



Sustainability Reporting Practice under CSRD/ESRS
An Analysis of the Chemical Industry for FY2024

Overview, Scope and Objective



Overview

Large public-interest entities with more than 500 employees had prepared for the new legal situation under CSRD/ESRS for reporting on the 2024 financial year.

However, the CSRD had not been transposed into German law in 2024, meaning the old requirements for the preparation of a non-financial statement continued to apply.

Subsequently, companies were faced with the decision of whether to report fully in accordance with ESRS, with reference to ESRS or without consideration of ESRS. The disclosures could be made in or outside the management report.

Furthermore, unlike in countries such as France, there was no obligation in Germany for a substantive audit. However, such audits could be voluntarily agreed upon.

With regard to reporting obligations, a lack of unified interpretation of the ESRS remains, due to which a heterogeneous implementation of the requirements is to be expected for the 2024 reporting season.



Scope and Objective

This document focuses on the sustainability reporting of large (publicly listed) companies in Germany from the chemical industry that have already reported in full compliance with the ESRS. In addition, selected European peers were also included in this analysis.

We expect that companies will benchmark the outcomes of their double materiality assessments against those of other organizations in their industry. Further, we expect companies to evaluate the structure and scope of ESRS reporting in order to reduce duplication and enhance readability.

The study is intended to contribute to the interpretation of the reporting requirements and their advancement through the omnibus process and the transposition into German law.

Chemical Industry Companies in the Benchmark













































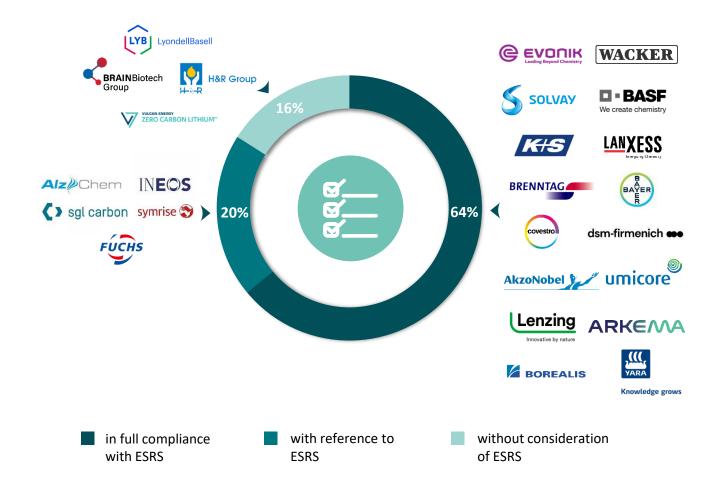






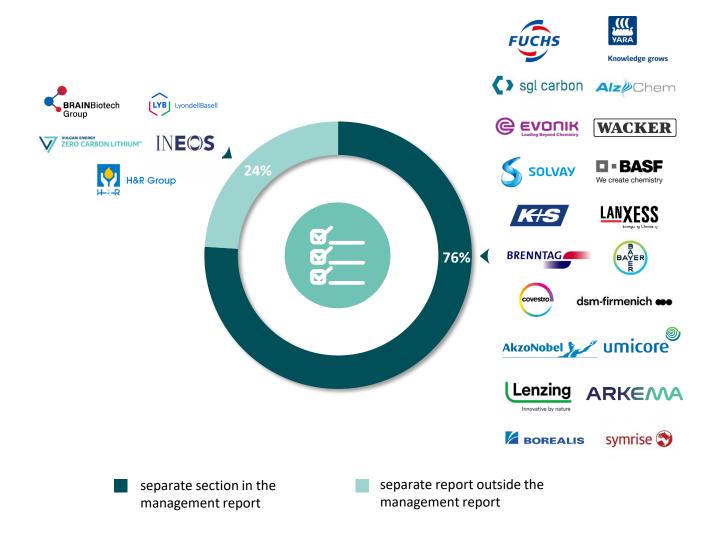


Level of ESRS Compliance



- Most of the analyzed reports in the chemical industry are prepared in **full** compliance with ESRS.
- A British company **voluntarily** reported with reference to ESRS.

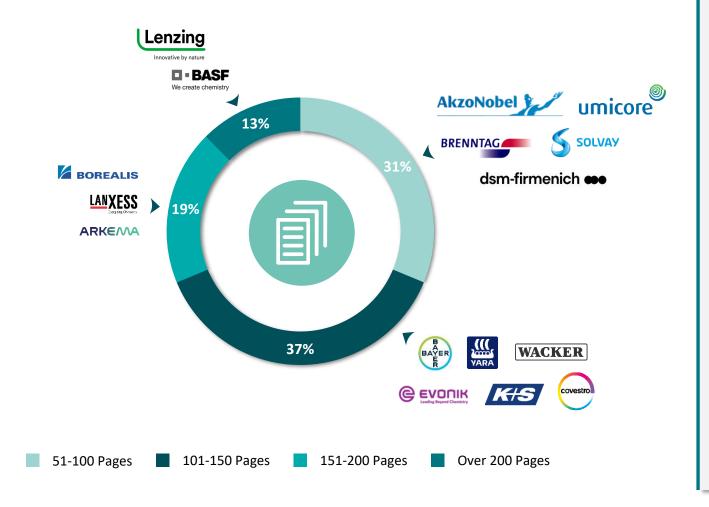
Form of Publication



- Most disclosures are presented in a separate section in the management report, with only a few voluntary or mandatory references to the annual financial statements or the management report itself.
- Over the coming years, we expect a renewed increase in integration characterized by a linkage beween financial and sustainability-related value drivers ("Connectivity").

Average number of Pages

Total number of analyzed ESRS-reports as of August 28, 2025: 16

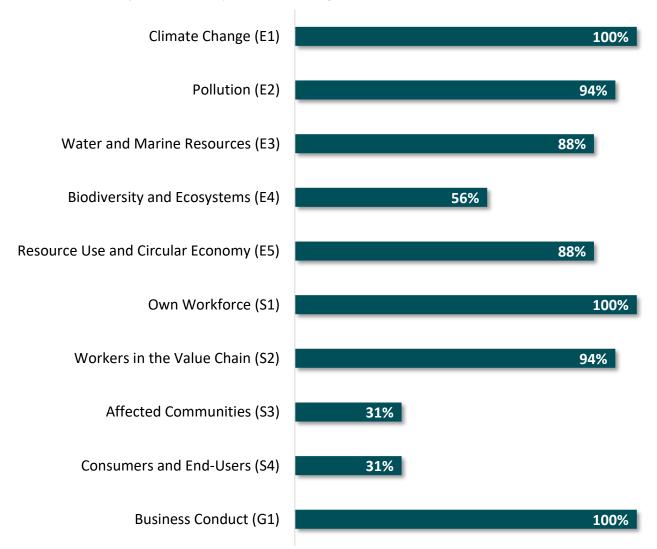


From this point on, only reports prepared in full compliance with the ESRS with respect to their content, are considered

ø135 ♣ Min. 65 | Max. 211 ★

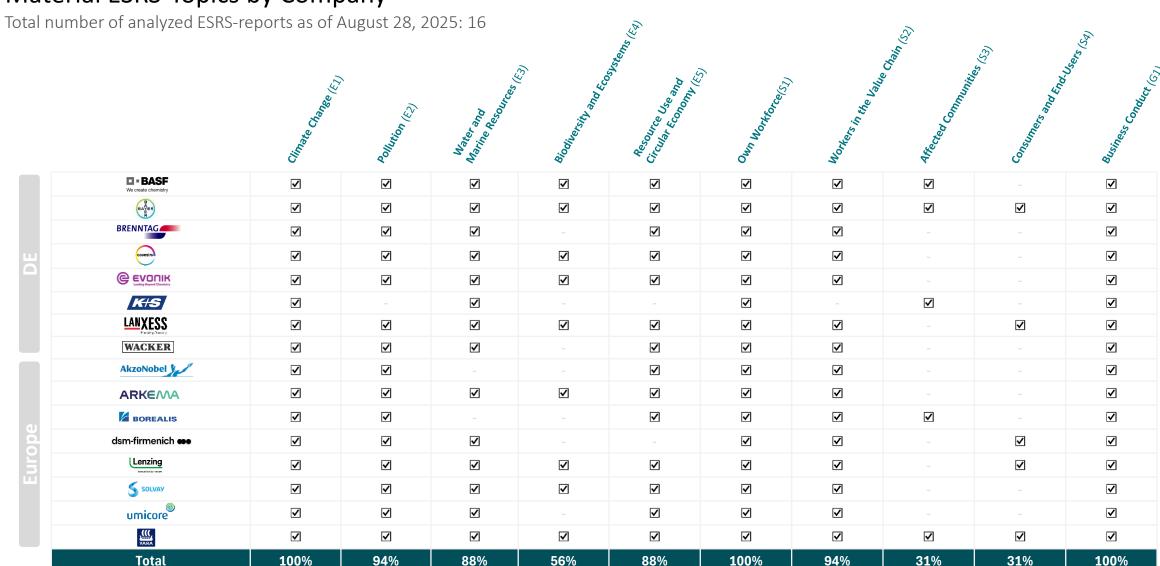
- The average number of pages is significantly higher than the initially expected 60-100 pages.
- The extent of the reports varies significantly due to, among other factors, the use of graphics and images, and information incorporated by external references.

Material ESRS-Topics



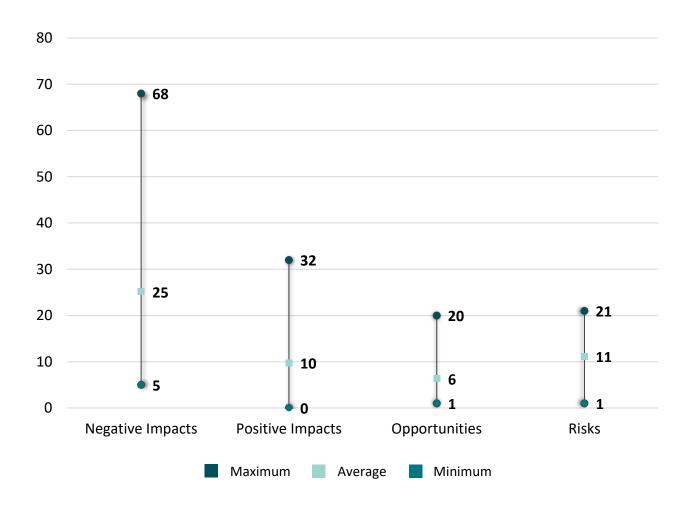
- The number of material ESRS-topics ranges from 5 to 10. On average, **8 ESRS-topics** have been identified as material.
- All analyzed companies classified the ESRS-topics Climate Change (E1), Own Workforce (S1) and Business Conduct (G1) as material as a result of the materiality analysis.
- Almost all analyzed companies classified the ESRS-topics Pollution (E2), Water and Marine Resources (E3), Resource Use and Circular Economy (E5), as well as Workers in the Value Chain (S2), as material.

Material ESRS-Topics by Company



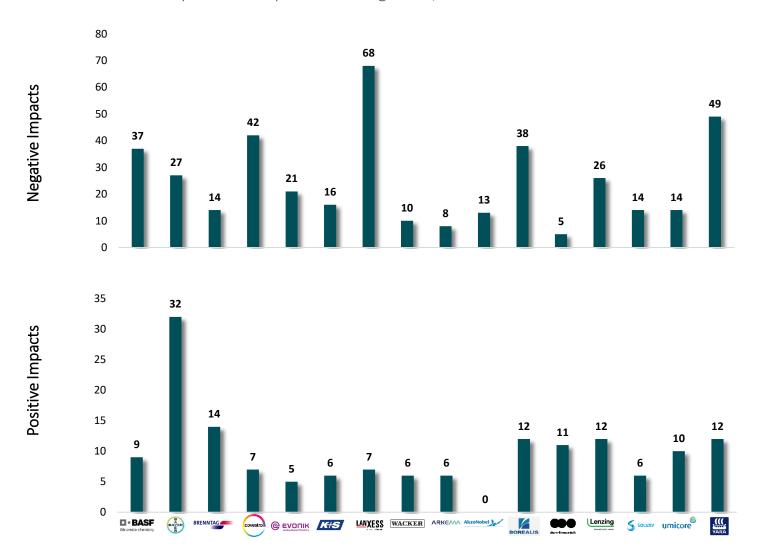
[☑] ESRS-Topic is identified as material

Number of identified IROs



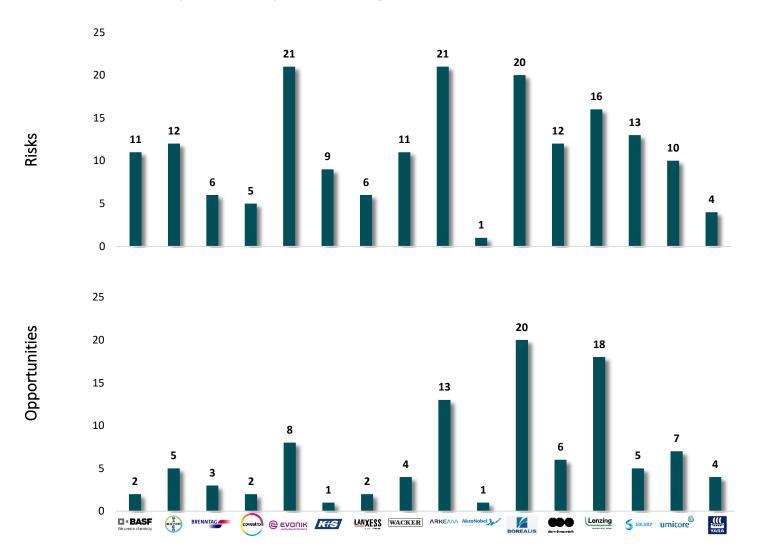
- The number of material IROs varies significantly, overall ranging from 15 to 90. On average, the analyzed companies in the chemical industry have identified a total of 52 IROs.
- Some companies restrict their formulation of IROs to brief statements (e.g., "increase in CO2 emissions"), while others provide more detailed descriptions by discussing Scope 1, Scope 2, and Scope 3 emissions individually.

Number of identified IROs by Company: Impacts



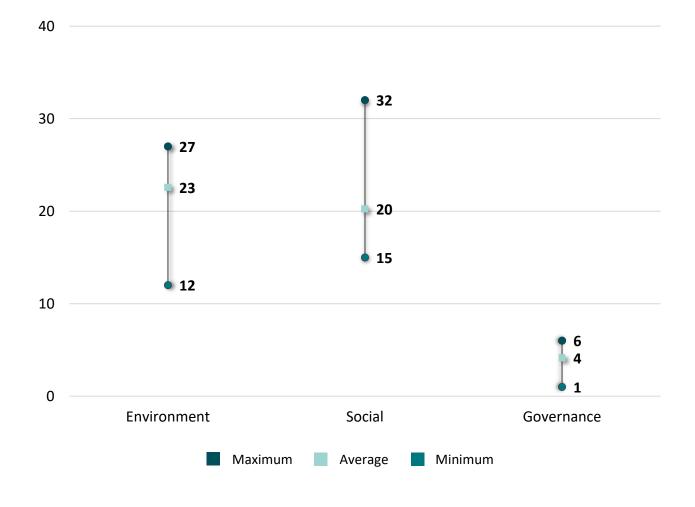
- The number of material negative impacts varies significantly, ranging from 5 to 68. The average within this industry benchmark is 25 negative impacts.
- The number of material positive impacts varies between 0 and 32. On average, 10 positive impacts are reported by the analyzed companies in the chemical industry.

Number of identified IROs by Company: Opportunities and Risks



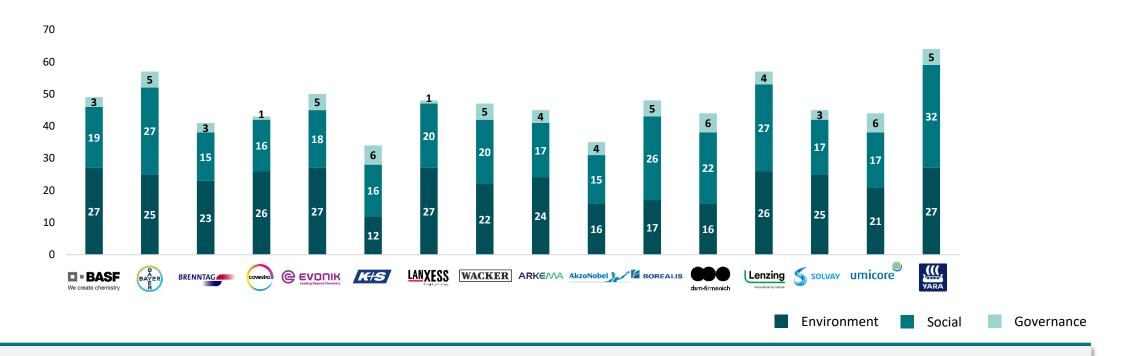
- On average, 11 risks are identified as material across the analyzed companies. The range spans from **1 to** 21 material risks.
- The number of reported **opportunities** ranges from 1 to 20. The average in this industry benchmark is 6 material opportunities.

Number of Disclosure Requirements applied



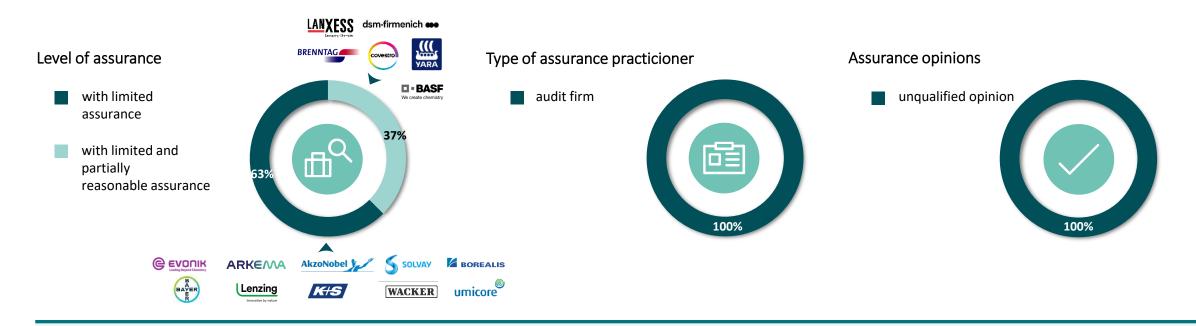
- The ESRS contain a total of 82 disclosure requirements, of which 12 are always to be reported under ESRS 2, while 70 from the topical ESRS are subject to the materiality assessment.
- In the reports analyzed to date, the companies apply an average of 47 out of 70 disclosure requirements, of which 23 out of 32 relate to environmental. 20 out of 32 to social and 4 out of 6 to governance standards.
- There is **no significant difference** between the eight German and eight European analyzed companies (see slide 8) in the number of disclosure requirements applied.
- There is a **heterogeneous** understanding of how disclosure requirements are labelled in reporting practice.

Number of Disclosure Requirements applied by Company



- The number of **environmental** disclosure requirements applied by the analyzed companies in the chemical industry ranges from **12** to **27**.
- In the **social** topics, a **minimum of 15** and a **maximum of 32 disclosure requirements** are reported.
- Companies report between 1 and all 6 governance disclosures.

Assurance



- All reports published to date, by the analyzed companies in this industry benchmark, have undergone an assurance engagement.
- Slightly **over a third** of the analyzed reports were audited with reasonable assurance.
- No report was subject to assurance by any provider of assurance services other than audit firms.
- None of the assurance engagements resulted in a qualified opinions or an adverse opinion.

Overarching Observations



Nearly **two thirds** of the companies in the chemical benchmark report "in full compliance with ESRS".



All companies in the benchmark that have reported in full compliance with ESRS have reported their sustainability disclosures in a separate section of the management report.



The **length of the reports** in the benchmark ranges from 65 to 211 pages. The **average number** of pages is **135**.



The number of material IROs ranges from 15 to 90. On average, 52 IROs are identified per analyzed company. The number of disclosure requirements applied varies between 34 and 64, with an average of 47.



All reports in the benchmark underwent an assurance engagement, with slightly over a third of them having undergone a limited and partially reasonable assurance.

Published to date



Betriebswirtschaft Aufsatz

Die Praxis der Nachhaltigkeitsberichterstattung nach CSRD/ESRS - Eine Analyse von DAX-, MDAXund SDAX-Unternehmen für das Geschäftsjahr 2024

StB Dr. Matthias Schmidt ist Partner im Bereich Sustainability Assurance be

Deloitte und das DRSC untersuchen in einer empirischen Studie die Praxis der Nachhaltigkeitsberichterstattung nach CSRD/ESRS von börsennotierten Unternehmen des DAX, MDAX und SDAX für das Geschäftsiahr 2024. Die Studienergebnisse zeigen, dass die Mehrheit der Unternehmen "unter vollständiger Beachtung der ESRS" berichtet, wobei größere (DAX-)Unternehmen deutlich häufiger vollumfänglich nach ESRS berichten als kleinere (SDAX-)Unternehmen. Ebenso machen größere Unternehmen diese Angaben häufiger im Lagebericht als kleinere Unternehmen. Durchschnittlich umfassen die Berichte im DAX 157 Seiten, im MDAX 122 Seiten und im SDAX 104 Seiten. Die Anzahl der wesentlichen IROs variiert stark, insgesamt zwischen fünf und 118 IROs mit einem Durchschnitt von insgesamt 43 IROs pflichtig werden, können die Ergebnisse der Studie zur pro Unternehmen. Bis auf sechs Berichte wurden alle bislang veröffentlichten ESRS-Berichte einer freiwilligen inhaltlichen

I. Hintergrund

500 Mitarbeitern hatten sich für die Berichterstattung über das Geschäftsjahr 2024 auf die neue Rechtslage nach Corpo-rate Sustainability Reporting Directive (CSRD)/European Sustainability Reporting Standards (ESRS) vorbereitet. Die CSRD wurde jedoch bekanntlich im Jahr 2024 in Deutschland nicht in nationales Recht umgesetzt, sodass die bis-herigen Vorgaben für die Aufstellung einer nichtfinanziellen Erklärung fortbestanden ("CSR-RUG")."

rachend standen Unternehmen vor der Entschei dung, ob sie vollumfänglich in Übereinstimmung mit ESRS berichten, in Anlehnung an ESRS oder ohne Beachtung der ESRS. Die Angaben konnten im Lagebericht oder außerhalb des Lageberichts gemacht werden. Ferner bestand – anders als nach CSRD – keine inhaltliche Prüfungspflicht durch einen Wirtschaftsprüfer. Allerdings konnten solche Prüfun-

- Richtlinie (EU) 2022/2464 des Europäischen Parlaments und des Rates vom 14.12.2022 zur Anderung der Verzednung (EU) Nr. 537/2014 und der Richtlinien 2004/109/EG, 2006/43/EG und
- 322 vom 16.12.2022 S. 15 fim Folgenden CSRSI.
 Delegierte Versedaung (EU) 2023/2772 der Kommission vom 31.07.2023 zur Englinzung der
- Vall LOW, Milylademudscheiber von 14.11.2024, su. https://mox.lok/28851 (Rzud: 1386/2001)

Berichtspflichten fehlt häufig noch eine gefestigte Auslegung der Vorgaben, sodass für die Berichtssaison 2024 mit einer heterogenen Umsetzung der Vorgaben zu rechnen war.

Studie die Praxis der Nachhaltigkeitsberichterstattung nach CSRD/ESRS von börsennotierten Unternehmen des DAX, MDAX und SDAX für das Geschäftsjahr 2024. Schwerpunkt der Untersuchung ist die Berichterstattung von börsen-notierten Unternehmen (DAX, MDAX, SDAX), die bereits vollumfänglich nach ESRS berichtet haben. Seit März 2025 wurden mehrfach Zwischenberichtet vorgelegt, die umfang-reiche Studie wird im Q3/2025 veröffentlicht.

Die Autoren gehen davon aus, dass Unternehmen im Jahres verlauf 2025 abgleichen werden, zu welchen Ergebnissen andere Unternehmen bei ihrer Wesentlichkeitsanalyse gekommen sind. Ferner ist zu erwarten, dass Unternehmer Aufbau und Umfang der ESRS-Berichterstattung hinterfragen werden, um Redundanzen zu vermindern und die Lesbarkeit zu erhöhen. Unternehmen, die künftig berichtskeitsanalyse sowie bei der Entwicklung der Berichterstattung. Schließlich soll die Studie einen Beitrag zur Auslegung der Berichtsvorgaben leisten sowie zu deren Überarbeitung durch das Omnibus-Verfahren und die Umsetzung der CSRD

II. Stichprobe und Methodik

1. Grundgesamtheit und Stichprob sennotierte Unternehmen, die zum 22.01.2024 dem DAX, MDAX, oder SDAX zugeordnet waren. Da die Berichtsvorga ben der CSRD unter Zugrundelegung der ESRS erstmals für Geschäftsjahre, die am oder nach dem 01.01.2024 beginnen, angewendet werden sollten, liegt der Fokus auf Berichten, die zwischen dem 01.01.2025 und dem 30.04.2025 veröffentlicht wurden. Die Anzahl der ursprünglich 160 Unternehmen aus DAX (40), MDAX (50) und SDAX (70) reduziert sich zunächst um Unternehmen mit abweichenden Geschäftsiahren (22). Weiterhin wurde ein Unternehmen in die Nachhaltigkeits berichterstattung des Mutterunternehmens somit von der Pflicht befreit, selbst einen Nachhaltigkeitsbericht offenzulegen. Ferner verringert sich die Anzahl um 2013/34/EU hissichtlich der Nachhabtgleitsbesicherstatung von Unternehmen, ABEU Nr. L weitere neum Unternehmen, die aus anderen Gründen bis basiert die Studie somit auf einer Grundgesamtheit von

Ávailable in German only



Contact Details



DR. MATTHIAS SCHMIDT Partner | Sustainability Assurance

Düsseldorf, Germany + 49 (0)151 1829 3086 mattschmidt@deloitte.de



DR. THOMAS SCHMOTZ

Technical Director

Berlin, Germany + 49 (0)30 206412 16 schmotz@drsc.de

Deloitte.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited (DTTL), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/de/UeberUns to learn more.

Deloitte provides industry-leading audit and assurance, tax and legal, consulting, financial advisory, and risk advisory services to nearly 90% of the Fortune Global 500° and thousands of private companies. Legal advisory services in Germany are provided by Deloitte Legal. Our people deliver measurable and lasting results that help reinforce public trust in capital markets, enable clients to transform and thrive, and lead the way toward a stronger economy, a more equitable society and a sustainable world. Building on its 175-plus year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte's approximately 457,000 people worldwide make an impact that matters at www.deloitte.com/de.

This communication contains general information only, and none of Deloitte GmbH Wirtschaftsprüfungsgesellschaft or Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms or their related entities (collectively, the "Deloitte organization") is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.

