

Improving climate and sustainability corporate disclosure policies to enable sustainable finance

2020 Research Report

An analysis of the climate-related disclosures of 300 companies from Central, Eastern and Southern Europe pursuant to the EU Non-Financial Reporting Directive

Project coordinated by:



As part of:



This project is part of the European Climate Initiative (EUKI). EUKI is a project financing instrument by the German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU). The EUKI competition for project ideas is implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH. It is the overarching goal of EUKI to foster climate cooperation within the European Union (EU) in order to mitigate greenhouse gas emissions.

More information on EUKI can be found here: <http://www.euki.de/>

The opinions put forward in this report are the sole responsibility of the author(s) and do not necessarily reflect the views of the Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU).



Disclaimer

The majority of sustainability-related disclosures require a predominantly qualitative assessment which is inherently subjective. Furthermore, despite the project's rigorous review mechanism, the complexity of the research implies inevitable errors and oversights. The scale of the research ensures that such errors do not significantly affect the aggregated data, but we do not recommend the use of individual company assessments to inform the decision-making of any stakeholders other than the companies themselves. The research has not been designed for this purpose.

Frank Bold takes responsibility for any error or inaccuracy in the research and presentation of results. The assessment criteria employed in this research do not intend to represent a definitive or final model of best practices or legislation. They were designed to provide a general overview of how companies in specific sectors reported on some of the most important environmental and social issues.

2020 Research report: An analysis of the climate-related disclosures of 303 companies from Central, Eastern and Southern Europe pursuant to the EU Non-Financial Reporting Directive

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Introduction



This report presents an in-depth assessment of climate and environmental disclosures of 303 companies from Southern, Central and Eastern Europe published in 2020 pursuant to the [EU Non-financial Reporting Directive \(EU NFRD\)](#).

The aim of this research is to support companies as well as policymakers and supervisors in their efforts to implement the EU NFRD, and substantiate the discussion on the legislative changes and standardisation of sustainability reporting.

This research is part of the project *Improving climate and sustainability corporate disclosure policies to enable sustainable finance* implemented by Frank Bold and supported by the European Climate Initiative. The project is based on the methodology and supports the goals of the Alliance for Corporate Transparency, an initiative of leading civil society organisations, whose purpose is to build multi-stakeholder consensus on how to improve and develop the European framework for non-financial reporting.

This framework plays a central role in how companies and investors understand and respond to climate risks and opportunities, as well as a range of other challenges that emerge in our increasingly fast and changing world. Addressing these challenges, in particular the transition to a low carbon economy, requires a large-scale reallocation of capital, which is impossible in the absence of meaningful forward-looking corporate disclosure.

The companies included in the research represent a vast majority of those falling under the scope of the EU NFRD from industries critical for climate change mitigation and adaptation and from European regions lagging in climate transition plans. More than half of these companies (168) were also included in the [analysis of 1000 European companies' sustainability reports](#) implemented last year by the Alliance for Corporate Transparency that largely followed the same methodology with regards to climate change and other environmental issues.

The [Alliance for Corporate Transparency](#) is an initiative coordinated by Frank Bold that brings together leading NGOs working on corporate transparency to improve the EU legislative framework on corporate sustainability reporting.

Partners

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RESEARCH REPORT

- 1 The first section of this report outlines the methodology of the research, how it was implemented, and general information about the companies included in the research.
- 2 The second section presents the results of the assessment of accessibility and presentation of non-financial information.
- 3 The third section addresses how strategic perspectives are reflected in companies' reports, namely what information they provide on their business model and governance with respect to environmental issues.
- 4 The fourth section presents the results of the assessment of companies' environmental disclosures against the requirements of the EU NFRD and of further criteria generally accepted and provided by international standards. This section subsequently addresses disclosures regarding climate change, use of natural resources, pollution, and biodiversity.
- 5 The fifth section presents the results of an assessment of disclosure of sustainable activities, products and services, with a focus on capital expenditures and turnover from such activities.
- 6 The sixth section summarises the main findings concerning the comparison of results between individual countries covered by the research.
- 7 The seventh section analyses the development of the reporting practices of the 168 companies included in the analysis of 1000 European companies implemented by the Alliance for Corporate Transparency last year.
- 8 The conclusions provide a summary of the key findings of the research.

METHODOLOGY

The research methodology was framed within the context of the [EU NFR Directive](#), which came into effect in 2018 and requires large listed companies as well as credit and insurance undertakings to disclose information necessary to understand their development, performance, position and impact on the environment and society. However, the EU NFRD does not specify in sufficient detail what concrete information must be disclosed. Where the EU NFRD lacks clear guidance, the methodology builds on international reporting standards and frameworks.

The methodology includes a set of criteria aimed at assessing the presentation, ease of accessibility and clarity of information disclosed. This section includes both objective criteria, such as on the presentation of KPIs, as well as questions that required researchers to provide subjective answers. Since different environmental issues are not equally relevant to all companies, we also asked about companies' materiality approach.

The EU NFRD requires companies to disclose information on their business models relevant for the matters included in their reports. Given the lack of clear consensus in this area among international standards, we assessed only whether the company explains how climate and the other environmental risks it faces may impact its business model. Further, we examined whether the company discloses information on the main aspects of the integration of sustainability in their top-level governance. The research methodology provides detailed criteria for the following thematic areas: climate change, use of natural resources, pollution and biodiversity. For each issue, the methodology

provides an assessment of whether companies disclose information required by the EU NFRD (ie. principal risks, policies, their outcomes and KPIs) and if the information is specific enough to understand companies' individual situations. In the case of companies from the finance sector, the assessment methodology takes into account only information related to these companies' investment, lending, and insurance activities.

To supplement this general assessment, the methodology provides additional qualitative assessment criteria derived from leading reporting standards (for example [TCFD recommendations for climate-related risk management](#), alignment of climate targets with the [Paris agreement](#) or [GHG Protocol methodology on climate-related KPIs](#)).

The last section of the methodology addresses corporate disclosures of positive sustainability impacts and sources of business opportunities related to company activities, products or services. In line with the [EC's Taxonomy on Sustainable Activities](#), the methodology examines data on turnover and capital expenditure.

We would like to highlight that since not all research questions are equally important for all companies, reading the results requires critical thinking. Please note that the research has not been designed to rank companies or provide advice to investors and other users of the reports for the purpose of their engagement with companies.

The overview contains a brief summary of criteria included in this report, while all research data, including individual companies' assessments, is available to the public in an open database at: www.allianceforcorporatetransparency.org/database/2020¹

Furthermore, Frank Bold has partnered with WikiRate to make the data-set and methodology accessible through WikiRate's open data platform. On WikiRate, EUKI research can be combined with other corporate ESG data to obtain additional information on company disclosure, and to support further research and advocacy. Visit [WikiRate](#)

<p>Accessibility, quality and materiality of the information provided</p>	<ul style="list-style-type: none"> → Traceability of information → Presentation of KPIs → Clarity of structure
<p>Strategic perspective (business model and governance)</p>	<ul style="list-style-type: none"> → Climate and environmental risks that may affect company's business model → Opportunities related to sustainability challenges → Integration of sustainability KPIs in executive compensation → Engagement of workforce representatives in sustainability strategy development → Corporate governance arrangements to support sustainability → Indication of matters discussed by the Board
<p>Main reporting criteria (applied separately for the individual environmental topics)</p>	<ul style="list-style-type: none"> → Policy, risks, outcomes for climate, use of natural resources, pollution and biodiversity matters → TCFD criteria for risk disclosure → Quantitative climate targets and alignment with Paris Agreement or science-based methodology → Use of renewable energy; GHG Scope 1/2/3; GHG intensity → Use of water (water stressed areas) → Discharges to air, water and soil → Impact on ecosystems
<p>Sustainable activities, products and services</p>	<ul style="list-style-type: none"> → Turnover → Capex → Green Bonds/Green Debt

² Please note that there can be slight differences between the results in the database and this report since the database contains the most current results."

RESEARCH IMPLEMENTATION

The research was implemented by Frank Bold. An in-house team of researchers carried out the analysis of 303 companies' non-financial statements and a review mechanism was set to designate a research coordinator to re-examine individual company assessments. Non-financial statements published in languages different from those spoken by our in-house researchers were analysed by external consultants. These assessments were checked for consistency.

Documentation: Which company resources were analysed?

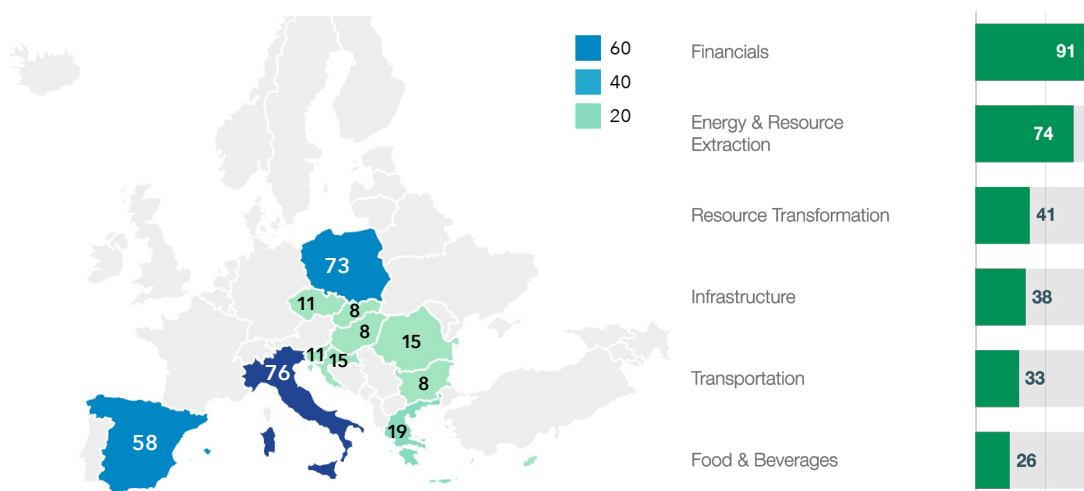
The project analysed the information disclosed in corporate annual or sustainability reports as well as any document or set of information clearly linked in these statements. The rationale behind this decision follows the principles of the EU NFRD and accompanying guidance, in which it is stated that the information should be easily accessible (i.e. "Cross referencing and signposting should be smart and user-friendly, for instance, by applying a practical rule of maximum one "click" out of the report").

Feedback from companies

All companies analysed have received their individual assessment and were invited to provide comments. We would like to thank those companies who have kindly responded to our request for feedback and helped us to correct errors in our assessment of their reports.

GENERAL INFORMATION ABOUT COMPANIES INCLUDED IN THE RESEARCH

The companies included in the research were selected from industries that significantly contribute to climate change and from European countries that lag behind in climate action and transition to a low-carbon economy. Companies from these countries also showed worse results in general in the [analysis of 1000 European companies' sustainability reports](#) implemented by the [Alliance for Corporate Transparency](#) last year. In the research presented in this report, we included the vast majority of companies from these sectors and countries that fall under the scope of the EU NFRD. In addition to these corporations, we also analysed companies who play an important role in the economy of countries included in the research. Titan Cement International S.A. is incorporated in Cyprus and headquartered in Belgium but operates in Greece and ŠKODA AUTO a.s. is not obliged to publish the non-financial statement pursuant to the EU NFRD but plays a significant role in the Czech economy.



Sectors Countries	Energy	Finance	Food & Beverages	Infrastructure	Resource transformation	Transportation	Total country
Bulgaria	2	3	1	1	0	1	8
Croatia	2	6	4	0	1	2	15
Cyprus	0	0	0	0	1	0	1
Czech Republic	2	7	1	0	0	1	11
Greece	5	6	1	2	1	4	19
Hungary	1	4	0	1	0	2	8
Italy	18	20	6	9	14	9	76
Poland	17	15	6	16	16	3	73
Romania	8	3	0	0	2	2	15
Slovakia	2	5	0	1	0	0	8
Slovenia	1	5	1	0	2	2	11
Spain	16	17	6	8	4	7	58
Total sector	74	91	26	38	41	33	



Accessibility and presentation

1 out of 4

companies provide KPIs in a summarised statement

20%

don't provide any KPIs at all

Read the following section for more results and key findings →

ACCESSIBILITY AND PRESENTATION OF NON-FINANCIAL INFORMATION

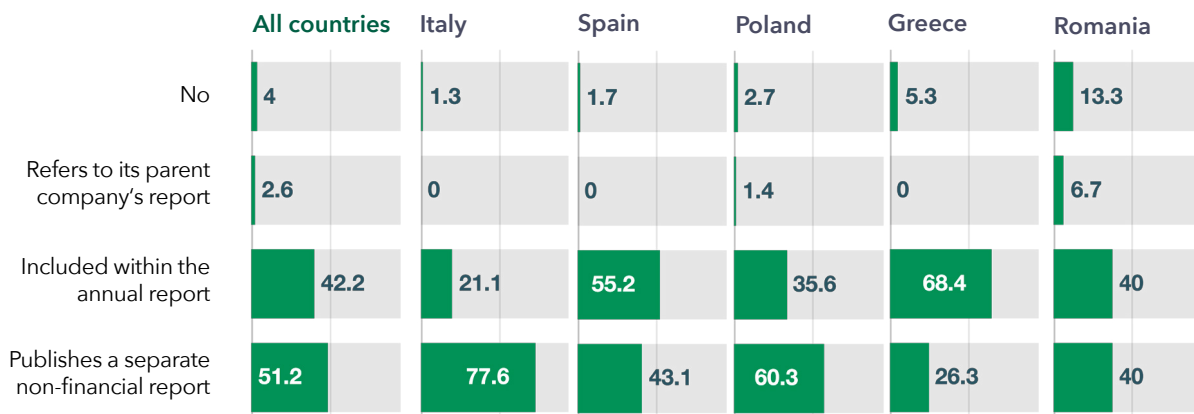
At first we assessed whether companies disclose any non-financial information in their annual and sustainability reports at all. We took into account any relevant information irrespective of whether companies identified the information as their non-financial statement. Overall, 4% of companies did not publish any non-financial information; 2 companies each from Poland, Romania, Czech republic and Hungary and 1 company in each of the following countries: Italy, Spain, Greece and Slovakia.

Non-financial information was more often presented in a separate document (51.2%) than included in the annual report (42.2%).

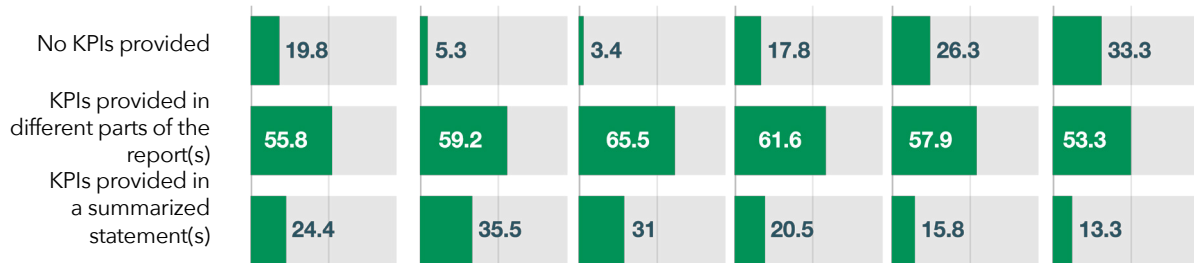
The EU NFRD requires companies to disclose relevant KPIs. We asked whether and how the KPIs are presented in the corporations' non-financial reports. The results show that 19.8% of companies do not publish any KPIs, which is nominally required by the EU NFRD, and 75.6% of companies in total do not disclose KPIs in summarised overviews which significantly reduces the practical usability of the reports.

Completely failing to produce any KPIs was rare among Spanish and Italian companies, but common in all other countries ranging between 17.8% in Poland and over 60% in Bulgaria, Hungary and Slovenia.

Does the company publish a non-financial statement?



KPIs presentation



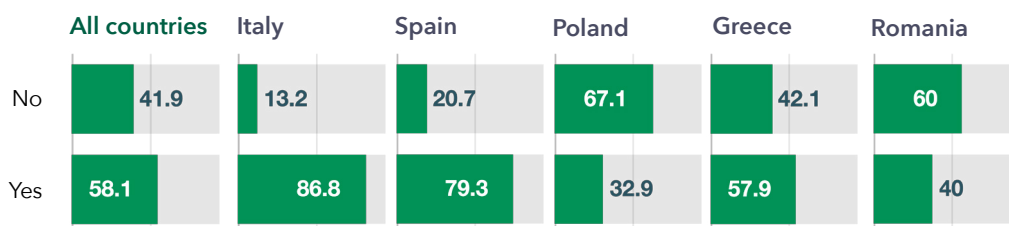
COMPREHENSIVENESS AND CLARITY OF THE INFORMATION DISCLOSED

We further assessed the structure and overall clarity of companies statements from the perspective of how these qualities facilitated or complicated the analysis. Please note that given the lack of clear guidance in the [EU NFR Directive](#) and voluntary reporting standards, such an assessment is inherently subjective, and depends entirely on the assessor.

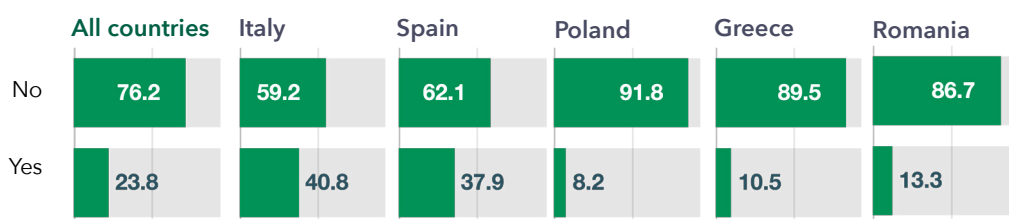
On the one hand, the analysts found that slightly less than 1/4 of companies (23.8%) reported the mandatory categories of information in a clear structure that allowed them to easily find and classify the information.

On the other hand, the approach to the determination of materiality was clearly articulated by 58.1% of companies. For the purpose of this assessment, such a criteria was fulfilled if the company explained why it considered an issue to be material. We did not assess whether companies described the materiality determination process as such or if they considered correct criteria in the process. Such an analysis requires the application of thematic criteria, and is provided for individual topics in the following sections. These results suggest that clarity regarding a company's approach to the determination of materiality does not necessarily correlate with the value of the actual information.

The approach taken to determining the materiality is clearly articulated.



Information on policies, outcomes, risks, and KPIs is provided in a clear structure



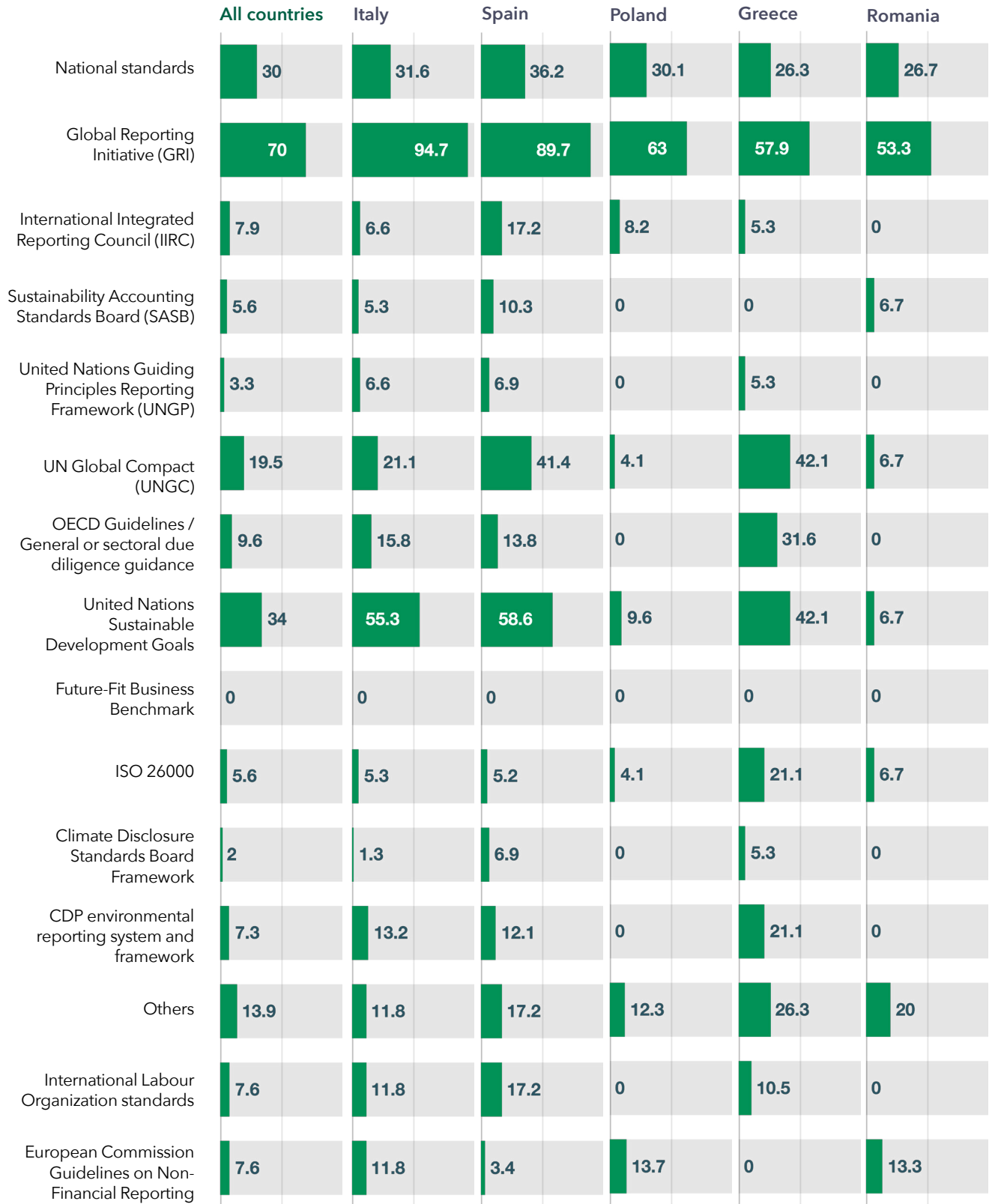
NATIONAL AND INTERNATIONAL FRAMEWORKS

The EU NFRD requires that companies disclose which national, EU or international frameworks they relied on in preparing their disclosures.

The only framework relied on by a majority of companies are the standards of the Global Reporting Initiative (70%), followed by the United Nations Sustainable Development Goals (34%) and the UN Global Compact (19.5%). The declared reliance on these standards, however, does not translate into disclosure of information examined in our assessment presented in the following sections.

No other standards (except for broad categories of national and other standards) were identified for more than 10% of companies. Among other things, this indicates a low level of awareness concerning the standards for human rights and environmental due diligence provided in the UN Guiding Principles for Business and Human Rights (3.3%) and relevant OECD standards (9.6%)

Non-financial statement specifies that it relies on:





Strategic perspective

1 out of 10

disclose specific sustainability matters addressed by the Board

40%

mention risks to their business model related to climate change

Read the following section for more results and key findings →

BUSINESS MODEL DESCRIPTION

In accordance with the [EU NFR Directive](#), companies should disclose a brief description of their business model which should help to understand the company's development, performance, position and impact of its activity in relation to environmental matters.

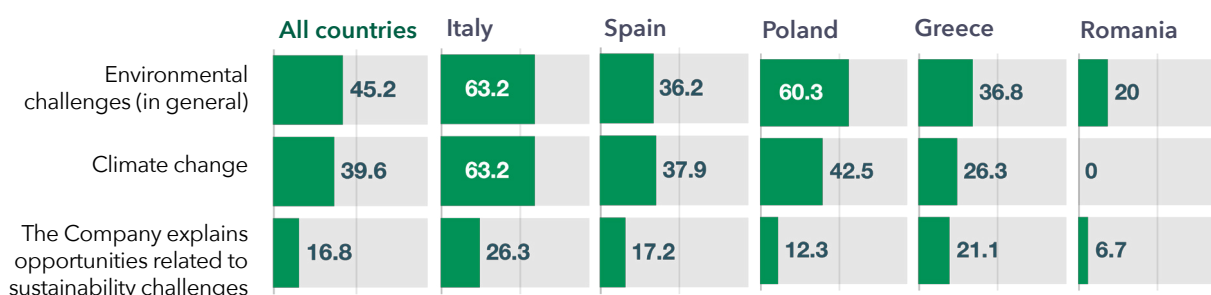
In this context, we examined whether companies describe risks in relation to the environment in general and climate change specifically that could have an influence on their business models, commercial strategies and financial planning. We also assessed whether companies explain strategic opportunities related to sustainability challenges. Please note that other qualitative aspects of disclosure of risks, including specificity, scope and management, were analysed separately in the thematic sections below. In this section, we focus merely on whether companies reflect on the risks from a strategic perspective, irrespective of the quality of such analysis.

Companies indicated risks that may affect their business model slightly more often in relation to other environmental matters than climate change. 45.2% companies disclose environmental challenges for their business strategies; the results vary from 33.3% in the Transportation sector to 61.5% in the Food & Beverages industry.

Risks to the business model related to climate change are explained by 39.6% of companies. The least reporting sector is Transportation (18.2%) while most companies reporting on this were identified in the Energy and Resource Extraction sector (55.4%). Financials disclose climate-related challenges for their business strategy in 35.2% of cases.

Business opportunities related to sustainability challenges were explained by 16.8% of companies. Similarly to climate risks, Transportation is the least reporting sector with 6.1% of companies and the Energy the most, with 29.7%.

The company describes risks that may affect the company's business model, strategy and financial planning



GOVERNANCE

The EU NFRD does not explicitly require any governance-related disclosures, however the majority of international reporting frameworks recommend this kind of disclosure.

We examined companies' non-financial reports for four governance-related criteria. We asked whether executive management's compensation is affected by ESG targets.

We also evaluated if the workforce or its representatives are reported to be included in setting the corporation's sustainability strategy. This criterion did not concern general information on workforce representation in the governance, nor on consultation if no other details and steps were described.

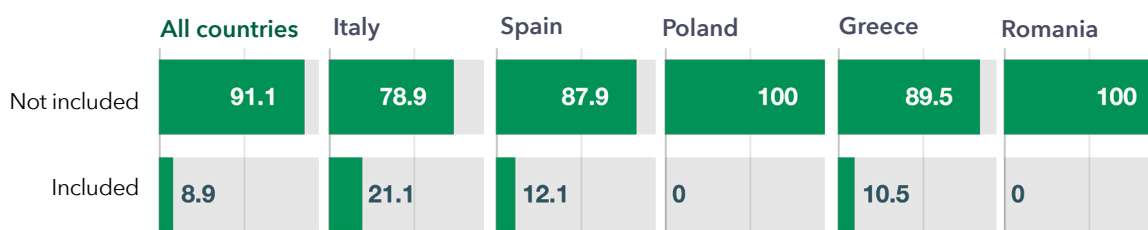
Moreover, we assessed whether companies describe any formal governance arrangements (such as an independent committee) to support sustainability and provide feedback to the board of directors.

Lastly, we looked for descriptions of sustainability matters that were addressed by the board in the reporting period.

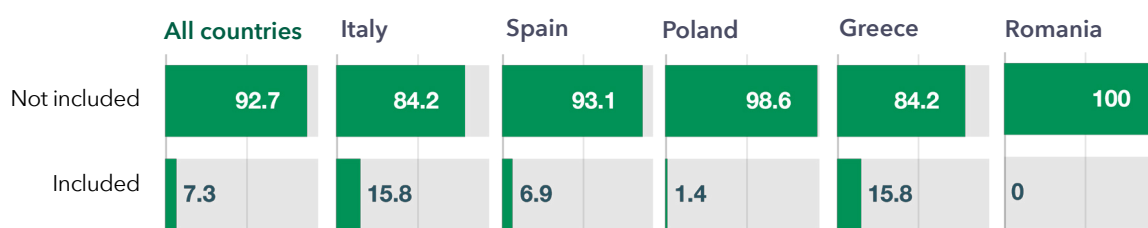
Corporate governance arrangements to support sustainability were disclosed by companies the most often, that is in 35.3% of the cases.

Other criteria - all of them concern practical implementation rather than a formal structure - were reported significantly less often: 7.3% for strategic workforce engagement, 8.9% for integration of sustainability KPIs in executive compensation and 10.6% for sustainability issues addressed by the board in the previous year. In all cases, a vast majority of the companies disclosing this type of information were from Italy and Spain.

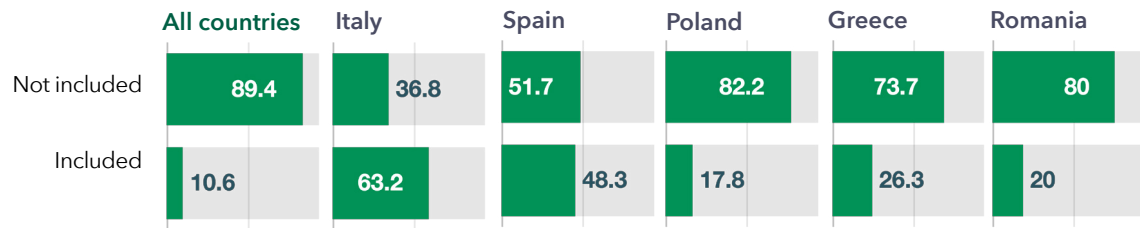
Description of how executive compensation is affected by their performance against ESG criteria



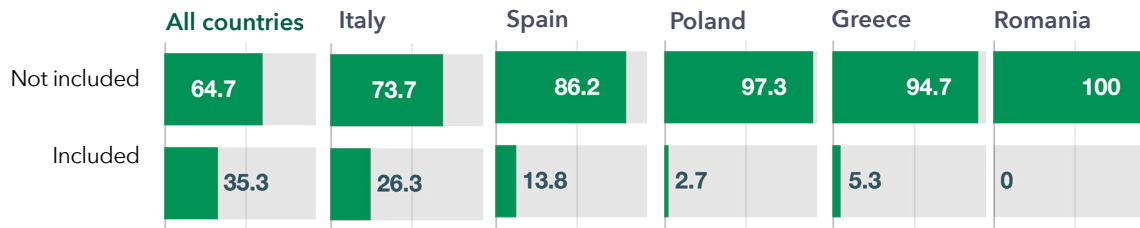
Information on engagement of workforce representatives in setting sustainability strategy



Description of corporate governance arrangements to support sustainability



Identification of sustainability matters addressed by the Board in the previous year and decisions





Climate change

16%

explain alignment with science-based targets (41% in the case of Spanish companies)

32%

describe specific risks (but only 6.6% use below 2°C scenario in their risk assessment)

Read the following section for more results and key findings →

CLIMATE-RELATED DISCLOSURES

The methodology we adopted to assess corporate climate-related disclosure was developed by taking into account established reporting standards, frameworks and principles including [GRI](#), [SASB](#), [CDP](#) and [CDSB](#), as well as the requirements of the [EU NFR Directive](#) and the [European Commission's non-binding guidelines on climate-related reporting](#). The latter were released in June 2019 to provide companies with recommendations on how to better report the impact of their activities on climate, while also ensuring meaningful disclosure concerning climate change impact on business. Such guidelines integrate the recommendations of the [Financial Stability Board's Task-Force on Climate-related Financial Disclosures \(TCFD\)](#), whose focus is on the financial materiality of climate change (namely, the impact of climate on business). In addition to such a perspective, the European Commission's guidelines provide support on how to disclose climate-related information which is non-financially material (impact of business activities on climate).

POLICIES & PROCEDURES

Firstly, we present the results of whether and to what extent companies report on climate-related policies. A description of the policies pursued by the undertaking with respect to relevant sustainability matters is one of the primary requirements of the EU NFRD. Climate change is generally understood as a material topic for all the sectors included in this research. We examined whether companies publish any policy at all and then whether the disclosure is vague or specific enough in terms of describing concrete issues and objectives necessary to understand the company's position and future development.

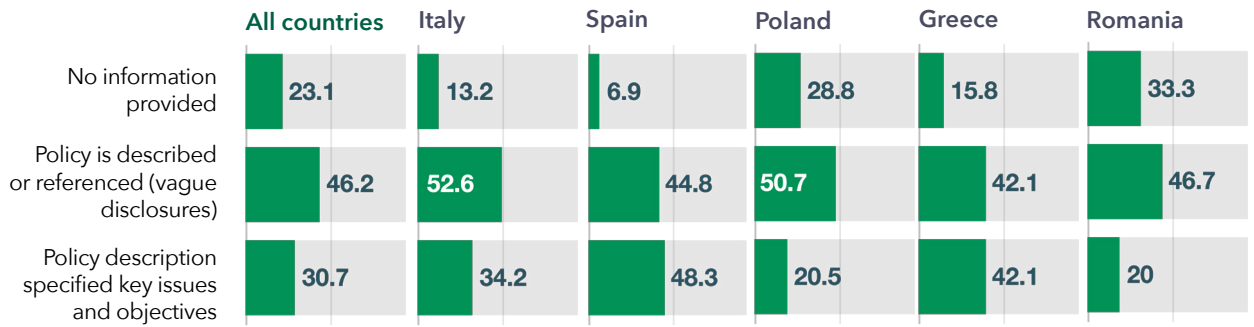
Specific policies are understood as those that clearly identify concrete climate-related issues, their purpose and objectives, including steps the company has already taken to achieve its objectives. Vague disclosures inform the reader about the company's approach to climate change mitigation and contain only fragmented details on the focus of such policies, their rationale and associated goals. Missing and vague disclosures prevail over specific disclosures and constitute more than 2/3 of the results.

In former communist countries there is a high share of companies that don't disclose any relevant policy information, ranging between 28.8% in Poland and 75% in Bulgaria, whereas in the Mediterranean region this share is between 6.9% in Spain and 15.8% in Greece. The EU NFRD includes an option for companies that don't pursue policies in relation to topics that are deemed material to provide a clear and reasoned explanation for not doing so. However, only one out of the 37 companies that didn't disclose their policy on climate provided such an explanation.

Detailed reporting of concrete issues and objectives addressed by companies' climate policies is more common in Spain and Italy (48.3% and 34.2% respectively), and in the Czech Republic with 36.4%. The interpretation of the Czech results is not straightforward, however, because the sample includes only 11 Czech companies, and the share of companies that provided specific policy disclosures is the same as those that didn't provide any.

The findings thus show a major gap in the implementation of the EU NFRD in this area. In no country does a majority of companies provide decision-useful information on their climate policies. The results in Spain and Italy, however, provide evidence that it is possible.

How well is the policy communicated?

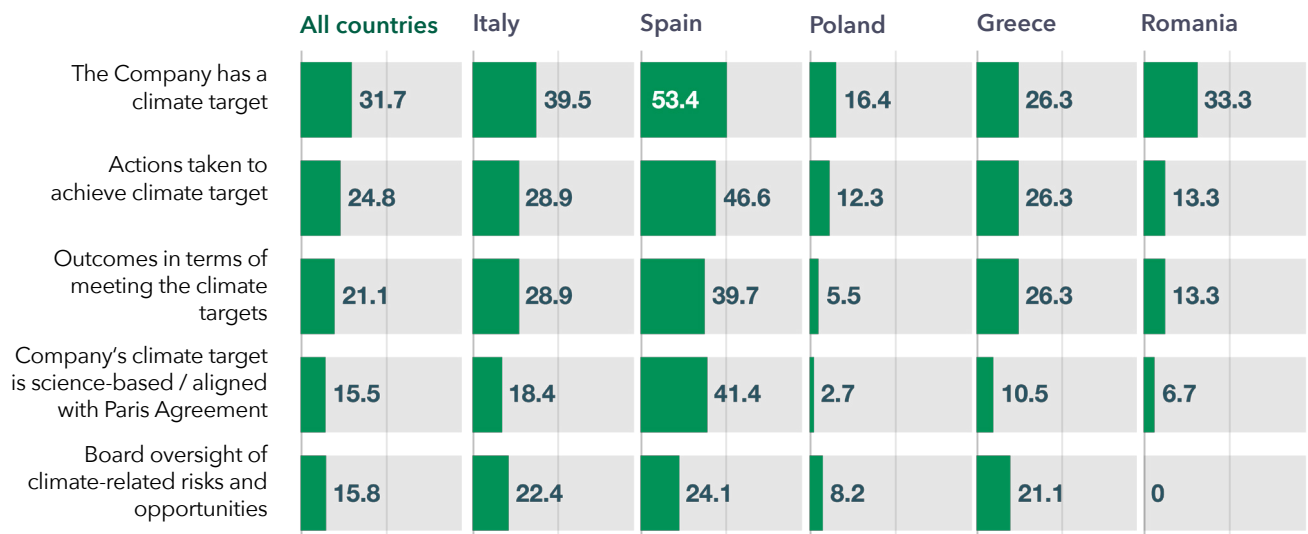


In addition to research on specificity of climate change policies, we asked for more detailed qualitative criteria regarding the disclosure of companies' climate change mitigation targets linked to primary impacts. For example, for an Energy company such a target should concern the strategic decarbonisation of the energy or resources it produces, while for a Financial company it should be related to its investment or lending activities. Disclosure of forward-looking information, particularly climate targets, is important to understand the ambition of a company, as well as its exposure to risks in the context of the policy goals to decarbonise the European economy. As such, the disclosure of climate targets is recommended in the European Commission Guidelines on Climate-Related Reporting, as well as in SASB standards, that outline which information is considered as financially material from the perspective of investors.

Approximately 1/3 of companies reported a climate change mitigation target. This is particularly important in the Energy sector, in which such type of disclosure is indeed more common than in other industries, yet is only reported by less than half of all Energy companies (45.9%).

Information on the alignment of targets with the [Paris Agreement](#) or [science-based targets](#) is disclosed by only half of the companies that do disclose a climate target (15.5% cross-sectorally and 24.3% in the Energy sector).

Differences between individual countries correspond to the findings on general policy disclosures. Almost half of the companies reporting on the alignment of their climate targets with the Paris Agreement or science-based targets are concentrated in one country only - Spain. Out of 74 Energy companies analysed in total, 18 companies report on these issues and 8 of them are located in Spain (that is 1/2 of all Spanish Energy companies).



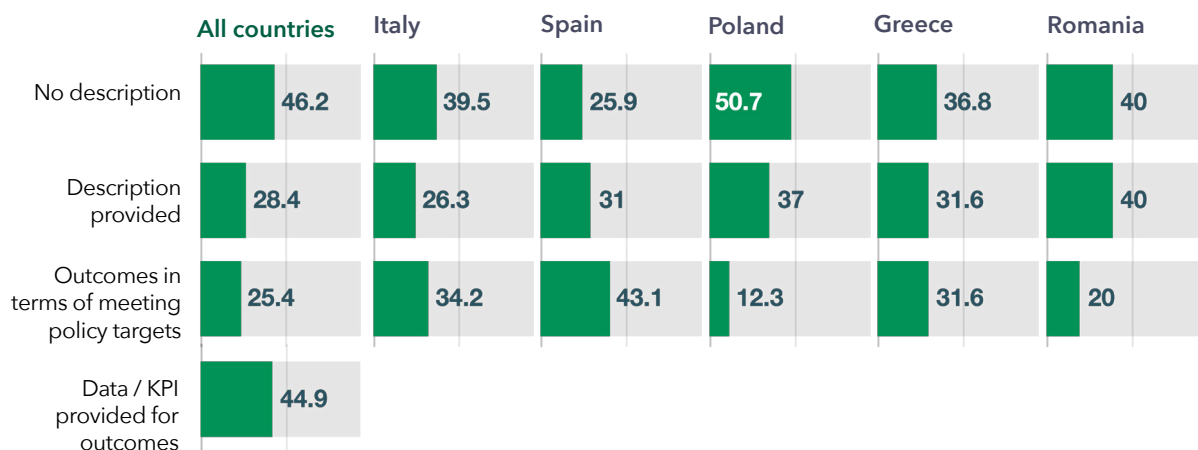
OUTCOMES

The EU NFRD explicitly requires that companies disclose outcomes of the policies which they pursue and describe in their non-financial statements. Disclosure of outcomes of climate-related policies enables readers to understand companies' performance and development.

While ½ of all companies disclose some policy outcomes (53.8%), only 1/4 describe them in terms of meeting the policy targets (25.4%). Please note that for the purpose of this assessment, the methodology didn't require policy targets to be related to the company's main climate impact, as was the case in the examination of climate targets and their alignment with the Paris agreement above. Any policy target or objective was taken into account provided it was specific enough to enable reporting on outcomes.

It is useful to compare these results with companies' policy disclosures. While 23.1% of companies didn't provide any information on policy, this number rises to 46.2% for outcomes. The results for specific policy disclosures remain coherent with the share of companies describing outcomes measured against policy objectives. These results drop only modestly from 30.7% to 25.4% (the drop was relatively higher for Greek, Hungarian, Czech and Polish companies). This suggests that disclosure of specific policy targets is strongly indicative of the overall quality of corporate non-financial reporting.

Outcomes description



RISKS

In addition to policies and their outcomes, the EU NFRD also requires companies to include information on their principal risks related to the same matters. All sectors included in the research face climate risks of transitional or physical nature.

Similarly to policies, we examined the quality of information on climate-related risks and impacts. That includes evaluation of the specificity of the risks statement in general, as well as more detailed qualitative criteria based on the TCFD recommendations. When companies mentioned the involvement of climate-related risks in the scope of their operations without disclosing specific concerns, we evaluated such cases as vague risk disclosures. Companies were evaluated as describing 'specific risks' when explaining concrete risks and plans to manage or mitigate them. These disclosures often contained detailed information such as different time horizons, breakdown of risks per country or description of climate-related scenarios used for risk assessment.

42.2% of companies don't disclose any relevant information on risks, which is significantly more than the 23.1% of companies that don't disclose any information on policies. While we did assess the disclosures of companies that are not exposed to major climate risks despite belonging to high-risk

sectors (for example producers of renewable energy), the disclosure of policies should be closely aligned with the existence and description of risks.

The share of companies that provide specific description of risks in general (31.7%) corresponds with the share of companies that provide specific policy disclosures (30.7%). In most countries, slightly more companies provide specific information on policies than on risks, with an exception of Italy, where over half of companies (53.9%) describe specific risks, whereas only 1/3 (34.2%) report on specific policy issues and objectives, which accounts for the difference in the general results above. This suggests a specific reporting culture in Italy. A detailed description of risks does not automatically imply a need for comprehensive policies, but such a large gap is indicative of potential problems with the integration of the findings of a company's risk assessment in corporate strategy. It is worth noting that the percentage of Italian companies providing non-financial information outside of the annual report is above average (77.6% vs. 51.2%).

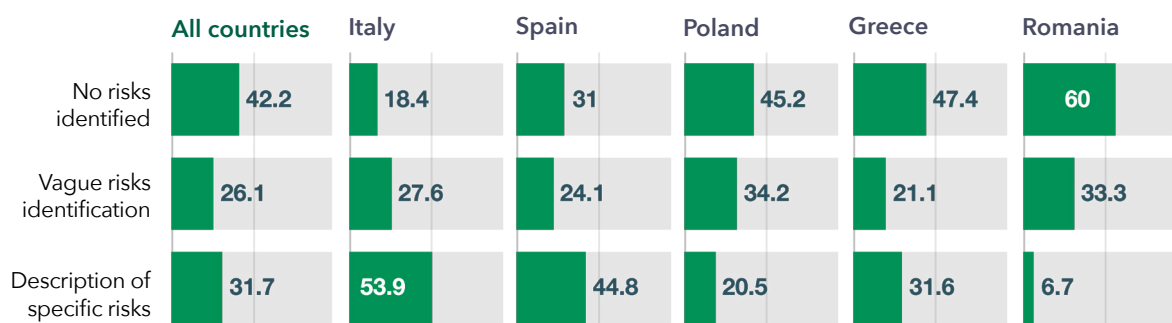
Clear information on the management of identified risks is provided on average by 17.8% of the companies, which corresponds to slightly more than half of the companies disclosing specific risks (typically companies that provide information on the management of risks also provide description of specific risks, but it is not an absolute rule).

The TCFD recommendations for climate risk reporting are applied unevenly by companies. Between 20-30% of companies address physical risks, transition risks and the effects of risks & opportunities on their business model. However, the forward-looking information recommended by the TCFD is reported by a much smaller share of companies. Information on short as well as long-term horizons is provided by only 8.9% of companies, and the use of a below 2 degrees Celsius global warming scenario in corporate risk assessments is confirmed by only 6.6% of companies; predominantly in Spain and Italy, with some additional good practice examples in Poland, Romania and Greece.

Please note that two Financial corporations in Slovakia (i.e. 1/4 of all Slovakian companies included in the research) refer to non-financial statements of their parent companies (ie. multinational Financial corporations), which resulted in some of the TCFD recommendations being met in Slovakia too. This does not necessarily reflect the actual approach of these subsidiaries to climate-related risk management nor the level of climate risk reporting in Slovakia.

The above-mentioned findings indicate a high level of detachment of climate-related risks, policies and outcomes. They also confirm the problem of lack of specific forward looking information, which is even more profound for risks than for policies and targets.

Statement of risks



	All countries	Italy	Spain	Poland	Greece	Romania
Risks & opportunities are provided for each time horizon	8.9	11.8	17.2	6.8	0	6.7
Physical risks are addressed	28.1	50	36.2	19.2	21.1	6.7
Transition to a low-carbon economy risks are addressed	25.4	36.8	39.7	19.2	15.8	20
Effects of risks & opportunities on business model	21.8	30.3	37.9	16.4	15.8	6.7
Clear management approach for the identified risks and impacts	17.8	35.5	24.1	6.8	15.8	6.7
Risk assessments uses climate-related scenarios incl 1.5°C/below 2°C	6.6	9.2	13.8	4.1	5.3	6.7
Breakdown of risks by activity or region	2	3.9	1.7	1.4	5.3	0

Financial sector

The specific criteria for risk reporting by financial companies concerning their investment, lending, insurance and asset management activities are based on the European Commission Guidance for Climate-Related Reporting. The Guidance includes a more extensive list and more detailed criteria than those included in the assessment at hand. For the purpose of this research, the criteria were formulated in more general terms in order to capture any relevant information provided by financial companies in this area.

Nevertheless, only 8 out of 91 financial companies included in the research report on any of the listed issues, of which 3 were Spanish, 3 Italian, 1 Greek and 1 Croatian. This is concerning for several reasons. Firstly, financial companies play a critical role in ensuring financing for the climate transition. Secondly, they are highly exposed to financial risks linked to the transition². Thirdly, starting in 2021, they will be subject to the disclosure requirements as regards their investment products, provided by the EU Taxonomy Regulation (December) and Disclosure Regulation (March).

	All countries	Italy	Spain	Poland	Greece	Romania
Amount or % of carbon assets per portfolio	3.3	0	11.8	0	16.7	0
Degree of alignment of the different portfolios against the Paris Agreement	1.1	0	5.9	0	0	0
How risk management processes (incl. internal stress testing) consider climate risks	7.7	15	11.8	0	16.7	0

² ESAS' [Joint Committee Report on Risks and Vulnerabilities in the EU Financial System - Autumn 2019](#)

KEY PERFORMANCE INDICATORS

In accordance with the EU NFRD, all companies should report KPIs relevant to their business.

Results for disclosure of Scope 1 GHG emissions are provided for all sectors excluding Finance. Taking into account that not all companies in these sectors necessarily produce GHG emissions directly, the results for Scope 1 GHG emissions (65.1%) show relatively satisfactory practice. Scope 2 GHG emissions represent the main impact for most companies. In this light, the fact that only 1/2 (51.9%) of companies disclose Scope 2 emissions is concerning. The main impact of Energy producers is represented by their Scope 1 emissions, therefore their inclusion in the Scope 2 overview may skew the results. Nevertheless, even by excluding all Energy companies (that is, Energy producers and all other energy-related companies), only 50.7% of the remaining companies disclose their Scope 2 emissions.

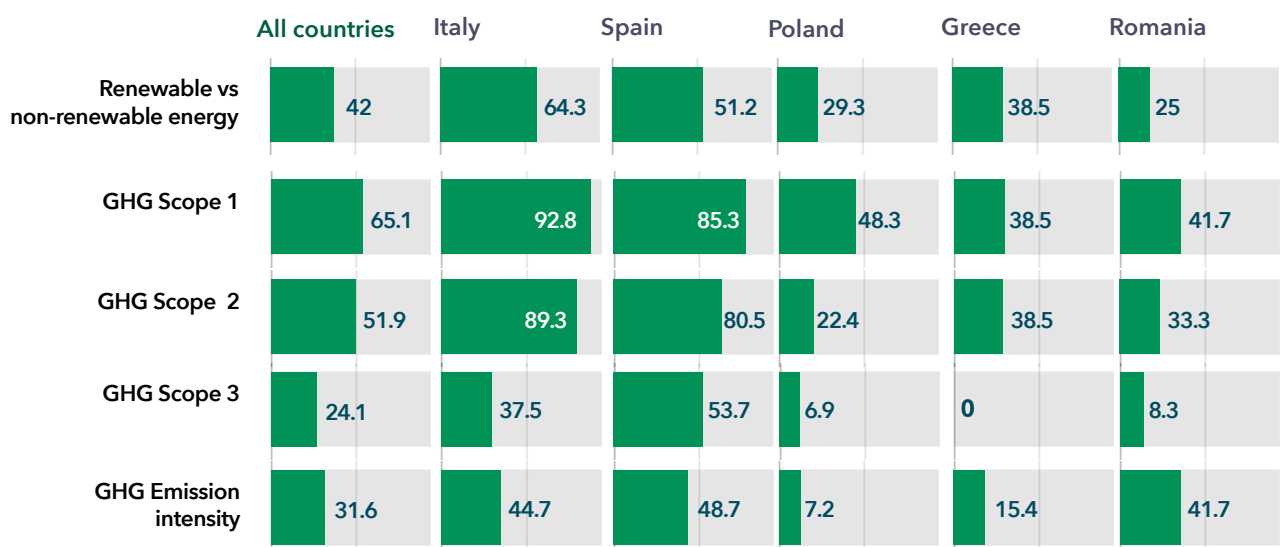
For Scope 3 GHG emissions numbers drop down to 1/4 of companies (24.1%). Reporting is not common even in the high-impact Food & Beverages sector (23.1%); moreover, no company sets a reduction target for this scope.

GHG emission intensity is in principle relevant for all sectors, except for Finance where its application is problematic due to methodological reasons and challenges in gathering reliable data. However, as the results show, less than 1/3 (31.6%) of companies from the remaining sectors disclose such metrics.

In terms of renewable vs. non-renewable energy, we analysed whether companies provide such an indication for either energy consumption or production. In this way, this criterion is relevant for all companies operating in selected sectors (excluding Finance); yet, less than 1/2 of them disclosed relevant KPIs (42%).

Spanish and Italian companies are significantly more likely to report all of the above KPIs. It is reasonable to assume that for these countries disclosing Scope 1 and 2 emissions is nearly universal when material; however, reporting on Scope 3 emissions and GHG intensity is done by 1/2 or fewer companies. The results for companies from all other countries are far below the averages summarised above.

KPI aggregated and/or disaggregated



Aggregated data for all sectors except Finance



Environmental issues

70%

don't provide any information on biodiversity

6 out of 10

report on use of water (but less than 10% disclose risks to local water stress)

55%

disclose a policy on pollution (only 7 % describe quantitative targets)

Read the following section for more results and key findings →

USE OF NATURAL RESOURCES

As well as for climate change, the [EU NFR Directive](#) requires reporting on policies and their outcomes, risks and KPIs for any other environmental issue identified by a company as material.

Below, we present the analysis of disclosures with respect to the three main environmental impact areas linked to the sectors included in this research: use of natural resources, pollution and biodiversity.

For each issue, we examined several additional qualitative aspects, in particular concerning the use of specific KPIs, based on the recommendations provided in the [European Commission's Guidelines on non-financial reporting](#), [GRI](#), [CDP](#) and [SASB](#) standards.

However, unlike climate change, not all matters and their specifics have the same relevance for all sectors included in the research. Therefore, in the interpretation of the data, we focus primarily on the analysis of quality and disclosure coherence, such as specificity of companies' policies, their correlation with the identification of principal risks and the use of corresponding KPIs.

POLICIES & PROCEDURES

Similarly as in the climate change section, we assessed the specificity of the corporate policies regarding the use of water, land or materials, and then asked about more detailed quality disclosures.

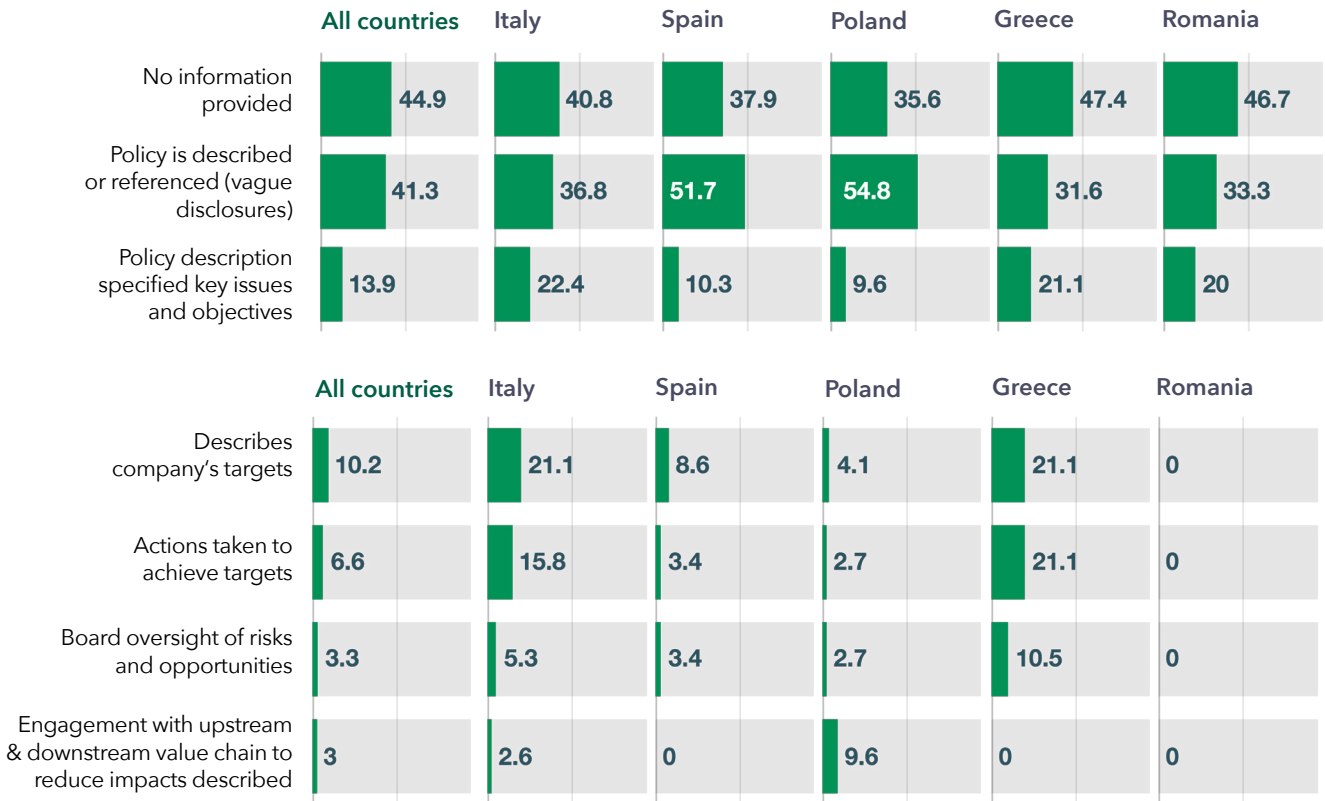
Specific policies are understood as those that clearly identify concrete issues, their purpose and objectives, including steps the company has already taken to achieve such objectives. Vague disclosures inform the reader about the company's approach to natural resources and contain fragmented information on the focus of such policies, their rationale and associated goals. For companies from the finance sector, the assessment methodology considered information related to these companies' investment, lending, and insurance policies.

The key finding in this area is that while 55.2% of companies describe policies on the use of natural resources, and an additional 12.5% provide explanations of why they don't have any policies, only 13.9% specify key issues and objectives and an even lower 10.2% report on quantitative targets. The majority of these companies are Italian and Spanish (21 out of 31 companies reporting on targets). Other qualitative criteria on implementation of these policies are reported by an even lower number of companies.

It is also worth noting that figures for specific policy disclosures and targets in the Food & Beverages sector, which is particularly exposed to risks linked to water scarcity and use of commodities from global value chains, are below the average (7.7% and 3.8% respectively).

These results suggest that the vast majority of companies reporting on the use of natural resources provide either incomplete or immaterial information.

How well is the policy communicated?



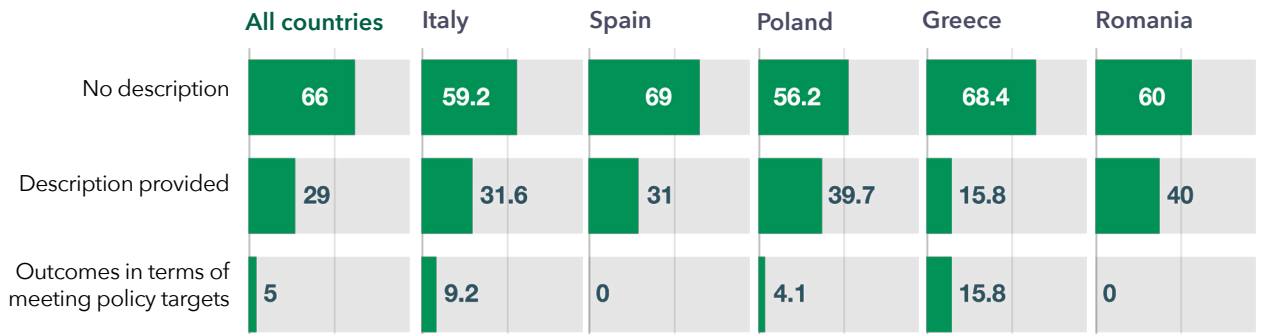
OUTCOMES

The EU NFRD additionally requires companies to disclose policy outcomes, to allow stakeholders to assess the effectiveness of a company's policy. We evaluated whether any outcomes were mentioned in the reports we assessed and whether they were presented for the explicit targets set by the company's policy.

While policies were disclosed by more than 1/2 (55.2%) of the companies, outcomes of any kind were presented by 1/3 (34%) only. Similarly, less than 1/2 of the companies disclosing concrete policy targets (10.2%) also report on outcomes in terms of meeting them (5%).

These results show that companies do not disclose policies and outcomes in an interconnected way.

Outcomes description



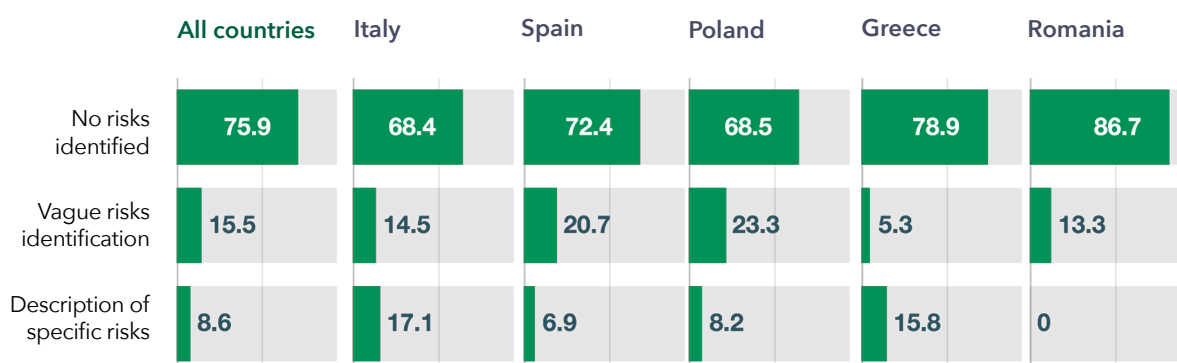
RISKS

In accordance with the EU NFRD requirements, companies should also describe principal risks and impacts for the environmental issues they report on. In fact, this analysis should be the starting point for the determination of materiality of reporting on a given issue.

When companies mentioned that there are risks or impacts involved in their scope of operations without disclosing specific concerns, we evaluated such cases as vague risk disclosures. The option 'description of specific risks' was selected when companies explained concrete risks and plans to manage or mitigate them. We further examined whether such disclosures contained detailed information on the nature of the risk (eg. their effects on the environment and on the company's business model or where the risks occur) and the way they are managed.

Only one quarter (24.1%) of companies report on risks related to use of natural resources which stands in contrast to more than half of companies describing their policies (55.2%). Specific risk disclosures were provided by 8.6% companies, which is relatively close to the percentage of entities explaining detailed policies (13.9%).

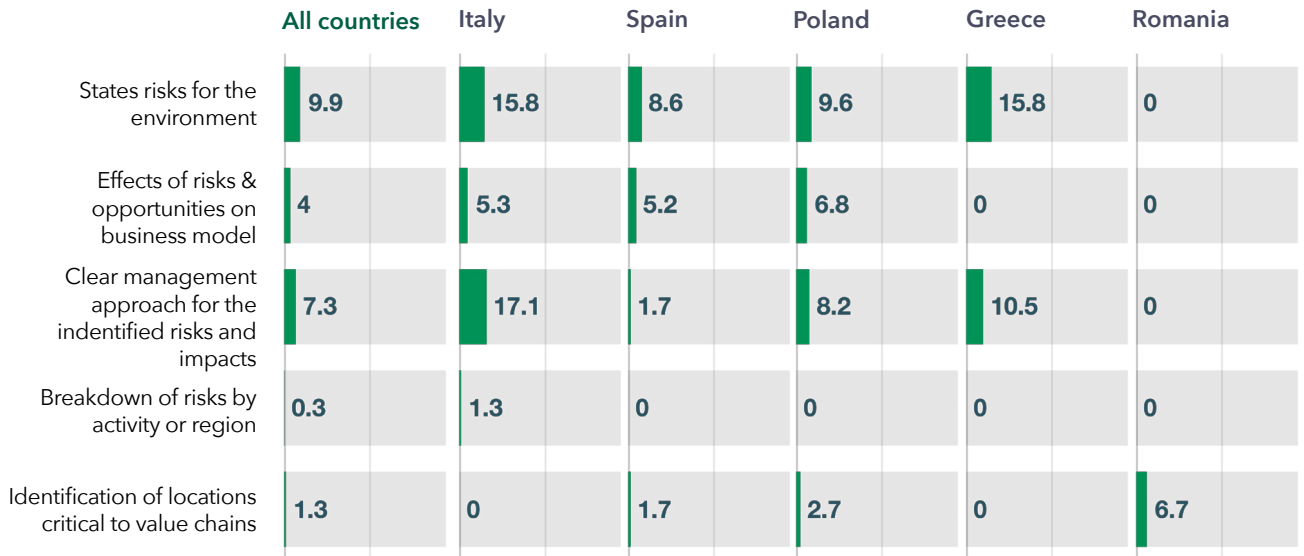
Statement of risks



Specific disclosures as well as detailed criteria were disclosed by companies operating in the Energy, Resource Transformation and Infrastructure sectors more often than those operating in other industries. The Food & Beverages sector lags behind, despite arguably being exposed to the highest risks. Only 11.5% companies in this sector identify any risks for the environment and 3.8% (ie. 1 out of 26) companies describe specific risks.

Surprisingly, risks are broken down for different operations and regions by just 1 Italian Energy entity out of all 303 companies. Very few companies (4 out of all 304) provide information on critical locations on supply chains, despite the fact that the EU NFRD requires an analysis of supply chains where appropriate. This suggests that companies included in the research do not include the use of natural resources in their supply chain due diligence, or that they do not carry out such due diligence at all.

These figures are lower than the results of the assessment of climate-related disclosures, but more importantly they show that only a small minority of companies' policy disclosures concerning use of natural resources are substantiated by a sufficiently specific description of risks and impacts.



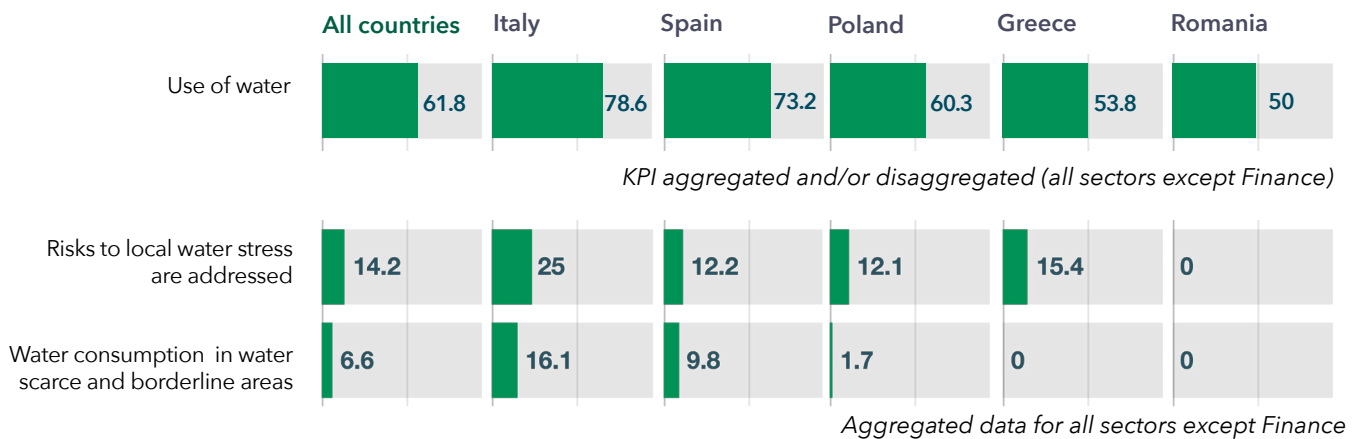
KEY PERFORMANCE INDICATORS

The EU NFRD also asks companies to disclose KPIs relevant to the business. Existing reporting standards suggest a number of such KPIs, but their relevance typically depends on the company's business model and operational context.

We specifically examined whether companies disclose data on use of water because it is the most universally applicable KPI in this area; additionally, because in principle it is relevant for all sectors included in the research except for Finance, which is excluded from the results.

The majority of corporations assessed disclose data for the use of water (61.8%), however more detailed information is rarely reported. KPIs disaggregated per country were provided by 2.8% of companies. 14.2% of companies disclose this KPI in the context of risks to local water stress; almost 1/2 of these companies are from Italy (14 out of 30). Quantitative data on the consumption of water in water scarce and borderline areas was disclosed by 6.6% of companies (9 out of 14 companies were Italian).

The lack of substantial information on water stress and scarcity, that is, on the local sustainability context, puts the value of reporting on the use of water in question.



POLLUTING DISCHARGES

POLICIES AND PROCEDURES

Similarly as in other sections, we assessed the specificity of company policies on pollution, as well as disclosure of more specific qualitative aspects.

Specific policies are understood as those that clearly identify concrete issues, their purpose and objectives, including steps the company has already taken to achieve them. Vague disclosures are considered as those that inform the reader about the company's approach to pollution prevention and control, and contain fragmented information on the focus of such policies, their rationale and associated goals. For companies from the finance sector, the assessment methodology considered information related to these companies' investment, lending, and insurance policies.

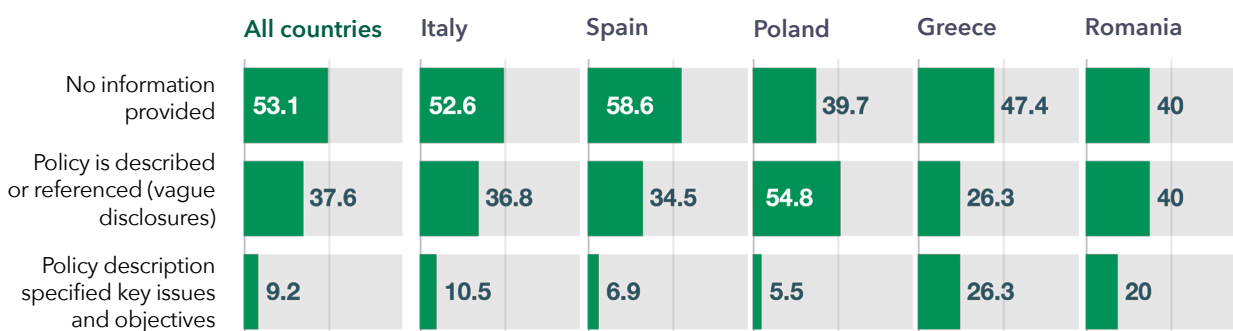
The assessment of specificity of disclosure is further determined by the company's approach to the matter from an operational or strategic perspective. In the area of pollution, companies' disclosures often focus on the operational perspective, whereas the [EU NFR Directive](#) requirements are focused on disclosure of material information based on the assessment of impacts and principal risks.

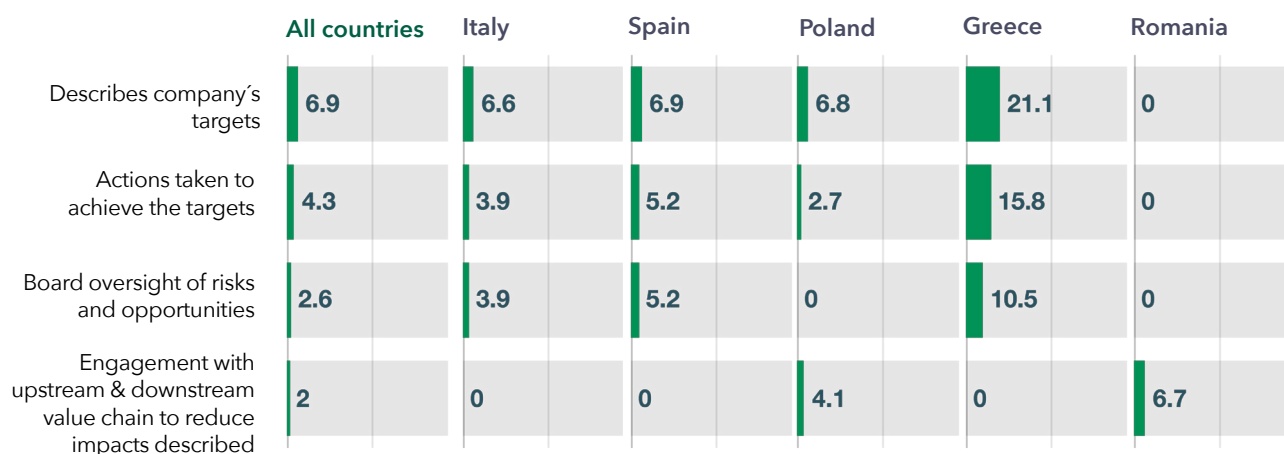
Our results show that pollution is considered material by fewer companies than is the case for climate change or use of natural resources. 46.9% companies describe related policies and of the companies that do not mention pollution at all, only 8.2% explain why.

Policies explaining key issues and objectives are communicated in only 9.2% cases, with 6.9% disclosing quantitative targets. This information is provided by Greek companies more often than others (26.3% and 21.1% respectively). It is worth mentioning that most of the analysed companies operate in high-risk sectors, namely Energy, Resource Transformation, Infrastructure, Transportation; the Finance sector is connected to this issue through investment, insurance and lending. While pollution is not necessarily material for all companies in these sectors, for most it probably is.

The principal finding of the assessment of companies' policies on pollution prevention and control is that a vast majority of them are not specific enough to be useful to users of reports.

How well is the policy communicated?





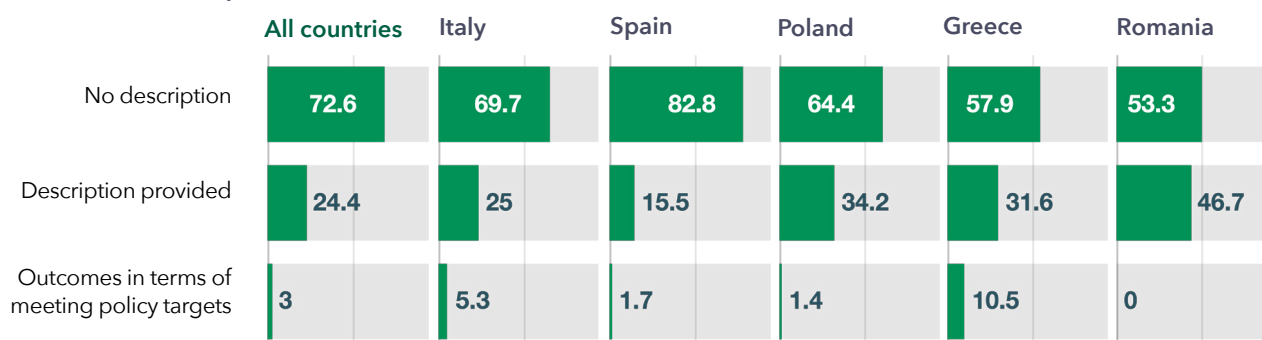
OUTCOMES

In accordance with the EU NFRD, companies considering pollution as a material issue should, in addition to policies, also report on their outcomes.

We examined whether such outcomes were reported at all and whether they were presented specifically for the explicit targets set by the company's policy. Policy outcomes were generally described in 24.4% cases, which is approximately 1/2 of the companies disclosing any policies for pollution control (46.9%). Similarly, 1/2 of entities describing quantitative targets (6.9%) also disclose outcomes in terms of meeting such targets (3%).

The key finding is that, as was the case for the use of natural resources, outcomes are reported by only 1/2 of the companies disclosing their policies.

Outcomes description



RISKS

In accordance with the EU NFRD requirements, companies should also describe principal risks and impacts for the environmental issues they report on.

When companies mentioned that there are risks or impacts involved in their scope of operations without disclosing specific concerns, we evaluated such cases as vague risk disclosures. The option 'description of specific risks' was selected when companies explained concrete risks and plans to manage or mitigate them. We further examined whether such disclosures contained detailed

information on the nature of the risk (eg. their effects on the environment and on the company's business model or where the risks occur) and the way they are managed.

Risks in relation to pollution were identified by 30.4% of companies which stands in contrast to the 46.9% of companies that disclose policies in this area.

Only 9.2% of companies described risks in a specific way. This result corresponds to specific policy disclosures in this area (also 9.2%). For the sake of comparison, it is also worth noting that this is similar to the number of companies disclosing specific risks identified for the use of natural resources (8.6%); however, these two samples do not include the same companies.

Most of the companies included in the research operate in high-impact industries when it comes to pollution, while the finance sector is connected to such industries via investment, lending or insurance activities. It can be reasonably expected that a significant share of the companies needs to explain what specific risks they face or explain that they don't, which would qualify as specific disclosure according to our methodology.

Results for other qualitative criteria remain similarly low. Breakdown of risks of pollution discharges by activity or region was disclosed by only 2 companies from Italy and Poland. No company identified critical locations in supply chains, despite the fact that the EU NFRD requires an analysis of supply chains where appropriate, which suggests that companies included in the research do not incorporate this issue in their supply chain due diligence, or do not carry out such due diligence at all.

Statement of risks

	All countries	Italy	Spain	Poland	Greece	Romania
No risks identified	69.6	67.1	84.5	49.3	68.4	60
Vague risks identification	21.1	19.7	13.8	34.2	15.8	33.3
Description of specific risks	9.2	13.2	1.7	16.4	15.8	6.7
States risks for the environment	16.2	15.8	3.4	27.4	31.6	13.3
Effects of risks & opportunities on business model	3	3.9	1.7	4.1	5.3	6.7
Clear management approach for the identified risks and impacts	7.3	7.9	3.4	13.7	15.8	6.7
Breakdown of risks by activity or region	0.7	1.3	0	1.4	0	0
Identification of locations critical to value chains	0	0	0	0	0	0

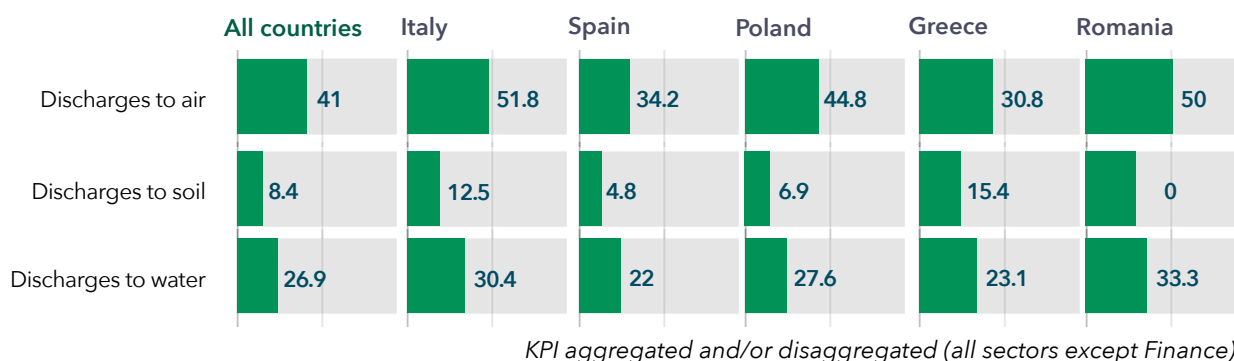
KEY PERFORMANCE INDICATORS

Pursuant to the EU NFRD, companies are requested to report on relevant non-financial KPIs. In relation to pollution, our assessment methodology includes KPIs on discharges to air, water and soil. Financial companies, for which pollution KPIs are not so relevant, are excluded from the comparison; the data are presented for all other sectors together.

Discharges to air include any emission other than greenhouse gases. They are reported in quantitative terms by 41% of companies, which suggests a strong overlap with companies disclosing policies on pollution (46.9%; however, this figure includes Finance companies). The gap between these figures and the number of companies disclosing specific risks further suggests that the majority of companies making these disclosures do not do so based on the assessment of their materiality. Notably, only 3 companies from Italy and Spain provide the data disaggregated per country, even though materiality of information on pollution depends largely on the local sustainability context.

Effluents to water are reported by 26.9% corporations from selected sectors. Energy and resource extraction discloses the data twice as often as other industries (40.5%) while companies from the Transportation sector are those reporting on this the least (15.2%).

When it comes to soil contamination, only 8.4% of companies disclose relevant KPIs. The the highest percentage of companies disclosing relevant KPIs was identified in the Energy sector, where such type of information is generally deemed as material in the case of energy producing and resource extraction companies; yet, despite being the highest scoring sector, only 14.9% of corporations disclose relevant KPIs. It is worth noting that the materiality of the data on soil contamination in other sectors depends on individual company operational contexts.



BIODIVERSITY AND ECOSYSTEM CONSERVATION

POLICIES AND PROCEDURES

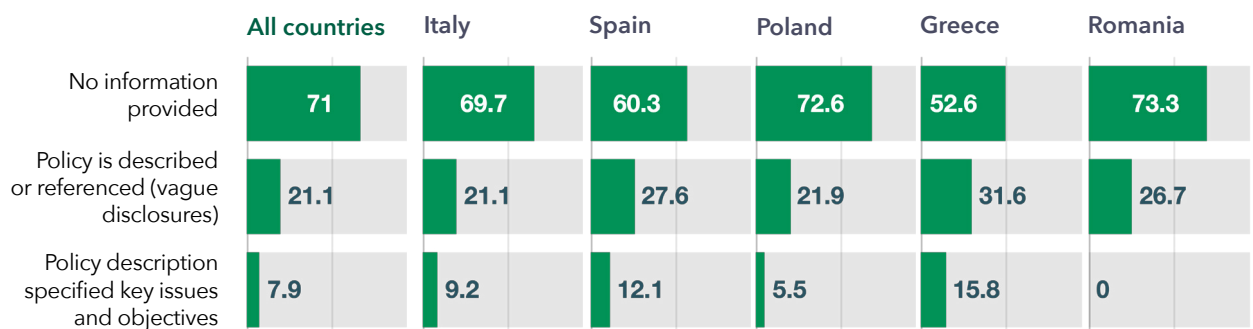
As in the case of other environmental issues, we assessed the specificity of company biodiversity policies, and further looked into how companies report on more detailed qualitative disclosures. Specific policies are understood as those that clearly identify concrete issues, their purpose and objectives including steps the company has already taken. Disclosures were considered vague when informing the reader about the company's approach to biodiversity and containing rather fragmented information on the focus of such policies, their rationale and associated goals. For companies from the finance sector, the assessment methodology considered information related to these companies' investment, lending, and insurance policies.

The results show that companies report on biodiversity less often than other thematic areas included in the research. 29% of companies describe policies on biodiversity and only an additional 6% explain why. Key issues and objectives are specified by 7.9% companies and 6.9% describe quantitative targets. The interpretation of these results is more complicated than in other environmental areas. The fact that only a minority of companies have and disclose their biodiversity policies is not necessarily concerning. The materiality of biodiversity issues is highly dependent on the company's operational context. Reporting becomes important if a company operates in or directly next to areas of high biodiversity value (typically protected areas), or if it sources agricultural or forestry commodities which are linked to systemic impacts on biodiversity.

The sectors where these risks are systemic include Infrastructure, Food & Beverages and Finance in the context of investment, insurance or lending activities. Companies from these sectors can be reasonably expected to report on biodiversity, or provide a legitimate explanation on the absence of risks and impacts due to their operational context. The research results show that specific policy disclosures are highest in the Infrastructure sector (18.4%) and lowest when it comes to Financials (1.1%), while Food & Beverages companies describe specific policies in 3.8% cases. An explanation of why policies are not addressed is provided by an additional 7.7%, 5.3% and 8.3% companies operating in these sectors respectively.

These findings indicate a major gap in practice in these sectors. Even if not all companies from these sectors are exposed to risks or linked to impacts on biodiversity, despite the systemic exposure of the sectors, the results show that many companies do not provide information necessary to understand their position, development, performance and impact.

How well is the policy communicated?



	All countries	Italy	Spain	Poland	Greece	Romania
Describes company's targets	6.9	5.3	10.3	6.8	15.8	0
Company's commitment/target to zero adverse impact on Biodiversity	0.7	0	0	1.4	5.3	0
Actions taken to achieve the targets	5	5.3	8.6	4.1	10.5	0
Board oversight of risks and opportunities	2.3	2.6	3.4	1.4	10.5	0
Engagement with upstream & downstream value chain to reduce impacts described	2	3.9	1.7	1.4	5.3	0

OUTCOMES

In accordance with the [EU NFR Directive](#), companies should, alongside policies, also report on their outcomes. We evaluated whether any outcomes were reported and if they were presented specifically next to explicit targets set by the company's policy.

The results confirm the pattern identified for the other environmental topics. Policy outcomes were disclosed in 13.5% of the cases, which is approximately half of the companies disclosing any policies (29%). Just 2 of the 21 companies describing concrete policy targets also report on outcomes in terms of meeting them.

Similarly as in other sections, these results show a high level of detachment of disclosures of policies and outcomes.

Outcomes description

	All countries	Italy	Spain	Poland	Greece	Romania
No description	86.5	90.8	79.3	86.3	78.9	80
Description provided	12.9	9.2	20.7	12.3	21.1	20
Outcomes in terms of meeting policy targets	0.7	0	0	1.4	0	0

RISKS

Pursuant to the EU NFRD requirements, companies should describe principal risks and impacts for the environmental issues they find material.

When companies mentioned that there are risks or impacts involved in their scope of operations without disclosing specific concerns, we evaluated such cases as vague risk disclosures. The option

'description of specific risks' was selected when companies explained concrete risks and plans to manage or mitigate them. We further examined whether such disclosures contain more detailed information on the nature of the risk (e.g. their effects on the environment and on the company's business model or where the risks occur) and the way they are managed.

20.5% companies identified risks in relation to biodiversity which is slightly more than 2/3 of companies that disclose policies in this area (29%). Specific risk disclosures were provided by 8.6% companies, which is comparable to the 7.9% of entities describing detailed policies and corresponds to the number of companies disclosing specific risks in other thematic areas - use of natural resources and pollution (8.6% and 9.2% respectively).

A vast majority of specific disclosures are addressed by companies operating in the Energy and Infrastructure sectors (23 out of 26 in total). In contrast, only 1 company from the Food & Beverages and 1 company from the Financial sector provided a description of specific risks.

Results for other qualitative criteria are even lower. Only 4 companies identified critical locations in supply chains, despite the fact that the EU NFRD requires an analysis of supply chains where appropriate, which suggests that companies included in the research do not incorporate biodiversity in their supply chain due diligence, or do not carry out such due diligence at all.

Statement of risks

	All countries	Italy	Spain	Poland	Greece	Romania
No risks identified	79.5	76.3	70.7	79.5	68.4	86.7
Vague risks identification	11.9	13.2	15.5	12.3	21.1	6.7
Description of specific risks	8.6	10.5	13.8	8.2	10.5	6.7
Includes a clear description of actual impacts	5.3	3.9	13.8	2.7	5.3	6.7
Concrete operations / business partners associated with salient issues & impacts	4.6	6.6	6.9	2.7	5.3	6.7
Risks provided for long term horizons	0.7	0	1.7	0	5.3	0
Breakdown of risks by activity or region	3.3	1.3	6.9	2.7	5.3	6.7
Clear management approach for the identified risks and impacts	3.3	5.3	3.4	2.7	10.5	0
Identification of locations critical to value chains	1.3	2.6	0	1.4	5.3	0

KEY PERFORMANCE INDICATORS

In relation to biodiversity, we also evaluated whether companies disclose policies and their outcomes for 3 specific thematic areas - 1) operations in areas of high conservation value, 2) habitat, landscape and environmental functions conversion and 3) impacts on marine ecosystems. As for biodiversity in general, in most sectors, the relevance of these topics depends on the company's operational context. The exception is the Infrastructure sector, in which a significant share of companies -though not necessarily all- should report on the first two criteria, and the Food & Beverages sector, in which companies producing or selling fish and seafood should report on marine biodiversity issues.

Policies for (a) operations in ecosystems of high ecological importance and (b) on habitat, landscape or other environmental functions conversion, were disclosed in the Infrastructure sector by 21.1% and 10.5% of companies respectively. Information on KPIs and management of concrete cases was provided by 15.8% and 5.3% respectively.

2 out of 5 Food & Beverages companies producing or selling marine products reported on marine biodiversity policies, while none disclosed KPIs or qualitative information on the management of impacts.



Sustainable Products and Services

1 out of 4

report on capital expenditure (climate change mitigation and adaptation)

5%

include information on turnover (climate change mitigation and adaptation)

Read the following section for more results and key findings →

POSITIVE IMPACTS BY PRODUCTS AND SERVICES / SOURCES OF OPPORTUNITY

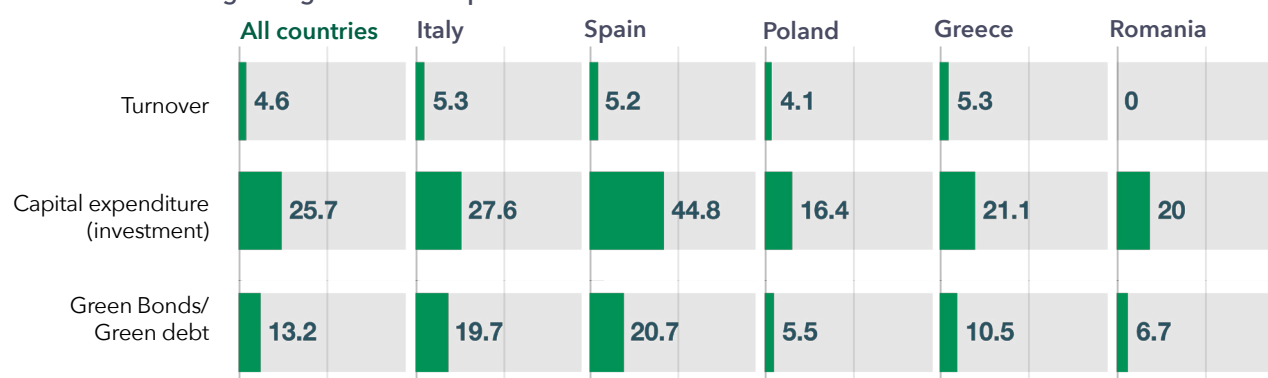
In this section, we assessed companies' strategies and initiatives in relation to their sustainable commercial business activities. We asked whether companies describe any products or services with positive impacts on climate change or other environmental topics and whether the information is substantiated by quantitative financial data. For this purpose, we included two main criteria as understood in the EU Taxonomy on Sustainable Activities - data on turnover and capital expenditure. In addition, we inquired whether companies report on the use of Green bonds or Green debts.

Similarly to the previous section, climate change was addressed more often than other environmental issues. 38% of companies described positive impacts of their products or services on climate change. The results vary from 51.4% in the Energy sector to 15.4% in the Food & Beverages sector. Quantitative financial data that would allow to assess how important these business strategies are, is reported to a much lower extent. In all sectors taken together, capital expenditure is reported by 1/4 of the companies (25.7%) and the turnover from these products is reported by only 4.6% of companies.

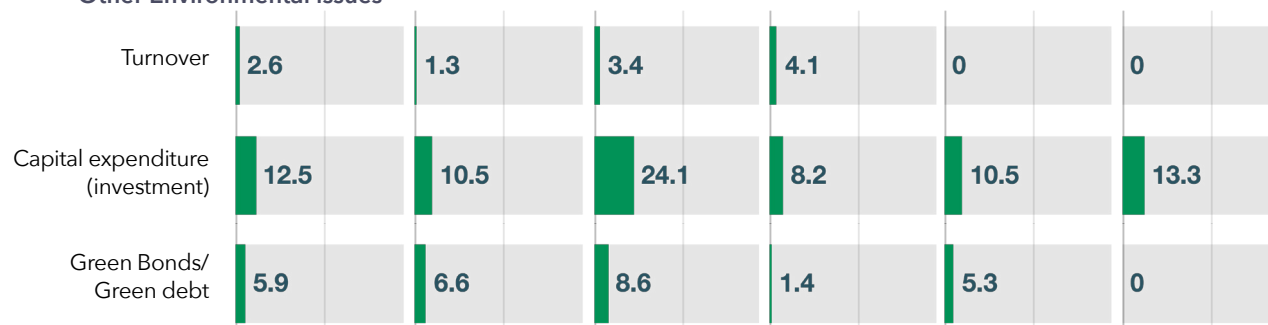
The results concerning the positive impacts of products and services on other environmental issues follow a similar pattern.

This type of disclosure is not explicitly required by the [EU NFR Directive](#), but it will become mandatory in December 2021 as per the [EU Taxonomy Regulation](#). The results above indicate preparedness, or rather lack thereof, of companies in this regard. Aside from future legal compliance issues, failure to report this information will dissuade investors, insurance and banks from investing in such companies, as they themselves will be subject to corresponding due diligence and transparency rules.

Climate change mitigation and adaptation



Other Environmental issues





Cross-regional analysis

41% Mediterranean companies
vs 20% CEE companies report specific policy information

25% Mediterranean companies
vs 4% CEE companies report on alignment with science-based climate targets

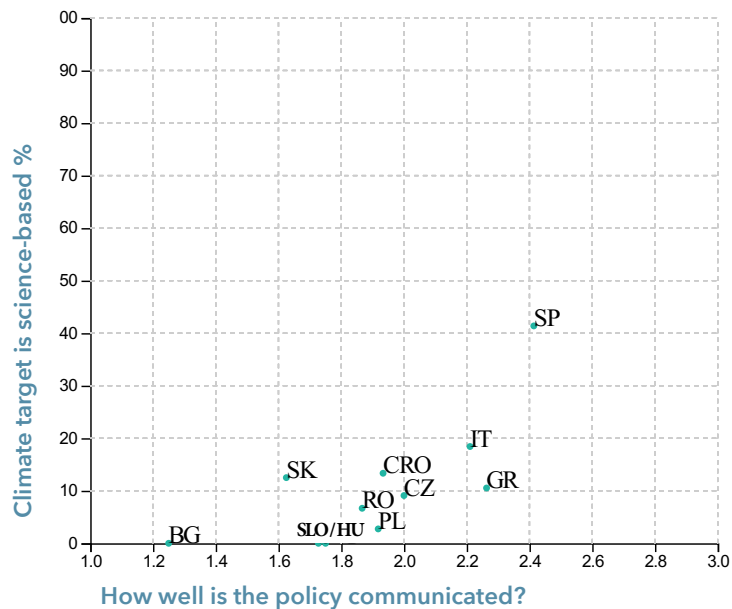
Mediterranean refer to Spanish, Italian and Greek. Central and Eastern European (CEE) refer to Bulgarian, Croatian, Czech, Hungarian, Polish, Romanian and Slovakian.

Read the following section for more results and key findings →

CROSS-REGIONAL ANALYSIS

The analysis includes 303 companies from Southern, Central and Eastern Europe representing a majority of corporations from the high-risk sectors in these regions falling under the scope of the [EU NFR Directive](#). However, due to differences in size of the economies covered, traditions regarding capital ownership and public trading, and implementation of the EU NFRD as regards personal scope, the distribution of the sample was not even. While there are 76 companies from Italy, 73 from Poland and 58 from Spain, there are only 19 or less entities from each of the other 9 countries. The data from these smaller countries is indicative of the common practice, but they cannot be blindly compared with others.

Below, we provide a brief summary of the results for each country relative to the averaged findings. These results are grouped in three categories from best to worst findings with the main focus on climate criteria. The results for other environmental topics are similar, yet lower.



Group 1 - Italy, Spain and Greece

Our results show that in general, companies from Italy, Spain, Greece (including the only Cypriot company included in the assessment, and that originally is from Greece) report more specific and comprehensive information than entities in other countries. However, it should be noted that even for climate disclosures, the share of companies providing specific information on policies, risks or targets fluctuates between 25-55%; this means that over a half of companies from these best performing countries do not provide specific information. General information on business opportunities is provided on average by 20% of companies.

Spanish companies show best results in reporting on climate-related policies, targets and outcomes. Specific policies are described by 48.3% of companies and a [science based climate target](#) is disclosed in 41.4% of cases; this is more than twice as much as Italian companies (18.4%) - the second most reporting country on this issue. 39.7% of Spanish companies also describe outcomes in terms of meeting climate targets.

Italian companies report specific information on risks significantly more often than companies from any other country. This pattern is most prominent with regard to climate change with 53.9% of entities, compared to an average of 31.7% in other countries. However, this disclosure does not correlate with the results of the assessment of specificity of policies - only 34.2% Italian companies disclose clear issues and objectives of their climate policy - and the above mentioned disclosure of climate targets. This indicates a detachment of risk assessment findings from corporate strategies; or - in other words - a lack of integration. This can be linked to a specific reporting culture in Italy, where companies tend to provide non-financial information outside of the annual report more often than the average elsewhere (77.6% vs. 51.2%).

Greek companies provide specific information on climate policies (45%) and risks (35%), which is not far from the results of Spanish companies (these results include an originally Greek company which is formally registered in Cyprus). The results regarding disclosures of climate targets reach 30%, which is worse than in Spain but comparable with the practices of Italian companies. However, reporting on science-based targets is far less common in Greece than in the other two Mediterranean countries (10%). It is useful to note that the energy companies were strongly represented in all countries (23.7% in Italy, 25% in Greece, 27.6% in Spain). Furthermore, 1 of 6 Greek financial companies included in the research is among the very few disclosing the amount of carbon-related assets per each portfolio and reporting on how risk management processes, including internal stress testing, consider climate-related risks.

Group 2 - Poland, Croatia, Romania, Czech Republic and Slovakia

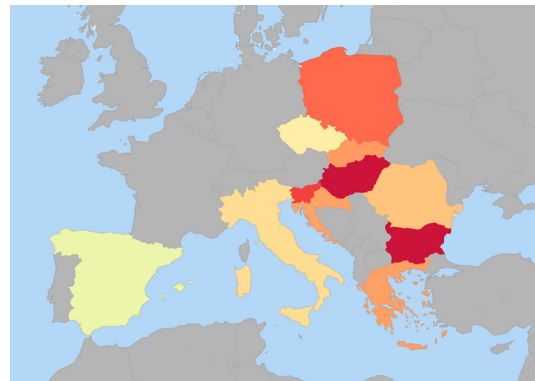
The second group consists of countries that show worse results in general, but also a relevant minority of companies providing specific information (on average 20% for the main climate criteria, but significantly less for other topics). Companies in this group tend to report on their business opportunities only in a general manner and about half as often as companies in the Mediterranean region (on average 10%). Similarly, information on capital expenditures on sustainable activities and products with positive climate impacts is almost twice less likely. None out of 36 Financial corporations disclose KPIs for asset exposure to climate risks.

How well is the policy communicated?

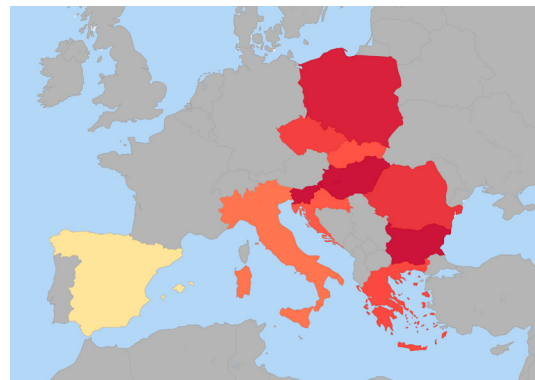
Average from 3 options (no information, vague disclosures, description of key issues and objectives)



The company has a climate target (%)

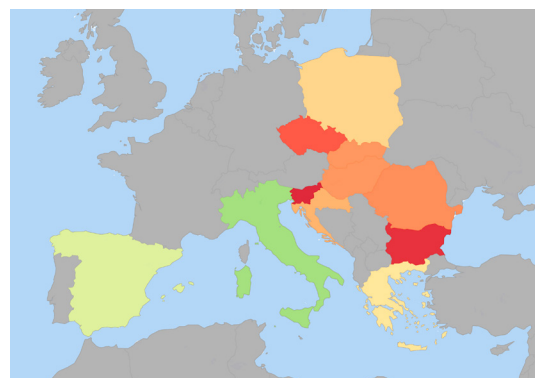


Company's climate target is science based / aligned with Paris Agreement (%)



Statement of risks

Average from 3 options (no risks identified, vague risks, description of specific risks)



Polish companies - in line with the summary above - provide specific information on climate risks and policies in about 20% of cases. Unlike in Spain and to a lesser extent Italy, these results are not correlated with reporting on science-based targets, which is disclosed by only 2 Polish companies (or 2.7%). The share of Energy companies in the Polish sample is comparable to the Mediterranean countries (23.3% in Poland, 23.7% in Italy, 25% in Greece, 27.6% in Spain). Furthermore, reporting on outcomes measured against policy objectives is less common in Poland than in the other countries in this group (12.3%); Polish companies tend to report relatively more often on engagement of the value chain to reduce impacts on natural resources (9.6%).

Croatian companies show similar, although slightly better results for the specificity of climate-related risks and policies (20% and 26.7% respectively). Unlike in other countries in this group, most of the Croatian companies that do report specific information on their climate risks and policies, also provide information on climate mitigation targets and outcomes measured against the policy objectives. A relatively high share of them also report on the alignment of their targets with the goals of the Paris agreement or science-based methodologies (13.3% compared to 26.7% that report a climate target). This indicates that Croatian companies that do report on climate tend to do it comprehensively. It should be taken into account that these results are attributable to 4 individual companies from a sample of 15. No Croatian company described specific policies or risks related to pollution.

Romanian companies reported specific information on their climate policies and outcomes as often as other countries in this group (20%), communicated a climate target slightly more often (33%), but, relative to Croatia, reported less often on the alignment of targets with the Paris Agreement or science-based target methodology (6.7%). Moreover, they reported in a specific manner on their climate-related risks less often than both Poland and Croatia (6.7%); no Romanian company addressed risks from a business model perspective. Given the sample of 15 companies, the positive results regarding the last two criteria are attributable to only 1 company. No Romanian company disclosed specific biodiversity policies, including 3 financial companies that may be connected to such impacts through their investment or lending activities.

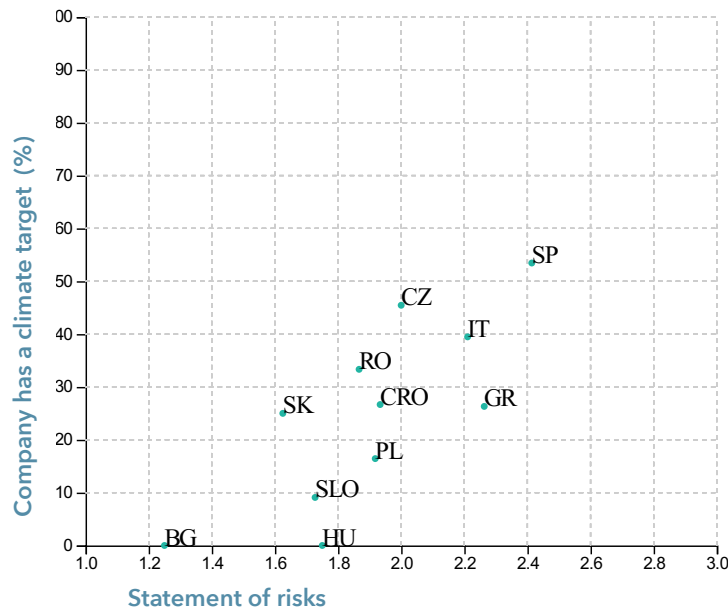
The assessment of **Czech** companies shows very uneven results. The share of Czech companies reporting specific information on climate policies and quantitative climate targets is above average in this group (36.4% and 45.5 % respectively) and reporting on outcomes with regard to policy objectives is as frequent as in other countries (18.2%), except for worse performing Poland. On the other hand, only 1 company (9.1%) reports on the alignment of its climate target with the Paris Agreement or science-based targets, out of 5 that do disclose a quantitative climate target. It should be noted that the fluctuation of results is affected by the relatively small sample of 11 companies. Unaffected by this interpretation problem is the finding that no company provides specific information on risks or any climate-related risks (specific or vague) for its business model or information on business opportunities. The sample of Czech companies includes ŠKODA AUTO a.s., which plays an important role in the Czech economy, but is not obliged to publish the non-financial statement pursuant to the EU NFRD. The results of its assessment indicates that it discloses climate-related information of comparable quality to other Czech companies.

The assessment of **Slovakian** companies suggests a very peculiar reporting practice. On average, the results are slightly better than for other countries in this group, being even on par with Greece; 25% of companies provide specific information on climate policies, quantitative targets and outcomes, as well as specific risks, although alignment with science-based targets is provided in only 12.5% of cases. This is due to the fact that two Financial entities included in the sample refer to their parent companies' non-financial statements - i.e. detailed sustainability reports written by international financial corporations - and the full sample of Slovakian companies is limited to 8 companies. The results for the remaining 6 companies, however, show a general lack of any non-financial disclosure or explanation of why information on environmental policies is not provided. It is also worth noting that the two entities mentioned above don't provide (neither directly, nor in their parent companies' reports) specific information on the implementation of the group policies in their own activities or their own exposure to carbon assets, which is necessary to understand their own position, performance, development and impact.

Group 3 - Bulgaria, Hungary and Slovenia

The last group consists of countries in which the research didn't identify any example of comprehensive and sufficiently specific disclosure on climate or environmental matters. Bulgaria and Hungary are represented by only 8 companies each, and 11 companies were included from Slovenia.

Given such a small sample size, comparing individual countries may produce unreliable results. However, it is possible to consider the results of all companies from all three countries together, which leads to a total of 27 companies.



Of these 27 companies only one Hungarian company and one Slovenian company reported on specific issues and objectives of their climate policies (that is 7.4%) and only one Slovenian company provided a quantitative climate mitigation target (3.7%). No company in this group provided information on the alignment of their targets with the Paris Agreement, outcomes of their policies against any objectives of such policies, and only 1 company described specific risks (3.7%).

Additionally, 63.6% of the **Slovenian** companies do not disclose any environmental KPIs and of the remaining four companies that do provide some KPIs, none does so in a summarised statement. This shows a deficient reporting culture in Slovenia concerning a lack of information on companies' impacts.

Out of 8 **Bulgarian** companies included in the research, only 2 disclose climate-related policies; it is also worth noting that both are vague. Neither of the two report on policy outcomes, even if unrelated to policy objectives. No company describes any policies on the use of natural resources or KPIs concerning the use of water.

Hungarian companies show the best results in relation to other countries in this group. In addition to the one company that describes specific issues and objectives of its climate policy, an additional 4 (that is 50%) provide at least some description of their policies, and 3 describe policy outcomes. The company that describes a specific policy also provides a comprehensive list of KPIs covering its environmental impacts, and a description of its policies for all other environmental topics.



Development of non-financial disclosures over time

20% increase
in reporting on climate targets

16% increase
in providing specific information on policies

However:

- Improvements are concentrated in Spain
- A majority of companies still don't provide specific information (only 36.3%)
- There is no significant progress on environmental due diligence or supply chain disclosures

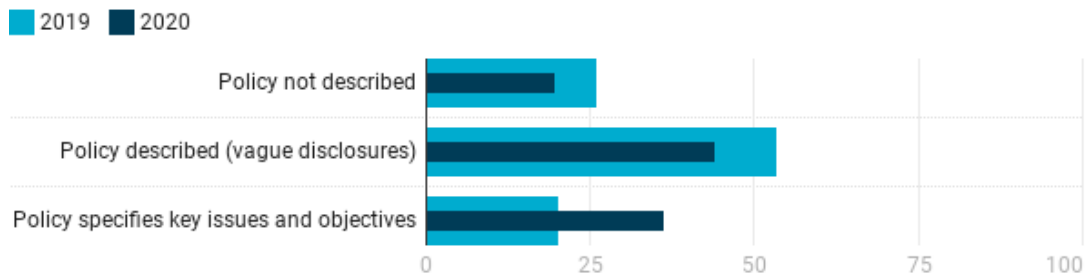
Read the following section for more results and key findings →

More than half of the companies included in our research (168) were also included in the analysis of 1000 European companies' sustainability reports implemented by the Alliance for Corporate Transparency last year following largely the same methodology. In this section, we provide a comparison of the assessment of specific environmental disclosures of these entities in their non-financial statements for 2018 and 2019 respectively. Although the information is provided by companies for the preceding year, in the comparison we refer to the years in which the non-financial statements were published and analysed, which is 2019 and 2020 respectively.

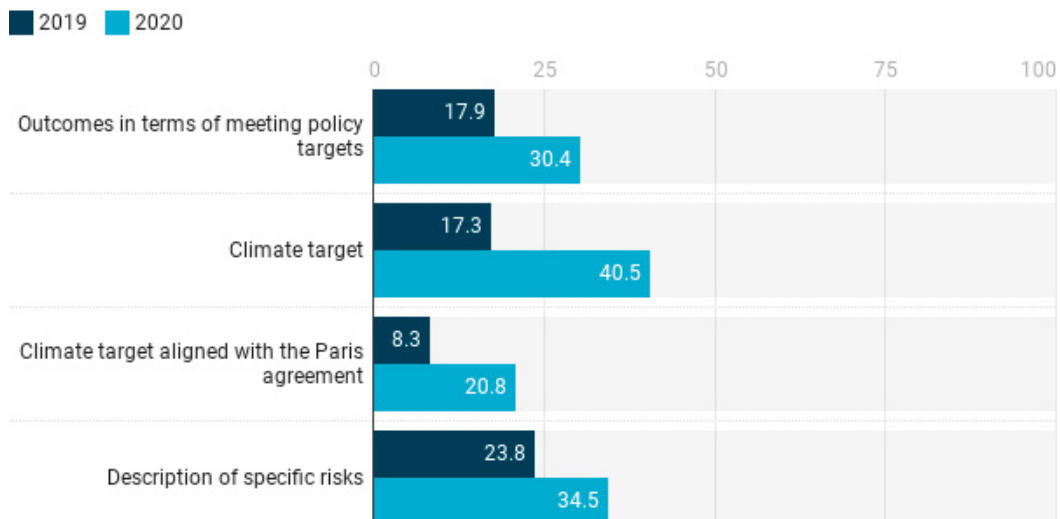
CLIMATE

The most significant improvement can be seen in the disclosure of company policies, including objectives, quantitative targets, and outcomes measured against policy objectives.

The research results show a clear improvement in the specificity of policy disclosures as regards key issues and objectives (20.2% provided such specific descriptions in 2019 and 36.3% in 2020), although it still represents a minority of the companies. This improvement is mirrored when it comes to outcomes disclosed in terms of meeting policy objectives (17.9% and 30.4% respectively), as such reporting requires policies to specify the objectives in the first place.



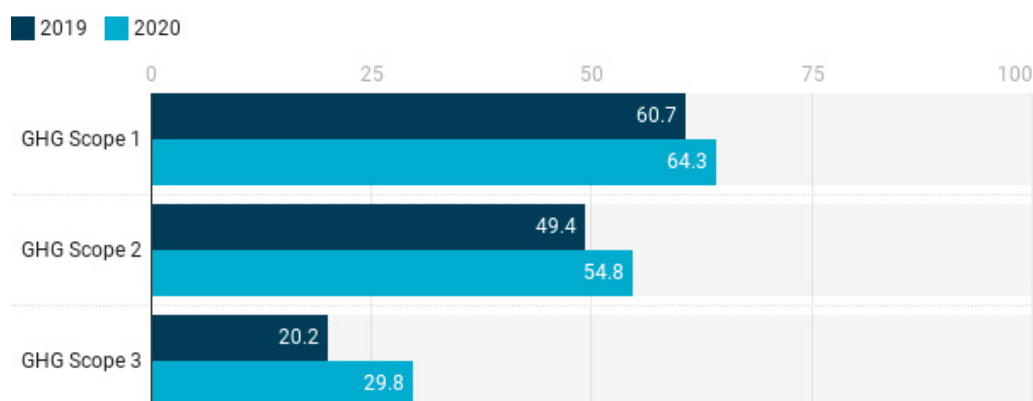
Reporting on climate targets represents the greatest relative improvement of climate-related disclosures (17.3% and 40.5%). Nevertheless, as in the case of disclosure of specific policies, reporting on quantitative climate targets is still provided by less than half of the companies. The alignment of climate targets with the goals of the Paris Agreement or science-based methodologies was also explained more often this year (8.3% in 2019 and 20.8% in 2020), but it still constitutes only half of the companies disclosing the targets and about a 1/5 of the companies overall. The improvement of these results is mostly accountable to Spanish companies. Their reporting on climate targets has grown from 41% to 62% and their Paris agreement alignment from 18% to 51%. The improvements in these categories in other countries were far less significant.



Specific risks disclosures were also reported more often than last year (23.8% in 2019 and 34.5% in 2020) but the improvement is not as significant as in the area of policies and targets and was driven mainly by Italian results (31% in 2019 and 63% in 2020). Interestingly, relatively more companies started to reflect strategic risks (i.e. risks to the business model and strategy: 21.4% in 2019 and 42.3% in 2020), but as the more modest improvement of specificity of companies' risk disclosures shows, these strategic reflections often remain vague or generic. These correspond to the finding that the number of companies disclosing information corresponding to the TCFD-based criteria for risk reporting, such as reporting on all time horizons, climate scenarios, strategy to manage risks, etc, remains very low.

This suggests that while companies are more aware of the risks associated with climate change than before, their understanding of the implications of these risks for the company's future or perhaps their willingness to be transparent about it lags behind.

Companies also disclose all Scopes of GHG emissions more frequently than last year but the improvement is not as substantial. Reporting on GHG emissions Scope 1 has grown from 60.7% to 63.7%, Scope 2 from 49.4% to 54.2% and Scope 3 from 20.2% to 29.8%.



OTHER ENVIRONMENTAL ISSUES

With respect to other environmental issues covered in the research, the results show a slight improvement in relation to policies specifying key issues and objectives. The difference is the most significant for the use of natural resources (6.6% and 14.9%), slightly less notable for biodiversity (4.8% and 8.3%) and negligible in case of pollution (7.7% and 9.5%). There is no year by year improvement when it comes to outcomes against policy targets.

In comparison with climate change disclosures, there is no substantial positive trend in reporting on other environmental issues.

Environmental due diligence indicators

The research methodology further included several criteria related to companies' environmental due diligence as understood in the OECD Guidelines for Multinational Enterprises. It should be noted that the criteria above do not constitute a comprehensive view on due diligence. While the Alliance for Corporate Transparency research provided an extensive methodology to assess companies' dedicated human rights due diligence disclosures, the questions of application of due diligence with respect to environmental issues are not yet fully settled and therefore the research did not address the environmental due diligence in a comprehensive way.

Nevertheless, the above-mentioned criteria have an indicative value with respect to the companies' environmental due diligence, and can provide some insights into the trends. Specifically, we examined the development of companies' reporting on due diligence indicators in relation to biodiversity and use of natural resources.

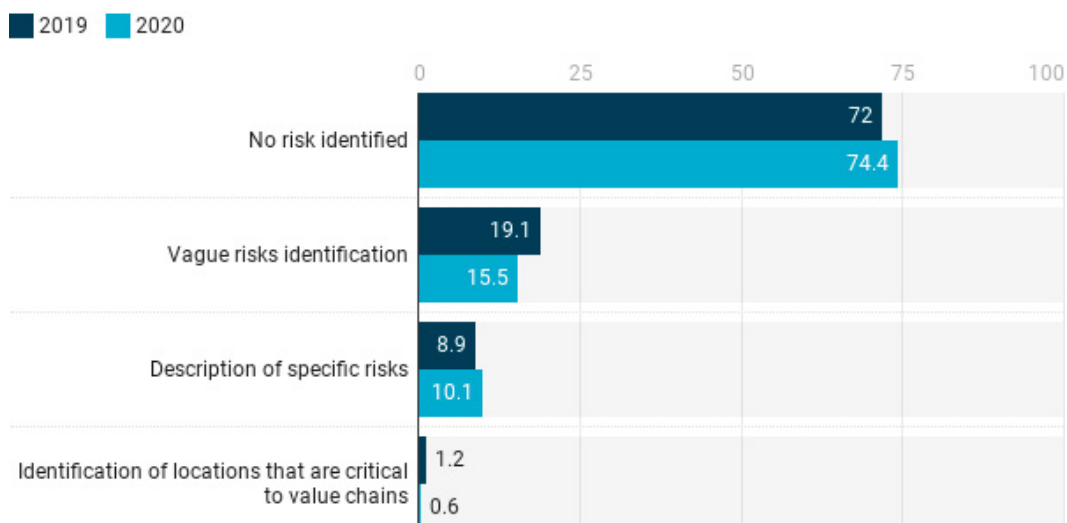
Companies slightly improved their reporting on due diligence indicators related to use of water, risks to people and environment related to the availability of water. Risks to water stress are addressed by twice as many corporations (6% and 11.9%) and the same pattern appears in the case of water consumption in areas of water scarcity (3% and 6%). Nevertheless, this still represents a small part of companies that report on use of water (58.9%), which suggests that the vast majority of these companies do not apply a due diligence perspective in this area. There has not been any progress regarding disclosure of information on critical locations in supply chains - only one company in both years provided such information.

Use of natural resources



When it comes to biodiversity due diligence indicators, the results don't show any improvement. Specific risks are described by a minority of companies in both years (8.9% in 2019 and 10.1% in 2020) and locations that are critical to value chains, including operations, suppliers and markets are identified by corporations only sporadically and even less often in 2020 than in 2019 (1.2% in 2019 and 0.6% in 2020).

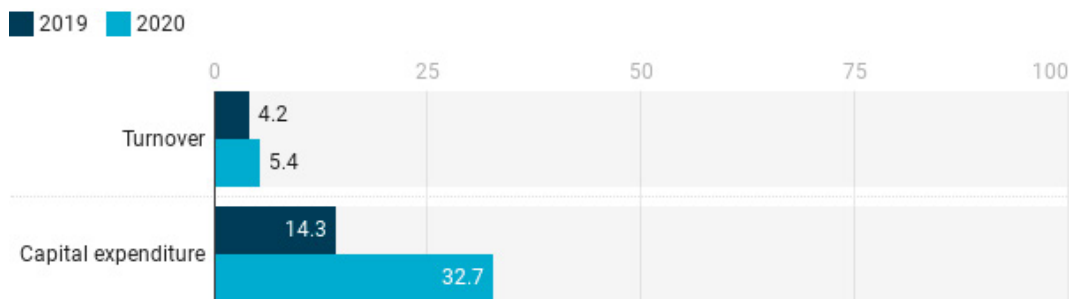
Biodiversity



GENERAL POSITIVE IMPACTS BY PRODUCTS/ SOURCES OF OPPORTUNITY

Finally, we compared the development of companies' disclosure of quantitative financial data in relation to their sustainable business activities, products and services in the sense of the EU Taxonomy Regulation. Though this Regulation and the related implementing measures provide a detailed classification of such activities, our research has taken into account any business activities, products and services declared by the company to have positive impacts on climate change mitigation and adaptation.

Companies significantly improved in disclosing investment into such activities, products and services (14.3% in 2019 and 32.7% in 2020) while there has not been a similar trend as regards disclosure of turnover from these products (4.2% in 2019 and 5.4% in 2020). These results suggest that while companies are becoming more aware of the expectations of investors regarding such disclosures, and potentially also of the [EU sustainable finance policies](#) in general and the EU Taxonomy Regulation in particular, they are still not prepared to comply with its requirements.





Conclusion



The research presented in this report has analysed the quality of companies' reporting on climate matters, use of natural resources, pollution and biodiversity.

The research focused on critical industries for climate change mitigation and adaptation, and therefore climate reporting indicators are material for a vast majority of companies from these industries.

The principal finding with respect to climate reporting is that only a minority of companies - approximately 30% - provide sufficiently detailed information on their climate policies and risks that allows to understand their development, position, performance and impact as expected by the [EU Non-Financial Reporting Directive](#). A significant number of companies don't disclose any relevant information for the categories required by the Directive: 23.1% don't report on any relevant policies; 46.2% don't describe outcomes of their policies; 42.2% don't explain principal risks. The remaining companies provide this type of information in a generic manner that does not provide users of reports with decision-useful information.

On a positive side, the comparison with the quality of reports published in 2019 shows a clear improvement in the specificity of policy disclosures and their outcomes in 15% of the companies analysed in both years. Also, the share of companies disclosing quantitative climate targets more than doubled.

There are two important caveats, however. Firstly, these improvements were largely concentrated in Spain. Secondly, a more in-depth assessment of the quality of these disclosures still shows major gaps in practice. The alignment of climate targets with the goals of the [Paris Agreement](#) or [science-based methodologies](#) is explained only by half of the companies presenting their climate targets. From all 303 companies included in the research only 15.5% provide such information.

The research found that reporting on greenhouse gas emissions is relatively widespread as regards Scope 1 and Scope 2, but it seems that it is not clear to companies if and how they should report on Scope 3 emissions and on greenhouse gas intensity. An increasing number of companies report on their capital expenditures on sustainable products and services, but very few have reported the turnover from such activities. Almost no finance company includes specific indicators recommended in the [European Commission Guidelines](#) regarding exposure to climate risks.

The countries covered by the research can be divided into three groups based on the research results. The first group, which comprises Italy, Spain and Greece, shows that a significant number of companies in these countries, nearing 50% for some criteria, report decision-useful information. The results of the second group, which comprises Poland, Croatia, Romania, Czech Republic and Slovakia, are slightly below the average of the first group - on average useful disclosures are provided by 20% of companies, although there are significant fluctuations in results per country and issue. The third group, comprising Bulgaria, Slovenia and Hungary, shows a complete lack of awareness of the expected quality and purpose of non-financial reporting. With the exception of one borderline example, the research didn't identify any case of comprehensive and sufficiently specific disclosures in these countries.

The results of the assessment of companies' disclosures concerning other environmental topics - use of natural resources, pollution and biodiversity - correlates with the findings for climate reporting. The share of companies providing specific disclosures drops to 10% on average, but the interpretation of this finding needs to take into account that the materiality of topics other than climate is determined by the company's business model and operational context.

It is more relevant to consider that the share of companies providing generic disclosures is relatively higher. For every company that provides specific information on its policies or risks there are two or three companies that report vague information. Furthermore, compared to climate reporting, relatively fewer companies report on outcomes of policy objectives. Virtually no companies did so for biodiversity matters. Similarly, almost no companies reported information indicative of the outcomes

of their environmental due diligence. These findings suggest a lack of clarity among companies on what the relevant issues are and how to measure performance.

The results of the research offer several suggestions for companies and policymakers:

- A majority of companies need to provide more specific, forward-looking and thus decision-useful information on their policies, outcomes and risks. Policymakers can help them by specifying relevant qualitative requirements.
- Reporting on Scope 3 emissions, greenhouse gas intensity, and turnover from sustainable activities is not very common, despite being material. Similarly, finance companies do not use indicators on their climate risk exposure as recommended by the European Commission. This suggests that it is not clear to companies if and how they should report on these indicators.
- Relatively few companies report on climate change targets and risks in the context of the transition of the European economy to a low carbon model and science-based methodology. While companies can take inspiration from the emerging good practice, policymakers need to provide clearer standards as to what is expected from companies and how they can implement it.
- There is a lack of clarity among companies on what other relevant environmental issues are and how to measure performance, in particular with respect to biodiversity and use of natural resources. To overcome this problem, it is necessary to specify such issues, related metrics, and -more importantly - materiality thresholds for their application by companies.
- The supervisors should specify and enforce minimum expectations for the implementation of existing legislative requirements. This concerns primarily the cases of clear failure to disclose basic information on climate risks, policy, outcomes and KPIs by companies from sectors critical for climate change mitigation and adaptation, and thus clearly exposed to major risks.



Annex



LIST OF COMPANIES DIVIDED BY COUNTRY

Bulgaria

ALCOMET AD
DSK BANK
First Investment Bank
PETROL AD
Speedy AD
TBI CREDIT EAD
TRACE GROUP HOLD AD
Zaharni Zavodi AD

Croatia

ADDIKO BANK D.D. ZAGREB
Adriatic Osiguranje d.d.
ATLANTIC GRUPA D.D.
AUTO HRVATSKA DD
Croatia Airlines d.d.
Čakovečki mlinovi d.d.
Fortenova Grupa d.d.
Group PETROKEMIJA
HEP Group
HRVATSKA POSTANSKA BANKA DD
INA d.d.
PODRAVKA PREHRAMBENA INDUSTRIJA
D.D.
Privredna banka Zagreb d.d.
Raiffeisenbank Austria D.D.
Zagrebačka banka dd

Cyprus

Titan Cement International S.A.

Czech Republic

AIR BANK
CEZ A.S.
Česká spořitelna
Československá obchodní banka A.S.
Energetický a průmyslový holding a.s.
EQUA BANK
J&T FINANCE GROUP SE
KOFOLA ČESKOSLOVENSKO A.S.
KOMERCNI BANKA
MONETA MONEY BANK A.S.
ŠKODA AUTO

Greece

Admie (IPTO) Holding SA
Aegean Airlines S.A.
ALPHA BANK AE
ALUMIL ALUMINIUM INDUSTRY S.A

ANEK LINES S.A.
ATHENS WATER SUPPLY & SEWERAGE S.A.
ATTICA BANK S.A.
ATTICA HOLDINGS S.A.
ELVALHALCOR HELLENIC COPPER AND
ALUMINIUM INDUSTRY S.A.
Eurobank Ergasias Services and Holdings SA
HELLENIC PETROLEUM S.A.
MARFIN INVESTMENT GROUP HOLDINGS
S.A.
Motor Oil
Mytilineos S.A.
National Bank of Greece S.A.
NIREUS
PIRAEUS BANK SA
Piraeus Port Authority SA
PUBLIC POWER CORPORATION S.A.

Hungary

Budapest Bank Zrt.
CIB BANK
Masterplast Group
MKB Bank Nyrt.
MOL Nyrt.
OTP Bank Nyrt.
RABA Jár್ಮűipari Holding Nyrt.
Waberer's International Nyrt.

Italy

2i Rete Gas
A2A S.P.A
ACEA SPA
Acsm Agam S.p.A
Alia Spa
ALLIANZ BANK FINANCIAL ADVISORS S.P.A.
ALPERIA GROUP
Astaldi S.p.A.
ASTM S.p.A
ATLANTIA S.P.A.
Azimut Holding S.p.A.
BANCA DI DESIO E DELLA BRIANZA
Banca Ifis Spa
Banca Mediolanum
BANCA POPOLARE DI MILANO SPA
BANCO BPM SPA
BIESE SPA
BPER BANCA S.P.A.
Brembo SPA
Buzzi Unicem
Carel Industries S.P.A.
Carraro S.p.A. Company Group



↑ *Italy*

CDP Group
CEMBRE S.P.A.
Cementir Holding S.P.A.
Credem Spa
DANIELI & C. OFFICINE MECCANICHE SPA
DAVIDE CAMPARI - MILANO
doValue S.p.A.
EDISON SPA
El.En. S.P.A.
ENAV SPA
ENEL SPA
ENI S.P.A.
ERG S.P.A.
Esselunga Group
FABBRICA ITALIANA LAPIS ED AFFINI S.P.A.
Ferrovie dello Stato Italiane
Fincantieri S.p.A. Capital Group
Fineco Bank
GENERALI GROUP
Gruppo Bancario Cooperativo Iccrea
HERA SPA
I.M.A. INDUSTRIA MACCHINE AUTOMATICHE S.P.A.
IMMSI SPA
IMPRESA PIZZAROTTI & C.
INTERPUMP GROUP SPA
INTESA SANPAOLO
IRCE Group
Iren
Italgas
ITALMOBILIARE S.P.A.
LA DORIA GROUP
Leonardo S.p.a.
MARR
MASSIMO ZANETTI BEVERAGE GROUP S.P.A.
Monte dei Paschi di Siena
ORSERO S.P.A.
Panariagroup Industrie Ceramiche S.p.A
PIAGGIO
Pininfarina S.p.A. Capital Group
PRIMA INDUSTRIE SPA
REALE GROUP
Saipem
SARAS S.P.A. - RAFFINERIE SARDE
Smat Group
Snam
SOCIETA CATTOLICA DI ASSICURAZIONE - SOCIETA COOPERATIVA
SOGEFI
SOL SPA
Tea Spa
TERNA S.P.A.-RETE ELETTRICA NAZIONALE
Tescmec SpA
UNICREDIT SPA
UNIONE DI BANCHE ITALIANE SPA
WEBUILD S.P.A.

Poland

CIECH S.A.
Cognor Holding
CREDIT AGRICOLE POLSKA GROUP
Getin Holding S.A.
GK Grupa Azoty
Gobarto S.A.
GRUPA IMPEL S.A.
Grupa Kapitałowa MOSTOSTAL ZABRZE - HOLDING S.A.
Grupa Kapitałowa Alior Bank S.A.
Grupa Kapitałowa Alumetal S.A.
Grupa Kapitałowa Apator S.A.
Grupa Kapitałowa Bank Pekao S.A.
Grupa Kapitałowa Banku Handlowego S.A. w Warszawie
Grupa Kapitałowa Banku Millenium S.A.
Grupa Kapitałowa Banku Ochrony Środowiska S.A.
GRUPA KAPITAŁOWA BNP PARIBAS BANK POLSKA S.A.
Grupa Kapitałowa Budimex S.A.
Grupa Kapitałowa Dino Polska S.A.
Grupa Kapitałowa Elemental Holding S.A
GRUPA KAPITAŁOWA ENEA
Grupa Kapitałowa ENERGA S.A.
Grupa Kapitałowa Erbud
Grupa Kapitałowa FAMUR
Grupa Kapitałowa Getin Noble Bank S.A.
Grupa Kapitałowa Idea Bank S.A.
Grupa Kapitałowa ING Banku Śląskiego S.A.
Grupa Kapitałowa Instal Kraków S.A.
Grupa Kapitałowa J.W. Construction Holding S.A
Grupa Kapitałowa Jastrzębskiej Spółki Węglowej S.A.
Grupa Kapitałowa KGHM Polska Miedź S.A.
Grupa Kapitałowa LOTOS
Grupa Kapitałowa LW Bogdanka
Grupa Kapitałowa MIRBUD
Grupa Kapitałowa NEWAG
Grupa Kapitałowa PCC Rokita
Grupa Kapitałowa PGNiG
Grupa Kapitałowa PKP CARGO S.A.
Grupa Kapitałowa Polimex Mostostal
Grupa Kapitałowa Polska Grupa Energetyczna
Grupa Kapitałowa Powszechnego Zakładu Ubezpieczeń Spółki Akcyjnej
Grupa Kapitałowa Rafako S.A.
Grupa Kapitałowa Rawlplug S.A.
Grupa Kapitałowa Sanok Rubber Company S.A.
Grupa Kapitałowa Seco/Warwick S.A.
Grupa Kapitałowa Stalprodukt S.A.
Grupa Kapitałowa TARCZYŃSKI
Grupa Kapitałowa TAURON Polska Energia S.A.

Grupa Kapitałowa Torpol S.A.
 Grupa Kapitałowa Trakcja PRKIL S.A.
 Grupa Kapitałowa Wielton S.A.
 Grupa Kapitałowa Zespołu Elektrowni Pątnów
 - Adamów - Konin SA
 GRUPA KAPITAŁOWA ZPUE S.A.
 Grupa Kapitałowa ZUE
 Grupa Kapitałowa Żywiec S.A.
 Grupa Kęty S.A.
 Grupa mBank S.A.
 Grupa Orlen
 Grupa PKO Banku Polskiego SA
 Grupa UNIBEP
 INTER CARS S.A.
 INTROL SA
 KRUK SA
 LENTEX S.A.
 MANGATA HOLDING S.A.
 Mostostal Warszawa S.A.
 Odlewnie Polskie S.A.
 OT Logistics S.A.
 Pamapol S.A.
 PRZEDSIĘBIORSTWO MODERNIZACJI URZA-
 DZEN ENERGETYCZNYCH 'REMAK' S.A.
 Radpol S.A.
 Seko S.A.
 STALPROFIL S.A.
 Zamet S.A.

Romania

AEROSTAR S.A.
 ALRO S.A.
 ALUM S.A.
 COMPANIA NATIONALA DE TRANSPORT AL
 ENERGIEI ELECTRICE TRANSELECTRICA SA
 Conpet S.A.
 First Bank SA
 LIBRA INTERNET BANK SA
 NATIONAL NATURAL GAS TRANSMISSION
 COMPANY TRANSGAZ S.A. (THE)
 OMV Petrom S.A.
 ROMPETROL RAFINARE S.A.
 S.N.G.N. ROMGAZ S.A.
 SOCIETATEA ENERGETICA ELECTRICA S.A.
 Societatea Nationala NUCLEARELECTRICA
 S.A.
 TMK Group
 TRANSILVANIA BANK

Slovakia

Národná diaľničná spoločnosť, a.s.
 POSTOVA BANKA A.S.
 Prima banka a.s.
 Slovenská sporiteľňa, a.s.
 Slovenský plynárenský priemysel, a.s.
 SLOVNAFT, a.s.
 Tatra banka a. s.
 Vub Banka

Slovenia

Abanka d.d.
 CINKARNA CELJE DD
 DEZELNA BANKA SLOVENIJE DD.
 INTEREUROPA GROUP
 LUKA KOPER, D.D.
 NOVA KREDITNA BANKA MARIBOR D.D.
 NOVA LJUBLJANSKA BANKA D.D.
 PETROL, SLOVENSKA ENERGETSKA DRU-
 ZBA, D.D., LJUBLJANA
 POSLOVNI SISTEM MERCATOR D.D.
 SKB BANKA
 UNIOR

Spain

ABANCA CORPORACION BANCARIA SA
 ACCIONA S.A.
 Acerinox S. A.
 ACS ACTIVIDADES DE CONSTRUCCION Y
 SERVICIOS, S.A.
 AENA, S.M.E., S.A.
 Alantra Partners SA
 AmRest Holdings SE
 Audax Renovables, SA
 Azkoyen SA
 BANCA MARCH SA
 BANCO BILBAO VIZCAYA ARGENTARIA SA
 BANCO DE SABADELL SA
 Banco Santander
 Bankia S.A.
 Bankinter
 Bolsas y Mercados Españoles
 CAIXABANK, S.A.
 CAJAMAR CAJA RURAL, S.C.C.
 CEMENTOS MOLINS, S.A.
 CIE AUTOMOTIVE S.A.
 Construcciones y Auxiliar de Ferrocarriles
 S.A. Capital Group
 Corporacion Financiera Alba SA
 DEOLEO, S.A.
 DIA - DISTRIBUIDORA INTERNACIONAL DE
 ALIMENTACION S.A.
 Duro Felguera
 EBRO FOOD, S.A.
 EDP RENOVAVEIS S.A.
 Elecnor SA
 ENAGAS, S.A
 ENDESA
 Ercros
 FERROVIAL, S.A.
 GESTAMP AUTOMOCIÓN, S.A.
 GRUPO ANTOLIN-IRAUSA SA
 GRUPO EMPRESARIAL SAN JOSE, S.A,
 Grupo FCC - Fomento de Construcciones y
 Contratas S.A.
 Grupo Tubos Reunidos
 IAG - International Consolidated Airlines
 Group S.A.



↑ *Spain*

IBERCAJA BANCO SA
IBERDROLA S.A.
KUTXABANK SA
LINGOTES ESPECIALES S.A.
MAPFRE GROUP
MINERSA
NATURGY ENERGY GROUP S.A.
NUEVA PESCANOVA
OHL - Obrascón Huarte Lain S.A.
Red Eléctrica Corporación, S.A
Renta4
REPSOL SA
Sacyr
SIEMENS GAMESA RENEWABLE ENERGY,
S.A.
TALGO
Técnicas Reunidas
TUBACEX S.A.
Unicaja Banco SA
Viscofan
Zardoya Otis SA



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