critical for understanding how Merck applies CSRD principles like double materiality and value chain coverage.

Impact, risk and opportunities (IRO) identifier	Type of IRO	Sustainability matter	Reference chapter
S2-NI-01	Actual negative impact	Equal treatment and opportunities for all: Diversity; Employment and inclusion of persons with disabilities	<a href="#">S2 Workers in the value chain</a>
S2-NI-02	Actual negative impact	Equal treatment and opportunities for all: Measures against violence and harassment in the workplace	<a href="#">S2 Workers in the value chain</a>

Merck provides transparent information on the assumptions, calculation methods, and data sources behind key sustainability metrics, reducing ambiguity and enhancing the credibility of disclosures.

Scope 1 Absolute Emissions Target	
Reference to material impacts, risks and/or opportunities	Identifiers E1-NI-01; E1-NI-02; E1-NI-03; E1-NI-04; E1-NI-05; E1-NI-07
Material sustainability matter	Climate change mitigation; Energy
Target	We want to reduce our direct greenhouse gas emissions (Scope 1) by 50% by 2030.
Reference value/year	1,827,000 tons (2020)
Methods	This climate target is based on SBTi criteria, the absolute contraction approach, and the Science-based Target Setting Tool provided by SBTi. In April 2022, the initiative validated and approved our target for 2030. This is a science-based target, compatible with limiting global warming to 1.5°C.
Consideration of stakeholders	Our Sustainability Board and business sectors are involved in setting targets, with final approval granted by the Executive Board.
Changes from the previous year	Our Scope 1 and 2 reduction targets used to be combined, and are now separated.
Performance/Key figures	We monitor our Scope 1 on a quarterly basis using monthly data collected via our central EHS data collection tool. In 2024, we reduced our Scope 1 emissions by 378,315 tons of CO <sub>2</sub> eq, bringing them down to 858,053 tons. We reduced our scope 1 emissions by 53% (base year 2020), achieving our target early, and we are working on stabilizing the results. The 1.5°C aligned reference target value for Scope 1 GHG emissions is 913,561 tons of CO <sub>2</sub> eq. Please see <a href="#">E1.6</a> for more details on our performance.



# First wave examples for CSRD: Acknowledgement of uncertainty

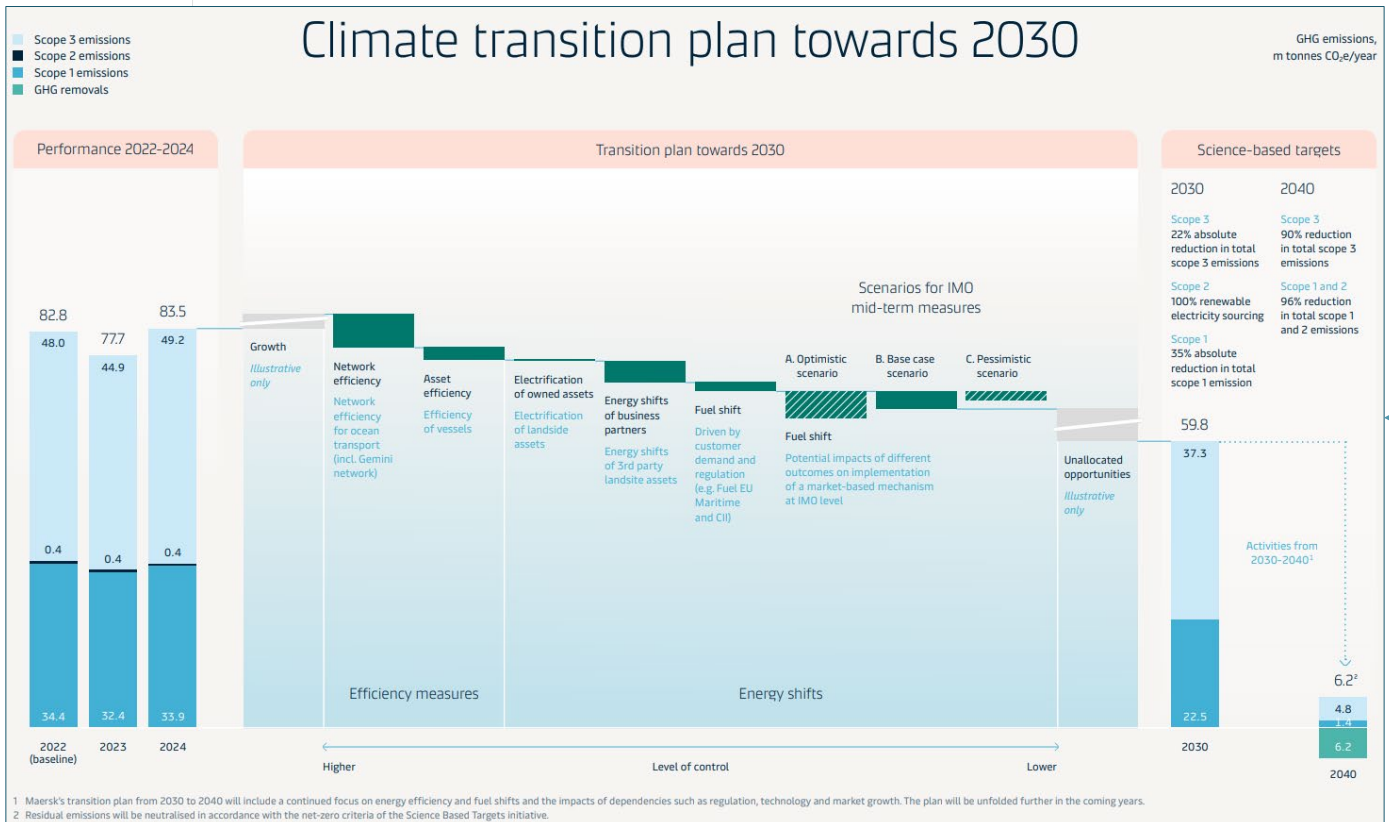
Maersk's Annual Report 2024 balances ambition with transparency around uncertainties, strengthening the credibility of its climate strategy.

## MAESRK

### Climate transition plan

Maersk's climate transition plan outlines the key levers and scenarios to reach our science-based commitments for 2030 taking into consideration key uncertainties and complexities. The plan encompasses GHG emissions from our own operations and value chain, covering our end-to-end logistics customer offerings across ocean, land and air. Our approach is focused on business integration and investments in levers where we have higher control, and stakeholder engagement and lobbying for levers more dependent on externalities, including regulatory progress and our customers' willingness to buy, as well as local standards, technology and infrastructure.

Maersk takes a pragmatic approach in its 2024 report by clearly reaffirming its commitment to net zero by 2040 while openly acknowledging external dependencies, such as fuel availability, infrastructure, and regulatory frameworks, that could impact its decarbonization trajectory, visualized by the graphic below.



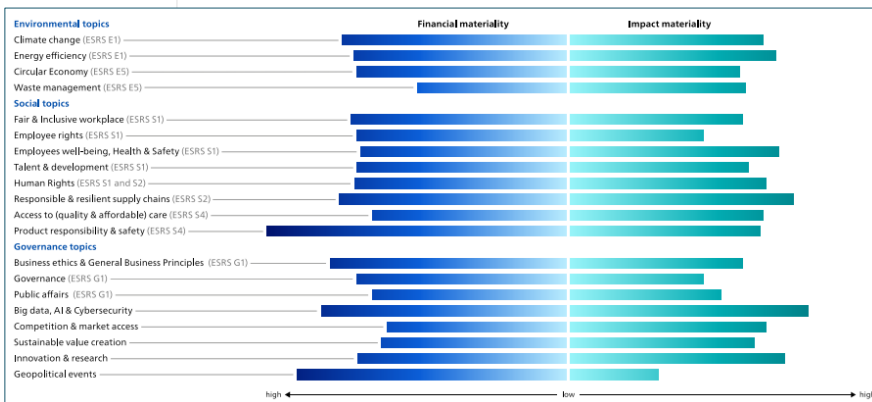
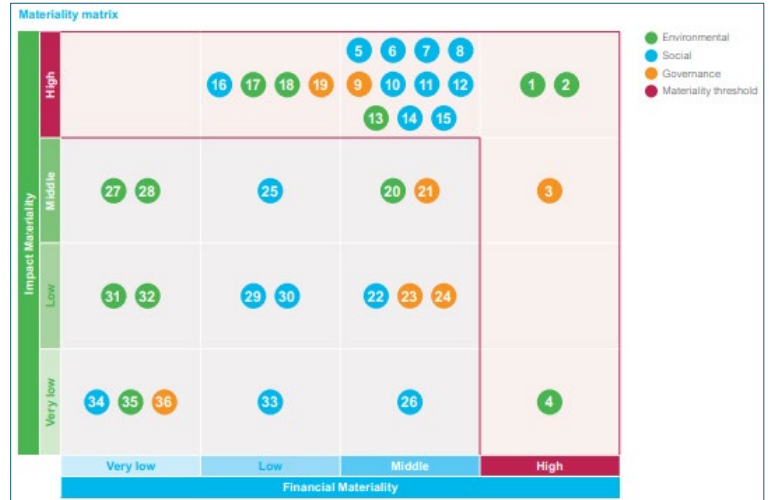


# First wave examples for CSRD: Double materiality assessment

Double materiality assessments involve many inputs, making clear and accessible presentation challenging. The examples below highlight effective ways to present these complex results.

## SCHNEIDER ELECTRIC

In its 2024 Universal Registration Statement, Schneider Electric leverages a 2x2 materiality matrix to visualize the relative materiality of each ESRS topic, using an alternative fill color to help stakeholders quickly identify material topics.



## ROYAL PHILIPS

In its 2024 Annual Report, Philips presents the results of its double materiality assessment via a butterfly bar chart, allowing the reader to directly compare financial and impact materiality across ESRS topics.

## ARLA FOODS

In its 2024 Annual Report, Arla Foods uses narrative, icons, and tables to show both impact and financial materiality by ESRS subtopic, clearly linking each issue to risks, opportunities, and stakeholders across the value chain.

General information / Sustainability in Arla / Materiality assessment / Environment Social Governance

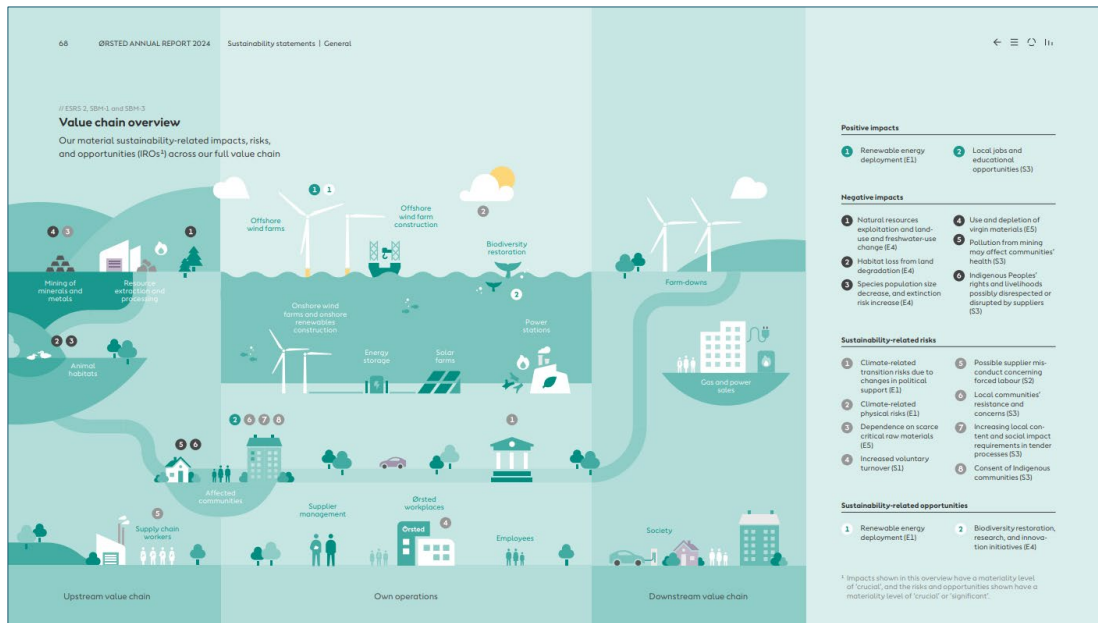
Sub topic	Impact	Type	Value chain	Risks / Opportunities
E1 Climate change	Energy	AN	Own operations	
	Climate change mitigation	AN	Farm	<ul style="list-style-type: none"> <li>Regulation to reduce emissions in the dairy sector</li> <li>Brand value if consumers turn away from dairy due to climate impact</li> <li>Leveraging climate data to access financing</li> </ul>
	Climate change adaptation	AN	Own operations	
AW Animal welfare	Animal welfare	AN	Farm	<ul style="list-style-type: none"> <li>Physical climate risk on farm</li> </ul>

# First wave examples for CSRD: Value chain

CSRD reporting requires a holistic view across the entire value chain. Each company interprets and illustrates these interactions differently. The examples below highlight how organizations define and represent their value chains.

## ØRSTED

Ørsted, a Danish multinational energy company, includes a value chain mapping in its 2024 Annual Report, though non-exhaustive, it shows material sustainability-related impacts and risks pictorially.



## SCHNEIDER ELECTRIC

In its 2024 Universal Registration Statement, Schneider Electric states that it performed its materiality assessment across its entire value chain, including direct and indirect effects on customers, partners, suppliers and communities. The analysis covers ESG topics from the ESRS and additional topics relevant to Schneider Electric's context. It then discloses the results of its risk analysis by stakeholder group and topic in a matrix format. Schneider Electric assesses risks and incorporates its value chain into relevant policies, actions and targets.

**Schneider Electric 2024 vigilance risk matrix**  
The risk matrix below summarizes Schneider Electric's risk analysis:

- Very high risk
- High risk
- Medium risk
- Low risk

		Schneider Electric sites	Suppliers	Contractors	Communities
Human rights	Decent workplace	Offices Travelers, sales forces Factories low voltage and electronics Project centers Field services	Travel and hospitality Transportation and shipping Raw materials Metal transformation and treatment Plastics Batteries Other components	On-Schneider Electric sites Off site and projects execution	Around Schneider Electric sites Around customer's project sites
	Health and Safety				
Environment	Pollution and specific substances management				
	Waste, water, and circularity				
	Energy CO <sub>2</sub> and GHG				
Business ethics	Ethical business conduct				
	Alert system, protection and, non-retaliation				
Offer safety and cybersecurity	Offer safety				
	Cybersecurity and data privacy				

# First wave examples for CSRD: Policies, actions, metrics and targets

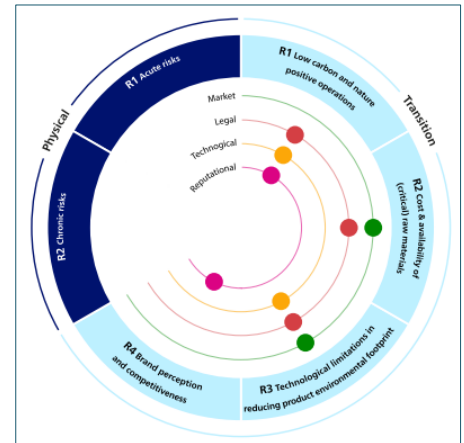
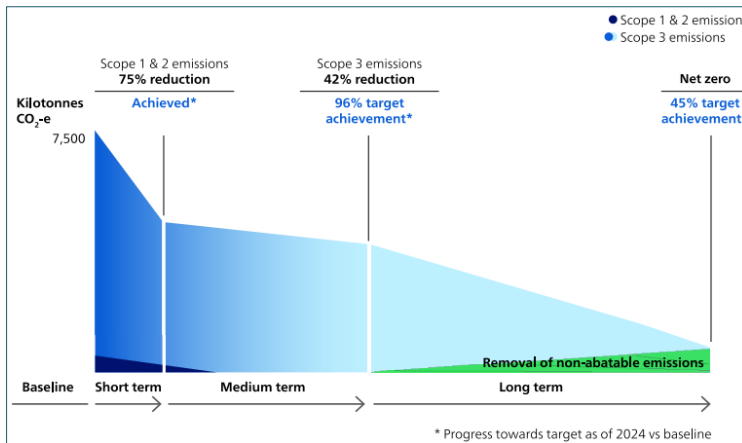
As companies begin aligning their reporting with the CSRD, disclosures are increasingly emphasizing the underlying policies, actions, metrics and targets that support and demonstrate their progress on sustainability goals.

## ROYAL PHILIPS

Philips discusses its material IROs across the report, covering materiality, time horizon, policies, actions, metrics, value chain, KPIs and targets.

Legend		Time horizon			Value chain			2025 Target				
		Short-term	Medium-term	Long-term	Upstream	Own operations	Downstream	KPI	Unit	2025 target		
<b>Environmental</b>	<b>Impacts, Risks and Opportunities</b>	<b>Description</b>			<b>Time horizon</b>	<b>Policies</b>	<b>Actions</b>	<b>Metrics</b>	<b>Value chain</b>	<b>KPI</b>	<b>Unit</b>	<b>2025 target</b>
<b>Climate change (ESRS E1)</b>	Material negative impact, material risk	As a healthcare company, Philips has a negative impact on the environment due to GHG emissions as a result of Philips' own operations and value chain activities.			●●●	Environmental Policy	Section 4.1.2 Note I Note XIII	E1-5 – Energy consumption and mix E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions E1-8 – Internal carbon pricing <b>Entity specific</b> Operational Carbon Footprint	▲▲▼	Net operational carbon footprint	kilotonnes CO <sub>2</sub> -e	0
		Philips is exposed to certain physical risks (including acute and chronic risks) and certain transitional risks which can lead to disruptions in Philips' operations.								Renewable energy in our operations	% of energy from renewable sources	75%
										Scope 1 & 2 emissions	kilotonnes CO <sub>2</sub> -e	34
										Scope 3 emissions	kilotonnes CO <sub>2</sub> -e	4,269 (2030 target)

Philips visualizes its climate transition plan with phased emissions cuts, target progress and non-abatable emission removals toward net zero (below, left).



Philips illustrates climate risk by mapping both physical and transition risks across categories like market, legal and technological, linking them to specific climate challenges in a concise, intuitive format (above, right).

## AIRBUS

Airbus' 2024 Annual Report uses tables to present emissions targets and progress, such as Scope 1 & 2 reduction milestones, showing how its 1.5°C-aligned climate commitments translate into measurable outcomes.

Energy target - Scope 1 & 2 emissions						
SBTI-validated, aligned with a 1.5°C scenario						
	Unit	Target year	Target value	% vs baseline	Baseline year	Baseline value
<b>Scope 1 &amp; 2 market-based emissions</b>	ktCO <sub>2</sub> e	2030	467	-63%	2015	1,262
Intermediate milestones, on TCO scope	ktCO <sub>2</sub> e	2025	509	-3%	2024	524
	ktCO <sub>2</sub> e	2024	581	-2%	2023	592

Assumptions: see "Scope of reporting and methodology" in "6.2.2.8 GHG Emissions (E1-6)"





# First wave CSRD examples: EU Taxonomy activities

Companies have encountered challenges with the EU Taxonomy regulation, especially with the Technical Screening Criteria. However, early CSRD reporters offer examples of the required tables for eligible and aligned turnover, CapEx, and OpEx.

Reporting on the EU Taxonomy can signal a company’s commitment to sustainability, showcasing transparency and adherence to ESG standards that attract investors and stakeholders. Given the complexity of determining taxonomy alignment, companies are advised to start early, develop a reporting plan, and address gaps, recognizing that Omnibus aims to simplify the regulation, including adjusting reporting templates and reducing the number of required datapoints.

## ØRSTED EU TAXONOMY KPIS

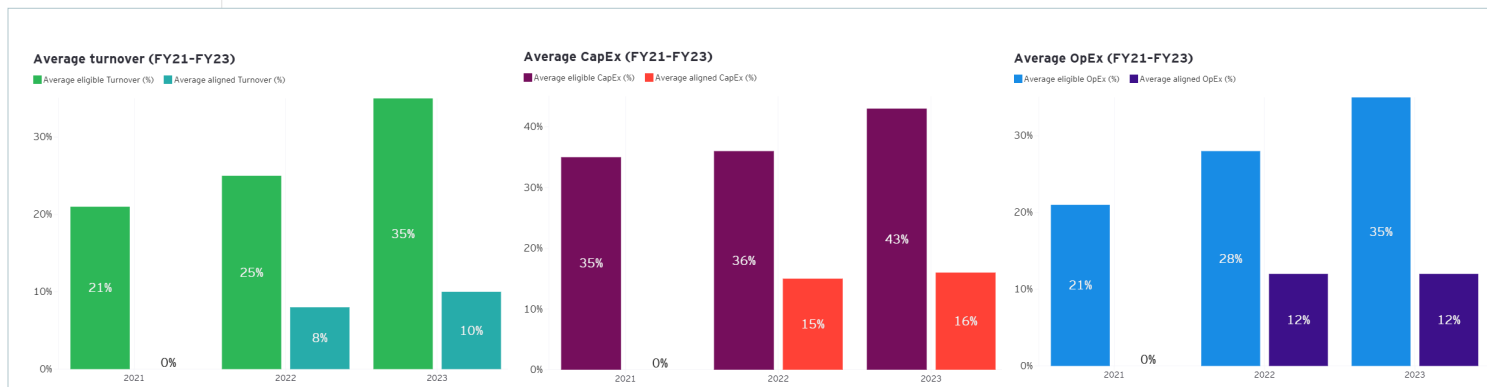


Ørsted reports on the EU Taxonomy in its 2024 Annual Report following the mandatory template required by Article 8 of the Disclosures Delegated Act. Given the relative complexity of reporting templates, Ørsted also translates the results for users stating:

- Taxonomy-aligned share of revenue in 2024 was 91%, up 5% from 2023
- Taxonomy-aligned share of CapEx in 2024 was 99%, consistent with 2023
- Taxonomy-aligned OpEx was 86%, an increase of 7% from 2023

Because Ørsted’s business is primarily developing renewable energy, it shows high percentages of alignment with the taxonomy.

An analysis performed by EY over EU Taxonomy disclosures for 307 nonfinancial entities indicates that companies are struggling to demonstrate aligned turnover, CapEx and OpEx, with average alignment at 10%, 16% and 12% respectively. According to the report, the reason for low alignment is primarily due to limited eligible activities, data challenges and difficulties interpreting Technical Screening Criteria.



# Capturing value and driving impact through your CSRD agenda



Preparing for CSRD is a resource-intensive exercise that requires input from across the organization to get it right. Even with the additional time through the Omnibus, the timeline to stand up this reporting process means that compliance alone can seem overwhelming. Our experience shows that companies can seize opportunities to create value for the organization and drive better decision making.



## CAN REPORTING FRAMEWORKS DRIVE IMPACT?

Increased transparency through corporate disclosure is one crucial action on the pathway to a more sustainable and regenerative future. When business activities are reported on, they are forced to be re-examined. Leading organizations will use these frameworks to re-evaluate their business models and reshape their strategy. As markets more accurately price risks from this increased transparency, the cost of capital will further accelerate impact at scale.

## QUESTIONS TO SUPPORT VALUE CREATION

### 01 ASSESS APPLICABILITY AND REPORTING APPROACH

- **Organizational model:** Is our current legal entity structure fit for purpose in today's environment? Was it built on value propositions that no longer make sense for our business?
- **Reporting:** How will the reporting approach we select help us better communicate our sustainability activities and progress? Where can this create a competitive advantage?

### 02 CONDUCT DOUBLE MATERIALITY ASSESSMENT

- **Resilience:** How can the double materiality assessment enhance your organization's enterprise risk management capabilities and build the resilience of your business?
- **Collaboration:** How can we use the double materiality assessment to engage with external stakeholders about sustainability and integrate the results into our operations?
- **Transformation:** How does our existing business model need to transform in the new economy? What signals can we take from the double materiality assessment results to harden our strategy?

### 03 ASSESS DISCLOSURE GAPS

- **Decision making:** Collecting data on new metrics is important, but how can we use this new data to improve decision making?
- **Real action:** Metrics and policy can often be the focus, but what actions does our business need to take to drive meaningful impact on topics that are material to our business?

### 04 REMEDIATE GAPS AND PREPARE FOR ASSURANCE

- **Resource allocation:** How can identified disclosure gaps help us prioritize, formalize and effectively deploy resources for policies, action plans and targets related to material sustainability topics?
- **Communications:** How can we communicate our sustainability efforts in a credible way that meets CSRD requirements while also positioning it as strategic, value-driven exercise beyond regulation?

# Sustainable actions, communicated well, pay off in the capital markets



## How Impact Pathways can support throughout your CSRD journey

### SUSTAINABLE ACTIONS

- **Double materiality assessment:** Assess company sustainability impacts, risks and opportunities to prioritize actions
- **Sustainability strategy:** Develop company-wide sustainability strategy
- **Material risk and opportunity deep dive:** Conduct sustainability risk and impact assessments for material topics including climate, water, biodiversity and workforce
- **Target setting:** Create and disclose forward-looking sustainability ambitions and goals accretive to business strategy
- **Policy assessment:** Identify and support creating policies for management of material sustainability topics
- **Sustainable financial activities:** Develop and implement a methodology for identifying, assessing and reporting sustainable turnover, OpEx and CapEx

### COMMUNICATED WELL

- **Reporting and disclosure assessment:** Assess existing company sustainability disclosures against ESRS
- **CSRD roadmap:** Develop actionable roadmap to prepare for CSRD and other regulatory requirements
- **PMO:** Manage initiatives to prepare for CSRD while building management capabilities
- **Communications review:** Review external communications for alignment in sustainability value creation narrative across annual reports, investor presentations, proxy statement and website

### PAY OFF IN THE CAPITAL MARKETS

- **ESG capital targeting:** Understand how sustainability, and specifically EU Taxonomy, is integrated by investors and target incremental pools of long-term capital
- **Stakeholder monitoring:** Monitor impact of sustainability efforts and resulting shifts in perspective on prioritized stakeholders:
  - Investor engagement
  - ESG raters / credit agencies
  - Employees perception & engagement
  - Customer retention
- **Performance improvement:** Leverage increased sustainability data to identify operational improvement opportunities and integrate learnings into decision making





# About Impact Pathways

Impact Pathways is helping accelerate the transition to a regenerative future.

We attract purpose-driven talent, provide authentic, evidence-based advice and invest in impact solutions.

Our global, impact-led consulting firm empowers organizations to create value for society while creating value for their business.



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**IT'S JUST GOOD BUSINESS**

Sustainable actions — *communicated well* — pay off in the capital markets.





# Appendix: Other reports we like

## Examples of strong, CSRD-relevant reporting practices across industries

REPORT	COUNTRY	SASB INDUSTRY	WHAT WE LIKED ABOUT IT
<a href="#">Adidas Annual Report 2024</a>	Germany	Apparel, Accessories, & Footwear	<ul style="list-style-type: none"> <li>• Early voluntary adoption of CSRD-aligned topics and clear structuring of disclosures</li> <li>• Transparency around methodology and data used to report on emerging topics, such as <a href="#">nature and biodiversity</a></li> </ul>
<a href="#">Carlsberg Annual Report 2024</a>	Denmark	Alcoholic Beverages	<ul style="list-style-type: none"> <li>• Operational clarity and depth in environmental disclosures, especially in areas like packaging, water efficiency and brewery emissions (pg. 58)</li> </ul>
<a href="#">Coca-Cola HBC Annual Report 2024</a>	Switzerland	Non-Alcoholic Beverages	<ul style="list-style-type: none"> <li>• Strong integration of ESG into its core strategy, with measurable KPIs and detailed transition roadmaps around climate and packaging</li> </ul>
<a href="#">Diageo Annual Report 2024</a>	England	Alcoholic Beverages	<ul style="list-style-type: none"> <li>• Highly strategic sustainability narrative, including classification of risk in terms of appetite and velocity (pg. 78-85)</li> </ul>
<a href="#">Maersk Annual Report 2024</a>	Denmark	Marine Transportation	<ul style="list-style-type: none"> <li>• Pragmatic approach to articulating climate goals while acknowledging external dependencies and scenario uncertainties (pg. 78-84)</li> </ul>
<a href="#">Netcompany Annual Report 2024</a>	Denmark	Internet Media & Services	<ul style="list-style-type: none"> <li>• Clear connection between materiality and enterprise risks and opportunities (e.g., responsible digitalization) (pg. 73)</li> </ul>
<a href="#">Novo Nordisk Annual Report 2024</a>	Denmark	Biotechnology & Pharmacy	<ul style="list-style-type: none"> <li>• Alignment of “strategic aspirations” with ESG metrics and targets, supported via highly sector-specific actions (e.g., pg. 68)</li> </ul>
<a href="#">Pandora Annual Report 2024</a>	Denmark	Apparel, Accessories, & Footwear	<ul style="list-style-type: none"> <li>• Focused governance model and transparent roadmap toward net zero, supported by a detailed materiality assessment and value chain awareness (pg. 52)</li> </ul>
<a href="#">SAP 2024 Integrated Report</a>	Germany	Software & IT Services	<ul style="list-style-type: none"> <li>• Emphasis on value-based management as opposed to regulatory compliance (pg. 60)</li> </ul>
<a href="#">Wolters Kluwer Annual Report 2024</a>	Netherlands	Professional & Commercial	<ul style="list-style-type: none"> <li>• Clear presentation of material IROs, using icons and colors to denote the type (e.g., opportunity, negative impact), relevancy in the value chain, expected time horizon, description and alignment with SDGs (pg. 102)</li> </ul>

Note: This list is non-exhaustive and limited by the sample of reports we reviewed.