Global Climate Reporting

Corporate Roundtable

Thursday, March 20
San Francisco



Climate Mandates and Digitization

Ami Beers, CPA, CGMA, Senior Director, Assurance and Advisory Innovation, AICPA

Dan Krekelberg, Climate Strategy Director, EcoEngineers

Michelle Savage, VP Communication, XBRL US

European Union's Corporate Sustainability Reporting Directive (CSRD)

- Adopted 2023, in effect January 1, 2024
- One of several EU directives aimed at corporate sustainability
- ESRS Standards in development by EFRAG advisory group
- Contains digital reporting requirements
- Phased compliance, 2025-2029
 - Largest EU listed companies 2025
 - Large EU listed companies 2026
 - SMEs 2027
 - Non-EU companies w/ EU operations 2029

European Union's Corporate Sustainability Reporting Directive (CSRD)

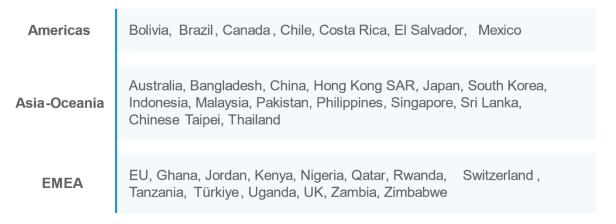
- EU published Omnibus Amendment on Feb 25, 2025
 - Maintains digital (XBRL) reporting requirements but timing for filing is dependent on ESMA rule (RTS)
 - Reduces number of covered entities now applies to companies with >1,000 employees and turnover > € 50 million OR assets> € 25 million (companies can report voluntarily)
 - Removes (for now) future requirements for sector-specific standards and disclosure
 - Delays timing by 2 years for Wave 2 and onwards filers

European Union's Corporate Sustainability Reporting Directive (CSRD)

- Next steps
 - In 2-3 months, Omnibus may be finalized
 - European Securities Markets Authorities (ESMA) may issue new consultation

IFRS Reporting Countries – International Sustainability Standards Board (ISSB)

 36 ISSB reporting countries have mandated or announced plans to mandate ISSB for climate disclosures



- Majority will also be XBRL-mandates using the ISSB taxonomy
- Timing remains fluid first ISSB disclosures expected in 2026

Digital Reporting Requirements

- CSRD Inline XBRL preparation begins in year 2 of each phase
- Other IFRS reporting countries' mandates accelerating, implementation timelines still fluid

Securities and Exchange Commission

- Final rule (March 6, 2024) on hold
- Reporting requirements:
 - Financial statement related disclosures in a note to the audited f/s effects of weather events and other natural conditions (subject to Audit and ICFR)
 - Nonfinancial disclosures in 10-K
 - Material climate-related risks, strategy and outlook
 - Board oversight and assessment activities
 - Material scope 1 and 2 GHG emissions
 - All disclosures to be electronically tagged in Inline XBRL
- Phase-in by company size and disclosure type

Climate Corporate Data Accountability Act - (SB 253)

- Covered Entities Public and privately held companies with >\$1
 billion in revenue doing business in CA
- Reporting Requirements Scopes 1, 2, and 3 GHG emissions in conformance with GHG Protocol (reports may meet other national/int'l reporting requirements)
- Effective Annual reporting S1 & S2 in 2026 and S3 in 2027
- **Digital** Calls for the creation of a publicly accessible digital platform, with emissions data accessible for use in an electronic format.

Per SB219 Regulations to be adopted by California Air Resource Board (CARB) 7/1/25

Climate-Related Financial Risk Act- (SB 261)

- Covered Entities Public and privately held companies with >\$500 million in revenue doing business in CA
- Reporting Requirements Climate risk disclosure report in alignment with TCFD and successor frameworks (e.g. ISSB) and posted on company website
- Effective On or before January 1, 2026 (biennially)
- **Disclosure** Companies directed to publish report on their website

SB 219 - Amends SB 253 and SB 261

- Grants the CARB up to an additional six months until July 1, 2025 to finalize regulations to implement SB 253
- Allows the CARB to choose whether to contract with a third-party reporting organization to receive emissions reports under SB 253
- Allows companies to consolidate their GHG emissions reporting at the parent company level

Regulation Development Process and Timeline

- Solicitation comment period ends March 21, 2025 (extended from February 14, 2025)
- California Air Resource Board (CARB) holds workshops and consultations, drafts proposed regulation
- CA Office of Administrative Law publishes Notice of Proposed Action, 45-day public comment begins
- Comments reviewed and incorporated
- Regulation approved (Q2 2025)

State Comparison

State Companison								
	Legislation	Status	Sponsor	Timing	Assurance			
California	SB 253 Climate Corporate Data Accountability Act	Passed	Senator Scott Wiener	Reporting begins 2026 for 2025 data	Yes			
California	SB 261 Greenhouse gases: climate-related financial risk	Passed	Senator Henry Stern	Reporting begins 2026	NA			
New York	SB 3456 Climate Corporate Data Accountability	Introduced	Senator Brad Hoylman- Sigal	Regs adopted by 12/31/26; reporting scope 1 and 2 in 2027; scope 3 in 2028.	Yes			
New Jersey	SB 4117 Climate Corporate Data Accountability Act	Introduced	Senators Bob Smith and John McKeon	In 3 years, report Scope 1, 2, and 3 to Regulator; publicly disclose Scope 1 and 2 in 4 years; scope 3 in 5 years.	Yes			
Illinois	HB 3673 Corporate Emissions Reporting	Introduced	Representati ve Kimberly Du Buclet	Regs adopted by 1/1/26; report scope 1 and 2 in 2027; 180 days later report scope 3 for same year.	Yes			
Colorado	HB 25-1119 Require Disclosures of Climate Emissions	Postponed	Representati ve Manny Rutinel	Report Scope 1 and 2 on or before 1/1/28; scope 3 on or before 1/1/29 for categories 1-3; scope 3 categories 4-7 on or before 1/1/30;	Yes			

categories 8-13 on or before 1/1/31.

Assurance Requirements

	SEC Climate Rule	EU CSRD	California
Scope of Assurance	 Limited Assurance - 3 years after first filing Reasonable Assurance - (only largest filers) 7 years after first filing 	 Limited Assurance – first year of reporting Reasonable Assurance – current law includes assessment, removed in Omnibus proposal 	 Limited Assurance – Scope 1 and 2 beginning in 2026. Scope 3 by 2030. Reasonable Assurance – Scope 1 & 2 in 2030
Subject Matter	Scope 1 & 2 emissions	Entire report, including underlying materiality assessment process	Scope 1, 2 and 3 emissions

Standards for Reporting and Assurance



Sustainability Reporting and Assurance:

Key Considerations for Legislators and Regulators

January 2025



CAQ

Encourage legislators and regulators to

- incorporate recognized sustainability reporting and assurance standards
- establish uniform requirements for assurance practitioners

Limited versus Reasonable Assurance

Limited Assurance

- Substantially less in extent than a reasonable assurance
- Focus on areas of increased risk
- Obtain an understanding of processes and controls through inquiry
- Evidence obtained primarily through inquiry and analytical procedures
- The practitioner's report includes a conclusion about whether any material modifications should be made to the subject matter

Reasonable Assurance

- Reasonable assurance is similar to an "audit"
- Identify risks of material misstatement and design an appropriate response
- Obtain an understanding of processes and controls, evaluate their design, and determine whether they have been implemented
- Evidence obtained through a combination of inquiry, analytical procedures, and substantive testing
- Additional testing of third-party information
- The practitioner's report includes an opinion of whether the subject matter is in accordance with the criteria, in all material respects

International Assurance Standards



INTERNATIONAL AUDITING AND ASSURANCE STANDARDS BOARD

- General Requirements for Sustainability Assurance Engagements (ISSA 5000)
- First time implementation guidance including examples (Issued January 2025)
- Withdraw of ISAE 3410, Assurance Engagements on Greenhouse Gas Statements (Planned for March 2025)



INTERNATIONAL ETHICS STANDARDS BOARD FOR ACCOUNTANTS

- International Ethics Standards for Sustainability Assurance
 - Revisions to the existing Code related to sustainability reporting
- Using the Work of an External Expert
 - Standard to apply the Code's conceptual framework when using the work of an external expert.

AICPA Audit Standards Board Approach to Sustainability Assurance Standards

- Update Baseline Attestation Standards
- (AT-C 105, 205, 210)

Establish New Sustainability Section of Attestation Standards (AT-C 500?) Reconcile ISSA
5000 to
Attestation
Standards
(Similar to App. B
in GAAS)
With example dual
standard reporting

Exposure Drafts expected Q4 2025

2024 Sustainability Report

Innovating for a **healthier**, **safer**, and **better-connected** world to create a brighter future.





Moody's Climate-related Risks and Opportunities Assessment

SCOPE 1, 2 AND 3 EMISSIONS

Moody's Scope 1, 2 and 3 emissions from 2019 to 2023 are detailed in Table 17. Emissions have been externally assured and were calculated in accordance with the World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD) GHG Protocol Corporate Accounting and Reporting Standard, Science-Based Targets Initiative (SBTi) Guidance and the latest SBTi Target Validation Protocol.

Table 17: GHG inventory breakdown and intensity metrics

GHG emissions (mtCO ₂ e)	2019	2021	2022	2023		
Scope 1	1,744.	851	810	571		
Scope 2 market-based	13,591	432	440	398		
Scope 2 location-based	14,035	6,878	7,696	6,987		
Scope 3	171,260	121,290	137,981	133,970		
Purchased goods and services	122,500	102,900	106,100	94,400		
Capital goods	5,600	7,900	9,900	6,700		
Fuel and energy-related activities	3,100	230	200	160		
Business travel	23,100	1,480	10,300	20,300		
Employee commuting	10,400	208	1,300	3,100		
Waste generated in operations	460	72	81	110		
Investments	6,100	8,500	10,100	9,200		
Total Scope 1, Scope 2 market-based, Scope 3	186,595	122,573	139,231	134,939		
Scope 3 categories evaluated by Moody's that are zero or not material						
Upstream transportation and distribution Emissions are included in purchased goods and service				d services		
	category					
Upstream leased assets Not relevant – All leases included in Scope 1 and 2				and 2		
Downstream transportation and distribution	Not relevant – Moody's does not distribute or transport products					
Use of sold goods	Not relevant – Moody's does not produce products that directly consume fuel or energy					
End-of-life treatment of sold products	Not relevant - Moody's does not produce physical products					
Downstream leased assets	Not relevant – Moody's does not own any assets that are leased downstream					
Franchises	Not relevant - Moody's does not operate any franchises					

GHG Emissions Data (SB 253)

GHG Emissions Explanatory (SB 261)

Emissions

Benchmark complies with all applicable legal and regulatory requirements on controlling and reducing emissions and energy use in our operations. We recognize the importance of adhering to stringent environmental standards and the growing body of laws aimed at protecting natural resources for current and future generations. With this commitment, we invest in systems and technologies that ensure compliance and enable us to meet or exceed these standards, safeguarding our planet's resources for the long term.

As highlighted in the previous chapter, all of Benchmark's manufacturing facilities are certified to ISO 14001:2015, the global standard for environmental management systems. This certification guides us in reducing environmental impacts, managing emissions effectively, and ensuring compliance with all relevant laws, regulations, and standards.

Benchmark's global EHS Policy directs all facilities to implement programs aimed at reducing energy consumption and GHG

emissions. Previously, we conducted internal tracking and progress reviews across various sites and functions. Since setting a Scope 1 and Scope 2 GHG emissions reduction target in 2022, we have publicly tracked and reported our progress. This progress is measured against our 2021 base year, when we completed an emissions inventory for all sites under Benchmark's operational control.

We are committed to reducing our absolute Scope 1 and Scope 2 GHG emissions by 15% by 2025 from a 2021 base year. We have begun developing a subsequent GHG reduction target, for which we plan to seek validation from the Science Based Targets Initiative (SBTi).

Additional details on our GHG emissions and inventory can be found in our CDP Climate Change response.

In 2024, we reduced our Scope 1 and Scope 2 GHG emissions by 11% relative to our 2021 baseline. Evidence of our commitment to reduce GHG emissions can be found across our sites.

SCOPE 1, 2 AND 3 EMISSIONS

GHG emissions (mtCO₂e)

Moody's Scope 1, 2 and 3 emissions from 2019 to 2023 are detailed in Table 17. Emissions have been externally assured and were calculated in accordance with the World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD) GHG Protocol Corporate Accounting and Reporting Standard, Science-Based Targets Initiative (SBTi) Guidance and the latest SBTi Target Validation Protocol.

2021

2022

2023

2019

Table 17: GHG inventory breakdown and intensity metrics

					,		
Scope 1	1,744	851	810	571	<i>!</i>		
Scope 2 market-based	13,591	432	440	398			
Scope 2 location-based	14,035	6,878	7,696	6,987			
Scope 3	171,260	121,290	137,981	133,979			
Purchased goods and services	122,500	102,900	106,100	94,400			
Capital goods	5,600	7,900	9,900	6,700	[
Fuel and energy-related activities	3,100	230	200	160			
Business travel	23,100	1,480	10,300	20,300			
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Scope 3 categories evaluated by Moody's							
Upstream transportation and distribution	Upstream transportation and distribution Emissions are included in purchased goods and services category						
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Downstream transportation and	Not relevant – Moody's does not distribute or transport						
distribution	products						
Use of sold goods	Not relevant – Moody's does not produce products that directly consume fuel or energy						
End-of-life treatment of sold products	Not relevant – Moody's does not produce physical products						
Downstream leased assets	Not relevant – Moody's does not own any assets that are leased downstream						
Franchises Not relevant – Moody's does not operate any franchises							

Fact Properties

(ifrs-sds) Absolute gross Scope 3 GHG emissions

Absolute gross scope 3 greenhouse gas emissions
generated during the reporting period. Indirect green
house gas emissions (not included in scope 2 greenhouse
gas emissions) that occur in the value chain of the entity,
including both upstream and downstream emissions.
scope 3 greenhouse gas emissions include the scope 3
categories consistent with the Greenhouse Gas Protocol
Corporate Value Chain (scope 3) Accounting and

Dimensions (i)

☐ Scope 3 emissions categories [axis] 🔟

Reporting Standard (2011).

Category 1-Purchased goods and services [member]

Properties

Date (i) 1 Jan 2023 to 31 Dec 2023

Fact Value 94,400 MtCO2e

Accuracy (i) ones

Scale (i) Unscaled

11.0% decrease on 1 Jan 2022 to 31

Change

Dec 2022

Entity [CIK] 0001059556

Concept (i) ifrs-sds:AbsoluteGrossScope3GH...

Type dtr-types:ghgEmissionsItemType

Inline Viewer Benchmark ESG iXBRL Example

Emissions

Benchmark complies with all applicable legal and regulatory requirements on controlling and reducing emissions and energy use in our operations. We recognize the importance of adhering to stringent environmental standards and the growing body of laws aimed at protecting natural resources for current and future generations. With this commitment, we invest in systems and technologies that ensure compliance and enable us to meet or exceed these standards, safeguarding our planet's resources for the long term.

As highlighted in the previous chapter, all of Benchmark's manufacturing facilities are certified to ISO 14001:2015, the global standard for environmental management systems. This certification guides us in reducing environmental impacts, managing emissions effectively, and ensuring compliance with all relevant laws, regulations, and standards.

Benchmark's global EHS Policy directs all facilities to implement programs aimed at reducing energy consumption and GHG

emissions. Previously, progress reviews acros setting a Scope 1 and in 2022, we have public This progress is meast completed an emission operational control.

We are committed to remarks.

2 GHG emissions by 1 have begun developing which we plan to seek Initiative (SBTi).

Additional details on o found in our CDP Clima

In 2024, we reduced ou 11% relative to our 202 to reduce GHG emission

Fact Properties

Concept

(ifrs-ibg) GHG Emissions Disclosure Explanatory

ISSB identified disclosure topic for the industry. Utilize text block to provide any contextual narrative (if any) that is additional to the metric disclosures identified by ISSB for the disclosure topic.

Properties

Date 1 Jan 2024 to 31 Dec 2024

1,830,000 kWhof electricity from solar panels at our

Fact Value Suzhou, China siteEmissions Benchmark complies with

all applicable [...]

Accuracy ① n/s

Scale (i) n/a

Change n/a

_ ...

Entity [CIK] 0000863436

Concept (i) ifrs-ibg:GHGEmissionsDisclosureExplanatory (a)

Type dtr-types:textBlockItemType

< 1 of 1 >

Labels

Standard Label

GHG Emissions Disclosure Explanatory

Terse Label

GHG Emissions Disclosure Explanatory

∨ References ①

IFRS

Name IFRS

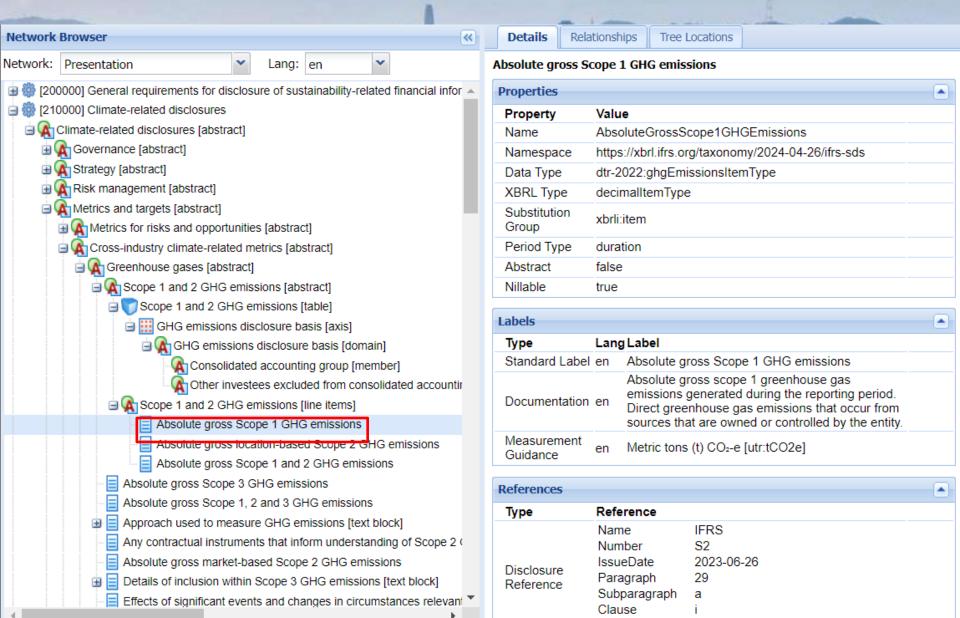
Number S2IBG

Standardized Digital Data

- Machine-readable and machine-interpretable
- Timelier, less expensive to process/analyze
- Establishes shared understanding of reported data
- Enables comparability

US financial reporting — digital for 20 years (FDIC (2005), Securities and Exchange Commission(2009), Federal Energy Regulatory Commission (2021))

Taxonomy



Absolute gross Scope 1 GHG emissions

Properties	
Property	Value
Name	AbsoluteGrossScope1GHGEmissions
Namespace	https://xbrl.ifrs.org/taxonomy/2024-04-26/ifrs-sds
Data Type	dtr-2022:ghgEmissionsItemType
XBRL Type	decimalItemType
Substitution Group	xbrli:item
Period Type	duration
Abstract	false
Nillable	true

Labels		
Туре	Lang	g Label
Standard Label	en	Absolute gross Scope 1 GHG emissions
Documentation	en	Absolute gross scope 1 greenhouse gas emissions generated during the reporting period. Direct greenhouse gas emissions that occur from sources that are owned or controlled by the entity.
Measurement Guidance	en	Metric tons (t) CO₂-e [utr:tCO2e]

References					
Туре	Reference				
Disclosure Reference	Name Number IssueDate Paragraph Subparagraph Clause Subclause	IFRS S2 2023-06-26 29 a i			



U.S. Securities and Exchange Commission

Latest Filings Received and Processed at the SEC

This listing contains the most recent filings for the current official filing date (including filings made after the 5:30 pm deadline on the previous filing day). Filings may be made Monday through Friday (except for U.S. Federal Holidays).

Key to Descriptions

(Filer) Filing was made by and describes the company named.

(Subject) Filing describes the company named but was made by another entity. (Filed by) Filing was made by the company named but describes a subject company

(Reporting) Filing was made by an individual reporting holdings in a company.

[Paper] Paper filings are available by film number.

[Cover] Filing contains an SEC-released cover letter or correspondence.

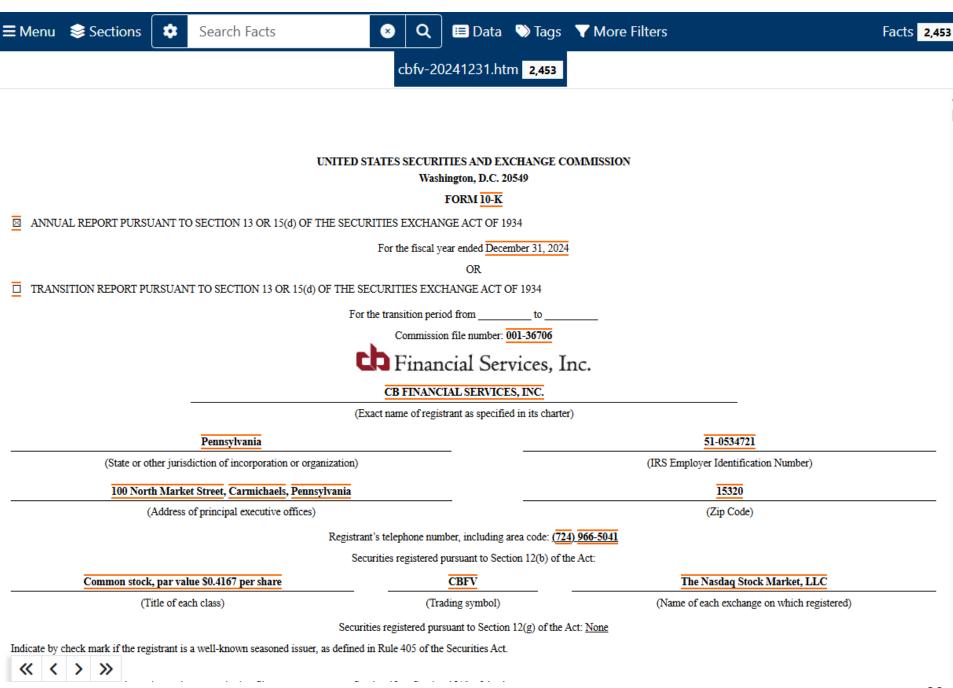
(Each "Reporting" and "Filed by" filing has a matching "Subject" listing.)

Items 1 - 40 RSS Feed Form Formats

	enter company name, CIK, or form type.							
	Company							
/.	CIK							
y -	Form Type	10-k						
	Ownership?	Include O Exclude O Only						
	40 Entries ➤	Retrieve Filings						

To limit filing results.

Form	Formats	Description	Accepted	Filing Date	File/Film No
		BBCMS Mortgage Trust 2024-C26 (0002020017) (Filer)			
10-K	[html][text]	Annual report [Section 13 and 15(d), not S-K Item 405] Accession Number: 0001888524-25-004900 Act: 34 Size: 17 MB	2025-03-19 13:46:15	2025-03-19	333-276033-01 25751958
		CB Financial Services, Inc. (0001605301) (Filer)			
10-K	[html][text]	Annual report [Section 13 and 15(d), not S-K Item 405] Accession Number: 0001605301-25-000008 Act: 34 Size: 18 MB	2025-03-19 13:38:28	2025-03-19	001-36706 25751932
		COMM 2015-CCRE22 Mortgage Trust (0001634976) (Filer)			
10-K	[html][text]	Annual report [Section 13 and 15(d), not S-K Item 405] Accession Number: 0001020242-25-000045 Act: 34 Size: 10 MB	2025-03-19 12:48:50	2025-03-19	333-193376-17 25751570
		TRAVELZOO (0001133311) (Filer)			
10-K	[html][text]	Annual report [Section 13 and 15(d), not S-K Item 405] Accession Number: 0001133311-25-000007 Act: 34 Size: 9 MB	2025-03-19 12:36:15	2025-03-19	000-50171 25751540
		TABLE TRAC INC (0001090396) (Filer)			
10-K	[html][text]	Annual report [Section 13 and 15(d), not S-K Item 405] Accession Number: 0001437749-25-008353 Act: 34 Size: 5 MB	2025-03-19 12:32:52	2025-03-19	001-32987 25751532
		Wells Fargo Commercial Mortgage Trust 2024-5C2 (0002039768) (Filer)			
10-K	[html][text]	Annual report [Section 13 and 15(d), not S-K Item 405] Accession Number: 0001888524-25-004888 Act: 34 Size: 15 MB	2025-03-19 12:28:28	2025-03-19	333-257991-14 25751519
		Benchmark 2024-V6 Mortgage Trust (0002012265) (Filer)			
10-K	[html][text]	Annual report [Section 13 and 15(d), not S-K Item 405] Accession Number: 0001888524-25-004886, Act. 34, Size: 7 MB	2025-03-19	2025-03-19	333-261764-03



Digital Data Impact

Reporting companies

- Clarity in reporting taxonomy contains concrete definitions, data types, clear guidance on what can be reported
- Facilitates reporting for companies with a global footprint
- Eliminates duplicate reporting to multiple regulators
- Inexpensive open-source tools can be built for small entities

Collectors of data

- Machine-understandable data
- Can be posted "as submitted" no need to build costly screening/querying tools
- Higher data integrity
- Easier to adapt to reporting changes

Users of data

- Faster, less expensive processing
- High integrity, consistent (comparable) data

Global Climate Reporting

Corporate Roundtable

Thursday, March 20
San Francisco



How Companies Are Preparing

Ami Beers, CPA, CGMA, Senior Director, Assurance and Advisory Innovation, AICPA

Corinne Dougherty, KPMG Sustainability Audit Leader

Jennifer Harrity, ESG and Sustainability Director, Sensiba

State of Play in Sustainability Reporting





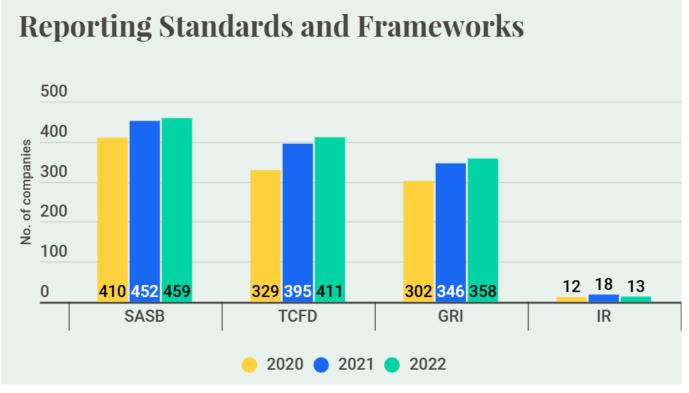




THE STATE OF PLAY:



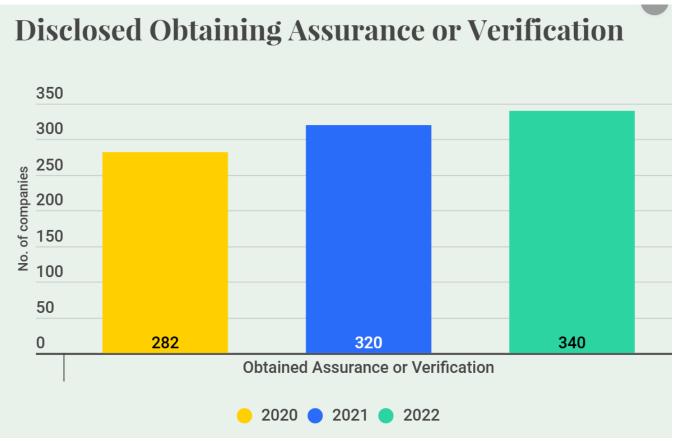
S&P 500 Reporting



- ➤ 98% reported ESG information
- Majority referenced 3 of the 4 common standards
- Companies use standards to varying degrees (fully adopted, partially adopted, used as a reference)

Source: CAQ S&P 500 ESG Reporting and Assurance Analysis June

S&P 500 Assurance



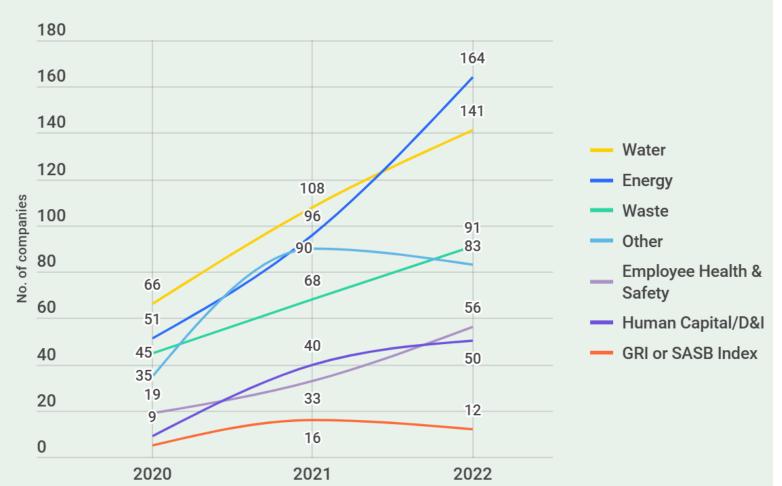
- ➤ 70% obtained assurance over some ESG information (64% in 2021)
- Scope of information continued to increase (GHG emissions plus 1-3 other metrics)
- Primarily limited assurance

Source: CAQ S&P 500 ESG Reporting and Assurance Analysis June

2024

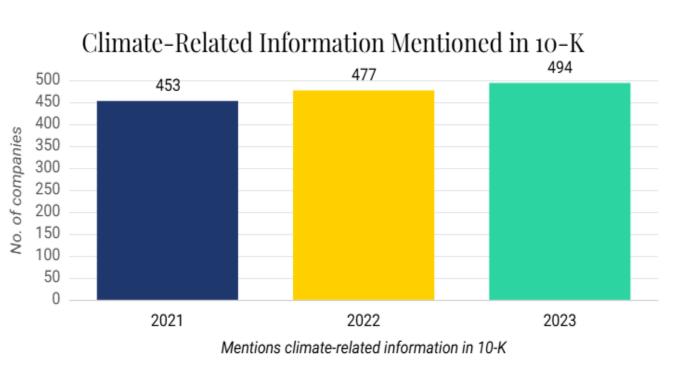
S&P 500 Assurance

Other ESG Topics Subject to Assurance/Verification



Source: <u>CAQ S&P</u> 500 ESG Reporting and <u>Assurance</u> <u>Analysis June 2024</u>

S&P 500 SEC 10-K Reporting



Disclosures include:

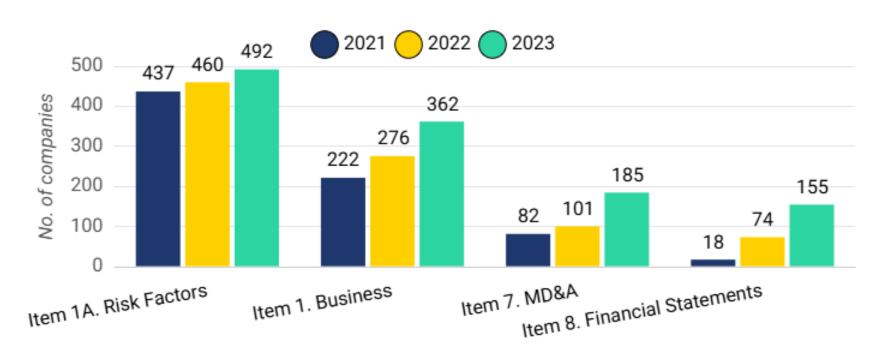
- Capital expenditures, R&D, losses for weather events
- Use of/sale of carbon offsets and RECs
- Net zero or carbon neutral commitments



Source: CAQ

S&P 500 SEC 10-K Reporting

Section of 10-K Climate is Mentioned





Source: CAQ

Getting Ready for Assurance

