



CORPORATE GOVERNANCE AND FINANCE DEPARTMENT

NOTICE

MEMORANDUM

TO : **ALL CONCERNED CORPORATIONS**

SUBJECT : REQUEST FOR COMMENTS ON THE DRAFT MEMORANDUM CIRCULAR ON THE REVISED SUSTAINABILITY REPORTING GUIDELINES FOR PUBLICLY LISTED COMPANIES AND THE SEC SUSTAINABILITY REPORTING FORM (SURE FORM)

DATE : 04 OCTOBER 2023

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The Commission hereby requests comments and/or inputs on the attached draft *Memorandum Circular* on the Revised Sustainability Reporting Guidelines for Publicly Listed Companies and the SEC Sustainability Reporting Form (SuRe Form).

The written comments on the exposure draft must be submitted to the Corporate Governance and Finance Department (CGFD) via email at cgfd_cgd@sec.gov.ph on or before 16 October 2023.

Issued on 04 October 2023.



SEC MEMORANDUM CIRCULAR NO. ___

Series of 2023

TO : PUBLICLY-LISTED COMPANIES

SUBJECT : REVISED SUSTAINABILITY REPORTING GUIDELINES FOR PUBLICLY-LISTED COMPANIES

WHEREAS, the Commission plays an active role in promoting sustainability reporting in the Philippines through the issuance of SEC Memorandum Circular (MC) No. 4, Series of 2019, also known as the Sustainability Reporting Guidelines for Publicly-Listed Companies (PLCs) or the SR Guidelines, which mandated sustainability reporting in the Philippines under a “comply or explain” approach or that which allowed PLCs to disclose corporate sustainability data, when available, and provide explanations for items where data is unavailable;

WHEREAS, on 26 June 2023, the International Sustainability Standards Board (ISSB) issued its inaugural standards, the International Financial Reporting Standards (IFRS) S1 (General Requirements for Disclosure of Sustainability-related Financial Information) and IFRS S2 (Climate-related Disclosures), which create a common language for disclosing the effects of climate-related risks and opportunities on a company’s prospects, and ensure that companies provide sustainability-related information alongside financial statements, in the same reporting package¹;

WHEREAS, in the exercise of its rule-making powers, the Commission recognizes and integrates the latest developments in global sustainability reporting frameworks, including the IFRS S1 and IFRS S2—both of which fully incorporate the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD)— the United Nations Sustainable Development Goals (UN SDGs), Global Reporting Initiative (GRI), Sustainability Accounting Standards Board (SASB), International Integrated Reporting Council (IIRC), and the United Nations Conference on Trade and Development (UNCTAD) - International Standards of Accounting and Reporting (ISAR) Guidance on Core Indicators, among others; and

WHEREAS, Section 179 (d) of Republic Act No. 11232, otherwise known as the Revised Corporation Code of the Philippines, grants the Commission the power to promote corporate governance and the protection of minority investors, through, among others, the issuance of rules and regulations consistent with international best practices;

¹ <https://www.ifrs.org/news-and-events/news/2023/06/issb-issues-ifrs-s1-ifrs-s2/>

NOW, THEREFORE, to further promote sustainability reporting, make the same relevant and useful for Philippine PLCs, and contribute to a robust sustainability reporting framework in the country, the Commission, in its *En Banc* meeting on 28 October 2023, resolved to issue the Revised Sustainability Reporting Guidelines for Publicly-Listed Companies (*Revised SR Guidelines*) attached to this Memorandum Circular.

Sustainable practices are shown to lead to company benefits like improved management systems, a motivated workforce, and sustainable vision, strategy, and business plans. Moreover, the *Revised SR Guidelines* serves as an effective tool to encourage companies to adopt sustainable business practices and attract Environmental, Social, and Governance (ESG) investors in the country's capital markets.

The *Revised SR Guidelines* is intended to help PLCs assess and manage non-financial performance across Economic, Environmental, and Social aspects of their organization, and enable PLCs to measure and monitor their contributions towards achieving universal targets of sustainability, such as the United Nations Sustainable Development Goals, as well as national policies and programs, such as AmBisyon Natin 2040.

Section I. Sustainability Reporting Format

The Sustainability Reporting (SR) required of PLCs shall be composed of the following:

1. **SR Narrative:** The PLCs shall submit a narrative sustainability report. The SR Narrative follows the format under SEC MC No. 4, Series of 2019. The SR Narrative shall be submitted together with the company's Annual Report (SEC Form 17-A). It is recommended to have a one-page Executive Summary/ Highlights of the companies' sustainability activities, programs, and projects at the beginning of the report.
2. **Sustainability Report (SuRe) Form:** The PLCs shall submit their duly answered SuRe Form through the SEC Electronic Filing and Submission Tool (eFAST), or any other related SEC-approved/implemented submission tools for easier access, data capture, analytics, and data management.

The SuRe Form **SHALL** be submitted in Microsoft Excel format.

The SuRe Form template includes three (3) major parts, to wit:

- A. Sustainability and Climate-related Opportunities and Risks Exposures (SCORE);
- B. Cross-Industry Standard Metrics (CISM); and
- C. Industry-Specific Metrics (ISM).

The PLC **MAY** also attach its SuRe Form or the details of the Form at the end of the SR Narrative, in addition to the eFAST submission.

Section II. SuRe Form Submission Process – Mode of Submission

The SuRe Form shall be submitted to the Commission in Microsoft Excel file format, and shall be done using eFAST through the link: _____.

The PLCs must ensure that for the Microsoft Excel file, the fields are **NOT** moved, merged nor altered when inputting data. Otherwise, the system will not accept the submission. Further instructions for filing may be accessed on eFAST.

Note that **neither signature nor notarization is required** for both the SR Narrative and the SuRe Form. However, it is the board's responsibility to confirm in writing in the SR Narrative that it has reviewed the accuracy and completeness of the SR submissions.

The SEC will also post on the eFAST website and the official SEC website the step-by-step guidelines on how to file the SuRe Form using the eFAST.

Section III. Deadline for submission of the SR

The SuRe Form is required to be submitted starting in the year 2024 covering the reporting year 2023. The SuRe Form covering the reported year shall be submitted through eFAST on or before April 15 of the following year during the same time as the filing of the PLCs Annual Report (SEC Form 17-A), which is within 105 calendar days from the end of the fiscal year.

The Narrative SR covering the reported year shall be attached as an Annex to the SEC Form 17-A to be submitted in the following year.

Section IV. Disclosures under the SuRe Form

The SuRe Form shall be composed of mandatory disclosures, unless otherwise indicated.

Section V. SuRe Form Additional Reminders

- The companies must indicate “0” if the disclosure has zero (0) value and indicate “N/A” if the disclosure is not applicable.
- Note that “0” and “N/A” are not interchangeable.
- The industry classification of the companies must be based on the 2019 Philippine Standard Industrial Classification (PSIC).
- If the reporting PLC is a holding company, that PLC’s SR must not include subsidiaries that are also listed. These listed subsidiaries are required to submit a separate and independent SR in accordance with this MC.

Section VI. Penalty for Failure to Timely Submit SuRe Form and/ or Narrative SR with the Annual Report

Non-submission, non-attachment, or late submission of the SuRe Form and/ or Narrative SR shall be subject to the following separate and distinct penalties:

| | Non-attachment of SR Narrative² | Non-submission of SuRe Form³ | Late submission⁴ | Incomplete |
|----------------|--|--|---------------------------------------|---|
| First Offense | Reprimand/ Warning | Reprimand/ Warning | Reprimand/ Warning | Reprimand/ Warning |
| Second Offense | P50,000 + P500 per day of delay | P50,000 + P500 per day of delay | P30,000 + P500 per day of delay | P30,000 + P500 per day of delay in completing the SuRe Form |
| Third Offense | P100,000 + 1,000 per day of delay | P100,000 + 1,000 per day of delay | P60,000 + P1,000 per day of delay | P60,000 + P1,000 per day of delay in completing the SuRe Form |
| Fourth Offense | Suspension/ Revocation of Secondary license or a fine of P1,000,000.00 | Suspension/ Revocation of Secondary license or a fine of P1,000,000.00 | P500,000.00 + P2,000 per day of delay | P500,000.00 + P2,000 per day of delay in completing the SuRe Form |

It must be emphasized that compliance with only one of the requirements (SR Narrative or SuRe Form) does not amount to compliance with this Memorandum Circular. Thus, penalties for each infraction listed above are cumulative.

² The penalty will apply if the non-attachment is more than 30 calendar days from the due date.

³ The penalty will apply if the non-submission is more than 30 calendar days from the due date.

⁴ The penalty will apply for late submission of either the SR Narrative or the SuRe Form.

Section VII. Transition Period for Compliance

In recognition of the critical need for a relief period for transition, PLCs may comply with disclosures specified in this Memorandum Circular on a “comply or explain” basis for a period of two (2) years. Afterwards, mandatory submission of ALL disclosures required by this Memorandum Circular shall be mandatory and therefore, subject to penalties.

Section VIII. Modification/Amendment

All other circulars, memoranda, notices and implementing rules and regulations that may be inconsistent with the foregoing provisions shall be deemed modified or amended accordingly.

Section IX. Effectivity

This Memorandum Circular shall take effect immediately upon its approval.

Makati City, Philippines, ___2023.

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| | | | | | | | | | | |
|--|--|--|--|--|--|--|--|--|--|--|
| Nature & Biodiversity loss | | | | | | | | | | |
| Raw Materials Scarcity | | | | | | | | | | |
| Water scarcity | | | | | | | | | | |
| Others (please specify; add more rows as necessary) | | | | | | | | | | |
| Description of how the company's definition of the time horizons (short - to long-term) is linked to your planning horizons for strategic decision-making | | | | | | | | | | IFRS S1.30 c Disclosure, IFRS S2.10 d Disclosure |

4. Management of highly material climate- and sustainability-related risks
Based on your response to the previous question, use the table below to disclose and enumerate the climate- and sustainability-related risks that were identified as having "high" impact to the business model and value chain, and provide the required information per risk.

| High risks | Description of how the risk significantly affects the business model and/or value chain | Entity's response or risk mitigation and/or adaptation strategy, including progress against | Resource allocation | |
|--|---|---|---------------------|---|
| High risk 1 | | | | IFRS S1.32 b Disclosure, IFRS S1.33 a, b, c Disclosure, IFRS S2.13 b Disclosure, IFRS S2.14 a (v), b, c Disclosure |
| High risk 2 | | | | |
| High risk 3 | | | | |
| High risk 4 | | | | |
| High risk 5 | | | | |
| Other high risk (please specify; add more rows as necessary) | | | | |
| Overall Resilience of your Business Provide discussion on the current level of resilience of the entities' strategy and business model in relation to the risks above | | | | IFRS S1.41 Disclosure IFRS S2.22 a Disclosure |
| Contextual information. Provide further information on the risk assessment process you performed to generate the disclosure above, specifically: - How and when climate-related scenario analysis was carried out; - Whether climate-related scenario analysis included diverse range of climate-related scenarios and what scenarios were considered; - Whether climate-related scenarios used are associated with climate-related transition risks, climate-related physical risks, or both; and - Whether the climate-related scenario was used that is aligned with latest international agreement on climate change. | | | | IFRS S1.41 Disclosure IFRS S2.22 a Disclosure IFRS S2.22 b (i.2) Disclosure IFRS S2.22 b (i.3) Disclosure IFRS S2.22 b (i.4) Disclosure |

5. Impact of material climate- and sustainability-related risks on the company's financial position, financial performance, and cash flows
Given your strategy, and wherever applicable, disclose the quantitative (single amount or range) or qualitative current and anticipated financial effects for each type or category of risk across the time horizons indicated below.

| Climate-related risks | Current and Anticipated Financial Effects | | | | | |
|---|--|--|--|--|--|--|
| | Current reporting period | Next reporting period | Short-term | Medium-term | Long-term | |
| Physical risks | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | IFRS S1.35 a, b, c, d Disclosure, IFRS S1.40 a, b Disclosure, IFRS S2.16 a, b, c, d Disclosure, IFRS S2.21 a, b Disclosure |
| Transition risks | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | |
| Other sustainability-related risks | | | | | | |
| Nature & Biodiversity loss | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | |
| Others (please specify; add more rows as necessary) | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | |

6. Climate- and sustainability-related opportunities
Wherever applicable, describe the key climate- and sustainability-related opportunities relevant to your company.

| Opportunities | Description of opportunities | |
|---|------------------------------|--|
| Decarbonization & Resource Efficiency Opportunities | | IFRS S1.35 a, b, c, d Disclosure, IFRS S1.40 a, b Disclosure, IFRS S2.16 a, b, c, d Disclosure, IFRS S2.21 a, b Disclosure |
| Use of more efficient modes of transport | | |
| Use of more efficient production and distribution processes | | |
| Use of recycled products, substitutes, or diversification | | |
| Move to more efficient buildings | | |
| Reduced water consumption | | |
| Use of lower-emission sources of energy | | |
| Use of supportive policy incentives | | |
| Participation in carbon market | | |

| |
|---|
| Shift toward decentralized energy generation |
| Products and services |
| Development and/or expansion of low emission goods and services |
| Development of climate adaptation and risk transfer solutions |
| Diversify into low-carbon business models |
| Markets |
| Improved competitiveness |
| Access to new assets and locations |
| Others (please specify; add more rows as necessary) |

7. Impact of climate- and sustainability-related opportunities and its impact on the company's financial position, financial performance, and cash flows
 Given your strategy, and wherever applicable, disclose the quantitative (single amount or range) or qualitative current and anticipated financial effects of your company's top climate- and sustainability-related opportunities across the time horizons indicated below.

| Climate-related opportunities | Current and Anticipated Financial Effects | | | | | IFRS S1.35 a, b, c, d Disclosure, IFRS S1.40 a, b Disclosure, IFRS S2.16 a, b, c, d Disclosure, IFRS S2.21 a, b Disclosure |
|---|--|--|--|--|--|--|
| | Current reporting period | Next reporting period | Short-term | Medium-term | Long-term | |
| Opportunity 1 | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | |
| Opportunity 2 | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | |
| Others (please specify; add more rows as necessary) | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | |
| Other sustainability-related opportunities | | | | | | |
| Others (please specify; add more rows as necessary) | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | <ul style="list-style-type: none"> Impact on financial performance: - Impact on financial position: - Impact on cash flows: - | |

Risk Management **Disclosure** **Reference**

8. Risk management process
 Describe your current processes, procedures, and practices with regards to the following activities.

| | |
|--|--|
| Identification of climate- and sustainability-related risks, including whether and how you used climate-related scenario analysis to identify climate-related risks | IFRS S1.44 a (ii) Disclosure, IFRS S2.25 a (ii) Disclosure |
| Assessment and prioritization of climate- and sustainability-related risks | IFRS S1.44 a Disclosure, IFRS S2.25 a Disclosure |
| Monitoring of climate- and sustainability-related risks | IFRS S1.44 a Disclosure, IFRS S2.25 a Disclosure |
| Changes in your processes to identify, assess, prioritize, and monitor these risks compared with the prior reporting period | IFRS S1.44 a (vi) Disclosure, IFRS S2.25 a (vi) Disclosure |

9. Opportunity management process
 Describe your current processes, procedures, and practices with regards to the following activities.

| | |
|---|---|
| Processes to identify, assess, prioritize, and monitor climate- and sustainability-related opportunities, including whether and how you used climate-related scenario analysis to identify climate-related opportunities | IFRS S1.44 a (vi) Disclosure, IFRS S2.25 a (vi), b Disclosure |
|---|---|

10. Integration of risk and opportunity management process to overall/enterprise risk management
 Describe your current process, procedures, and practices with regards to the following activities.

| | |
|---|--|
| Extent to which and how processes for identifying, assessing, prioritizing and monitoring SRROs are integrated into or inform entity's overall risk management process | IFRS S1.44 c Disclosure, IFRS S2.25 c Disclosure |
|---|--|

Metrics and Targets **Disclosure** **Reference**

11. Metrics and targets for physical risks

| Metrics (Absolute or Intensity - IFRS S2.33 g Disclosure) | Method used to calculate and scope Part of entity to which climate-related target applies (IFRS S2.33 c Disclosure IFRS S1.50 d Disclosure) | Sources from which metrics were drawn (IFRS S1.49 Disclosure) | Base Period from which progress for climate-related target is measured (IFRS S1.51 d Disclosure, IFRS S2.33 e Disclosure) | Performance (IFRS S1.51 f Disclosure, IFRS S2.35 Disclosure) | Milestones & Target & Period over which the climate-related target applies (IFRS S1.51 c Disclosure, IFRS S2.33 d Disclosure) | Third-party Validation (IFRS S1.50 c Disclosure) |
|---|---|--|---|--|--|--|
| Intensity Metric: Exposure Assessment Coverage –Percentage of total number (or asset value) of business-critical assets assessed for exposure to projected climate hazards | | | | | ___% by 20__ | Yes/No |
| Intensity Metric: Vulnerability Assessment Coverage - Percentage of the total number (or asset value) of business-critical assets assessed for its vulnerability to material climate hazards. | | | | | | |
| Intensity Metric: Asset Resilience Percentage – Percentage of assets (in number or asset value) assessed for exposure and vulnerability and improved for its resilience to material hazards with minimal residual risks. | | | | | | |
| Others (please specify; add more rows as necessary) | | | | | | |
| 12. Metrics and targets for transition risks | | | | | | |
| Absolute Metric: Future GHG-related tax liabilities based on GHG emissions and benchmark carbon price. | | | | | ___% by 20__ | Yes/No |
| Intensity Metric: Future GHG-related tax liabilities as a percent of total taxes paid to government (based on GHG emissions and benchmark carbon price) | | | | | | |
| Intensity Metric: Projected cost to transition to low-carbon operations. | | | | | | |
| Others (please specify; add more rows as necessary) | | | | | | |
| 13. Metrics and targets for other sustainability risks | | | | | | |
| Living Wage Performance – Percentage of workers paid at least a living wage | | | | | ___% by 20__ | Yes/No |
| Others (please specify; add more rows as necessary) | | | | | | |
| 14. Contextual Disclosures(Provide elaboration on the context and assumptions relevant to the disclosures above. Distinguish the context between physical and transition risks as needed.) | | | | | | |
| | Disclosure | | | | | Reference |
| Entity's Objective and approach to setting and reviewing the climate-related metrics, and target, and monitoring progress • Whether and how company-specific metrics were derived by adjusting metrics taken from source other than the IFRS Sustainability Disclosure Standards • Whether and how your climate-related target has been informed by latest international agreement on climate change • Whether and how the entity is applying a carbon price in decision-making • Whether and how climate-related considerations are factored into executive remuneration | | | | | | IFRS S1.50 a Disclosure IFRS S2.34 Disclosure IFRS S2.33 b Disclosure IFRS S2.33 h Disclosure IFRS S2.29 f (i) Disclosure IFRS S2.29 g (i) Disclosure |
| Redefinition or replacement of metrics, and targets (if any) including metrics used to set and monitor progress towards reaching entity's targets. | | | | | | IFRS S1.51 g Disclosure, IFRS S2.34 d Disclosure, IFRS S1.52 Disclosure, IFRS S1.B52 Disclosure |
| Explanation of and reasons for changes in metric. | | | | | | IFRS S1.B52 b Disclosure, IFRS S1.B52 c Disclosure |
| General Requirements | | | | | | |
| Disclosure | | | | | Reference | |
| 15. Source of guidance, reporting period, and statement of compliance | | | | | | |
| Sources of guidance the entity has applied in preparing sustainability-related financial disclosures Industry(s) applied in preparing sustainability-related financial disclosures | | | | | | IFRS S1.59 a Disclosure IFRS S1.59 b Disclosure |
| Date of start and end of reporting period | | | | | | IFRS S1.66 a Disclosure |
| If applicable, whether amounts disclosed in sustainability-related financial disclosures are not entirely comparable due to change in length of reporting period | | | | | | IFRS S1.66 b, c Disclosure |
| Information about transactions, other events and conditions that occur after end of reporting period , but before date on which sustainability-related financial disclosures are authorized for issue Entity's explicit and unreserved statement of compliance | | | | | | IFRS S1.68 Disclosure |
| | | | | | | IFRS S1.72 Disclosure |
| 16. Judgements, uncertainties and errors | | | | | | |
| Information about judgements , apart from those involving estimations of | | | | | | IFRS S1.74 Disclosure |
| Sources of measurement uncertainty and assumptions , approximations and judgements entity has made in measuring amounts that are subject to high level of measurement uncertainty | | | | | | IFRS S1.78 Disclosure |
| 17. Application guidance | | | | | | |
| If applicable, type of material information not disclosed due to prohibition of disclosure and explanation of source of restriction | | | | | | IFRS S1.B33 Disclosure |



Sustainability Report (SuRe) Form
SUSTAINABILITY- AND CLIMATE-RELATED RISKS, OPPORTUNITIES & METRICS

| | |
|---|------------------------------------|
| Company name: | Company ABC |
| Email address of contact person: | juan.delacruz@abc.com |
| Reporting period: | January 1 to December 31, 2023 |
| PSIC Code: | 64199 |
| PSIC Section: | Financial and Insurance Activities |
| Independent assurance level and provider: | Limited assurance - 123 & Co. |

| Category and Sustainability Disclosure Topic | Metric | Unit of measure | Data Disclosure | Information on Target/s | | | | Reporting Standard |
|---|---|---|-----------------|-------------------------------|--------------------------------------|-------------|----------------------------|--|
| | | | | Target | Period over which the target applies | Base period | Milestones/interim targets | |
| Metrics and targets relevant to managing transition climate risks | | | | | | | | |
| Financial Metrics | | | | | | | | |
| | 1. Capital deployment | Amount of capital expenditure, financing or investment deployed in million Php towards climate-related risks resilience | | | | | | IFRS S2.29 e Disclosure, IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 2. Internal carbon prices | Price for each metric tonne of greenhouse gas emissions the entity uses to assess the costs of its greenhouse gas emissions | | | | | | IFRS S2.29 f (ii) Disclosure, IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 3. Remuneration linked to climate-related considerations | Percentage of executive management remuneration recognized in the current period that is linked to climate-related considerations | | | | | | IFRS S2.29 g (ii) Disclosure, IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| GHG Emissions | | | | | | | | |
| | 4. Gross Scope 1 GHG emissions | Metric tons CO ₂ e | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 5. Gross location-based Scope 2 GHG emissions | Metric tons CO ₂ e | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 6. Gross Scope 3 GHG emissions | Metric tons CO ₂ e | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 7. GHG emissions intensity | Metric tons CO ₂ e per million Php revenue | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Metrics and targets relevant to managing climate-related opportunities | | | | | | | | |
| Climate-related disclosures | | | | | | | | |
| | 8. Climate-related opportunities | Amount in million Php and percentage of assets or business activities aligned with climate-related opportunities | | | | | | IFRS S2.29 d Disclosure, IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Metrics relevant to the management of all other sustainability-related risks and opportunities | | | | | | | | |
| Investments in sustainable activities or industries | | | | | | | | |
| | 9. Total amount of investments on sustainable industries and activities according to ASEAN Green Taxonomy/BSP's sustainable finance taxonomy or UN SDGs | Amount in million Php | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Energy management | | | | | | | | |
| | 10. Energy intensity | GJ per million Php revenue | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 11. Total and percentage of renewable energy (RE) consumption | Absolute number (in GJ) and % RE consumption over total energy consumed | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Water management | | | | | | | | |
| | 12. Water intensity | Cubic meters per million Php revenue | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 13. Total and percentage of water recycled and reused | Absolute number (in cu.m) and % water recycled and reused over total water consumed | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Waste management | | | | | | | | |
| | 14. Solid waste intensity | Metric tons per million Php revenue | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 15. Total and percentage of waste recycled or reused | Absolute number (in ton) and % waste recycled or reused over total wastes generated | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Diversity and inclusion | | | | | | | | |
| | 16. Total number of board of directors, by gender | Headcount | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 17. Total number of employees, by gender | Headcount | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 18. Total number of indirect hires, by gender | Headcount | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 19. Total number of senior management employees, by gender | Headcount | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 20. Total number of middle management employees, by gender | Headcount | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 21. Total number of rank-and-file employees or staff, by gender | Headcount | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Employee wellbeing and engagement | | | | | | | | |
| | 22. Number and percentage of employees coverage by collective bargaining agreements | Headcount and % of employees covered over total rank-and-file employees | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Data privacy and security | | | | | | | | |
| | 23. Number of incidents of data breaches | Number of substantiated incidents | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Other company-specific sustainability metrics | | | | | | | | |
| Topic (please specify; add rows as necessary) | Company-specific metric (please specify; add rows if necessary) | (unit of measure) | | | | | | IFRS S1.50 Disclosure |
| Topic (please specify; add rows as necessary) | Company-specific metric (please specify; add rows if necessary) | (unit of measure) | | | | | | IFRS S1.50 Disclosure |
| Topic (please specify; add rows as necessary) | Company-specific metric (please specify; add rows if necessary) | (unit of measure) | | | | | | IFRS S1.50 Disclosure |
| Other qualitative metrics relevant to the management of all other sustainability-related risks and opportunities | | | | | | | | |
| | | | | Descriptive Disclosure | | | | |
| Procurement | | | | | | | | |
| | 25. Policy on responsible/sustainable procurement practices | Description or narrative | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Net Zero commitment | | | | | | | | |
| | 26. Policy on SBTi net zero commitment | Description or narrative | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Employee wellbeing and engagement | | | | | | | | |
| | 27. Additional employee benefits (on top of statutory benefits) | List of additional benefits | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 28. Policy, strategy, or formal grievance process on gender-based harassment and bullying in the workplace | Description or narrative | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 29. Policy, strategy, or formal grievance process on the health, safety, and wellbeing of employees in the workplace | Description or narrative | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 30. Policy, strategy, or formal grievance process with regards to employee decorum | Description or narrative | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Data privacy and security | | | | | | | | |
| | 31. Processes and procedures related to data privacy and security, information security, or cybersecurity | Description or narrative | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Children's rights | | | | | | | | |
| | 32. Company policy (and practices) on children's rights as consumers, dependent of workers, or workers themselves. | Description or narrative | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| | 33. Company policy or practices requiring commitment of suppliers and/or contractors to respect children's rights. | Description or narrative | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |
| Contributions to UN SDGs | | | | | | | | |
| | 34. Summary (and estimated financial equivalent) of contributions to the company's focused or relevant UN SDGs | Description | | | | | | IFRS S1.51 a, b, c Disclosure, IFRS S2.33 d, e, f Disclosure |

Legends:
 Disclosure is mandatory.
 Disclosure is encouraged.