

---

**Intergovernmental Working Group of Experts on International  
Standards of Accounting and Reporting  
(ISAR)**

**40<sup>th</sup> SESSION  
17 – 19 October 2023**

Tuesday, 17 October 2023

**High-level panel  
Current state of global financial and sustainability reporting  
frameworks, standards, and codes: prospects for further  
harmonization**

Presented by

Priti Savla  
Chairperson, Sustainability Reporting Standards Board  
The Institute of Chartered Accountants of India (ICAI)

*This material has been reproduced in the language and form as it was provided.  
The views expressed are those of the author and do not necessarily reflect the views of UNCTAD.*

---



# Current State of Global Financial and Sustainability Reporting Frameworks, Standards, and Codes: Prospects for Further Harmonization

**CA Priti Paras Savla**

Chairperson,  
Sustainability Reporting Standards Board, ICAI



# Sustainability Reporting Ecosystem Around the Globe



European  
Sustainability  
Reporting  
Standards



UNITED NATIONS  
UNCTAD



भारतीय प्रतिभूति और विनियम बोर्ड  
Securities and Exchange Board of India



# Sustainability Regulations in India

non-financial disclosures

With Sustainability reporting gaining traction in India, SEBI defined Sustainability disclosures in a standardised manner for listed companies basis which Business Responsibility and Sustainability (BRSR) guidelines were issued

SEBI introduced  
**Business  
Responsibility Report  
(BRR)** in 2011

**BRR** was mandated for  
top listed companies

- 100 in 2012
- 500 in 2015
- 1,000 in 2019

Scope of BRR was expanded  
in 2020 to introduce **BRSR**

Applicable to the Top 1,000  
listed companies from FY23

Principle	Essential Indicators	Leadership Indicators
Ethics	6	5
Sustainable life-cycle	6	6
Employees	10	7
Stakeholders	1	2
Human Rights	7	2
Environment	8	6
Public policy	2	2
Social development	6	2
Consumers	3	6

## ICAI's BRSR Scoring Methodology

Maturity stage	BRSR Score (% of Total Score)
Formative	Up to 25%
Emerging	> 25% and Up to 50%
Established	> 50% and Up to 75%
Leading	> 75%

**Maximum Score: 300**

- Essential | 225
- Leadership | 75

Principle



Indicators



Questions



Disclosure

# BRSR Core –Framework for Assurance

## Key points:

- SEBI vide Circular No. SEBI/HO/CFD/CMD - 2/P/CIR/2021/562 dated May 10, 2021 had prescribed the Business Responsibility and Sustainability Report (BRSR) which was subsequently incorporated in the Master Circular dated July 11, 2023. Based on the recommendations of the ESG Advisory Committee and pursuant to public consultation, the Board decided to introduce the BRSR Core for assurance by listed entities.
- BRSR format has been updated to incorporate additional KPIs based on nine attributes of BRSR Core. Further, intensity ratios would be based on revenue adjusted for Purchasing Power Parity (PPP) to enable global parity.
- BRSR Core has been made applicable to top 1,000 listed entities (by market capitalisation) on glide path method from the year 2023 on glide path method. The Companies are required to provide the BRSR Core disclosures as part of the annual report from FY 2023-24.
- BRSR Core requires reasonable assurance by independent assurance provider as per the format provided in circular. It also specifies the parameter, measurement, data and approach for reporting and assurance for each attribute of the BRSR

# BRSR Core –Framework for Assurance

**FY  
2023-24**

Reasonable  
assurance on BRSR  
Core mandatory for  
top 150 companies\*

**FY  
2024-25**

Reasonable  
assurance on BRSR  
Core mandatory for  
top 250 companies\*

**FY  
2025-26**

Reasonable  
assurance on BRSR  
Core mandatory for  
top 500 companies\*

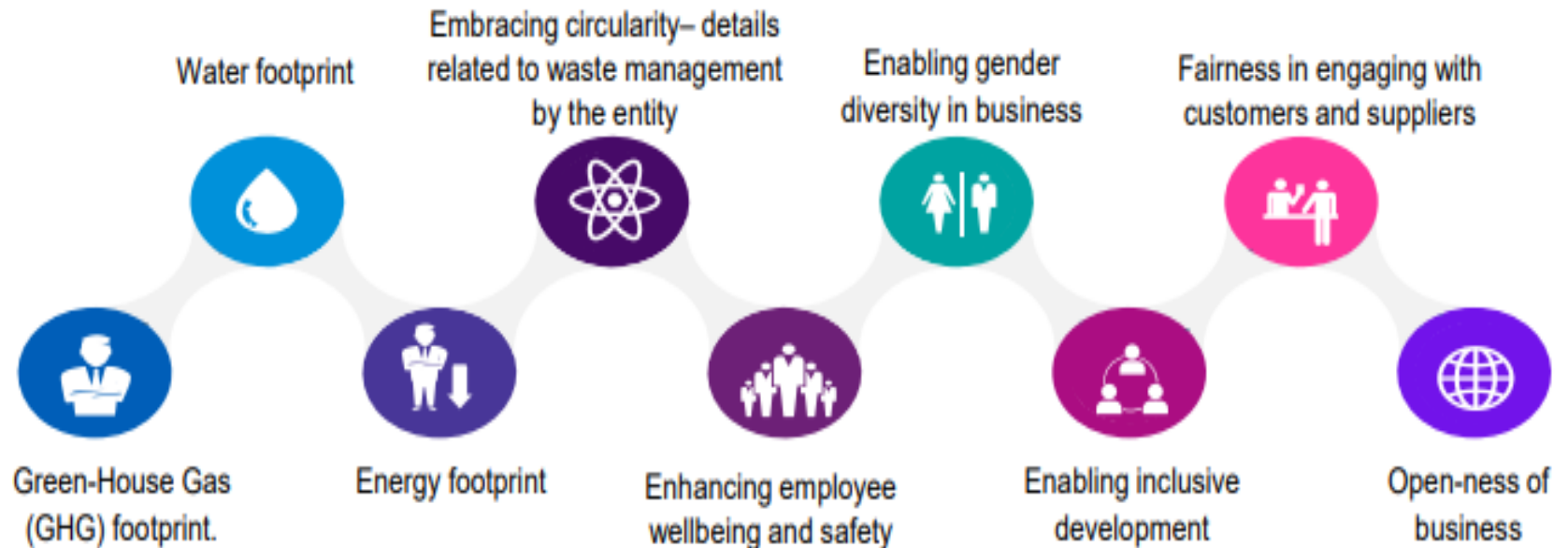
**FY  
2026-27**

Reasonable  
assurance on BRSR  
Core mandatory for  
top 1000 companies\*

*\*As per market capitalisation*

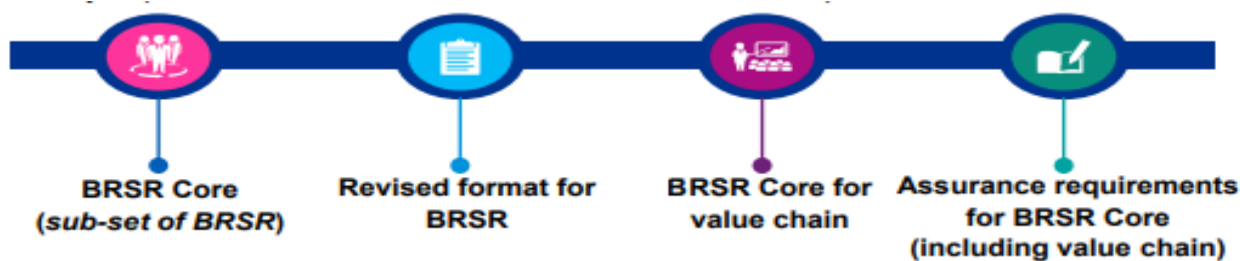
# BRSR Core –Framework for Assurance

The nine attributes of BRSR Core\* are as follows:



# BRSR Core –Framework for Assurance & ESG disclosures for Value Chain

- Further SEBI has also introduced in BRSR, disclosures and assurance of ESG parameters for the **value chain** have been introduced from Financial Year 2023-24. In this, value chain shall encompass the top upstream and downstream partners of listed entities.





# ICAI's Standards On Sustainability Assurance

ICAI has issued:

Standard on Sustainability Assurance Engagement: (SSAE) 3000:  
SSAE 3000 deals with assurance engagements on an entity's sustainable information to be read in conjunction with the "Framework for Assurance Engagements" issued by ICAI.  
It is an umbrella standard for all assurance engagement on sustainability information.

Standard on Assurance Engagement on Green House Gas Statements (SAE) 3410:  
SAE 3410 deals with assurance engagements to report on entity's GHG Statement.

# Harmonization of Global Financial and Sustainability Reporting

The aim of harmonizing, or unifying sustainability reporting standards is to provide a clear and easily understandable reporting framework, that will bring about much-needed uniformity amongst reports and help save time and resources for reporting entities.

## Benefits of Harmonization:

- Standardization
- Easy Understanding
- Better Comparability

# Harmonization of Global Financial and Sustainability Reporting

## **Main challenges when attempting to harmonize sustainability reporting standards across countries and reporting frameworks**

Heavy variation between national legislation amongst different regions and the completely different approaches that countries' legislators have. These types of significant differences between the underlying philosophies of the reporting practices between different regions cause challenges in trying to piece together the extent and scope of voluntary and mandatory disclosures, as well as what types of data the disclosures should contain and for whom the provided information should be accessible for and how.

### Major Challenges:

- Different Goals
- Different Regulatory Requirements
- Different Reporting Formats

Thank You

CA Priti Paras Savla



**The Institute of Chartered Accountants of India**  
**(Set up by an Act of Parliament)**  
Contact [sustainability@icai.in](mailto:sustainability@icai.in)